

RE: FY2025 EPA Brownfields Assessment Coalition Grant Application

The Appalachian Council of Governments is pleased to submit this proposal for FY2025 Brownfields Assessment Coalition Grant funding. Below we provide the information requested.

1. Applicant Identification:

Appalachian Council of Governments
30 Century Circle
Greenville, South Carolina 29607

2. Website URL:

- **Appalachian Council of Governments (<https://www.scacog.org/>)**
 - **Cherokee County (<https://cherokeecountysc.gov/>)**
 - **Oconee County (<https://oconeesc.com/>)**
 - **Pickens County (<https://www.co.pickens.sc.us/>)**
 - **Spartanburg County (<https://www.spartanburgcounty.org/>)**

3. Funding Requested:

- (a) Assessment Grant Type: Assessment Coalition
- (b) Federal Funds Requested: \$1,200,000

4. Location:

Counties: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
State: South Carolina

5. Coalition Members' Target Areas and Priority Site Information:

- **Appalachian Council of Government:**
 - Jackson Mill and mill village
 - Census Tract: 45007011700
 - 1000 West Front Street, Iva, SC 29655

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- Cherokee County:
 - Robinson Warehouses and surrounding downtown area
 - Census Tract: 45021970502
 - 126 East Robinson Street, Gaffney, SC 29340

 - Oconee County:
 - Chicopee Mill and mill village
 - Census Tract: 45073030401
 - 200 South John Street, Walhalla, SC 29691

 - Pickens County:
 - Brunswick Worsted Mills and mill village
 - Census Tract: 45077010402
 - Site Name – 145 City View Circle, Pickens, SC 29671

 - Spartanburg County:
 - Pacolet Mills #3 and surrounding mill village
 - Census Tract: 45083023900
 - 263 Walker Street, Pacolet, SC 29372

Note: A one-page map depicting the target areas and priority sites is attached.

6. Contacts:

(a) Project Director:

Name: Jill Charlton, Senior Project Manager

Phone: (864) 241-4625 | Email: jcharlton@scacog.org

Mailing Address: 30 Century Circle, Greenville, SC 29607

(b) Chief Executive/Highest Ranking Elected Official:

Name: Steven R. Pelissier, Executive Director

Phone: (864) 242-9733 | Email: pelissier@scacog.org

Mailing Address: 30 Century Circle, Greenville, SC 29607

7. Population:

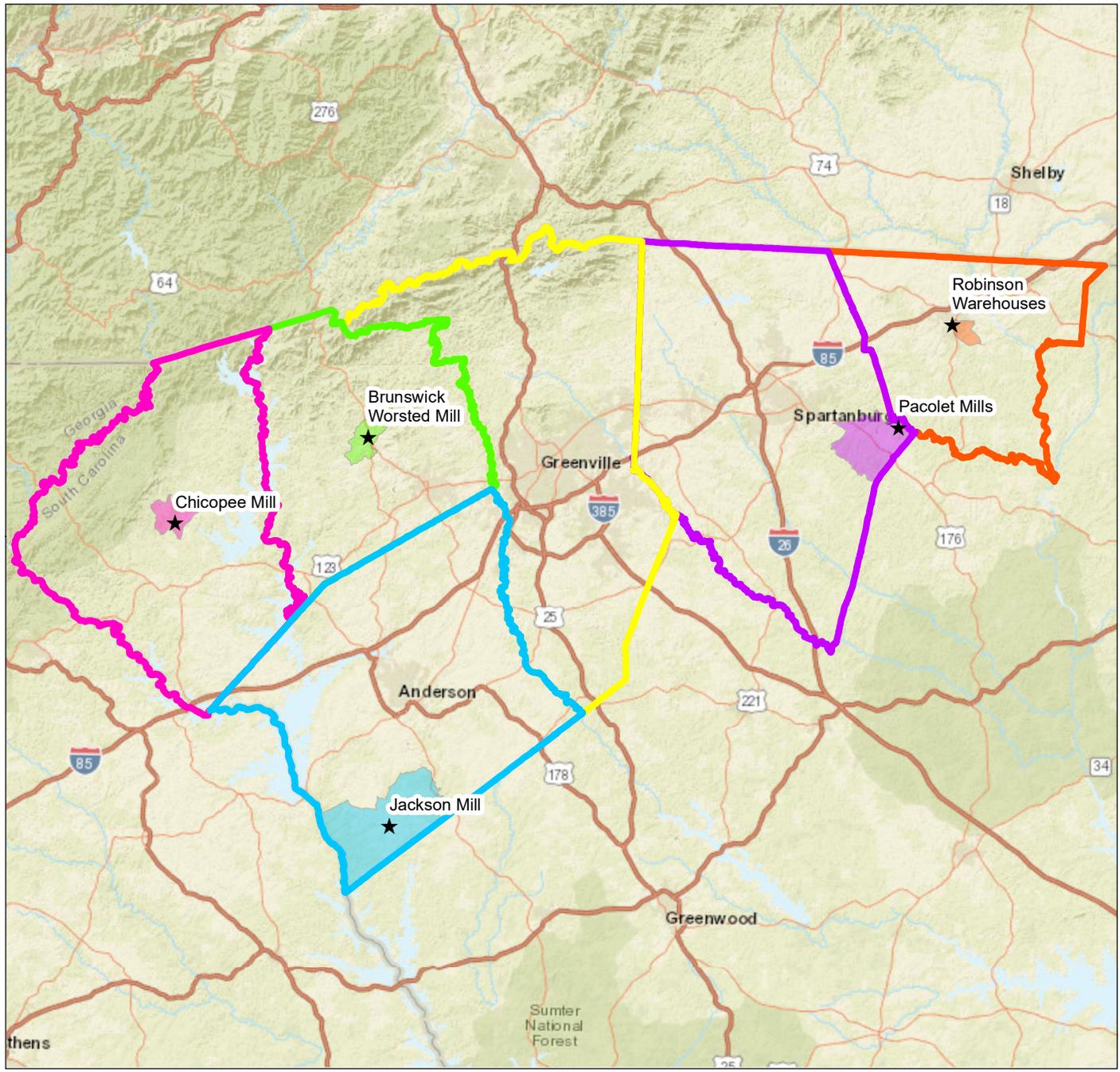
- Population of Target Areas:
 - Town of Pacolet: 1,970
 - Town of Iva: 1,030
 - City of Walhalla: 4,102
 - City of Pickens: 3,374
 - City of Gaffney: 12,651

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less.	1-2
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2
The priority site(s) is in a federally designated flood plain.	4
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.	
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 sites within the target areas.	
The target area(s) is impacted by a coal-fired power plant has recently closed (2014 or later) or is closing.	

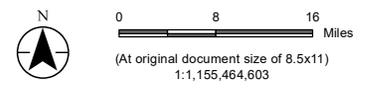
9. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the South Carolina Department of Environmental Services is attached.

10. Releasing Copies of Applications: not applicable



Title
Appalachian Council of Governments Coalition

Project
 Appalachian Council of Governments
 FY2025 EPA Brownfields Coalition
 Grant Application



- Legend**
- ★ Priority Sites
 - Cherokee County
 - Greenville County
 - Pickens County
 - Oconee County
 - Spartanburg County
 - Anderson County
 - Census Tract 45007011700
 - Census Tract 45021970502
 - Census Tract 45073030401
 - Census Tract 45077010402
 - Census Tract 45083023900





SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

Julie E. Blalock, Chief
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

November 1, 2024

Sara S. Janovitz, Manager
Brownfields and Land Revitalization
United States Environmental Protection Agency
61 Forsyth Street S.W. 10th Floor
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Assessment Coalition Grant
Appalachian Council of Governments, South Carolina

Dear Ms. Janovitz:

The South Carolina Department of Environmental Services, the State's environmental authority, acknowledges and fully supports the Appalachian Council of Governments' application for a Brownfields Assessment Coalition Grant. The Coalition comprises the Counties of Anderson, Cherokee, Greenville, Oconee, Pickens, and Spartanburg.

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

Sincerely,

A handwritten signature in blue ink that reads "Julie E. Blalock".

Julie E. Blalock, Chief
Bureau of Land and Waste Management

cc: Elizabeth Basil, BEHS
Robert Hodges, Manager, Brownfields Program

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Coalition Members, Target Area, & Brownfields:

1.a.i. Coalition Members:

The Appalachian Regional Council of Governments (ACOG), founded in 1965 as a regional planning organization for the six-county Appalachian region of South Carolina, will serve as the lead coalition member. Non-lead coalition members include Cherokee County (pop. 56,200), Oconee County (pop. 78,755), Pickens County (pop. 131,106), and Spartanburg County (pop. 330,119). With their relatively small populations and limited staff, the counties lack the capacity and resources to pursue large grants and instead rely upon the ACOG for grant expertise and project management. None of the members currently have access to brownfield grant resources.

1.a.ii. Overview of Brownfield Challenges & Description of Target Areas:

The ACOG serves a six-county region, encompassing Anderson, Cherokee, Greenville, Oconee, Pickens, and Spartanburg Counties, collectively referred to as the “Upstate” of SC. Although the Upstate includes some larger urban areas such as the City of Greenville, this region is largely a collection of small towns and rural areas, spread across nearly 4,000 square miles. These smaller communities were predominantly incorporated as mill villages, developed during southeastern textile boom of the late 1800s. During this time, mill companies in the northeastern US relocated to the south to take advantage of lower land costs, and by the 1990s, many of these textile operations migrated again, overseas, in effort to secure lower production and wage costs. This economic shift immensely affected mill communities, removing in many cases, the largest single employer of a town or county, and left their hopes of economic prosperity in disarray.

Through input and participation with the community and non-lead members, this initiative will initially focus on five of these communities as target areas in each coalition member’s jurisdiction: the City of Gaffney (Cherokee County), City of Walhalla (Oconee County), City of Pickens (Pickens County), Town of Pacolet (Spartanburg County), and the Town of Iva (ACOG). Each of these mill communities have experienced socioeconomic and environmental recessions of the textile industry. Major industry closures in these communities, including the Gaffney Manufacturing Company & Hamrick Mill (Gaffney); Chicopee Cotton Mill (Walhalla); the Brunswick Worsted mills, Alice Manufacturing plant, Hagood mill, and Easley mill (Pickens); Pacolet Mill (Pacolet); and the Jackson mill in Iva, have collectively devastated these small, rural communities. The mill closures not only resulted in job losses, but also left large industrial buildings to deteriorate within the centers of their community, along with additional support businesses and warehouses, their services no longer needed by the mills and former mill workers.

However, growth in regional ecotourism and collegiate education have attracted visitors and new residents to these communities. This has also presented new challenges such as the need for safe and affordable housing, increased job opportunities, and enhanced community livability – convenient access to parks, greenspaces, retail, and medical facilities. Challenges to these shifts include significantly increased housing costs, from a 14.2% increase in 2021, to a 54% increase in 2022. More communities across the region now struggle with ensuring a safe and affordable housing supply with a diversity of housing choices especially for families and older adults. Through revitalization of the former mill properties and their villages, these blighted sites now offer an opportunity to help solve the region’s growing problems. Through infill of these sites, communities can reduce local blight and bring new housing and businesses options into communities most affected. This grant will support each coalition members’ efforts toward revitalization through assessment, community engagement, cleanup planning, and reuse planning for catalyst brownfield sites within their communities.

1.a.iii. Description of the Priority Brownfield Sites:

Working in conjunction with our community stakeholders, the ACOG has prioritized five sites in the Target Areas based upon their potential for redevelopment, their impact (environmental, blight, economic) to the community, and their locations in disadvantaged communities as identified by CEJST. Initial focus will be on these priority sites, but the ACOG will continue to identify and prioritize other sites within our 6-county region as funding allows.

The City of Gaffney (pop. 12,651), located in Cherokee County (non-lead member), was built on the foundations of the textile industry. During the late 1800s, creation of the Gaffney Manufacturing

Company (GMC) and Hamrick Mills began to employ much of the local workforce, and eventually, drove the development of downtown Gaffney, including the courthouse and central town structures by 1914. Many of the facilities supporting these mills (warehouses, storefronts, retail shops), including the **Robinson Warehouses** at 126 E. Robinson Street (Census Tract [CT] 45021970502), began to deteriorate and become underutilized after closure of the mill. This property, encompassing two contiguous parcels totaling 0.19-acres, features a former warehouse industrial space now blighted in the core of downtown. The site is positioned along a prominent road in central Gaffney with strong redevelopment potential. Based on its observed exterior condition, age of construction, and historically industrial setting, contaminants of concern include heavy metals, Polychlorinated biphenyls (PCBs), Volatile Organic Compounds (VOCs), Semi-VOCs (SVOCs), asbestos-containing materials (ACMs), and lead-based paint (LBP). The City of Gaffney envisions the priority site and surrounding storefronts as potential catalysts for renewed urban growth and economic development.

Oconee County (non-lead member) selected the former **Chicopee Mill** at 200 S John St (CT 45073030401) in the City of Walhalla (pop. 4,102) as a priority site due to its local cultural significance, deterioration, and redevelopment potential. The former mill rests within downtown Walhalla, just 2 blocks from its town-center, at the corner of E. South Broad Street and S. John Street. In the 1930s, the Chicopee Manufacturing Company, originally a subsidiary of Johnson & Johnson, established the mill – focusing on the production of non-woven fabrics and disposable products - gauze, bandages, and other medical supplies. A mill village of about 60 homes is directly south, east, and west of the site. When the mill closed in 1978, over 300 workers, a significant portion of the town's then population, were left unemployed, placing Walhalla into economic distress. Now, only a portion of the mill structure remains and continues to deteriorate. The priority site includes a 2,220 square-foot (sqft) warehouse, concrete parking, a small pond, perimeter fencing, and partial foundations of former mill structures, encompassing 11.27 acres. Contaminants of concern include heavy metals, PCBs, VOCs, SVOCs, per- and polyfluoroalkyl substances (PFAS), ACM, and LBP. The City of Walhalla prioritized this site due to its redevelopment potential and strategic downtown location.

The City of Pickens (pop. 3,374), located in Pickens County (non-lead member), flourished as the railroad and textile epicenter for the county in the late 1800s – early 1900s. Multiple textile mills were constructed in and around Pickens during this time, including the Arial mill, Glenwood mill, and the **Brunswick Worsted Mill**. The City prioritized the former **Brunswick Worsted Mill** site (CT 45077010402), due to its proximity to the city center, dilapidated state, and ongoing developer interest. This 19.1-acre parcel, located at 145 City View Circle, still contains the 155,087 sqft former mill structure, associated parking lot, and greenspace. The property is currently enrolled in the voluntary cleanup program (VCP) with South Carolina (NRP-22-7671), in which stakeholders have identified onsite soil contamination and expressed interested in redevelopment plans for multi-family housing. Contaminants of concern include heavy metals, PCBs, VOCs, SVOCs, PFAS, ACM, and LBP. Given the identified concerns, the City intends to use grant funding to complete remaining additional assessment needed under the VCP, and for cleanup and reuse planning initiatives in support of developer interest.

The **Pacolet Mills** community in the Town of Pacolet (pop. 1,970), nestled within Spartanburg County (non-lead member), was founded on the backbone of late 1800s textile boom. The mill village grew around the textile plant established by the Pacolet Manufacturing Company in 1882, and quickly became one of the region's largest and most innovative textile producers. The Company built a total of four mills along the banks of the Pacolet River, including the priority site **Pacolet Mill #3** (CT 45083023900), and at its peak in the early 1900s employed over 2,300 workers. After significant damage to these mills following a historic flood of the Pacolet River, and the steady decline of the US textile industry, Pacolet Mills closed in 1983. Since then, the community has suffered, the mill structures have been demolished, and the sites have remained a vacant eyesore. Contrasting with the blighted remnants of former operations, such as foundations and concrete slabs along the riverfront and a defunct hydroelectric dam, the mill village housing many of the Town's residents still stands proud, and the community sports a beautiful entry to the Pacolet riverbend. Today, while the mills are no longer operational, the community of Pacolet Mills remains a testament to the region's textile heritage, and the remnants of the mills stand as historic markers of this once-thriving industry. As such, the priority site includes the remnants of the mill structures within 258-acres with waterfront infrastructure and foundations. Contaminants of concern include heavy metals, PCBs, VOCs, SVOCs, and PFAS. The Town of Pacolet and its local

community groups prioritized the site based on its impact on the adjacent mill village and town hall, prominent waterfront position, parcel footprint, and the site's continuing redevelopment potential.

The ACOG (lead member) has selected the former **Jackson Mill** located at 1000 W Front St. (CT 45007011700) in the Town of Iva (pop. 1,030). This 14.6-acre priority site was selected due to its prominent location in downtown Iva, deteriorated condition, local historical significance, and redevelopment potential. The **Jackson Mill** was constructed in 1905 and continually served as its major local employer as a manufacturer of cotton fabrics and yarn. During the 1940s and 1950s, the mill employed over 1,500 workers. Later in the mid-late 1900s, much of the mill was demolished, with the exception of a single small vacant warehouse, and remnant concrete slabs. The former mill is encircled with a mill village – nearly 100 homes built in the early 1900s. Many of these mill houses are still occupied today. According to town officials, developer interest exists and includes servicing a local need for increased healthcare facilities. ACOG and the Town of Iva prioritized the site based on its impact on the adjacent mill village and the site's potential for redevelopment based on developer interest. Contaminants of concern include heavy metals, PCBs, VOCs, SVOCs, PFAS, ACM, and LBP.

1.a.iv. Identifying Additional Sites:

Working with our coalition members and community stakeholders, ACOG has developed a preliminary inventory of over 20 additional sites across the six-county region. The project team will establish a Steering Committee (see Sec. 2b) to identify and prioritize additional sites. ACOG will continue to prioritize sites in the underserved areas of the region and disadvantaged census tracts, as defined CEJST. Sites will be prioritized based on community need (as measured by census data, EPA's CEJST and EJScreen mapping tools); the environmental, economic, and social impact of the site on the surrounding community; and redevelopment potential.

1.b. Revitalization of the Target Areas:

1.b.i. Reuse Strategy & Alignment with Revitalization Plans:

For the ACOG region as a whole to prosper, economic development strategies at both the regional and community levels are essential. Priority one in ACOG's 2023-2027 Comprehensive Economic Development Strategy (CEDS) is to foster economic prosperity by supporting the growth of regional clusters and encouraging local asset-based economic development. As such, ACOG continues to work with communities in our six-county region to develop comprehensive and targeted plans for revitalization. ACOG works in close collaboration with our community partners towards building a competitive economy and promoting healthy, livable communities that preserve our residents' quality of life. During our recent outreach efforts, improving economic development capacity by increasing the quality and quantity of development-ready sites and buildings through adaptive reuse of brownfield sites ranked as a high priority. New affordable housing, commercial and medical properties, and mixed-use developments will be needed to address the needs of current and future residents in the disadvantaged communities surrounding the Target Area sites. The following are the reuse plans for our priority sites:

Robinson Warehouses, Gaffney – In their 2015-2025 Comprehensive Plan, the City of Gaffney identified limited shopping and employment opportunities in the downtown area as a particular challenge facing the community. The plan summarizes its intent to achieve "smart growth", recommending the renovation or purge of deteriorating and substandard buildings, as well as the inclusion of commercial development within walking distance of residences, particularly near areas of dense populations, such as the former mill village in the downtown area. Proposed redevelopment of this priority site includes a reuse for retail-commercial, given its location on a downtown corridor and its proximity to nearby residences (one block). Grant funds will be used to assess potential environmental hazards associated with its prior use while quantifying issues and costs for potential developers.

Chicopee Mill, Walhalla – In a 2015 Master Plan for the community, the City of Walhalla envisions the reuse of vacant space, such as the mill site, adjacent to the mill village, as a key opportunity for additional residential development to offer affordable, energy-efficient housing for local contractors, ecotourists, and residents. Additionally, the Walhalla Downtown Development Corporation (a community-based redevelopment group) developed a downtown business district map, focusing on the redevelopment of central Walhalla, including the redevelopment of E South Broad Street and S Ann Street, adjacent to the Chicopee Mill property. This grant will be used to assess the priority mill property

in an effort to serve the community's growing needs for safe/affordable housing and urban growth as detailed in the Master Plan.

Brunswick Worsteds Mills, Pickens – According to the City of Pickens administrator, conversations between private developers and the city have led to a potential multi-family redevelopment – serving one of many community needs. After enrolling in the SC Voluntary Cleanup Program, preliminary assessment data has identified numerous environmental hazards, potentially challenging redevelopment. Grant funds will be used to assess and delineate these hazards and establish cleanup planning/mitigation strategies with the aid of the SC Brownfields program.

Pacolet Mill #3, Pacolet – A Comprehensive Plan for Pacolet, led by the Town Council in the summer of 2024, prioritizes the redevelopment of the former mill parcels (Pacolet Milliken Properties). This plan specifically outlines a multi-million-dollar comprehensive effort to revitalize the riverfront portions of the former mill, including the redevelopment of a public park, amphitheater space, river access, and zip-line course, to establish the town as a vibrant cultural and outdoor recreation destination. The plan also identifies the goal to link the former mill's extensive footprint and greenspaces to nearby multi-use trails. The proposed recreational uses align with the appropriate reuses of the large portions of the site within the federally designated flood plain. This grant will be used to assess potential onsite contamination and subsequent challenges it may pose for redevelopment, including redevelopment planning to build upon the plan's vision for the priority site and riverfront amenities.

Jackson Mill, Iva – The Town of Iva's Comprehensive Plan identifies the need for additional housing stock and redevelopment of job-supplying commercial/industrial opportunities. The former Jackson Mill priority site is particularly suitable for commercial redevelopment projects given its proximity to the town-center and surrounding residential community. According to town officials, developer interest in the priority site includes the development of a healthcare facility, serving the surrounding community. Given the lack of nearby healthcare providers – the nearest being over 16 miles away, in the City of Anderson, the potential for this priority site to be redeveloped as a healthcare facility would benefit the community, spur local jobs, and attract new residents. Grant funds will be used to assess potential environmental hazards and develop a site reuse plan for a potential medical campus.

1.b.ii. Outcomes & Benefits of Reuse Strategy:

The redevelopment of the priority properties has the potential to significantly spur growth within the targeted communities, by meeting the critical need for new, energy-efficient affordable housing, attracting public and private investment, providing a healthy environment for its residents, creating jobs, increasing property values, and bringing new businesses, jobs, and new residents to the Target Areas. The **Robinson Warehouses** site will enhance blighted areas by mitigating environmental hazards and renovating blighted structures for new retail/commercial uses that will create jobs and generate taxes for the community. Multi-family residential redevelopments at the former **Chicopee Mill** in Walhalla and the **Brunswick Worsteds Mill** in Pickens will provide energy-efficient, affordable housing, stimulate private investment and jobs in the communities, as well as reduce the sprawl and the need to extend infrastructure to outlying areas. The **Chicopee Mill** site can potentially accommodate 40 townhomes, attracting about \$20 million in resources and investment to the community. At the **Pacolet Mill #3** site, the proposed redevelopment will significantly improve climate adaptation and mitigation capacity by creating greenspaces that properly manage the flood zone of the Pacolet River, which has experienced catastrophic floods. Climate adaptation and resiliency strategies will be included in the reuse plan developed for the site, which will include nature-based solutions to reduce and mitigate future flood waters. At the **Jackson Mill** site, the creation of a medical campus will increase local employment, bring in high-quality jobs back into the community, and provide much-needed healthcare services to local residents. Energy efficient building design and climate mitigation measures will be incorporated into the reuse plan for the campus.

1.c. Strategy for Leveraging Resources:

1.c.i. Resources Needed for Site Reuse:

ACOG and our coalition partners are eligible for a variety of state and federal grants and are motivated to leverage any additional funding streams, required for potential further assessment, cleanup, and eventual reuse of priority sites. Completing environmental assessments, cleanup planning, and reuse planning with this brownfield funding will enable the ACOG to assist the coalition members

and the Target Areas with developing a funding strategy for redevelopment and unlock grant opportunities (e.g., HUD funding requires environmental assessment prior to application). If additional funds are needed for site assessment, the Target Areas may request funds from the SC Department of Environmental Services (SC DES), Brownfield Environmental Site Testing Program (SC BEST), or their EPA Brownfields Assessment Grant for States and Tribes. For site cleanup activities, coalition members may apply for an EPA Brownfields Cleanup grant or a grant/loan from the SC DES EPA Brownfield Cleanup Revolving Loan Fund (BCRLF). For private developers, South Carolina also offers Voluntary Cleanup Activities Tax Credits for cleanup costs up to \$50,000 per year to entities signing Voluntary Cleanup Contracts (VCC). Also, developers may receive a tax credit for each new full-time job created, exemption from ad valorem taxes, and other benefits pending their meeting of certain requirements. All removal and remedial actions on VCC sites – public and private – are also eligible for funding from the SC BCRLF. Private developers can also leverage the SC Abandoned Buildings Revitalization Act’s \$250,000 tax credit for buildings abandoned for 5 years or more in unincorporated areas of a county to encourage infrastructure reuse. ACOG and our coalition partners will pursue these and all other funding sources needed to facilitate the cleanup and redevelopment of the priority sites.

1.c.ii. Use of Existing Infrastructure:

As former industrial/commercial properties, and those already in municipally served, urban areas the priority sites possess the infrastructure required to serve redevelopment needs. These include sewer, electrical, and water infrastructure with redevelopment capacity. In addition, developers may leverage historical architecture and components of the Chicopee Mill, Brunswick Worsted Mill, and the Pacolet Mill priority sites. No additional infrastructure needs are anticipated.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a. Community Need:

2.a.i. The Community’s Need for Funding:

Our coalition members, and more specifically our Target Area cities and towns, have small populations – City of Gaffney: 12,651; City of Walhalla: 4,102; City of Pickens: 3,374; Town of Pacolet: 1,970; and the Town of Iva: 1,030; and each have significantly lower Median Household Incomes and Per Capita Incomes when compared to SC and the US, as the following table shows. These communities, due to the regional reduction of textile and other industrial migrations overseas, are disproportionately affected and economically disadvantaged in terms of comparative income, unemployment, poverty, and property value. Each priority site is located in a disadvantaged census tract as identified by CEJST. Due to their **low income and small populations**, the Target Area communities do not have the ability to draw on other initial sources of funding to carry out environmental assessment, remediation, and the subsequent reuse of the priority sites.

Demographic Data (ACS 2022 5-year estimates)	City of Gaffney	City of Walhalla	City of Pickens	Town of Pacolet	Town of Iva	South Carolina	US
Total Population	12,651	4,102	3,374	1,970	1,030	5,142,750	331,097,593
% Minority	57.8	31.7	27.5	23.9	8.0	35.0	34.1
% Under 5	7.4	2.1	10.3	4.5	1.7	5.9	5.7
% Elderly (>65)	16.1	21.9	12.7	25.5	22.1	18.2	16.5
Median Household Income	\$38,059	\$40,176	\$43,452	\$44,894	\$22,760	\$63,623	\$75,149
Per Capita Income	\$21,682	\$18,566	\$22,948	\$26,024	\$18,157	\$36,072	\$41,261
% Unemployment	9.4	9.3	1.5	7.0	17.0	5.2	5.3
% All In Poverty	23.1	33.5	18.0	15.2	33.9	14.4	12.5
% Families with Children in Poverty	29.0	33.1	21.4	21.1	33.3	16.5	13.6
% with SNAP Benefits	22.0	30.5	23.7	9.4	18.1	10.5	11.5
Median Home Value	\$120,800	\$158,700	\$191,100	\$91,000	\$103,300	\$216,200	\$281,900

2.a.ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations:

The Target Areas’ sensitive populations include low-income, elderly residents, and impoverished families with children due to higher unemployment levels (see above table). These sensitive populations are more susceptible to the risks of exposure to environmental contamination, including the heavy

metals, PCBs, VOCs, SVOCs, PFAS, ACM, and LBP contaminants suspected on the priority sites. Furthermore, given the lack of controlled access (fenced perimeter), and lack of known environmental assessment data at these target properties, surface soils and waters may be impacted and may pose as an immediate potential threat to trespassers. Existing mill structures are present at the **Chicopee Mill** (Walhalla), **Jackson Mill** (Iva), and **Brunswick Worsted Mill** (Pickens) that may also contain hazardous building materials (ACM/LBP). Additional exposure pathways include potential groundwater & stormwater contamination at Target Areas that may have migrated to adjacent/nearby properties. Assessments procured through this plan will allow each community to identify these potential health threats, associated risks, and subsequent mitigations plans.

The **Robinson Warehouses** (Gaffney) site is currently boarded-up, with the deteriorated former structures dominating the parcel footprints in the downtown area. Concerns for future exposure to potentially contaminated site soils and vapor migration, in addition to potential onsite ACM/LBP materials, currently inhibit redevelopment. The reuse of this structure will aid in the downtown revitalization of Gaffney, creating new jobs, enhanced downtown vibrancy. In the **Chicopee Mill** Target Area, the facility is predominantly enclosed with a chain-linked fence, however, access is not completely restricted, with opened/broken entrances, allowing potential trespasser risks. Given the lack of assessment data gathered, potential surface soils, groundwater, and surface water (onsite pond) from former mill operations may be affecting nearby neighbors. In the **Pacolet Mill #3** Target Area, nearby residents in the mill village and trespassers/recreational users are at risk of exposure to surface soils and waters from the unsecured mill properties and former operations. At the **Jackson Mill** Target Area, its unrestricted access and remnant structure(s) may pose a risk to local trespassers and recreators for interactions with the onsite pond (potentially used during mill operations), surface soils, and potentially hazardous building debris (ACM/LBP). The ultimate goal of assessing these priority sites is to identify environmental risks and mitigation strategies to protect the public from potential environmental exposures. The eventual reuse of the priority sites will create new affordable housing, additional recreational amenities, retail and commercial spaces, and a medical campus in the respective communities. Thus, the project will ultimately result in increased quality of life for the Target Areas and their sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:

As mill towns, many residents have lived and worked in the Target Area communities for decades, resulting in the increased potential for chronic long-term exposure to potential contaminants at these brownfields sites. These contaminants may be present within site soils and groundwater (ingestion risks), airborne – asbestos fibers or vapor-phase VOCs (inhalation), or via direct contact in surface soils and water (dermal). As following table demonstrates, the result is an increased incidence of cancers and a higher mortality rate from cancers within the counties (data is unavailable at the town/city level).

National Cancer Institute State Cancer Profiles ^a Age-Adjusted Incidence Rate cases per 100,000	Cherokee County (Gaffney)	Oconee County (Walhalla)	Pickens County (Pickens)	Spartanburg County (Pacolet)	Anderson County (Iva)	South Carolina	U.S.
Bladder Cancer	20.4	20.0	19.8	16.4	21.8	16.9	18.8
Colon & Rectum Cancers	46.0	37.7	36.5	35.7	41.8	35.6	36.4
Kidney & Renal Pelvis Cancer	16.0	22.0	19.5	18.3	18.8	17.5	17.3
Lung Cancers	76.4	61.3	60.4	62.2	65.6	58.4	53.1
Liver & Bile Duct Cancers	10.0	9.0	8.0	10.0	8.9	7.9	8.6
Pancreas Cancer	10.8	11.8	13.1	10.8	14.7	13.7	13.5
Stomach Cancer	6.9	5.7	4.1	7.5	5.0	6.1	6.3
All Cancer Sites	477.4	454.8	458.6	448.2	445.1	435.0	444.4
Age-Adjusted Mortality Rate (All Cancers)	179.3	146.4	150.9	161.5	156.8	156.8	146.0

In all five respective counties of the Target Areas, the occurrence of lung cancer and liver & bile duct cancers as well as the overall incidence of all cancers and the age-adjusted mortality rate from cancers were above state or federal rates. Similarly, elevated occurrences of bladder cancers, colon cancers, and

^a National Cancer Institute. <https://statecancerprofiles.cancer.gov/index.html>. Accessed October 2024.

stomach cancer cases are found in most of the counties. These cancers have been historically linked to chronic exposure of a variety of contaminants, many of which have been commonly used during textile plant operations (identified as environmental concerns at the target sites Sec. 1.a.iii) – including heavy metals (lung, colon, kidney cancers), PFAS (kidney cancer), chlorinated solvents, VOCs, and SVOCs (bladder and liver cancers), ACM exposure (lung cancer), LBP (lung and bladder cancers).^b

Exposure to airborne particulates, such as wind-blown contaminated soils and ACM (as found on the target sites), may contribute to and/or complicate asthma and other respiratory diseases. Asthma occurrences in most of the Target Areas are elevated compared to state rates, as shown in the following table.

Target Area:	Gaffney	Walhalla	Pickens	Pacolet	Iva	South Carolina
Asthma, % of Individuals ^c	11.2%	12.5%	10.0%	11.2%	11.9%	11.1%

(3) Environmental Justice:

(3.a) Identification of Environmental Justice Issues:

Over the last century, the Target Area communities have disproportionately shared the negative environmental consequences of textile operations. These communities, mill villages, and neighborhoods each lie adjacent to or nearby the historic mill operations, with many residences even sharing a property boundary. Industry regulations of the mid-20th century are a small fraction of today’s regulatory system, as were its environmental protections to both workers and the surrounding community – commonly faced with hazardous material dumping, releases to the air, stormwater releases, and impacts to soils and groundwater, as well as other receptor risks outlined in previous sections. As those with the means migrated away from the mill-centric communities, the remaining low-income and impoverished residents bore the brunt of remnant environmental impacts and face the negative environmental legacy and blight.

Each priority site is located within census tracts identified as disadvantaged in CEJST, which provides numerous metrics verifying economic, environmental, and human health disadvantages. CEJST shows 21%-28% of the population in the Gaffney, Walhalla, and Iva communities obtained less than a high school education. CEJST data suggests community-wide economic hardships in the Target Areas are far greater than the state or nation. In terms of population percentages living in poverty, Wahalla (30.2%), Pacolet (14.9%), and Gaffney (62.2%) were particularly burdened. The Chicopee Mill census tract is within the 88% low-income percentile; the Jackson Mill (70%), Robinson Warehouses (94%), Pacolet Mill (65%), and Brunswick Worsted Mill (84%), were also identified with elevated low-income percentiles.^d In addition, in the City of Gaffney – the priority site census tract, EJ Screen Mapper data reveals the population is in the 91st (SC) and 98th (US) percentile for EJ Indices for PM 2.5, Ozone, Diesel PM, Toxic releases to air, lead paint, RMP Facility proximity, USTs, and wastewater discharges. Populations in each member county were also found to be within the 90th – 91st percentile for drinking water non-compliance.^e

(3.b) Advancing Environmental Justice:

Through this project, ACOG will help educate local governments, communities, and stakeholder on EJ issues, particularly during the site reuse planning stages. Since the priority sites are currently vacant, no direct displacement will result from this project. However, we will consider and plan for the effect the increased housing, commercial investment, and new public amenities will have on the adjacent mill villages and develop strategies to mitigate the unintended displacement of existing community residents and businesses. The reuse plans will explore options for resources to further strengthen those neighborhoods, such as seeking funding to assist existing homeowners repair and renovate their homes. More directly, site assessments and cleanup planning under this project will identify potential contaminants, migration pathways, and containment measures to help prevent offsite transport and exposure to contaminants, thus relieving one of the burdens on EJ communities.

^b <https://dceg.cancer.gov/>, Accessed October 2024.
^c <http://www.city-data.com>. Accessed October 2024.
^d <https://screeningtool.geoplatform.gov/>. Accessed October 2024.
^e <https://ejscreen.epa.gov/mapper/>. Accessed October 2024.

2.b. Community Engagement:

2.b.i. Project Involvement and ii. Project Roles:

ACOG staff will meet at least quarterly with a Steering Committee to provide project updates and solicit input and guidance on project priorities and goals. The Committee will be comprised of the non-lead coalition members and stakeholders from the communities and the region. They will help identify and prioritize additional sites and Target Areas, and, most importantly, identify, leverage, secure, and implement other resources and funding in the Target Areas. In the Target Areas, ACOG will host local community workshops to engage residents and stakeholders and provide the opportunity for them to form a local committee to offer input on project decisions, outputs, and future plans. We will conduct outreach through community-based organizations, such as but not limited to (due to lack of space) those listed in the following table, to engage with underserved populations.

Organization	Contact	Mission Statement	Project Role
Know2Cherokee	Teresa Spires info@know2cherokee.com 508 W. Buford St., Gaffney SC	Bring together individuals and organizations to promote a growth mindset regarding education, economic development, and public health in Cherokee County.	Host community meetings in the Gaffney Target Area, provide input on reuse plans for Robinson Warehouses, solicit community participation, and identify additional sites for assessment.
Walhalla Partners for Progress	Janet Smalley [REDACTED] PO Box 1099, Walhalla, SC	A collaborative effort to pull together municipal, civic, businesses, individuals and all the different assets that the city has to be able to work together to make Walhalla an even greater city than it is.	Host community meetings in the Walhalla Target Area, invite other community groups and residents to engage with project, provide input on priority sites and reuse plans.
Ascend Pickens	Megan Thomas [REDACTED] 222 W Main St Suite A, Pickens, SC	Create jobs through retaining and recruiting businesses. Enhance community character through physical improvements. Promote events and activities to draw people downtown, and Partner with the City of Pickens, the Greater Pickens Chamber of Commerce and others on ongoing improvements.	Host community meetings in the Pickens Target Area, serve as community liaison to generate interest and involvement in the project, suggest other sites for to consider for the project as funding allows, support redevelopment planning efforts.
One Spartanburg Inc	Kyle Sox ksox@onespartanburginc.com 105 N. Pine St., Spartanburg, SC	To build a vibrant Spartanburg through business, economic and tourism development.	Host community meetings in the Pacolet Target Area, engage local businesses and residents to support the reuse of Pacolet Mills for recreation and ecotourism, identify other sites in the county.
REVIVA	Yvonne McGee [REDACTED] 106 Broad St, Iva, SC	Organization devoted to civic improvement, promoting activities and events that create community pride in the Town of Iva.	Host community meetings in the Iva Target Area, provide community input for reuse strategy, disseminate information to residents, and encourage participation.

2.b.iii. Incorporating Community Input:

Through ongoing outreach efforts with our coalition partners and Target Areas, ACOG staff have discussed this brownfields application and developed the initial inventory of sites. ACOG will continue the engagement through the Steering Committee, which will meet at least quarterly to review the project status, provide feedback to project staff, and make key decisions such as site selection and prioritization. In between meetings, project staff and members may communicate via e-mail or phone to ensure that project activities move forward without interruption. ACOG staff and Steering Committee members will solicit, conscientiously consider, and provide timely responses to all community input received through a variety of communication methods.

Outreach to the Target Area communities will be led by ACOG staff and coordinated through Steering Committee members, all of whom are committed to educating their communities on brownfields risks and project activities and outcomes. We will host community workshops (both in-person and virtual options) within the Target Area communities at key points along the project timeline to disseminate information, answer questions, solicit input, and engage residents. We will conduct outreach through our partner community-based organizations to ensure a broad spectrum of stakeholders, including underserved communities, are engaged. This will include a review of our inventory of brownfields sites

to discuss redevelopment priorities and gather feedback on targeted sites. A second type of planning event will be held to gather input on site reuse concepts where we will share market data, environmental considerations, and other factors to discuss potential opportunities for each property – parking, entry/exit points, commercial/residential/industrial reuse options, related job creation, greenspace and parks, landscaping concepts, and signage and frontage designs.

ACOG staff will provide project updates regularly in our newsfeed and social media, and a brownfields project page on our website will be created to provide a background on the project, key accomplishments, outreach collateral (brochures, flyers, fact sheets, etc.), and contact information on how to get involved. A translator will be available at public meetings, as needed. For persons with physical disabilities, meetings will be held at locations that are accessible.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3.a. Description of Tasks/Activities & Outputs:

ACOG is requesting \$1,200,000 to complete the following tasks within the four-year period of performance. ACOG staff will primarily perform the Project Management and Reporting activities, and staff will lead, with support from the Qualified Environmental Professional (QEP), the Community Outreach and Reuse Planning tasks. The QEP will complete the Environmental Assessment and Cleanup Planning activities. The selection of the QEP has been completed, see Section 4.a.iv.

Task 1: Project Management & Reporting
i. <u>Project Implementation</u> : ACOG’s Project Director will oversee the grant implementation, administration, and compliance with the EPA cooperative agreement work plan, budget, schedule, and terms and conditions. She will ensure tasks are completed efficiently and will be responsible for oversight of the QEP to complete the project tasks. She will hold monthly project team meetings, which will include the non-lead coalition members, QEP, EPA Region 4 Project Officer, and SC DES Project Manager to review the project status and take corrective actions to stay on schedule and make appropriate progress. With QEP assistance, ACOG will complete EPA quarterly reports, yearly financial reporting (FFR) and DBE utilization forms, and ACRES database entry/updates. ACOG anticipates three staff will also attend national and regional grantee brownfield training conferences/workshops. ACOG with assistance from the QEP will complete a closeout report documenting all grant activities and accomplishments.
ii. <u>Anticipated Project Schedule</u> : Ongoing throughout the 4-years; National Conference in Aug 2025 with other conferences TBD, Monthly team meeting, Quarterly Reporting on Federal fiscal quarters; Annual reporting each October, closeout report in Oct-Dec 2029.
iii. <u>Task/Activity Lead</u> : ACOG Project Director with some QEP assistance
iv. <u>Outputs</u> : ACRES reporting, 48 monthly meetings; 16 quarterly reports; 4 FFR and DBE reports; 1 Closeout Report. Three ACOG staff to attend four conferences/workshops.
Task 2: Community Outreach
i. <u>Project Implementation</u> : ACOG Project Director will lead the community outreach efforts with support from non-lead coalition members, QEP, Steering Committee, and community-based organizations, including development of a community involvement plan (CIP), preparation of outreach materials, and convening the Steering Committee. The Steering Committee will serve as the primary conduit for outreach, assist with site identification and prioritization for assessment beyond the priority sites already identified, and support reuse planning efforts. The project team will also meet with other community groups, property owners, and developers throughout the project.
ii. <u>Anticipated Project Schedule</u> : Oct 2025 – Sep 2029; CIP in 1 st quarter; quarterly Steering Committee meetings; outreach material and meetings in 2 nd – 14 th quarter; additional site inventorying and prioritization 5 th – 12 th quarter
iii. <u>Task/Activity Lead</u> : ACOG Project Director with support from non-lead coalition members, QEP, Steering Committee, and community-based organizations.
iv. <u>Outputs</u> : 1 CIP; 16 Steering Committee meetings; 4 sets of outreach material; 8 community meetings
Task 3: Site Assessments
i. QEP will submit a Generic Quality Assurance Project Plan (QAPP) for EPA approval; complete site

eligibility forms for EPA approval; request petroleum determinations from SC DES; perform Phase I Environmental Site Assessments (ESAs) in accordance with ASTM Standard E1527-21 and the EPA All Appropriate Inquiry Final Rule; conduct Phase II ESAs in accordance with ASTM E1903-19 upon approval of Site-specific Sampling and Analysis Plans (SAPs); draft Health & Safety Plans (HASPs) for field work; and complete ACM and LBP surveys and other assessments depending on the need at each priority site. VCC assistance provided for properties entering the SC DES program.
ii. Anticipated Project Schedule: Oct 2025 – Mar 2029; Generic QAPP 1 st quarter; Phase I ESAs and ACM & LBP surveys 2 nd - 13 th quarter; Phase II ESAs 3 rd - 15 th quarter
iii. Task/Activity Lead: QEP with oversight from the ACOG Project Director
iv. Outputs: 1 Generic QAPP; 24 Phase I ESAs; 16 ACM/LBP Surveys; 4 VCCs, 12 SAPs; 12 HASPs; and 12 Phase II Reports
Task 4: Cleanup & Reuse Planning
i. QEP will develop Analysis of Brownfields Cleanup Alternatives (ABCA) reports for sites with contamination. The ABCA will identify potentially applicable remediation alternatives for the site by comparing potential land uses with the environmental impacts associated with properties and steps required to redevelop the property. The level of remedial action can then determine how to best meet community needs. The QEP will also develop abatement designs for properties with identified ACM. The ACOG Project Director will lead the reuse planning activities with non-lead coalition members, QEP, Steering Committee, and community-based organizations support, including development of site-specific reuse plans in the targeted areas plus other sites identified during the project period.
ii. Anticipated Project Schedule: Oct 2026 – Jun 2029; ABCAs 5 th – 15 th quarter
iii. Task/Activity Lead: QEP with oversight from the ACOG Project Director for Cleanup Planning. The ACOG Project Director will lead Reuse Planning with support from non-lead coalition members, QEP, Steering Committee, and community-based organizations.
iv. Outputs: 8 ABCAs; 10 ACM Abatement Plans; 10 Reuse Plans

3.b. Cost Estimates:

Task 1 – Project Management & Reporting:

<i>Personnel:</i>	Average of 12 hours of staff/month (12x48x\$45/hr) = \$25,920
<i>Fringe:</i>	38% fringe rate x Personnel total (0.38x\$25,920) = \$9,850
<i>Travel Costs:</i>	3 staff attend 3 regional/grantees workshops (3x3x\$500/person/trip = \$4,500 total), 3 staff attend 3 national conferences (3x3x(\$750 airfare + 3 hotel nights @\$200/night totaling \$600 + \$150 in meals = \$1,500/person/trip) = \$9,000 total) = \$13,500
<i>Contractual Costs:</i>	48 project team meetings (48x\$400); 16 Quarterly Reports (16x\$350); 1 closeout report (\$5,000); quarterly ACRES updates (16x\$250) = \$33,800
<i>Indirect Costs:</i>	42% indirect rate x Personnel & Fringe total (0.42x\$35,770) = \$15,023
<i>Total:</i>	\$98,093

Task 2 – Community Outreach:

<i>Personnel:</i>	Average of 10 hours of staff/month (10x48x\$45/hr) = \$21,600
<i>Fringe:</i>	38% fringe rate x Personnel total (0.38x\$21,600) = \$8,208
<i>Travel:</i>	Mileage per quarter to attend outreach events (160x16x0.67) = \$1,715
<i>Supplies:</i>	Presentation materials, printing costs (16x\$250) = \$4,000
<i>Contractual Costs:</i>	Community Involvement Plan (\$3,600); Quarterly Steering Committee meetings (16x\$600); 8 community meetings (8x\$1,200) = \$22,800
<i>Indirect Costs:</i>	42% indirect rate x Personnel & Fringe total (0.42x\$29,808) = \$12,519
<i>Total:</i>	\$70,842

Task 3 – Site Assessments:

<i>Personnel:</i>	Average of 4 hours of staff/month (12x48x\$45/hr) = \$25,920
<i>Fringe:</i>	38% fringe rate x Personnel total (0.38x\$25,920) = \$9,850
<i>Contractual Costs:</i>	1 Generic QAPP (1x\$3,500); 24 Phase I ESAs (24x\$4,000); 16 ACM/LBP Surveys (16x\$7,500); support for 4 VCCs (4x\$3,000), 12 SAPs (12x\$4,000), HASPs (12x\$500), & Phase II ESAs (12x~\$36,883 avg) = \$728,096
<i>Indirect Costs:</i>	42% indirect rate x Personnel & Fringe total (0.42x\$35,770) = \$15,023
<i>Total:</i>	\$778,889

Task 4 – Cleanup & Reuse Planning:

Personnel: Average of 12 hours of staff/month (12x48x\$45/hr) = **\$25,920**
Fringe: 38% fringe rate x Personnel total (0.38x\$25,920) = **\$9,850**
Travel: Mileage per quarter to attend reuse planning events (129x16x0.67) = **\$1,383**
Contractual Costs: 8 ABCAs (8x\$5,000); 10 Site Redevelopment Plans (10x\$12,000 avg); 10 ACM Abatement Plans (10x\$4,000) = **\$200,000**
Indirect Costs: 42% indirect rate x Personnel & Fringe total (0.42x\$35,770) = **\$15,023**
Total: **\$252,176**

OVERALL PROJECT BUDGET TABLE

Budget Categories	Project Management & Reporting	Community Outreach	Site Assessments	Cleanup & Reuse Planning	Total
Personnel	\$25,920	\$21,600	\$25,920	\$25,920	\$99,360
Fringe	\$9,850	\$8,208	\$9,850	\$9,850	\$37,758
Travel	\$13,500	\$1,715	\$0	\$1,383	\$16,598
Supplies	\$0	\$4,000	\$0	\$0	\$4,000
Contractual	\$33,800	\$22,800	\$728,096	\$200,000	\$984,696
Total Direct Costs	\$83,070	\$58,323	\$763,866	\$237,153	\$1,142,412
Total Indirect Costs	\$15,023	\$12,519	\$15,023	\$15,023	\$57,588
Total Budget	\$98,093	\$70,842	\$778,889	\$252,176	\$1,200,000

Note: \$728,096 is allocated for Site Assessments and \$200,000 is allocated for Site Specific Cleanup and Reuse Planning for a total of \$928,096 or 77.3% of the grant.

3.c. Plan to Measure and Evaluate Environmental Progress and Results:

The project team (including ACOG staff, non-lead coalition members, QEP, EPA Region 4 project officer, and SC DES project manager) will meet monthly by conference call to review project activities, accomplishments, schedule, and budget to ensure project goals are being met and take corrective actions, if necessary. Project updates will be provided at least quarterly to the Steering Committee, which will review progress, identify community priorities, address any community concerns, and guide the project. ACOG will submit Quarterly Reports, detailing the outputs and outcomes of the project, and enter and track site-specific information in the online ACRES database. At a minimum, outputs to be tracked include the number and attendees present at community workshops, public meetings, environmental assessments, ABCAs, and reuse plans; and the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability:

4.a.i. Organizational Capacity, ii. Organizational Structure, iii. Description of Key Staff:

ACOG is a multifaceted service organization for local governments, providing public administration, planning, information systems and technology, grants, workforce development, and services for the elderly population. The Grants Services Department provides resources to assist local governments and their agencies, focusing on a wide range of community and economic development related projects. The grant assistance includes project planning, project development, grant writing, and grant management. Our objective is to match the needs of the community to the grant funding available to maximize opportunities and resources. Our staff serves as consultant, liaison, problem solver and project manager to make certain the project is feasible and contributes to a healthy, safe and sustainable community. Our goal in assisting to shape our communities is to ensure a strong economical viable region.

Ms. Arlene Young, Grant Services Director, will provide executive level oversight of the project that meets ACOG’s goals and strategy. She leads the Grant Services staff and has 43 years of experience including grant management, community and economic development in local and regional government. Ms. Jill Charlton, Senior Project Manager will serve as Project Director, will manage the grant, lead project activities, track the budget and schedule, complete reporting requirements, and ensure

compliance with the grant’s terms and conditions. She has 25 years of experience in grant management, economic and community development and city management in local, regional, state and educational institutions. Mr. Don Zimmer, Finance Director, oversees the financial activities of ACOG’s approximately \$16.6 million budget; approximately 75% of ACOG revenue comes from federal sources. He has 38 years of experience in financial management and will provide the needed financial support for the Brownfield Coalition Assessment Grant. During work plan development, ACOG will enter into a Memorandum of Agreement (MOA) with our coalition partners, to define the governing structure for the project. All members have committed to participate in a Steering Committee to make project decisions.

4.a.iv. Acquiring Additional Resources:

ACOG followed the procedures detailed in 2 CFR 200 and EPA’s rule at 2 CFR 1500 to procure a QEP to provide support for grant activities. ACOG released a competitive, public Request for Proposals on June 20, 2024. Three proposals were received by the July 25, 2024, due date. A committee evaluated and scored the three proposals and selected the QEP deemed most qualified and cost effective based on the evaluation criteria. A contract task order will be issued once ACOG receives the grant award. The QEP maintains a local office and several of the staff live and work in the region. The QEP will provide technical and programmatic support for all aspects of the project. ACOG will again follow a similar process if additional resources are needed and will encourage local businesses to apply or seek subcontracting opportunities.

4.b. Past Performance & Accomplishments:

4.b.ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements:

4.b.ii.(1) Purpose and Accomplishments:

ACOG Grant Services is currently administering and managing 46 grant projects both federally and non-federally funded. Below are three grant project examples which we are providing project development, project management, financial administration, stakeholder engagement and communication with funding agencies.

Awarding Agency	Amount	Project/Purpose	Outputs/Outcomes
US EDA	\$5.2 million	GSP Internation Airport - constructing an additional 33,640 square feet of apron and 1,300 linear feet of roadway to support air cargo services.	Air Cargo Services generate \$28.3 million in annual tax revenues; \$10.1 million in State/Local revenues and \$18.2 in Federal revenues.
US EDA	\$8,956,184	SCTAC/International Transportation Innovation Center – construction of looped travel lanes to allow test vehicles to safely gain speed and enter a large, banked turn on either end of the runway, allowing manufacturers to conduct a variety of vehicle and systems tests.	The Loop Infrastructure is an important element to support automotive business recruitment efforts for SC as this asset for testing is uncommon and facility options are limited in the US. This creative economic development approach supports growing workforce opportunities.
US EDA & Appalachian Regional Commission	EDA - \$3 million ARC - \$870,000	City of Woodruff – providing sewer infrastructure to a new industry	\$700 million in private investment and 300 jobs created.

4.b.ii.(2) Compliance with Grant Requirements:

ACOG has successfully led, administered and managed the grants outlined above including project management, financial administration, stakeholder engagement and communication with funding agencies. ACOG consistently achieves and records expected results and required deliverables, meets reporting requirements and follows applicable procurement policies for contractual work.

Threshold Criteria for Assessment Coalition Grants

1. APPLICANT ELIGIBILITY:

(a) Applicant Type: Group of General Purpose Units of Local Government

(b) Eligibility: The Appalachian Council of Governments (ACOG) is a “Group of General Purpose Units of Local Governments” established under South Carolina law to function as a single legal entity with authority to enter into binding agreements with the Federal Government as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.

2. NUMBER AND ELIGIBILITY OF NON-LEAD COALITION MEMBERS:

The coalition included four local governments as non-lead members:

- (1) The County of Cherokee is a “general purpose unit of local governments” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.
- (2) The County of Oconee is a “general purpose unit of local governments” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.
- (3) The County of Pickens is a “general purpose unit of local governments” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.
- (4) The County of Spartanburg is a “general purpose unit of local governments” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.

3. TARGET AREAS:

As shown on the Narrative Information Sheet, each coalition member has selected a Target Area, and the Target Areas do not overlap:

- ACOG: Jackson Mill in the Town of Iva
- Cherokee County: Robinson Warehouses in the City of Gaffney
- Oconee County: Chicopee Mill in the City of Walhalla
- Pickens County: Brunswick Worsted Mill in the City of Pickens
- Spartanburg County: Pacolet Mill #3 in the Town of Pacolet

4. EXISTING BROWNFIELDS GRANTS TO NON-LEAD MEMBERS:

- a. Cherokee County, Oconee County, and Pickens County have never been awarded an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant. Spartanburg County was awarded an Assessment Grant in 2001 and a Cleanup Grant in 2009, both of which were closed successfully.
- b. None of the non-lead coalition members have an open EPA Brownfields MARC Grant.

5. COALITION AGREEMENT:

Signed letters from Cherokee County, Oconee County, Pickens County, and Spartanburg County documenting their commitment as non-lead coalition members are attached.

6. COMMUNITY INVOLVEMENT:

Through ongoing outreach efforts with our coalition partners and Target Areas, ACOG staff have discussed this brownfields application and developed the initial inventory of sites.

Threshold Criteria for Assessment Coalition Grants

ACOG will continue the engagement through the Steering Committee, which will meet at least quarterly to review the project status, provide feedback to project staff, and make key decisions such as site selection and prioritization. In between meetings, project staff and members may communicate via e-mail or phone to ensure that project activities move forward without interruption. ACOG staff and Steering Committee members will solicit, conscientiously consider, and provide timely responses to all community input received through a variety of communication methods.

Outreach to the Target Area communities will be led by ACOG staff and coordinated through Steering Committee members, all of whom are committed to educating their communities on brownfields risks and project activities and outcomes. We will host community workshops (both in-person and virtual options) within the Target Area communities at key points along the project timeline to disseminate information, answer questions, solicit input, and engage residents. We will conduct outreach through our partner community-based organizations to ensure a broad spectrum of stakeholders, including underserved communities, are engaged. This will include a review of our inventory of brownfields sites to discuss redevelopment priorities and gather feedback on targeted sites. A second type of planning event will be held to gather input on site reuse concepts where we will share market data, environmental considerations, and other factors to discuss potential opportunities for each property – parking, entry/exit points, commercial/residential/industrial reuse options, related job creation, greenspace and parks, landscaping concepts, and signage and frontage designs.

ACOG staff will provide project updates regularly in our newsfeed and social media, and a brownfields project page on our website will be created to provide a background on the project, key accomplishments, outreach collateral (brochures, flyers, fact sheets, etc.), and contact information on how to get involved. A translator will be available at public meetings, as needed. For persons with physical disabilities, meetings will be held at locations that are accessible.

7. EXPENDITURE OF EXISTING GRANT FUNDS:

ACOG has never received an EPA Brownfields MARC Grant.

8. CONTRACTORS AND NAMED SUBRECIPIENTS:

ACOG followed the procedures detailed in 2 CFR 200 and EPA's rule at 2 CFR 1500 to procure a QEP to provide support for grant activities. ACOG released a competitive, public Request for Proposals (RFP) on June 20, 2024. The RFP was posted on ACOG's website, : <https://www.scacog.org/rfp-portal>, and posted on the South Carolina Business Opportunities (SCBO) database, an online portal for procurement solicitations for South Carolina agencies and units of local government. Three proposals were received by the July 25, 2024, due date (35-day advertisement period). The committee selected Stantec Consulting Services, Inc., as the firm deemed most qualified based on the evaluation criteria including cost reasonableness. The RFP can be accessed at the previously provided link. A contract will be negotiated once ACOG receives the grant award and can be provided to EPA at that time.

No subrecipients have been identified or anticipated.