



Narrative Information Sheet

1. Applicant Identification

The City of South Fulton
5440 Fulton Industrial Blvd. SW
South Fulton, GA 30336

2. Website URL <https://www.cityofsouthfultonga.gov>

3. Funding Requested

- | | |
|-----------------------------------|----------------|
| a. <u>Assessment Grant Type</u> | Community-wide |
| b. <u>Federal Funds Requested</u> | \$500,000 |

4. Location The City of South Fulton, Fulton County, Georgia.

5. Target Area and Priority Site/Property Information

- Target Area:
 - Red Oak District CT 1312011306 and
 - Old National Highway District CT13121010604 and
 - Old National Highway District CT 13121010507
- Priority Site 1: **Camelot Condominiums** 5655 Old National Highway. South Fulton, GA 30349
- Priority Site 2: **Old National Park** 2400 Pleasant Hill Road SW, South Fulton, GA 30349
- Priority Site 3: **Red Oak Plaza** 3375 Roosevelt Hwy, South Fulton, GA 30349

6. Contacts

a. Project Director

Artie Jones, III
Director of Economic Development
5440 Fulton Industrial Blvd. SW, South Fulton, GA 30336
Telephone: (470) 716-4904
Email artie.jones@cityofsouthfultonga.gov

b. Chief Executive/Highest Ranking Elected Official

khalid kamau
Mayor
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- 7. Population City of South Fulton, Georgia 110,920 (2023 US Census)
- 8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
At least 30% of the overall project budget will be spent on eligible reuse/ area-wide planning activities for priority site(s) within the target area.	9
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	

- 9. Letter from the State or Tribal Environmental Authority Attached.
- 10. Releasing Copies of Applications Not Applicable.



ENVIRONMENTAL PROTECTION DIVISION

Jeffrey W. Cown, Director

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

October 28, 2024

VIA ELECTRONIC Mail artie.jones@cityofsouthfultonga.gov

Mr. Artie Jones, III
Director of Economic Development
City of South Fulton
6385 Old National Highway
Suite 210
South Fulton GA 30349

RE: State Acknowledgement Letter – Brownfield Community-Wide Assessment Grant Application
City of South Fulton

Dear Mr. Jones:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the City of South Fulton will be submitting an application to the U.S. Environmental Protection Agency (“EPA”) for funding assistance under the federal Community-Wide Assessment Grant Program to conduct assessment and planning activities. GA EPD understands that the City is applying for \$500,000 for the assessment of hazardous substances and petroleum.

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the City of South Fulton for such assessment. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shannon Ridley", written over a large, stylized blue scribble or flourish.

Shannon Ridley
Brownfield Coordinator

File: FFY 2025, EPA Grant Applicants, City of South Fulton-Assessment

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area Just southwest of the world's busiest airport, Hartsfield-Jackson International Airport (Airport), lies the young City of South Fulton, Georgia (the "City"), which encompasses 86.25 sq. miles and has a resident population of 110,920 (US Census 2023). The City of South Fulton was incorporated on May 1, 2017, following a wave of 'Cityhood Movements' in Metro Atlanta driven by wealthier areas seeking to retain tax revenues and political control. This rapid incorporation left poorer, predominantly minority areas like South Fulton struggling as the county's tax base shrank, resulting in reduced services and economic decline. In response, the City of South Fulton sought to regain control over its resources and budget, aiming to restore prosperity to the community. Simultaneously, the City was dealing with the fast-paced growth of the nearby airport and subsequent issues associated with its expansion, including the relocation of wealthier residents away from the nuisance and towards the new centers of population growth. Many businesses followed suit, creating a wealth vacuum effect, which eroded imported revenues and left former commercial corridors vacant. With a desire to have more control over resources, budget, and other aspects of their community, the City incorporated and has been moving towards reinstating the success that many areas in South Fulton once held. Considerable obstacles are being faced after decades of disinvestment. Brownfield properties (30% of land in the target area) complicate redevelopment efforts. High crime, significant poverty, and lack of business interest exacerbate the struggle.

The **geographic boundary / target area (TA)** of the application is **the contiguous Old National Highway and Red Oak Districts (1.51 sq. miles combined)**. This TA contains the priority corridors of the City's Main Street Programs, the focus of recent Livable City Initiative (LCI) planning studies. Geographically, this area is defined by the City's eastern boundary, Jonesboro Rd to the south, Ben Hill Rd and I-85 to the west, and Will Lee Rd to the north. **Old National Highway** is a commercial corridor located immediately south of Interstates 85/285, on the eastern edge of the City with the highest population density. Once a premier shopping destination in the south metro-Atlanta area, Old National Highway is now suffering from high vacancy rates, blighted neighborhoods, increased crime, drug manufacturing and distribution, and general disinvestment. This district is a key focus area identified for redevelopment by the City. The corridor is ideally located along principal transportation routes, accessible to established residential developments, and near the Airport, a crucial economic driving force for the City. The **Red Oak District** runs perpendicular to the Old National District, directly west of I-285 and north of U.S-29. Developed as a railroad community in the late 1850s, this corridor historically serviced the commercial and industrial needs of rail passengers and cargo. Currently, the area suffers from high rates of air toxins (76th percentile in the USA), continued environmental, social, and physical issues due to the area's high proximity to traffic (92nd percentile in the USA), and a low-income (47%) population (EPA EJScreen, 2024). These factors contribute to the **brownfield challenges** faced by the TA.

Serious environmental justice issues, such as the proliferation of contaminants including drug manufacturing compounds, solvents and petroleum products from illegal dumping and numerous gas stations/automotive repair facilities, friable asbestos-containing materials (ACMs), lead-based paint (LBP), and polyfluoroalkyl substances (PFAS) from firefighting foams, have plagued the TA and its citizens resulting in increased disinvestment in the area. This disinvestment has perpetuated and worsened the living conditions of the minority-led community. Old National Highway has become a center for illicit drug activity and a decaying, built environment, resulting in high crime rates, lack of affordable and safe housing (especially for seniors), scarcity of recreational and/or park facilities, and several other socio-economic issues. To restore Old National Highway as a premier commercial corridor, reduction of brownfields, crime, and drugs—along with a transformational project—are required to catalyze reinvestment in the area and disrupt the damaging cycle. **This grant will directly support the inventory, assessment and planning for reduction of brownfield properties, and a plan for economically-viable solutions with reuse planning.**

ii. Description of the Priority Brownfield Site(s) Brownfields are commonplace throughout the TA, with an estimated 30% of the target area being considered brownfields. The proximity of the Airport, three highways, and a rail line, made the TA historically desirous for the manufacturing of goods, with easy distribution throughout the country. The exodus of these businesses (see 1.a.i.) has left a litany of abandoned properties. An active quarry is centrally located within the target area, providing construction materials for metro Atlanta, however this use reduces air quality and risks heavy metal contamination within the target area. Common contaminants of concern including ACMs, LBP, PFAS, drug manufacturing compounds, solvents and petroleum exist in identified brownfield properties and the priority sites below.

The following three sites were **prioritized for reuse** based on their identification as focus areas in the Economic Development Strategic Plan (completed 2020) and meeting the goals laid out in the City's recently updated Comprehensive Plan, discussed in Section 1.b.i. Focus areas and goals were developed based on community engagement input. Sites were **prioritized for assessment** due to perceived contamination impeding reuse.

• **Site 1, Camelot Condominiums**, is identified as a catalyst site in the Strategic Plan. Citizens unanimously prioritized the 41.6-acre site, known to be a top crime-hub of the City, during Strategic Plan engagement sessions. Built in the '70s, it was a homeownership opportunity for primarily minority, lower-income residents. It was a family-oriented community with a playground, tennis courts, and club house. A corrupt HOA led to Camelot's demise. Property values plummeted after a bankrupt HOA led to extreme property neglect, leaving seniors and young families on fixed incomes trapped and unable to leave. Today, residents live interspersed between condemned buildings. Used needles can be found in the parking area outside the dilapidated playground, a health concern for children and parents. Entire buildings have been overtaken by drug manufacturing and distribution of meth and fentanyl. Fires are commonplace, with charred remains of entire buildings throughout the development. Fire sources are two-fold, drug manufacturing and squatters illegally stealing electric from other units. Illegal dumping is rampant, with overflowing dumpsters, dismantled cars, gas cans, and more. Environmental concerns include ammonia, ether, acetone, and controlled substances from drug manufacturing; solvents and petroleum products from illegal dumping; LBP; friable ACMs; and PFAS from firefighting foams. Due to health and safety concerns of sensitive populations, the City has stepped in to find a strategy. This site is **proposed to be redeveloped as a mixed-use, mixed-income development with 192,931 ft² of retail space and 849,400 ft² of residential space**, in the form of 661 multifamily units and 114 townhomes (SHAPE, Old National Park Concepts). The redevelopment will be constructed in phases to minimize displacement. Phase I will replace condemned buildings with new, safe, and affordable senior housing for ownership. This will provide an opportunity for senior residents of Camelot to relocate within their neighborhood with minimal disruption. Phase II will include the remaining residential units, as well as implementation of retail/commercial space connecting to Phase I.

• **Site 2, Old National Park**, like Site 1, this 43-acre assemblage was recognized as a catalyst site in the Strategic Plan, and prioritized by stakeholders during engagement efforts. The Site is largely hidden from view from Old National Highway, but upon closer inspection, the potential environmental issues are very apparent. Among the site's underutilized recreational, residential, and commercial land, non-conforming uses are abundant. Concerns include solvents and petroleum from illegal dumping and abandoned cars dispersed throughout the Site. Additionally, an abandoned, non-permitted air conditioner repair business (with a yard full of old, decaying condenser units) poses concerns from ozone-depleting refrigerants. This parcel lies adjacent to an active day care center. The assemblage includes the 22-acre Old National Park athletic facility. The Old National Park athletics facility and the day care center provide opportunities for the target area's youth to be impacted by the potential contaminants and storage tanks illegally dumped in this partially wooded, partially industrial area. As part of the reuse strategy, the City intends to preserve **18 acres of the wooded portions** (where illegal dumping is most prevalent) into **greenways and park expansions**. Appropriate lighting and activity generation would deter dumping activities and curb illicit activities known to occur here. **Recreational opportunities** will be suited to the community, such as playgrounds, trails, outdoor gathering spaces (including home to the weekly **Old National Farmers' Market**), and recreational equipment for all ages. As an economic driver for the community, plans include an outdoor competition swimming pool and water playground. 25 acres of the former industrial uses will be transformed into **medium density mixed-use space** (420,000 ft² commercial; 1,450 multifamily units and 100 townhomes).

• **Site 3, Red Oak Plaza**: This 4-acre plaza has been identified as a Red Oak District priority site within the City's ongoing 2024 Vision Plan. Located at the main intersection entering the Red Oak corridor, this site has been largely underutilized including vacant storefronts, an abandoned laundromat, and an overlooked auto repair business. Environmental concerns include LBP, friable ACMs, dry cleaning solvents, and petroleum. The Site will be a **community asset**, including a **community art studio and job incubation space, small-scale residential opportunities and neighborhood-serving retail**, and will catalyze the Red Oak District's initiation into a more robust, downtown corridor. These uses were prioritized by residents in the Comprehensive Plan Update community engagement and the City of South Fulton Market Analysis (Sept. 2024).

iii. Identifying Additional Sites The City will turn the existing inventory of brownfield sites into a GIS-based inventory, early in the grant period. The inventory will depict storage tanks, hazardous waste sites, sites with perceived contamination, vacant properties, redevelopment opportunities, transit stops, CEJST-designated areas, and other

layers as desired by TA residents/stakeholders. The inventory will be presented at bi-annual meetings and updated per resident/stakeholder input. Site prioritization will occur with the inventory, with sites given weight-based rankings on serving a CEJST community, reusing meeting community needs, perceived environmental issues, safety considerations, and catalyst potential. Additional, inventoried brownfield sites will be incorporated into the engagement process, with CEJST-designated disadvantaged areas prioritized. Meetings will be used to solicit input regarding additional site selection, site cleanup, and reuse planning through open conversations, and electronic and paper surveys. Contact information for the City’s Brownfield Coordinator, Ms. Karaey Davis, will be readily available on the City’s brownfield website and brochure for residents and stakeholders to reach out on additional site selection and input. Sites will be prioritized by the Brownfields Steering Committee based on the criteria above, with other considerations included as needed.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans Recent planning efforts formed the basis of the TA, selection of the priority brownfield sites, and proposed reuse strategies. In **June 2020**, the City published the **Economic Development Strategic Plan** which included an assessment of demographic and economic conditions, a discussion of special opportunity areas, results of extensive community input, and a five-year action plan. The Old National and Red Oak Historic Districts were identified as key economic development opportunities which led to formation of the Main Street Programs. Community input during the planning process found crime, lack of retail and restaurant options, and lack of outdoor exercise opportunities, as the residents’ most significant challenges. Site 1, the hub of City crime, and Sites 2 & 3, prime opportunity for commercial use, were identified as priority sites for the TA.

Following the Economic Development Strategic Plan’s identification of Priority Sites 1 & 2, the City completed an **Old National Highway Analysis** in September 2020. The Analysis included conceptual plans of the Sites. As discussed in 1.a.ii., Site 1 has been envisioned as a mixed-use, mixed-income development with nearly 200,000 ft² of retail space, 661 multifamily units, and 114 townhomes. Site 2 has been envisioned with three primary uses: recreation in the primary forms of a swimming facility and greenways; commercial space (420,000 ft²); and residential (1,450 multifamily units and 100 townhomes).

In 2021, the City completed their first **Comprehensive Plan Update**, which expanded their existing Plan to address the desires, needs, and opportunities identified in the above-mentioned planning efforts. The following action items were identified in the Plan Update as Implementation Actions to Build an Equitable South Fulton and ALL are incorporated through the proposed Brownfield project:

Implementation Actions	Priority Site Reuse Strategy Alignment
Create a brownfield/greyfield program	Strategy supports the assessment and reuse of Priority Brownfield Sites.
Promote homeownership opportunities	Sites 1, 2, & 3 will include attainable home ownership opportunities.
Develop Farmers Market in Old National Area or within Community Parks	Site 2 will be home to the Old National district farmers’ market.
Develop business incubator space	The Red Oak Plaza will house the incubator space.
Partner with organizations to promote arts and placemaking	The City will partner with Fulton County Arts & Culture (project partner identified in Section 2.b.) to setup a community art center at Site 3. Reuse of Site 3 is key to placemaking in the target area.
Ensure Stable Housing for All	Sites 1, 2, & 3 will provide a variety of housing types for various income levels. There will be ownership and rental opportunities.
Creating an Economic Engine for the South Side	Sites 1, 2, & 3 will be economic engines for the target area with the creation of mixed-use space. The swimming facility proposed for Site 2 is geared to be an economic driver, bringing swimming competitions and consumers.

As a continuation of efforts for the TA, area-wide planning commenced in August 2024. Community engagement identified lack of outdoor exercise opportunities, proliferation of tire and junk car shops, and lack of nice apartments. Through these preliminary analyses, the priority brownfield strategies for Sites 1 & 2 were refined and Site 3’s strategy was developed to address these issues and create a defined, focal entry point for the Red Oak district.

ii. Outcomes and Benefits of Reuse Strategy Cleanup alone will spur economic development in this community because it will signal to potential investors that positive change and investment by the city is coming to the community. Business owners and developers need confidence in the City’s commitment to follow through with their plans. The assessment and cleanup of these key areas are the first steps towards earning their confidence and generating excitement about the community’s potential. The revitalization plans for the focus area emphasize mixed-use, mixed-income development and reinvestment in recreational and green spaces – all of which will contribute significantly to the

economic and recreational enrichment of the City. **Site 1 (Camelot Condominiums) Outcomes** – This development proposes 192,931 ft² of retail space and 849,400 ft² of residential space, in the form of 661 affordable, energy efficient multifamily units and 114 townhomes, that will reduce both housing and utility cost burdens on low-income residents. With the redevelopment of this priority site, the City hopes to decrease dangerous crime activities and recreate the area in a more aesthetic and functional manner attracting visitors, residents, and future businesses to the area. **Site 1 economic benefits** include reductions to policing and code enforcement costs, improved taxable values and lower energy costs to residents (identified as CEJST energy cost burdened) without the displacement of target area residents. Additionally, the reuse strategy’s incorporation of citizen education, including on homestead property tax exemption for seniors, will aid current Camelot senior residents to positive financial outcomes. **Site 1 environmental benefits include** energy efficient, storm-resistant buildings. The revitalization plans for Old National Park (**Site 2**) encourage smart and green infill development and expand neighborhood services near existing residential development: **Outcomes** – 29± acres of highly demanded and safe recreational/park space (including an aquatic facility), over 1,500 residential units, including affordable and multi-generational housing options, critical civic spaces, and small-scale neighborhood retail/commercial uses. **Site 2 Economic Benefits** – By revitalizing and adding to the area’s recreational facilities, the City hopes to increase the demand to live, work, and play within the TA, attract new business, enhance existing business, and support the City in its economic, physical, and social growth, without resident displacement. The Red Oak Plaza’s reuse strategy works to catalyze investment and enhancement of the proposed downtown corridor. The inclusion of a site located at the focal entryway to this district encourages the start to revitalize the corridor with a stronger sense of place, history, and culture. **Site 2 environmental benefits** include preservation of green space and energy efficient, storm resistant buildings.

Site 3 Outcomes – Reuse of an underutilized plaza for community-use facilities, neighborhood-serving retail, and small-scale residential. **Site 3 Benefits** – The revitalization of this plaza into an improved, mixed-use, community space, will push similar development in the area, growing sense of place and therefore consumer desire and increased tax revenue for the City. The City will seek for the development to be energy-efficient and extreme storm resilient, with solar panels.

c. Strategy for Leveraging Resources

i. **Resources Needed for Site Reuse** As a city, South Fulton is eligible to access and implement a variety of funding sources, including grants, loans, taxes, and more. This project will build off recent investments in the target area including a \$200,000 2022 Livable Communities Initiative Grant from the Atlanta Regional Commission to advance recent plans along Old National Highway. The City has received and dedicated American Rescue Plan (ARP) funds to the following activities that will support reuse of brownfields in the target area: \$1,050,000 for a Master Stormwater Plan; \$1,700,000 Stormwater infrastructure improvements; \$1,300,000 for broadband and Wi-Fi improvements; and \$130,000 for economic development planning. \$250,000 of ARP funds have also been received and dedicated towards City district plans. The Old National Highway corridor underwent federally-funded resurfacing equating to \$3,808,397.71, completed in January 2023 (GDOT, 11/4/24). The development partner on Site 2 is seeking a State Apartment Incentive Loan which provides low-interest loans to support affordable housing projects. **This grant will provide critical pre-development funds for assessment and reuse planning for community selected, priority sites that are otherwise unfunded and provide leverage for the following identified funding opportunities:**

South Fulton TAD	The Target Area is covered by a Tax Allocation District (TAD). Funding from the TAD can be used to facilitate use. The amount of funding available depends upon the amount of new development taking place and will vary with the Priority Sites.	Assessment, cleanup, and reuse
EPA	Eligible site owners will apply for Brownfields Cleanup Grants	Cleanup
Green & Healthy Homes Initiative	The City is in the process of establishing itself as a Green and Healthy Homes site, which will enable the area to receive funding for lead remediation and abatement work	Cleanup
U.S. Dept. of Housing (HUD)	The City has an estimated \$500,000 annually as a Community Development Block Grant that can support cleanup and reuse of brownfield properties through funding items such as demolition, sidewalk repair, and sewer replacement.	Cleanup and reuse
Georgia EPD	Site assessment and cleanup costs incurred while in GA EPD brownfield program can be recouped through property taxes for up to 10 years (max amount determined by GAEPD).	Assessment, Cleanup
Georgia DOT	Transportation Alternative Program (TAP) grants to fund non-traditional transportation such as sidewalks, bike paths, and streetscapes (Up to \$1M)	Reuse

Georgia DCA	CDBG funding, through GA DCA, for demolition of blight, housing, public facilities, and economic development for low- and moderate-income persons. (Up to \$500K)	Reuse
SPLOST	The City is eligible for Special-purpose Local-Option Sales Tax (SPLOST) to finance buildings, including swimming facilities (Site 2), estimated to pay for itself in 10 years	Reuse
Georgia Dept. of Natural Resources	Grants will be sought under the Recreational Trails and Georgia Outdoor Stewardship Program for engineering and construction of the greenways and park spaces for Site 2. Up to \$3M.	Reuse

ii. Use of Existing Infrastructure The priority sites identified are all supported by existing infrastructure including utilities (gas, water, and electric), existing broadband, roads, and sidewalks (majority). Additionally, public transit infrastructure is extensive along Old National Highway (23 transit stops between Godby Rd and Flat Shoals Road), allowing existing and future citizens to access the area through multi-modal transportation options (MARTA, [itsmarta.com](https://www.marta.com); Accessed: October 2024). As discussed in Section 1.c.i., the City is using ARP funds to identify if infrastructure upgrades are needed for the target area and priority sites. If improvements are needed, \$3,000,000 in ARP funds are set aside for stormwater and additional broadband upgrades.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need** i. The Community’s Need for Funding The City of South Fulton is one of the newest cities in Georgia (8 years old) which incorporated to control their own future and outflow of money/support from the area. This has not been a cheap endeavor, and funds to support assessment, remediation, and reuse in the target are constrained by the target area’s low-income population (83%) and a limited tax base. City officials are working to increase tax revenues through Local Option Sales Tax (LOST), which currently accounts for 22% of the City’s budget, however, these funds are in jeopardy and may be eliminated in January 2025. The City is an area of persistent poverty (>20 percent poverty > 30 years) and a CEJST identified disadvantaged community (see 2.a.ii). The City’s limited budget is constrained by high unemployment, heavy reliance on public services, poor health outcomes, low educational attainment, and high crime, all of which are symptoms and causes for this continued plight. The TA has a grade of “F” for both violent and overall crime ([CrimeGrade.org](#)). Requested funding will assist with redevelopment efforts in a disadvantaged community, as defined by Justice40. As a new city with limited reserves, South Fulton lacks the ability to draw on other funding sources to conduct assessments prior to redevelopment and the priority sites, particularly Site 1, are a source of strain for the city, as they require extra policing. This grant will provide critical pre-development funds for assessment and reuse planning for community selected, priority sites that are otherwise unfunded.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations Sensitive populations for the target area include minorities (97%), the impoverished (83%), impoverished children (32%), youth (35%), and seniors (14%). As the airport expanded, the target area, was impacted by noise, traffic and reductions in air quality. Illegal dumping, unsafe pedestrian opportunities, and illicit drug activity caused the target area to encounter continued disinvestment for businesses and homeowners alike. This pattern continues to spiral to this day, worsening the City’s high crime rate to a dangerous statistic of 48 per one thousand residents, a crime rate higher than 94% of other communities in Georgia (Neighborhood Scout).

Demographic Data	Population	Minority Population	Poverty	Poverty of Children	Population under 18 years	Poverty of Seniors
Target Area	1,206	97%	83% low-income	32%	35%	14%
South Fulton	110,920	96.2%	5.8%	6.6%	24.1%	7.3%
Georgia	11,029,227	50.4%	13.6%	18.4%	23.0%	12.1%
United States	331,449,281	38.4%	12.5%	16.0%	21.7%	11.3%

Source: American Community Survey, 2020, 2021, 2022, 2023; EPA EJScreen Report

CEJST Identified Disadvantaged Community Thresholds Exceeded						
Target Area	Energy	Housing	Health	Legacy Pollution	Workforce Development	Transportation
Red Oak District CT 1312011306	Energy costs 95 th percentile and low income 84 th percentile	Housing cost 96 th percentile and low income 84 th percentile				Transportation Barriers 91 st percentile and low income 84 th percentile
Old National Highway District	Energy costs 92 nd percentile	Housing cost 95 th percentile	Low life expectancy 97 th	Proximity to RMP facilities	Unemployment 92 nd percentile	Traffic proximity 97 th percentile and

CT 13121010604 & CT 13121010507	and low income 81 st percentile	and low income 82 nd percentile	percentile and low income 82 nd percentile	90 th percentile and low income 82 nd percentile	and High School Education 14% <HS Diploma	low income 82 nd percentile
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As exhibited above, the target area is identified as a disadvantaged community across multiple categories, including energy, housing, health, workforce development, legacy pollution, and transportation. With a 97% minority population base, the target area is challenged by the discrimination, a stigma of danger, and disinvestment that often accompanies communities with high minority populations. The reuse strategy proposed for our target area includes projects specific to the needs of the minority population - safe, affordable, senior housing at Sites 1 & 2 and safe, accessible recreation areas at Old National Park. The City also contains high concentrations of poverty for sensitive population, including childhood poverty (32%) being 13.6% higher than the state average and senior poverty (14%) being 1.9% over the state average. Further, the target area has a high unemployment rate (92nd percentile, CEJST, 2024). Provision of senior housing options is critical in the target area. Additionally, by increasing recreational opportunities in the TA, children may have an increased space to participate in positive activities for their physical and mental health. This grant will facilitate the inventory and identification of threats, while providing for the reduction of threats through cleanup planning.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions Within the TA, sensitive populations suffer disproportionately from disease and health conditions attributed to exposure to environmental concerns such as air emissions, hazardous substances, solvents, and the vast amount of contaminants used in drug manufacturing. CEJST data places the TA in the 97th percentile for low life expectancy. Even in the County, (where health outcomes are far better than within the target area) the population exhibits higher incidence rates of several environmentally influenced health and welfare risks, including low weight births, cancer (breast and prostate), and heavy alcohol usage. Some case factors associated with low weight births include poor maternal nutrition and poor access to health care for the mother, (web.stanford.edu; Svechkina, et al., “Environmental risk factors associated with low birth weight,” 2018) all seen in the target population. EJScreen (see 2.a.ii.3(b)) places the TA in the 60th percentile for PM2.5, within a food desert, and within a medically underserved area. The target area’s Air Toxics Cancer Risk, between 95-100th percentile in the USA further displays the population’s need for significant environmental reform. The identification and subsequent removal of contaminants from the target area, **enabled by these grant funds**, would lessen these environmentally influenced risks and help to improve health outcomes in the community.

Incidence of Health Risks and Issues	Fulton County	Georgia	United States
Percentage of Low Weight Births ¹	10.9%	9.5%	8.0%
Breast Cancer Incidence Rate ² (per 100K population)	135.0	123.5	123.0
Prostate Cancer Incidence Rate ³ (per 100K population)	188.4	150.1	131.7
Lifetime Asthma Incidence Rate ³	13.2%	13.5%	12.9%
Heavy Alcohol Usage ⁴	17%	10.5%	14.6%

Health data is unavailable at the city level for South Fulton. ¹Health Resources Services Administration, 2014, ²CDC 2010, ³CDC 2011, ⁴Robert Wood Johnson Foundation, County Health Rankings, 2014

(3) Environmental Justice

a. Identification of Environmental Justice Issues

Environmental justice issues have been an unfortunate part of history and development within the Atlanta Metropolitan Area (including the target area). Racist land design practices, led to highways intentionally being cut through the minority TA, ranking the area in the 97th percentile for traffic proximity (CJEST) and 91st percentile for transportation barriers. Practices such as redlining, occurring between 1938 and 1968, heavily impacted the growth and land use patterns of Atlanta metro, particularly in the target area. The Mapping Inequality application, highlighting historic redlining maps on current aerials, display these detrimental practices extending all the way through the Airport

Selected Variables	State Percentile	USA Percentile
EJ Index for Particulate Matter 2.5	89	92
EJ Index for Ozone	92	84
EJ Index for Diesel Particulate Matter*	91	93
EJ Index for Air Toxics Cancer Risk*	91	96
EJ Index for Air Toxics Respiratory	89	96
EJ Index for Traffic Proximity	95	95
EJ Index for Lead Paint	89	82
EJ Index for Superfund Proximity	91	83
EJ Index for RMP Facility Proximity	94	95
EJ Index for Hazardous Waste	91	79
EJ Index for Underground Storage	86	89

corridor, including our target area. Field notes indicate a Level D “hazardous” area (worst grade) with heavy vehicular traffic, traversed by main railroad and highway lines, and poor repair conditions of many properties (Mapping Inequality, Accessed November 2024). These designations heavily impact current living conditions of Southern Metro Atlanta (includes target area). In fact, a 2018 study shows that 74% of neighborhoods labeled as ‘hazardous’ in the redlining maps, are low-to-moderate income and 64% are minority neighborhoods today ([Redlining in Atlanta | What it is and what impact it left | 11alive.com](#)). Disinvestment in residential properties and infrastructure and issues related to employment are some impacts worsened by redlining practices, that we see today in the City. As shown in the CEJEST table in 2.a.i (1) and the EJSCREEN table above, the target area is burdened by a disproportionate share of environmental impacts, is disadvantaged, and ranks in the upper quartile for the indices and benchmarks measured.

(3) b. Advancing Environmental Justice This grant will support the implementation of our reuse strategy to alleviate environmental injustices, including reinvesting in decaying residential areas in favor of safe and attainable residential areas and increased opportunities for business growth and employment and prioritization of infill development with increased recreational/ greenspaces. The reuse strategies address the CEJEST disadvantaged thresholds of housing, health, and legacy pollution. The City is strategically phasing development to proactively counteract potential displacement. Attainable housing opportunities at Site 2 are planned to be completed prior to Site 1 demolition. Additionally, Site 1 reuse will be phased, with Phase I of construction being affordable senior housing to minimize disturbances to the senior residents. Site 2 largely consists of vacant businesses. If a business is displaced, the City will aid in relocation to minimize displacement.

b. Community Engagement i. Project Involvement and ii. Project Roles Since its incorporation in 2017, the City has worked diligently to understand the community’s existing partnerships and potential for new partnerships to aid economic development and revitalization of the community. Historically, the City has partnered with organizations such as the Atlanta Aerotropolis Alliance, who have been able to assist and provide resources for small businesses, a primary challenge for the City’s business owners (BAE, 2019). These efforts will be continued and expanded under the execution of the City’s Brownfield Program. The table below highlights the City’s project partners that have committed to being a part of the City’s new Brownfield Committee, who will be responsible for decision making in respect to site selection, cleanup, and future reuse of brownfield sites. The Committee will aid provide input for the Site Inventory, site ranking, and setting criteria for sites to be approved for assessment and eligible activities.

Name of organization & Mission	Point of contact	Specific Project Role
Fulton County Arts and Culture - <i>Access to the arts.</i>	David Manuel; d.manuel@fcac.org	Partner organization to promote art and placemaking within the target area. They will assist in setup of a community art center at Site 3.
Aerotropolis Atlanta Alliance – <i>Catalyst for regional economic competitiveness around the Airport.</i>	Shannon James; s.james@aeroatl.org	Aerotropolis is active in community engagement in the target area and will assist in brownfield outreach activities. They will assist in placing businesses that pay livable wages within the target area to aid residents obtaining higher paying jobs.
Old National Merchants Association - <i>Create a healthy economic environment for merchants and the community.</i>	Emmanuel Rainey; [REDACTED]	As a voice for businesses located along the corridor, the Association will solicit input from local businesses and work with the City to include in reuse plans.
South Fulton HOA Alliance - <i>To develop, strengthen, and protect Georgia neighborhood associations.</i>	Marvin Arrington; admin@arringtonphillips.com	The Alliance will solicit input from target area residents and work with the City to incorporate input into reuse plans.
Habitat for Humanity - <i>Bring people together to build homes, communities and hope.</i>	Jason Meriwether; jason.meriwether@atlantahabitat.org	This nonprofit will partner with the City on home rental to ownership opportunities within the target area on Site 2.
Housing Authority of Fulton County - <i>Address the need for decent, safe, sanitary, and affordable housing.</i>	Lolita Grant; Lolita.grant@hafc.gov	The Authority will assist in affordable housing opportunities within the target area, particularly for Site 1 (senior affordable).
Red Oak Main Street Program – <i>Revitalize Red Oak by supporting residents and local business.</i>	Trevor Thornton; trevor.thornton@cityofsouthfultonga.gov	These Programs consists of local businesses within the Red Oak and Old National Highway districts (the target area) that are committed to the area’s growth and vitality. They will assist with site prioritization and reuse planning to help create a vibrant target area.
Old National Redevelopment Program – <i>Administer key economic development initiatives and provide access to resources and incentives.</i>	Teresa Parhams; teresa.parhams@cityofsouthfultonga.gov	

Old National Area Residents United – <i>Community engagement and support.</i>	Joyce Armster: [REDACTED]	Resident group that will help advertise the City’s new Brownfields Program and will aid in ranking community priorities to provide weight-based ranking criteria for future
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ii. Incorporating Community Input The City has adopted a Citizen Participation Plan to provide for and encourage citizen participation in its grant funded programs. This Plan will inform the development of a Community Involvement Plan in Q1 of the project period. South Fulton will collaborate with project partners, local residents, and other stakeholders to gather quarterly and real-time feedback on site selection, assessment activities, reuse, and proposed cleanup planning. Formal bi-annual or project specific meetings will be held at various spaces in the target area, in a hybrid format (in-person and virtually), to expand accessibility to all stakeholders. To the extent possible, meetings will “piggyback” on other community events to maximize attendance drawn from the target area and promotion of the brownfield program. Flyers and social media posts, successful methods for the community, will be used to advertise. The City’s project team will solicit community comment/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meetings will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. All deliverables (Phase I/II, SAPs, HASPs, ABCAs, Q&A docs, site eligibility forms, etc.) will be maintained online by the City and placed at a central repository within the target area for ease of access. The target area is predominantly English-speaking. Where needed, the City will make translation services available at meetings and provide translated materials.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1 – Programmatic Support
i. Project Implementation. <i>EPA-funded:</i> Grant setup and kickoff; quarterly reporting with ACRES database updates; MBE/WBE and annual financial forms; <i>Non-EPA-funded:</i> contractor procurement; Work Plan development; staff time to implement project and oversee cooperative agreement
ii. Anticipated Project Schedule: Pre-Award Contractor/QEP procurement: October 2023 (completed); Work Plan: May 2025; Quarterly, annual and programmatic reporting months 4-48; ACRES updates: month 1 – after grant closure.
iii. Task/Activity Lead(s): Artie Jones, Project Director, will be responsible for overseeing programmatic activities and compliance with the Work Plan and schedule. The QEP will complete quarterly/annual reporting and ACRES updates.
iv. Output(s): 1 kickoff meeting, 1 set of forms (site access, nomination, and prioritization forms), 16 quarterly reports, 1 close-out report, ACRES updates
Task 2 - Outreach
i. Project Implementation. <i>EPA-funded:</i> Conference attendance/travel for 6 conferences; Community Involvement Plan (CIP); brownfields brochure specific for the City; bi-annual brownfields meetings; and priority site meetings <i>Non-EPA-funded:</i> staff time to coordinate, oversee, and attend outreach events/activities; brownfield website development; supplies and printing for brochures and outreach events
ii. Anticipated Project Schedule: CIP & brochure: pre-award - month 2; Brownfield meetings bi-annual (hybrid format) throughout project period; priority site meetings in year 1.
iii. Task/Activity Lead(s): The selected QEP, directed by Mr. Jones (Director) and Ms. Davis (Coordinator), will prepare the CIP. Ms. Davis will oversee the CIP and outreach activities. She will also oversee social media updates and coordinate bi-annual and priority site meetings.
iv. Output(s): 1-2 attendee(s) at 6 brownfield conferences total (National and EPA Region IV), 1 Community Involvement Plan; 1 brownfields brochure and social media updates/outreach, 8 bi-annual brownfields meetings, and 3 priority site meetings.
Task 3 - Site Assessment
i. Project Implementation. <i>EPA-funded:</i> Generic Quality Assurance Project Plan (QAPP); 6 Phase I and 5 Phase II ESAs with Site-Specific Sampling and Analysis Plans (SAPs) and Health and Safety Plans (3 of the Phase I & II ESAs at Priority Sites); 1 Site Inventory; <i>Non-EPA-funded:</i> staff time to secure site access, review reports, and assistance with the Site Inventory and prioritization
ii. Anticipated Project Schedule: Generic QAPP: pre-award; Phase I ESAs: pre-award - month 40 (Priority Sites pre-award - month 12); Site-specific SAPs, H&S plans, & Phase II ESAs: months 6–42.
iii. Task/Activity Lead(s): All tasks will be overseen by the Brownfields Project Director, Mr. Jones. City staff will secure site access and approve assessment activities, as needed. The selected QEP will complete the Generic QAPP and site assessment activities in accordance with current ASTM standards and All Appropriate Inquiry. The QEP will complete the GIS Inventory. The Brownfields Steering Committee will prioritize sites.
iv. Output(s): 1 Generic Quality Assurance Project Plan (QAPP); 6 Phase I ESAs with site access agreements; 5 Phase II

ESAs with Site-Specific SAPs and Health and Safety Plans; 1 GIS-based Site Inventory.
Task 4 – Cleanup/ Reuse Planning
i. Project Implementation. <i>EPA-funded:</i> Analysis of Brownfields Cleanup Alternatives (ABCAs) and reuse/ concept plans; A Brownfields Reuse Roadmap (funding matrix) will be completed to assist the City in identification of additional leveraged funding opportunities. <i>Non-EPA-funded:</i> staff time to review reports, reuse plans, and Reuse Roadmap
ii. Anticipated Project Schedule: Cleanup/reuse planning: months 6-40.
iii. Task/Activity Lead(s): The QEP will compete cleanup planning. Planners and market analysts will complete the reuse plans, which include market analyses for Sites 1 & 2. Ms. Davis, Brownfield Coordinator, will oversee all work.
iv. Output(s): 4 ABCAs; 4 Brownfields Reuse Plans (Sites 1 & 2 include market analyses), and 1 Brownfields Resource Roadmap.

b. Cost Estimates The City of South Fulton will consider staff time and supplies as an in-kind leveraged resource. Lump sum contractual rates based on average rates of \$125-175/hour for a QEP or planner are used. \$247,000 (49.4%) of funds are directly associated with site-specific assessment and cleanup planning. \$153,000 (30.6%) is budgeted for site-specific reuse planning work. Together, with the addition of site-specific outreach events, **\$415,000 or 83% of grant funds are allocated to site-specific work.**

Task 1 – Programmatic Support: \$25,000 – Contractual Costs - \$25,000: 16 quarterly reports at \$1,250 each for a total of \$20,000; a closeout report at \$3,500; and \$1,500 for grant kick-off items – overview of cooperative agreement with EPA and QEP and site access, nomination, and prioritization forms. **Task 2 Outreach: \$40,400 – Travel: \$7,500** Attendance at 6 National or Regional brownfields conferences at average cost of \$1,250 (\$2,400 for 6 conference registrations, \$2,400 for 12 hotel nights, \$1,800 for flights and transportation, and \$900 per diem (\$50/day for 18 days)); **Contractual Costs - \$32,900:** Community Involvement Plan for \$5,000; creation of a brownfields brochure at \$2,900; 8 bi-annual meetings at a cost of \$10,000 (8 @ \$1,250 /meeting); and priority site meetings at \$15,000 (\$5,000 per Site). **Task 3 – Site Assessments: \$261,600 – Contractual Costs - \$261,600:** A Generic QAPP at \$4,600; 6 Phase I ESAs at \$30,000 (6 @ \$5,000); 5 Phase II ESAs for \$177,000 (5 @ avg. cost of \$35,400); 5 Site Specific SAPs and Health & Safety Plans \$20,000 (5 @ \$4,000); 1 Site Inventory at \$30,000. **Task 4 Cleanup and Reuse Planning: \$173,000 – Contractual Costs - \$173,000:** 4 ABCAs for \$20,000 (4 @ \$5,000), 4 Site Reuse/Concept Plans at a total of \$138,000 (\$50,000 each for Sites 1 & 2 which include market analyses, \$25,000 – Site 3, \$13,000 for a fourth site); 1 Brownfields Resource Roadmap for \$15,000.

Budget Table (Note: Personnel and Supply budgets are in-kind by the applicant and are therefore \$0 and not shown in table)

Budget Categories	Task 1. Programmatic Support	Task 2. Outreach	Task 3. Site Assessments	Task 4. Cleanup & Reuse Planning	Total
Travel	\$0	\$7,500	\$0	\$0	\$7,500
Contractual	\$25,000	\$32,900	\$261,600	\$173,000	\$492,500
Total (%)	\$25,000 (5%)	\$40,400 (8.1%)	\$261,600 (52.3%)	\$173,000 (34.6%)	\$500,000

c. Plan to Measure and Evaluate Environmental Progress and Results South Fulton’s Brownfields Project Director will be responsible for tracking, measuring, and evaluating progress. A spreadsheet of expected outputs and outcomes will be maintained and updated quarterly. **Anticipated outputs:** the number of sites added to the site inventory; community meetings/charrettes held; ACRES entries Phase I and II ESAs completed; ABCAs completed; and Site Reuse (Planning) Assessments created. Reports to EPA, MBE/WBE forms, and closeout reporting will also be outputs. **Anticipated outcomes:** the number of attendees at community meetings/events; sites and acres able to be marketed with an understanding of environmental conditions; sites made available for reuse; jobs created; dollars leveraged; contaminant concentrations reduced; acres of green space created; and sites redeveloped. Qualitative measures of long-term community education and overall improvement of quality of life will be monitored through surveys. Progress will be measured against meeting anticipated deadlines and community satisfaction. The Project Director will meet with the EPA Project Officer to institute appropriate countermeasures if the project milestones/schedules deviate from the approved work plan.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability **i. Organizational Capacity** and **ii. Organizational Structure.** South Fulton has sufficient capacity to carry out and manage the programmatic, administrative, and financial requirements of the proposed grant project. The City is governed by a Mayor and a seven-member City Council. Additionally, the City has two City Boards (Code Enforcement and Zoning) and two City Commissions (Planning and Historic & Cultural Landmarks). The City Manager serves the Council and the City to oversee 15 City Departments. The City’s multi-

department management approach will ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the grant project. This grant will be administered by the Economic Development Department with oversight from the Assistant City Manager and Finance Department. As noted below, the City's team of capable professionals have substantial experience with federal grant management, including the USEPA Brownfield Program. **iii. Description of Key Staff** The City's brownfield program will be managed by **Project Director Artie Jones**. Mr. Jones was previously the Economic Development Director at the City of College Park, where he managed the City's EPA Brownfields Program. During his time at College Park, Mr. Jones oversaw more than \$2,400,000 in property transactions within their Brownfield Program. He has extensive experience with real estate development, due diligence, community/stakeholder engagement, and managing grants (including three Brownfields Assessment Grants, a Multi-Purpose Grant and two Brownfields Cleanup Grants). **Brownfield Coordinator Karaey Davis** will assist Mr. Jones. Ms. Davis is the Special Projects Coordinator for the City and oversees projects with redevelopment programming. She has a master's degree in public administration. **Althea Bradley** will serve as **Financial Director**. Althea Philord-Bradley holds an MBA in Finance and has over 23 years of experience in municipal finance and has managed large federal grants, including US EPA & US HUD. Ms. Philord-Bradley is well versed in federal accounting requirements and standards and in a prior municipal position oversaw ASAP drawdowns and billing on three EPA Brownfields Grants that were successfully closed (FY21-FY19).

iv. Acquiring Additional Resources The City has internal staffing procedures in place to replace critical individuals and has procurement procedures to seek additional contracting help should it be necessary. The City procured an Environmental Consulting Firm to provide services associated with this project on October 12, 2023. If needed, additional contractors can be procured following similar procurement methods. The procurement was conducted in full compliance with federal fair and open bid requirements (2 CFR Part 200 and 2 CFR Part 1500). The City promotes strong labor and procurement practices and will work with the selected contractor in providing opportunities for local, small, and/or minority businesses to work on proposed projects, during and after the life of the grant, in a meaningful and equitable way. The City monitors usage of disadvantaged businesses and will work to provide opportunities where feasible.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Assistance Agreements The City of South Fulton currently manages a citywide grants portfolio of \$32.4 million dollars in federal, state, county, and local funding. Although the City has not previously received an EPA Brownfield Grant, it has been fortunate to receive other federally and non-federally funded resources. The following summary highlights three of the City's recent awards that are most similar and relevant (in TA) to the proposed project.

1. Purpose and Accomplishments Grant Program: Local Maintenance & Improvement Grant (LMIG) from Georgia Department of Transportation (GDOT) for **\$1,027,771.30**. **Purpose & Accomplishments:** The funding was used to resurface Demooney Road, East Stubbs Road, and Cascade Palmetto Highway. All three roadways service the target area and were in a significant state of disrepair. **Grant Program:** Blight Reduction and Neighborhood Revitalization Funding **Amount:** \$125,000 **Purpose & Accomplishments:** The Code Enforcement used these funds to shore up unmet funding needs and address widespread blight within the target area. Activities conducted under this award included: acquire lawn maintenance equipment to assist with our Code Cares Initiative (\$10,000), which assists homeowners with code violations due to an inability to complete/afford necessary yard maintenance; secure blighted and nuisance properties (boarding and fencing) within the City (\$20,000); contractor services to demolish properties deemed to be a health and safety risk to the community (\$55,000); funded the implementation of preventative measures regarding education, skip tracing, and estate planning to help prevent properties from falling into uninhabitable conditions (\$20,000); neighborhood cleanup and revitalization efforts including additional curbside pickups for large items and illegal dumpsite cleanups (\$20,000). **Grant Program:** Public Facilities, Facility Improvements, and Public Infrastructure **Amount:** \$223,126 **Purpose & Accomplishments:** The City's Public Works Department utilized these funds to provide sidewalk repair/extension and lighting within the target area: \$120,000 for sidewalk development & improvements (repairs to existing sidewalks and extension of existing sidewalks to eliminate gaps); \$103,126 for public lighting enhancements to provide pedestrian friendly access.

2. Compliance with Grant Requirements The City was in full compliance with the workplan, schedule, and terms and conditions under the above assistance agreements, and maintained a history of timely and acceptable reporting, as required by the awarding agencies. All projects were completed on time and within budget. The City achieved the expected results of each agreement within each of the respective project periods.



Threshold Criteria

1. Applicant Eligibility

- a. The City of South Fulton is an eligible entity as a city, defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Community Involvement

The City has adopted a Citizen Participation Plan to provide for and encourage citizen participation in its grant funded programs. This Plan will inform the development of a Community Involvement Plan in Q1 of the project period. South Fulton will collaborate with project partners, local residents, and other stakeholders to gather quarterly and real-time feedback on site selection, assessment activities, reuse, and proposed cleanup planning. Formal bi-annual or project specific meetings will be held at various spaces in the target area, in a hybrid format (in-person and virtually), to allow for wider accessibility to residents. To the extent possible, meetings will “piggyback” on other community events to maximize attendance drawn from the target area and promotion of the brownfield program. Flyers and social media posts will be used to advertise. The City’s project team will solicit community comments/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meetings will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. All deliverables (Phase I/II, QAPPs, HASPs, ABCAs, Q&A docs, site eligibility forms, etc.) will be maintained online by the City and placed at a central repository within the target area for ease of access. The target area is predominantly English-speaking. Should the need arise, the City will make translation services available at meetings and provide translated materials.

3. Expenditure of Existing Grant Funds

The City of South Fulton affirms that it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. Contractors and Named Subrecipients

Contractors The City published a Request for Proposals (RFP) #23-37 for Environmental Consulting Firms to provide dual procurement services associated with this project on July 26, 2023. The solicitation was posted on the procurement page of the City’s website and distributed through bidnet direct. The City provided a pre-bid conference, an open question period for interested parties and initially had a 19-day response period (See *RFP #23-37 Environmental Consultant Firm*), but an addendum was issued to extend the response period to 41-days (see *RFP #23-37 Addendum – Environmental Consultants Firms*), with proposals due on September 5, 2023. Three (3) responses were received. The City selected the highest ranked consultant, Stantec Inc., who incorporated the inclusion of local and disadvantaged firms on October 12, 2023. The contract will be executed in early 2025. A copy of the solicitation documents and the draft contract, included in the RFQ as Attachment C (page 57), are provided.



**The City of South Fulton, Georgia
FY2025 US EPA Brownfields Assessment Grant**

Threshold Criteria

If needed, additional contractors can be procured following similar procurement methods. The procurement was conducted in full compliance with federal fair and open bid requirements (2 CFR Part 200 and 2 CFR Part 1500).

Named Subrecipients Not applicable. The City has not named any subrecipients in this application for Brownfields Grant funding.