

NARRATIVE INFORMATION SHEET

R04-25-A-023

1. Applicant Identification

City of Frankfort
315 West 2nd Street
Frankfort, KY 40601

2. Website URL

<https://www.frankfort.ky.gov>

3. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$500,000

4. Location

- a. City: Frankfort
- b. County: Franklin
- c. State: Kentucky

5. Target Area and Priority Site Information

- a. Target Area: Holmes Street Corridor
 - Census Tract: 21073071200
- b. Priority Sites:
 - 100-110 Northgate Drive
 - 421 Holmes Street
 - 555-587 Warsaw Street
 - 368 Warsaw Street

6. Contacts

- a. Project Director
 - Name: Rebecca Hall
 - Phone: (502) 352-2076
 - Email: rhall@frankfort.ky.gov
 - Mailing Address: City of Frankfort, 315 West 2nd Street, Frankfort, KY 40601
- b. Chief Executive/Highest Ranking Elected Official
 - Name: Mayor Layne Wilkerson
 - Phone: (502) 875-8500
 - Email: lwilkerson@frankfort.ky.gov
 - Mailing Address: City of Frankfort, 315 West 2nd Street, Frankfort, KY 40601

7. Population

28,285

8. Other Factors

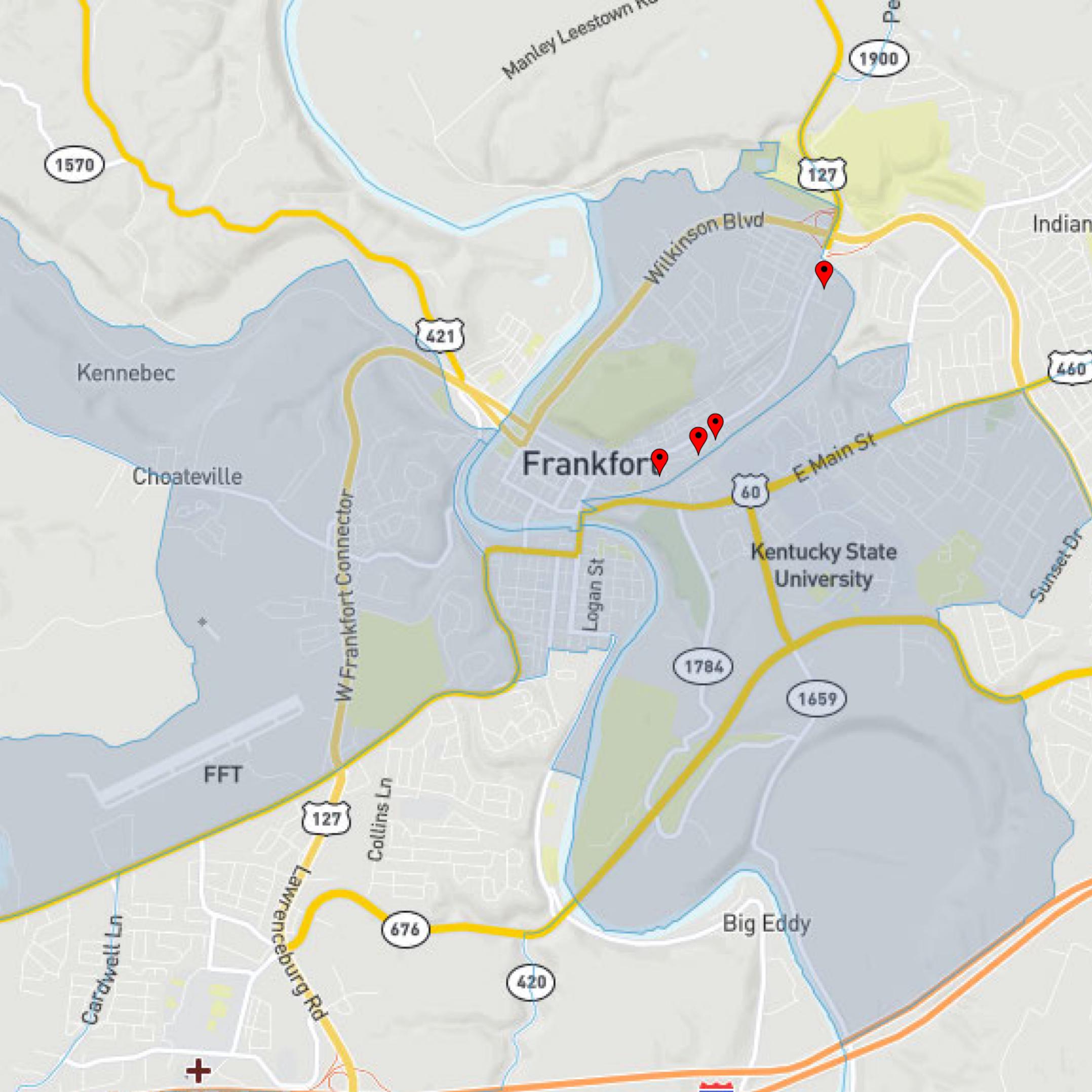
Other Factors	Page #
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the 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).	N/A
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 7
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	5, 7, 8, 9, 10
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	N/A

9. Letter from the State or Tribal Environmental Authority

See attached

10. Releasing Copies of Applications

Not applicable, the application does not include confidential, privileged, or sensitive information.



Frankfort

Kentucky State University

Kennebec

Cheateville

Big Eddy

Wilkinson Blvd

E Main St

W Frankfort Connector

Lawrenceburg Rd

Carolwell Ln

Collins Ln

Logan St

Sunset Dr

Manley Leestown Rd

1900

1570

127

421

460

60

1784

1659

127

676

420





Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
Phone: (502) 564-2150
Fax: 502-564-4245

Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

November 8, 2024

Rebecca Hall
Grants Manager
City of Frankfort
315 W. 2nd Street
Frankfort, KY 40601

Re: Letter of Support for a Brownfield Community-Wide Assessment Grant

Dear Ms. Hall:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the City of Frankfort. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment. We support your application for a Brownfield Community-Wide Assessment Grant and look forward to continuing our work with your community on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Kiersten O'Leary".

Kiersten O'Leary
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management
Richard Thomas, Division of Waste Management, Frankfort Regional Office

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area – Frankfort, located astride a double curve in the Kentucky River in the central portion of the state, is the capital city of Kentucky. Frankfort is a major regional engine of economic growth in Kentucky. As the seat of state government, the community’s workday population swells daily with 12,000 people commuting into Frankfort from surrounding areas for work. Known for its iconic Capitol building, bourbon distilleries, and small-town charm, Frankfort is awash with history. Forbes magazine rated Frankfort as one of the best small cities in the United States to raise a family and Livability.com ranked the community among the top ten places for African Americans. Frankfort enjoys a business-friendly environment, a skilled workforce, and an extraordinary quality of life. Government, education, health care, and manufacturing are significant sectors of Frankfort’s economy. Key resources and assets in Frankfort include a strong downtown business district, educational institutions (e.g., Kentucky State University, the state’s oldest historic Black college), cultural facilities (e.g., Capital City Museum), public spaces (eight different parks with approximately 800 acres), and other amenities.

The project area is the neighborhood surrounding Frankfort’s Holmes Street corridor (State Route 2261). Holmes Street is a critical local thoroughfare located east of the historic downtown and north of the state Capitol building. Holmes Street runs from High Street downtown for approximately two miles to Wilkinson Boulevard. It serves as a centerline in a small valley prone to flooding and bounded by steep ridges. The corridor encompasses 25 city blocks. The area consists of a mix of residential, commercial, and civic uses. The state government is a major landowner along Holmes Street. The streetscape is scaled to people, consistent with its function as a neighborhood center.

Holmes Street has the potential to be a vibrant gateway into downtown Frankfort. The projected demand on the roadway is expected to soon reach approximately 7,500 vehicles daily with the redevelopment of the 16-acre former Capital Plaza Tower site. The area is prime for revitalization and will be where Frankfort grows. The city’s downtown is largely built out and constrained by the Kentucky River and limestone bluffs. No empty lots remain in the downtown core for new growth. By necessity, development will extend up Holmes Street, where much of the population lives. As detailed in a land-use study completed during the preparation of the [Frankfort-Franklin County Comprehensive Plan](#), brownfields redevelopment is critical to improving the function and appearance of the area.

Light industry intersperses Frankfort’s Holmes Street corridor. It is common for automotive repair shops and manufacturing facilities to abut low-income housing. When it rains, the stench of petroleum fills the air from contamination seeping into the sewers. The corridor’s commercial decline began with the construction of a highway bypass. Many contaminated sites now lie vacant and underutilized. Previous assessments conducted along Holmes Street have identified serious environmental contaminants, including lead, arsenic, mercury, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), and other pollutants in the soil and groundwater.

The Holmes Street neighborhood (Franklin County Census Tract 712) is identified as “disadvantaged” by the Climate and Economic Justice Screening Tool (CEJST). Holmes Street’s challenges disproportionately burden the low-income residents in the project area, who struggle with generational poverty, food insecurity, high housing costs, disabilities, poor health outcomes, and exposure to environmental hazards. Minorities comprise 38.2% of Census Tracts 712, compared to 27.0% citywide. Median household incomes are more than 40% lower in the project area (\$44,286) than the national level (\$75,149). Poverty is approximately 3.5 times the United States measure in Census Tracts 712. EPA Brownfields resources will be used to assess pollution at key properties, helping to kick off remediation activities that will improve health outcomes and boost economic development. The proposed project will directly benefit the residents of this marginalized neighborhood.

ii. Description of the Priority Brownfield Sites – Brownfields are entwined throughout the Holmes Street neighborhood and potentially affect the health and welfare of low-income residents. Frankfort has successfully assessed and remediated sites across the community with the previous EPA Brownfields grants. An inventory of 30+ sites has already been created. Key redevelopment targets, all within a federal flood zone (Zone X), include:

- **100-110 Northgate Drive** – These parcels, totaling 4.24 acres, were previously used for oil and gas tank storage. The site is very likely contaminated with heavy metals (including lead, mercury, cadmium, and zinc) and volatile organic compounds (VOCs) like benzene, toluene, ethylbenzene, and xylene (BTEX). Holmes Street

neighborhood residents want to convert the property into a dog park or recreational space.

- 421 Holmes Street – An auto repair shop was located on this 0.16-acre site, immediately adjacent to residential housing. Potential pollution includes heavy metals, VOCs, solvents, and waste oil. A grocery store is a possible reuse option. The Holmes Street neighborhood is a food desert with no access to fresh, affordable produce.
- 555-587 Warsaw Street – An auto storage facility operated on these properties. Expected contaminants include heavy metals, PAHs, PCBs, and VOCs. The 0.26-acre properties are near the new Farmers Market Pavilion in Frankfort and could be repurposed for agriculture retail use or a restaurant.
- 368 Warsaw Street – This 0.93-acre site previously housed a wood processing facility. The property is likely contaminated with heavy metals, preservatives and pesticides (including copper, creosote, and arsenic), VOCs, and machine oil. Now owned by the Commonwealth of Kentucky, the parcel could support light industrial reuse, creating jobs in a neighborhood with high unemployment.

iii. Identifying Additional Sites – Frankfort will follow a process developed through previous EPA Brownfields activities to identify additional sites for brownfield assessments. A Steering Committee comprised of neighborhood residents, local business owners, environmental justice advocates, and other stakeholders will advise the City on site selection. Public meetings in the Holmes Street neighborhood will also be hosted to educate residents about brownfields and encourage community members to recommend suspected brownfields. Properties will be considered based on the following criteria: redevelopment potential, protection of public health, proximity to sensitive populations, interested buyers, community support, capacity to spur further revitalization, ability to create jobs, likelihood to negotiate site access with owners, and prospect to leverage additional state/federal resources for revitalization. Priority will be given to brownfields located in Census Tracts 712. This area meets Executive Order 13985’s definition of “underserved communities” as it has high poverty (41.0%) and a significant Black population (25.6%). All identified sites will be included on Frankfort’s brownfield inventory.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans – Frankfort seeks EPA Brownfields funding to characterize hazardous substances and petroleum contamination along the Holmes Street corridor. Cleaning up and reusing targeted sites will help the City improve health outcomes, spur economic development, and create open space.

Brownfields redevelopment aligns with local plans. In 2000, stakeholders established the Holmes Street Neighborhood Association. In conjunction with the City and University of Kentucky, extensive visioning exercises were conducted with residents, businesses, and other participants. That work led to the 2007 [*Holmes Street Redevelopment Master Plan*](#). The plan emphasizes enhancing housing stock and building the corridor’s image as a desirable place to live.

Two recent planning efforts illustrate the need for brownfield investment in Frankfort. First, the community identified properties within its federally-designated Opportunity Zone prime for reuse. Many targeted sites have contamination issues that have stymied revitalization for decades. Second, Frankfort completed its *Downtown Master Plan* in late 2018. That effort seeks to guide the redevelopment of the Capital Plaza Area at the end of Holmes Street, which is planned for a mix of uses, including residential, retail, commercial, and hospitality.

EPA Brownfields resources will also complement other land use and revitalization plans:

- The *Frankfort/Franklin County Comprehensive Plan* encourages the reuse of vacant and underutilized land in high-priority areas, including Holmes Street.
- The Frankfort/Franklin County Tourist Commission developed the *Kentucky River Development Plan* to connect the Holmes Street Corridor with cultural and natural resources.
- WalkBike Frankfort prepared a pedestrian/bike plan focused on the Holmes Street corridor.

Brownfield assessments will also leverage Frankfort’s environmental justice policies. The City has prioritized allocating resources in areas with socioeconomic disadvantages to address the disproportionate impacts. Historical practices of discrimination continue to impact the community’s Black and low-income residents negatively. In 2022, the City completed a study funded by the National Park Service and Kentucky Heritage Council researching its Black history. The [*African American Historic Context Report*](#) reviews Black life in Frankfort through the lens of

enslavement and emancipation, Jim Crow segregation laws, civil rights, education, commerce, economics, family life, and neighborhoods. Due to historic discrimination and disinvestment, the Holmes Street neighborhood’s large population of Black and low-income residents are burdened by low incomes, safety concerns, mobility gaps, and environmental risks. Brownfields remediation in the area will help Frankfort to mitigate these impacts.

Frankfort will soon begin constructing a Complete Street along Holmes Street. With \$20.8 million in U.S. Department of Transportation (DOT) funding and \$7.4 million in local match, the City is reconfiguring Holmes Street with safe pedestrian crossings, traffic calming measures, and bike facilities; improving bus stops to enhance connections to public transportation; fixing broken and obstructed sidewalks; enhancing Americans with Disabilities Act (ADA) accessibility; installing green infrastructure to manage stormwater and protect watershed health; and upgrading aesthetics. EPA Brownfields resources will leverage this federal transportation investment.

ii. Outcomes and Benefits of Reuse Strategy – EPA Brownfields resources will help unlock the revitalization potential of the Holmes Street corridor. This area is prime for infill development, including housing, commercial spaces, and parks.

Potential reuses along the Holmes Street corridor include a grocery store and agriculture retail space. The nearest supermarket to the neighborhood is over four miles away. A Dollar General, Family Dollar, and convenience store are the only food options within the area. Brownfields redevelopment will help Frankfort eliminate a food desert. Parks and green space are also attractive reuse opportunities. The Trust for Public Land’s ParkServe tool indicates that only 30% of Holmes Street neighborhood residents live within a 10-minute walk of an outdoor recreational facility. The area is rated “very high” for park needs. A dog park on the corridor will help the City meet recreational demands.

Redevelopment in the Holmes Street corridor will increase housing choice and create job opportunities to attract/retain young professionals. Revitalization will expand opportunities for workers to live close to their work. In addition, the City is promoting sustainability measures in the area to improve resilience. Frankfort has submitted a grant application for EPA Community Change funding, focusing on healthy home measures, appliance and heating/cooling replacements, energy efficiency retrofits, and solar installations that will help marginalized residents reduce their reliance on fossil fuels, curb greenhouse gas emissions, and improve air quality. This comprehensive home rehabilitation approach along Holmes Street will reduce energy use, decrease electricity costs, and improve health outcomes. Sustainable reuse will be incorporated into brownfield planning.

The proposed project supports Frankfort’s local climate adaptation/mitigation capacity and resilience. The community is already experiencing the effects of climate change. Frankfort struggles with rising temperatures, severe drought, heavier rainstorms, frequent flooding, and other extreme weather events. Reuse of contaminated properties will boost smart growth and reduce greenhouse gas emissions.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse – Frankfort has extensive experience leveraging federal dollars with public and private dollars. State, federal, and private sector funding will help to support brownfield redevelopment activities. Key resources that have been committed, secured, and anticipated include:

Source	Purpose	Status	Amount
U.S. Department of Housing & Urban Development (HUD)	Community Development Block Grant-supported revitalization in the project area	Anticipated	\$3-4 million
Kentucky cleanup grants	Remediation of EPA-assessed sites	Anticipated	\$2-3 million
EPA cleanup grants	Remediation of EPA-assessed sites	Anticipated	\$5 million
U.S. Department of Transportation (DOT)	Complete construction in the Holmes Street neighborhood	Secured	\$27.3 million
Additional private investment	Development on EPA-assessed sites	Anticipated	\$20-30 million

ii. Use of Existing Infrastructure – The burden of maintaining underused infrastructure in the urban core increases as new development moves to Frankfort’s fringe. Targeted sites are located in an established area with existing municipal infrastructure. The Holmes Street neighborhood is fully served by roads, water, sewer, electricity, gas, transit, and other public utilities (including high-speed internet). The community continues to seek funding from the

recently passed federal infrastructure bill to support its local needs further. EPA Brownfields resources are budgeted for an infrastructure needs assessment to help determine what upgrades are necessary to sustain new growth.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding – As a small city, Frankfort is limited in tackling brownfields. Median household incomes are low in Frankfort (approximately 30% lower than the national level), limiting the City’s ability to raise tax dollars. Among Frankfort’s fiscal challenges are state-mandated increases in pension contributions, tax revenue shortfalls, and the continued effects of the COVID-19 pandemic. During the pandemic, many state workers moved to remote work, decreasing the number of state employees paying city occupational taxes. These changes led Frankfort to make deep cuts in their operating expenses. Current revenue is insufficient to fund vital community assets at a sustainable level. This economic picture means that blighted areas will continue to decline without EPA Brownfields funds.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations – Census Tract 712 has a large population under 5 years old. Women aged 15-50 years old in Census Tract 1, 3, and 5 also give birth at high rates. See summary table below (levels higher than state and national levels shown in red):

Vulnerable Populations	Census Tract 712	Kentucky	United States
Children Under 5	11.4%	5.9%	5.7%
Pregnant Women (per 1,000)	61	53	52

Considering prior uses, Frankfort expects targeted brownfields will be contaminated with heavy metals (including lead, mercury, cadmium, and zinc), PAHs, PCBs, VOCs, preservatives and pesticides (including copper, creosote, and arsenic), solvents, and motor oil. EPA has designated some of these substances as carcinogenic, mutagenic, and teratogenic. The existence of these contaminants poses serious concerns to sensitive populations. Contaminated sites exacerbate the risk of cancer and non-cancer mortality for nearby households, including the area’s pregnant women and infants. Contaminants of concern include:

- Lead (likely at most sites) – Children’s brains and nervous systems are more sensitive to lead’s effects. Pregnant women are also vulnerable to lead exposure, which can result in miscarriage and premature birth.
- PAHs (likely at most sites) – PAHs cause adverse birth outcomes, including low birth weight, premature delivery and heart malformations.
- VOCs (likely at most sites) – VOCs are particularly damaging to the livers, kidneys, and central nervous systems of children.

Brownfields also yield negative psychological impacts as vacant sites and dilapidated areas impact surrounding neighborhoods, resulting in blight and disinvestment, reduced property values and corresponding tax revenue, and higher crime. Redevelopment in the project area will benefit historically marginalized communities in Frankfort. Revitalization efforts are intentionally designed to prevent gentrification, overcome inequality, and improve quality of life. EPA funding will initiate the cleanup of these contaminants and reduce threats to the health and welfare of sensitive populations. Brownfields assessments of critical sites represent a first step in removing pollution and eliminating exposure pathways for Frankfort’s most vulnerable residents.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions – Environmental hazards in Frankfort are concentrated in lower-income areas. Disadvantaged residents in Census Tracts 712 have higher rates of chronic health conditions. A CEJST analysis of disparities in the project area finds that Census Tract 712 residents ranked in the 92nd percentile for asthma, the 88th percentile for diabetes, the 94th percentile for heart disease, and the 97th percentile for low life expectancy. The Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry (ATSDR) rates Frankfort as “medium-high” using its Social Vulnerability Index criteria.

According to Franklin County’s Community Health Assessment, area residents disproportionately live with multiple chronic conditions, including asthma, arrhythmia, coronary artery disease, diabetes, and hypertension. Heart disease is the leading cause of death in the region. Cancer incidence is 493.1 per 100,000 population in Franklin County, compared to 444.4 across the United States, according to the National Cancer Institute. HealthData.gov data indicates

that life expectancy is 70.2 years in Census Tract 712, compared to Kentucky’s rate of 75.9 years.

Black residents in Census Tract 712 experience the city’s highest burdens of chronic disease (obesity, high blood pressure, and diabetes) and emergency room utilization. Asthma emergency room visit rates for Black adults and children from the project area are significantly higher than those of other Frankfort residents, suggesting that environmental triggers may likely play a role.

Exposure to hazardous materials and petroleum likely impacts health. Franklin County’s Health Department will develop a health monitoring program to assess high incidence rates (especially with sensitive populations) and correlate data to existing brownfields. Brownfield cleanup will help mitigate these risks.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues – The Holmes Street neighborhood is an environmental justice area. Census Tract 712 in Frankfort experiences higher poverty rates and lower median household incomes than Kentucky and the United States. Brownfields disproportionately impact these marginalized residents. According to the U.S. Census Bureau, Frankfort has a significant Black (16.9%) population. Within the project area, this minority population is greater – 25.6% Black. See summary below (variations from state and/or national levels shown in red):

	Census Tract 712	Kentucky	United States
Minority	38.2%	16.8%	41.1%
Poverty Rate	41.0%	16.1%	12.5%
Median Household Income	\$44,286	\$60,183	\$75,149

Census Tract 712 is identified as “disadvantaged” by CEJST. Using EPA’s EJSCREEN tool, the project zone appears in the top half of the following state and national environmental indicators (shown in red):

Environmental Indicator	Percentile in Kentucky	Percentile in United States
Particulate Matter	85	74
Ozone	88	71
Nitrogen Dioxide	81	65
Diesel Particulate Matter	84	64
Traffic Proximity and Volume	87	57
Lead Paint	92	82
Risk Management Plan Facility Proximity	82	65
Hazardous Waste Proximity	87	68
Underground Storage Tanks	89	77
Wastewater Discharge	95	86

Structural racism in Frankfort is the result of long-standing policies and practices that cause disproportionate harm to people of color. One example is the legacy of redlining, which resulted in the segregation of minority households into neighborhoods surrounded by railroads and polluting industries. Today, residents of Census Tract 712 report a substantially greater prevalence of chronic diseases such as obesity, high blood pressure, and diabetes than the community average. Contamination exposure pathways likely lead to low life expectancy in the project area – 70.2 years in Census Tract 712 compared to 75.2 years across Frankfort.

(b) Advancing Environmental Justice – Brownfields assessments will improve equity in Frankfort. Redevelopment of contaminated sites along the Holmes Street corridor will:

- Reduce environmental pollution that threatens the health and welfare of people of color;
- Help eliminate a food desert, creating better access to fresh produce;
- Increase access to recreational amenities for disadvantaged residents with limited green space options;
- Provide affordable housing options for struggling community members;
- Support business, including diverse entrepreneurial endeavors; and
- Improve access to education, jobs, health care, and other key destinations.

Frankfort will incorporate anti-displacement strategies into its reuse plans. These efforts will ensure that current residents and businesses can continue to thrive without being forced out of the project area by rising costs.

b. Community Engagement

i. Project Involvement & ii. Project Roles

Name of organization/ entity/group	Entity's mission	Point of contact (name & email)	Specific project involvement or assistance provided
Franklin County Health Department	Works to ensure the public's health in Frankfort and Franklin County.	Judy Mattingly, judya.mattingly@ky.gov	Steering Committee. Information sharing with residents on the health risks of brownfields.
Opportunity for Work and Learning (OWL)	Works to build job skills among low-income and minority residents.	Tony Higgins, thiggins@owlinc.net	Steering Committee. Help residents access brownfields job training.
Focus on Race Relations	Addresses inequities for Black children and families in Frankfort.	Kristie Powe, [REDACTED]	Steering Committee. Encourage Black and Hispanic residents to participate in engagement activities.
Thorn Hill Education Center	Non-profit education and career center	Kelley Anderson, Kelley.anderson@ffclc.com	Steering Committee. Encourage disadvantaged residents to participate in engagement activities.
WalkBike Frankfort	Supports recreational improvements in Frankfort.	Don Stosberg, [REDACTED]	Steering Committee. Community engagement.
Frankfort Area Chamber of Commerce	Focused on furthering the goals of the Frankfort business community.	Tish Shade, tish@frankfortky.info	Steering Committee. Site prioritization. Outreach to businesses.
Kentucky Capital Development Corporation	Regional economic development organization.	Penny Peavler, ppeavler@kycapitaldevelopment.com	Site prioritization. Participate in reuse planning.

iii. Incorporating Community Input – A Community Engagement Team will develop public involvement strategies. This team will organize quarterly meetings over the project period, including virtual sessions. Outreach activities will target disadvantaged Census Tract 712 residents, particularly sensitive populations. The engagement aims to share information, collect feedback, and describe next steps. Input will also be gathered to shape the reuse of assessed properties. Personnel from Franklin County's Health Department will share information on brownfield risks. Engagement activities will occur after work hours, be centrally located, and provide child care to maximize participation. Comment cards will be provided at meetings to capture and document input.

Traditional media, including the newspaper, television, and local radio stations, will be used to disseminate information. Web sites and social media will describe brownfields efforts and promote engagement opportunities. A survey tool will be used to gather feedback. Frankfort will also regularly communicate with households in the project area through community newsletters. All written outreach materials will be available in English and Spanish. Frankfort has used this outreach process successfully with previous brownfield activities.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task #1 – Cooperative Agreement Oversight
i. Project Implementation: A project manager will ensure compliance with grant requirements. Tasks include oversight and performance reporting. Three people will attend EPA's National Brownfields Training Conference to learn best practices and identify ways to leverage federal resources. Key residential and business leaders will be asked to participate on a project Steering Committee. In addition, two project teams – a Community Engagement Team and a Technical Team – will be established to implement the project.
ii. Anticipated Project Schedule: Ongoing project management with quarterly reporting and regular Assessment, Cleanup and Redevelopment Exchange System (ACRES) updates.
iii. Task/Activity Lead: Rebecca Hall, Grants Manager.
iv. Outputs: Formalized Steering Committee and teams, quarterly reports, ACRES updates, and closeout report.

Task #2 – Procuring Contractors

i. Project Implementation: Environmental/planning contractors will be procured to conduct assessments and develop cleanup/reuse plans. These services will be solicited through a Request for Proposals (RFP). Frankfort will initiate a competitive qualifications-based selection process in compliance with state and federal regulations.

ii. Anticipated Project Schedule: Environmental/planning contractors procured during first quarter of Year 1.

iii. Task/Activity Lead: Rebecca Hall, Grants Manager.

iv. Outputs: RFPs for assessments and cleanup/reuse planning and contracts with qualified professionals.

Task #3 – Community Engagement

i. Project Implementation: City staff will lead the Community Engagement team. Residents will confirm priority brownfields, determine secondary sites, and recommend reuse options. Frankfort will connect with the community through quarterly meetings, newsletters, web sites, social media, and other outreach tools. Frankfort will use ATSDR’s Brownfields/Land Revitalization Action Model to foster dialogue.

ii. Anticipated Project Schedule: Quarterly community meetings and ongoing communications.

iii. Task/Activity Lead: Rebecca Hall, Grants Manager.

iv. Outputs: Community engagement plan, quarterly neighborhood meetings, and newsletters/fact sheets.

Task #4 – Site Selection

i. Project Implementation: City staff and environmental consultants will work with the Steering Committee to confirm primary brownfields selected for assessments and recommend additional sites in the targeted project area.

ii. Anticipated Project Schedule: Primary and secondary sites will be selected in the second quarter of Year 1.

iii. Task/Activity Lead: Rebecca Hall (Grants Manager) and environmental consultants.

iv. Outputs: Inventory of identified brownfields and primary/secondary site recommendations.

Task #5 – Negotiating Access

i. Project Implementation: City staff and environmental consultants will negotiate with landowners to secure access. This permission will enable Frankfort to collect sediment, surface water, and groundwater samples; install groundwater monitoring wells, if necessary; and use equipment, including vehicles and drill rigs.

ii. Anticipated Project Schedule: Site access negotiations will begin in the second quarter of Year 1 and continue through the end of Year 2.

iii. Task/Activity Lead: Rebecca Hall (Grants Manager) and environmental consultants.

iv. Outputs: Site access agreements.

Task #6 – Phase I & Phase II Activities

i. Project Implementation: Frankfort will initiate and complete up to 11 Phase I assessments. The community plans to conduct up to 6 Phase II assessments in the targeted area. These activities will be conducted by qualified environmental professionals and preceded by approved Quality Assurance Project Plans (QAPP). Procured environmental contractors will ensure that all Phase I and Phase II activities meet American Society for Testing Materials (ASTM) standards and comply with the All Appropriate Inquiries Final Rule.

ii. Anticipated Project Schedule: Assessment activities will occur over a 27-month period, from the third quarter of Year 1 through the third quarter of Year 3.

iii. Task/Activity Lead: Environmental consultants, with support from Rebecca Hall (Grants Manager).

iv. Outputs: 11 Phase I and 6 Phase II assessments, 1 generic QAPP, and 6 site-specific QAPP addenda.

Task #7 – Cleanup & Reuse Planning

i. Project Implementation: Cleanup/reuse plans will be developed by qualified experts, with significant community input. Proposed activities include: a charrette; development of an Analysis of Brownfields Cleanup Alternatives (ABCA) for sites to be remediated; an infrastructure needs assessment to identify upgrades required to support growth; a land use plan that considers cleanup strategies for high-priority brownfield sites, green infrastructure, energy efficiency, and Complete Streets; and an implementation strategy with business recruitment approaches, identification of public and private revitalization resources, and a game plan for implementing the land use plan.

ii. Anticipated Project Schedule: Cleanup/reuse planning will occur in Year 3, unless needed earlier.

iii. Task/Activity Lead: Environmental consultants will develop cleanup plans for assessed sites. A planning team

familiar with market analysis, infrastructure needs, land use planning, and funding options will also be contracted.

iv. Outputs: 1 charrette; ABCAs for cleanup sites; assessment of existing infrastructure assets and upgrades needed to support reuse; sustainable land use plan; and detailed implementation strategy that includes brownfields cleanup priorities, business recruitment approaches, and public/private resources that can support revitalization.

Task #8 – Health Monitoring

i. Project Implementation: Franklin County’s Health Department will communicate the health risks associated with brownfields and monitor public health in the project area. Health officials will identify and address potentially harmful exposures to residents. Screenings of vulnerable populations will be conducted to determine whether these exposure pathways might have resulted in health impacts.

ii. Anticipated Project Schedule: Participation in public workshops during Year 1, ongoing communications with residents, and health screenings conducted concurrently with Phase II assessments.

iii. Task/Activity Lead: Judy Mattingly, Franklin County’s Health Department Director.

iv. Outputs: Presentations at quarterly meetings, online and printed materials describing health issues related to brownfields, and health screening reports.

A timeline of project activities is included below:

Activity	Year 1				Year 2				Year 3			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Cooperative Agreement Oversight	X	X	X	X	X	X	X	X	X	X	X	X
Procuring Contractors	X											
Community Engagement	X	X	X	X	X	X	X	X	X	X	X	X
Site Selection		X										
Negotiating Access		X	X	X	X	X	X	X				
Phase I & Phase II Activities			X	X	X	X	X	X	X	X	X	
Cleanup & Reuse Planning									X	X	X	X
Health Monitoring	X	X	X	X	X	X	X	X	X	X	X	X

b. Cost Estimates

		Project Tasks								
Direct Costs		Cooperative Agreement Oversight	Procuring Contractors	Community Engagement	Site Selection	Negotiating Access	Phase I & Phase II Activities	Cleanup & Reuse Planning	Health Monitoring	Total
		Personnel	\$10,000	\$500	\$2,500	\$1,000	\$1,500	\$5,000	\$5,000	\$4,500
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Travel	\$4,500	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4,500
	Equipment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Contractual	\$0	\$0	\$28,000	\$5,000	\$6,500	\$279,000	\$145,000	\$0	\$463,500
	Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,000	\$2,000
	Total Direct Costs	\$14,500	\$500	\$30,500	\$6,000	\$8,000	\$284,000	\$150,000	\$6,500	\$500,000
	Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Total Budget	\$14,500	\$500	\$30,500	\$6,000	\$8,000	\$284,000	\$150,000	\$6,500	\$500,000

The cost estimates presented in the budget above include the following assumptions:

- Cooperative Agreement Oversight: Rebecca Hall (Grants Manager) will provide cooperative agreement oversight (\$10,000 staff time). Travel expenses are budgeted for three people to attend EPA’s National Brownfields Training Conference (\$1,500 per person for airfare and hotel, \$4,500 total).
- Procuring Contractors: The budget allocates \$500 for staff time to conduct an RFP process for environmental and planning contractors to perform assessments and develop cleanup and reuse plans.
- Community Engagement: City staff (\$50/hour for 50 hours, \$2,500 total) and consultants (\$28,000) will

manage the engagement process.

- **Site Selection:** The budget includes \$1,000 (\$50/hour for 20 hours) in staff time and \$4,000 for contractors to manage the brownfield site selection process.
- **Negotiating Access:** Staff time (\$50/hour for 30 hours) and consultant expenses (\$6,500) are included in the budget to negotiate site access with willing private property owners.
- **Phase I and Phase II Activities:** Environmental consultants will conduct up to 11 Phase I assessments (\$4,500 each, \$54,000 total) and up to 6 Phase II assessments (\$37,500 each, \$225,000 total). City staff (\$50/hour for 100 hours, \$5,000 total) will oversee the assessment process.
- **Cleanup/Reuse Planning:** Environmental consultants will develop cleanup plans for sites targeted for remediation. A planning team will also be contracted to help determine site reuses. The budget includes \$145,000 for cleanup/reuse plan contracting, as well as \$5,000 (\$50/hour for 100 hours) for city staff time.
- **Health Monitoring:** Staff time (\$50/hour for 90 hours, \$4,500 total) for Franklin County's Health Department is allocated to conduct health monitoring activities in the project area. The budget also includes \$2,000 to design and print health materials.

c. Plan to Measure and Evaluate Environmental Progress and Results – Frankfort will track project progress. A work plan, to be approved by EPA, will help guide outputs and outcomes. The project manager will evaluate progress based upon milestones identified in the work plan. Internal project management software will help ensure that assessment and reuse planning activities are moving along, and that project outputs and outcomes are being achieved. This will provide safeguards that grant funds are expended promptly and efficiently. Data will be regularly entered into ACRES.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity – Frankfort has the expertise necessary to manage the project. A project manager will lead all project teams and be invested with the authority necessary to complete the project. Project management duties will be assigned to Rebecca Hall, Frankfort's Grants Manager. She will be responsible for assuring compliance with the administrative and reporting requirements of the cooperative agreement. Rebecca has successfully managed previous EPA Brownfields-funded projects.

Representatives from the Franklin County Health Department, OWL, Focus on Race Relations, Thorn Hill Education Center, WalkBike Frankfort, and Frankfort Area Chamber of Commerce will serve on a Steering Committee. Staff will meet regularly with the Steering Committee (initially and then quarterly). The Steering Committee will help select brownfield sites, support community engagement, and participate in reuse planning.

Frankfort will use a team approach to ensure that work is not dependent on a few key personnel. A Community Engagement Team will implement strategies to involve disadvantaged residents in Census Tracts 1, 3, and 5. The Community Engagement Team will be composed of members of various municipal departments, as well as members of community associations, the business community, the nonprofit field, and other stakeholders. A second Technical Team will support assessment, cleanup, and reuse planning activities.

Frankfort's Finance Department will be responsible for compliance with the grant's financial requirements. This team has extensive experience managing federal funding.

ii. Organizational Structure – Frankfort has a long track record of successfully managing brownfield projects. Developing a detailed work plan with clear milestones and responsibilities is critical to this effort. This will be developed at an initial meeting with the City Manager and other key staff. Project goals will be identified, and responsibilities within the work plan will be defined. Performance measures will help to track progress. Status updates will be incorporated into Frankfort's existing reporting structure to ensure that the project remains on schedule. Monthly reports will be provided to the City Manager. In addition, staff will meet regularly with key partners.

Frankfort will follow all funding requirements. Administratively, the community is experienced in managing EPA Brownfields work. The City has established clear guidelines for timely and accurate reporting of financial and programmatic information to funding agencies. Local systems are in place to track reporting deadlines and ensure

submissions are made in accordance with the terms and conditions of the grant award. Frankfort's Finance Department also has effective internal controls over the use and distribution of federal funds. The Finance team will maintain accurate, current, and complete records identifying the source and application of federally-funded activities.

iii. Description of Key Staff – Rebecca Hall, Frankfort's Grants Manager, will oversee the proposed project. Rebecca has 22+ years of local government experience and has managed state and federal funding, including EPA Brownfield awards. She will liaise with EPA Region 5 and assure compliance with all cooperative agreement requirements. Rebecca will be assisted by qualified interdepartmental staff, including Eric Cockley (Planning & Community Development Director) and Jordan Miller (Senior Community Planner). Eric joined the city in 2018 and is responsible for local economic development efforts. He has conducted numerous engagement activities in Frankfort to make marginalized residents feel more connected to their city. Jordan has over eight years of experience building capacity in disadvantaged neighborhoods. In addition, Judy Mattingly, Franklin County's Health Department Director, will manage the project's health monitoring activities. She has served as a local health professional since 2014.

Frankfort will use a team approach to ensure the project is not dependent on a few key people. Two project teams will be established. A Community Engagement Team will implement strategies to enhance resident involvement. A second Technical Team will be formed to support the identification and assessment of brownfield properties.

iv. Acquiring Additional Resources – Frankfort will hire qualified experts to support engagement activities, conduct assessments, and develop cleanup/reuse plans. The City has established RFP procedures that staff will follow in selecting consultants. These services will be procured in compliance with EPA regulations.

The Kentucky Energy and Environmental Cabinet will provide technical assistance. City staff will work with prospective purchasers to enroll sites into the Commonwealth's voluntary Brownfield Liability Relief Program. Franklin County's Health Department will communicate the health risks associated with brownfields. Health professionals will provide technical assistance, identify sensitive populations, and ensure cleanup reduces exposure pathways. Frankfort will also coordinate with the New Jersey Institute of Technology, EPA's technical assistance provider for Region 4.

In Kentucky, workers can bargain collectively through a labor union. Frankfort will promote the project to local contractors and their union members. EPA investment will support efforts to create jobs paying prevailing wages, promote upward economic mobility, and grow Frankfort's middle class. OWL, a local workforce development organization, will help unemployed and underemployed neighborhood residents access brownfields job training and connect with assessment activities. Frankfort will encourage competing firms to include apprenticeship opportunities for local low-income individuals, women, people of color, and others underrepresented in brownfield jobs (e.g., people with disabilities, people with convictions). Safe working conditions will also be ensured for city staff, consultants, and others conducting brownfield activities.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

1. Purpose and Accomplishments – Frankfort has managed multiple EPA Brownfields-funded projects, including:

- 2014 Assessment – Project results included 12 Phase I and 11 Phase II assessments. In addition, six underground storage tanks (UST) were removed and three were closed in place. In April 2017, Frankfort hosted a successful Brownfield Forum to bring property owners and developers together. The City also developed a Downtown Redevelopment Strategy with EPA funds.
- 2007 Assessment – Five Phase I and three Phase II assessments were completed with this funding. In addition, five USTs were removed and three tanks were closed in place.

2. Compliance with Grant Requirements – Frankfort has a superb record of complying with state and federal grant requirements. The community has successfully worked with Kentucky government agencies as well as HUD, DOT, and others. Work plans were created and diligently followed for previous efforts. All funding agency terms and conditions were met, including filing timely reports. Recent projects have been completed on budget and on time. Intended project outcomes were achieved, as demonstrated in the examples above.

The City has no open EPA Brownfields cooperative agreements.

Threshold Criteria City of Frankfort, Kentucky

1) APPLICANT ELIGIBILITY

- a. The City of Frankfort is a unit of local government, and a political subdivision under the laws of the Commonwealth of Kentucky. The City is eligible to receive EPA Brownfields funding.
- b. The City of Frankfort is exempt from federal taxation. Section 501(c)(4) does not pertain to local governments. The City is registered to lobby the federal government.

2) COMMUNITY INVOLVEMENT

A Community Engagement Team will develop public involvement strategies. This team will organize quarterly meetings over the project period, including virtual sessions. Outreach activities will target disadvantaged Census Tract 712 residents, particularly sensitive populations. The engagement aims to share information, collect feedback, and describe next steps. Input will also be gathered to shape the reuse of assessed properties. Personnel from Franklin County's Health Department will share information on brownfield risks. Engagement activities will occur after work hours, be centrally located, and provide child care to maximize participation. Comment cards will be provided at meetings to capture and document input.

Traditional media, including the newspaper, television, and local radio stations, will be used to disseminate information. Web sites and social media will describe brownfields efforts and promote engagement opportunities. A survey tool will be used to gather feedback. Frankfort will also regularly communicate with households in the project area through community newsletters. All written outreach materials will be available in English and Spanish. Frankfort has used this outreach process successfully with previous brownfield activities.

3) EXPENDITURE OF EXISTING GRANT FUNDS

The City of Frankfort has received previous EPA Brownfields funding. There are no open EPA Brownfields cooperative agreements.

4) CONTRACTORS AND NAMED SUBRECIPIENTS

The City of Frankfort has not procured any contractors for EPA Brownfields funds. The City will follow the federal fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 when contracting with environmental and planning specialists.

The Franklin County Health Department is identified as a subrecipient of EPA Brownfields funds. The agency is part of a unit of local government and is eligible to receive federal funding.