

FRANKLIN COUNTY, TENNESSEE

CHRIS GUESS, COUNTY MAYOR

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WINCHESTER, TN 37398

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R04-25-A-066

RE: FY2025 EPA Brownfields Assessment Coalition Grant Application

Franklin County Tennessee is pleased to submit this proposal for FY2025 Brownfields Assessment Coalition Grant funding. Below we provide the information requested.

1. Applicant Identification:

Franklin County Tennessee

2. Website URL:

(a) Website URL for Lead Applicant (Franklin County Tennessee): <https://franklincotn.us>

(b) Website URL for Coalition Members:

- City of Winchester, TN: <https://www.winchester-tn.com>
- City of Cowan, TN: <https://www.cityofcowan.com>
- Town of Huntland, TN: <https://www.huntland.org>

3. Funding Requested:

(a) Assessment Grant Type: Assessment Coalition

(b) Federal Funds Requested: \$1,200,000

4. Location:

(a) City: Winchester, Cowan, Huntland

(b) County: Franklin

(c) State or Reservation: Tennessee

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

Lead Coalition Member: Franklin County, Tennessee

Target Area Name	Census Tract (CT) Number(s)	Priority Site Address(es)
Franklin County		
West Winchester	47051960400	1. Former Dickies Market 1180 David Crockett Hgwy.
		2. 725 David Crockett Hgwy
		3. Old Farmers Pavilion 1041 Wilton Circle
		4. Former Exxon Gas Station 1239 Dinah Shore Blvd
City of Winchester (Non-Lead Coalition Member #1)		
East Winchester	47051960500	1. 202 1 st ave, SW
		2. Steele Salvage Yard 504 4th Ave SW

Target Area Name	Census Tract (CT) Number(s)	Priority Site Address(es)
City of Cowan (Non-Lead Coalition Member #2)		
Cowan	4705190600	Former Gas Station
		1. 210 Cumberland St. W
		2. 210 Cumberland St E.
		3. Old CSX building
Town of Huntland (Non-Lead Coalition Member #3)		
Town of Huntland	47051960800	1. Former Allegheny Shirt Factory 200 Jones St.
		2. Former Gas Station 443 Main St.
		3. Former Auto Service Station 700 Main St.

6. Contacts:

(a) Project Director:

Name: Chelle Daniels, Grants Manager

Phone: (931) 229-6769 | Email: chelledaniels@franklincofn.gov

Mailing Address: 855 Dinah Shore Blvd | Suite 3, Winchester, TN 37398

(b) Chief Executive/Highest Ranking Elected Official:

Name: Chris Guess, Mayor

Phone: (931) 967-2905 | Email: c/o Chelle Daniels chelledaniels @ franklincofn.gov

Mailing Address: 855 Dinah Shore Blvd | Suite 3, Winchester, TN 37398

7. Population:

- Population of Target Areas:
 - Franklin County = West Winchester TA: 8208
 - City of Winchester: 9,978*
 - City of Cowan: 1,827**
 - Town of Huntland: 1,218**
- Population of Franklin County: 44,654*

*US Census, July 1, 2023

**American Community Survey 2022

8. Other Factors:

Other Factors Criteria	Page #
Community population is 15,000 or less.	1
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).	
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.	5
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	5
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 located within a community in which 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 Tennessee Department of Environment and Conservation is attached.

10. Releasing Copies of Applications: NA



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
DAVY CROCKETT TOWER, 7TH FLOOR
500 JAMES ROBERTSON PARKWAY
NASHVILLE, TENNESSEE 37243

November 4, 2024

Chelle Daniels, Grants Manager
Franklin County Annex
855 Dinah Shore Blvd, Suite 3
Winchester, TN 37398

Re: State Letter of Acknowledgement for the Coalition Assessment Grant
Application

Dear Ms. Daniels,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$1,200,000 US Environmental Protection Agency (EPA) Brownfields Coalition Assessment Grant.

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

We greatly appreciate your efforts to address brownfields in Franklin County, the City of Winchester, the City of Cowan, and the City of Huntland, Tennessee.

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Coalition Members, Target Areas, & Brownfields: **1.a.i. Coalition Members:** To promote a regional effort and support revitalization of brownfields throughout the County's most impacted areas, lead member Franklin County (the County) has formed a Coalition with three non-lead members each representing separate geographic areas referred to as Target Areas (TAs). Coalition non-lead members include the Town of Huntland, the City of Cowan, and the City of Winchester which is the county seat. Non-lead members were identified as key members for the EPA Brownfield Assessment Coalition Grant (ACG) because of ongoing partnerships with the County and collective goals to address environmental justice issues, economic conditions, housing shortages, promote safer communities, and preserve greenspace. Non-lead member Cowan lacks capacity/resources to manage an EPA brownfield grant on their own but together our Coalition forms a cohesive collaborative partnership that will streamline grant management and maximize opportunities for brownfield assessment and planning. TAs by coalition member include the Town of Huntland (pop. 1,226 Census Tract (CT) #47051960800), the City of Cowan (pop. 2,040, CT# 4705190600), the City of Winchester's eastern CT (pop. 9,586, CT# 47051960500) with Franklin County's TA covering Winchester's western census tract. (pop. 8,208, CT# 47051960400)^a.

Our TAs have high concentrations of brownfields and with aging populations, persons with disabilities, low income, high poverty levels, and with a decreasing tax base there is very limited funding to address brownfields. Working with our local communities and strategic partners the County is uniquely positioned to lead a coalition to address brownfields and support revitalization in our most socially and economically challenged areas. To address our collective revitalization goals, including improving public health outcomes in environmental justice areas through the filling of funding gaps that fuel public-private partnerships, our coalition is applying for a \$1.2M in fiscal year (FY) 2025 EPA Brownfield ACG funding.

1.a.ii. Overview of Brownfield Challenges & Description of Target Areas: Franklin County, pop. 44,654, located in the southern tier region of Tennessee covers 576 miles², is bounded on the south by the Alabama border, Coffee County to the north, Lincoln County to the west, and Marion County to the east. Franklin County consists of four cities, three towns, one census-designated place, and eight unincorporated communities. Franklin County was historically an agricultural region with cotton a primary product which was floated down the Elk River to New Orleans. With the development of improved roads and turnpikes, wagon trains transported produce to Nashville and returned with supplies. In 1854, Vernon K. Stephenson profoundly transformed the county by constructing the Nashville and Chattanooga Railroad through Decherd. This involved tunneling through the Cumberland Plateau between Cowan and Sherwood and extending into Alabama to connect with the Western and Atlantic Railroad, leading to Georgia, and the East Tennessee and Georgia Railroad to the northeast. With access to a variety of shipping routes to utilize industries like tanning, farming, timber, and grain production were born in the area. Today, the region is struggling to navigate severe downsizing of our timber industry, closure of the Allen Stove Manufacturing Company in 1991 and closures of related facilities. These declines have resulted in abandoned buildings on former commercial and industrial sites, some of which had continual use for 100+ years. These vacant or underutilized brownfields range from former industrial facilities to small corner gas stations and auto repair facilities clustered throughout our small towns.

The TAs have +/- 29% of the County's population. Winchester, Cowan, and Huntland CTs are located within defined CTs that are overburdened, underserved, and disadvantaged due to low median incomes of residents and high poverty^b. EPAs currently designates the 3 out of 4 of our TAs as disadvantaged communities as they are burdened with some of the greatest socio-economic challenges in the state and US suffering from low income, population loss, transportation barriers, high energy costs, health impacts, and risks from flooding. While there are likely hundreds of brownfields scattered throughout our region, the Coalition has identified four priority TAs. These

^a US Census

^b Climate and Economic Justice Screening Tool, November, 2022.

TAs have the highest concentrations of brownfields near sensitive populations, including countless households suffering from higher unemployment and poverty levels:

The Franklin County TA covers the westernmost CT of the City of Winchester, southwestern Decherd, home to a large Nissan automobile assembly plant, and rural lands to the southeast. In addition to multiple brownfield sites, residents in this TA are faced with an expected agriculture loss rate in the 77th percentile, population loss 83rd, building loss 67th, transportation barriers, and higher than average health impacts. Decherd also notes low-income levels in the 90-95th percentile. The Coalition has identified four priority brownfield sites in this TA that would immediately address these challenges with a goal of bringing much needed housing, commercial and recreational space to these communities.

The City of Winchester TA covers the westernmost CT in the City of Winchester. It is an EPA designated disadvantaged area as it meets several required burden thresholds including climate change, low-income, and health indicators. Residents face significant EJ impacts living among numerous brownfields (abandoned industries, landfills, and service stations), exposing them to contaminants in groundwater, sediment, soil, and regulated building materials (RBMs) such as asbestos, lead paint and PCBs. While there are multiple brownfields scattered in this TA, the Coalition has identified two priority brownfield sites (a large former salvage yard, and former auto repair facility) that would immediately address social and economic challenges with a goal of bringing much needed commercial/manufacturing space to address blight and create jobs.

The City of Cowan TA is comprised of the entire geographic boundary of this small, historic community and lands to the southeast to the Alabama border. Surrounded by lush forests and rolling hills, Cowan is ideal for outdoor activities and nature-based tourism. It also benefits from its proximity to the Great Smoky Mountains and local attractions like South Cumberland State Park. The Cowan Railroad Museum is a focal point of the city, commemorating its railroad history with historic displays, relics, memorabilia, and a model railroad layout. While recreational amenities draw interests from nature-based enthusiasts, Cowan is an EPA identified disadvantaged community with multiple brownfields and a full suite of legacy environmental, social, and economic impacts. In addition, all the CTs meet the definition of an American Rescue Plan Act (ARPA) qualified CT^c. Cowan also faces challenges with limited access to modern healthcare services and high-speed internet in some rural areas. The Coalition sees these challenges as unique opportunities for growth and has selected three priority brownfield sites in Cowan where EPA ACG funding will be a catalyst to support initiatives to improve healthcare access, expand educational programs, upgrade local infrastructure, and promote sustainable tourism. This will give an otherwise underserved community the opportunity to bring commercial and recreational business and related jobs/economic benefits to residents.

The Town of Huntland TA covers the boundaries of the Town and surrounding lands and is located just North of the Alabama state line and bordering the Cowan TA to the Northeast. The area is known for its picturesque landscape with Huntland nestled between rolling hills, lush forests, and scenic farmlands. Huntland has a rich history and a deep connection to agriculture, with farming and outdoor activities being central to its local economy and culture. The TA also has access to various recreational areas, including nearby parks, lakes, and hiking trails, making it a go-to location for families and individuals seeking a rural lifestyle while maintaining proximity to urban amenities. Huntland has a strong sense of pride in its heritage, and its residents are committed to preserving the town's charm while working toward progress and growth. Residents in the TA face significant socio-economic, climate change and other EJ impacts such as low income, agricultural loss, flood risks and energy cost burdens. Residents also live among numerous brownfields including blighted former manufacturing facilities warehouses, and services stations exposing

^c American Rescue Plan Act (ARPA) Qualified Census Tracts (CT) are those in which at least 50% of households have incomes below 60% of the Area Median Gross Income (AMGI) or have a poverty rate of 25% or more.

them to contaminants in groundwater, sediment, soil gas and RBMs. The Coalition has identified three priority brownfield sites that immediate begin addressing the noted challenges and ultimately bringing transformational change for the community.

EPA funding is vital to the Coalition’s efforts to complete site assessments, reuse planning and cleanup plans in these TAs to help reverse the social and economic impacts of our brownfields and facilitate community revitalization.

1.a.iii. Description of the Priority Brownfield Sites: The TAs were historically used for agriculture, rail transportation, manufacturing, and related support services. With over 200 years of industrial/manufacturing activity, hazardous substance and petroleum-impacted brownfields are scattered throughout our TAs and the region. Our Coalition team members have developed a working list (Table 1.1) of brownfield sites to revitalize abandoned and derelict properties, return them to the tax rolls and put them back into productive use. These sites and others have created legacy environmental justice impacts in our communities with residential neighborhoods built alongside early industrial corridors putting residences, schools, and parks in very close proximity to former industrial, manufacturing, transportation and utility businesses. Revitalization planning (see 1.b.i) has identified these sites as economic development catalysts for each TA. Our Coalition will assess at least two sites in each member’s geographic boundary and at least 80% of the funding for site-specific activities will be used in underserved communities.

TA ¹	Priority Site ²	Table 1.1 Priority Site Descriptions	Funding Needs
Franklin County	Former Dickies Market 1180 David Crockett Hgwy.	Approx 9.28-acre parcel with past use as a Market and fuel station. COCs include petroleum, metals, RBMs, and PCBs.	Phase I/II ESA, RBM Surveys, reuse plan, ABCA.
	725 David Crockett Hgwy.	1.05-acre parcel that formerly housed a hat factory (made hats for the series Yellowstone) with potential for restaurants and a commercial event center.	Phase I/II ESA, RBM Survey
	Old Farmers Pavilion 1041 Wilton Circle	Approx. 40-acre vacant site formerly used as farmers pavilion, fairgrounds, and tire storage. Contains a 1,200 ft2 structure. COCs include RBM.	Phase I/II ESA, RBM Survey
	Former Exxon Gas Station 1239 Dinah Shore Blvd	One-story 1,566 ft ² concrete block facility on 1.57 acres, built in 1966 and formerly used as a fueling station.	Phase I/II ESA, RBM Survey
Winchester	202 1st ave, SW	Former auto service shop that has been used for storage of old cars now. This parcel is in a commercial district adjacent to a property where a boutique hotel is being constructed. Optimal commercial space location.	Phase I/II ESA, RBM Surveys, reuse plan, ABCA.
	Steele Salvage Yard 504 4th Ave SW	This property is currently vacant and formerly housed a salvage yard. There is also a salvage yard located adjacent to the NW. COCs = petroleum, metals, PCBs, VOCs/SVOCs.	Phase I/II ESA, reuse plan, ABCA
Cowan	Former Gas Station 210 Cumberland St. W	Former service station and market includes one existing 1,620 ft ² common brick structure built in 1940 with a 238 ft ² open porch and a 390 ft ² canopy. Potential future uses include a Welcome Center, arts center,	Phase I/II ESA, RBM Surveys, reuse plan.
	210 Cumberland St E.	2.26-acre parcel that houses and abandoned grocery store built prior to 1980. COCs include petroleum, metals, RBMs, and PCBs.	Phase I/II ESA, RBM Surveys, reuse plan.
	Old CSX building	Parcel contains a former rail station that is no longer in use. COC = RBM and potentially fuels. Building is located at the trail head of the Mountain Goat trail making it ideal for future support of Cowan’s current rail construction project. COCs include RBM and LBP.	RBM Survey, ABCA
Huntland	Former Allegheny Shirt Factory 200 Jones St.	Factory was built in 1955 and used for major garment manufacturing until work was exported causing closure. It was last used as a functional building in 2004. COCs include petroleum, metals, RBMs, and PCBs.	Phase I/II ESA, RBM Surveys, reuse plan, ABCA.
	Former Gas Station 443 Main St.	Property houses a 1953 constructed one story block auto garage that is no longer in us. underground gasoline and diesel fuel storage tanks. Records show the presence of at least 3 underground storage tanks. COCs = petroleum, metals, PCBs, VOCs/SVOCs and RBMs.	Phase I/II ESA, RBM Survey, reuse plan, ABCA.
	Former Auto Service Station 700 Main St.	Built in 1940, the parcel has historically been used for many purposes including. Currently rented as an auto repair shop and fuel sales. Underground tanks are likely present. COCs = petroleum, metals, PCBs, VOCs/SVOCs and RBMs.	Phase I/II ESA, RBM Survey, reuse plan, ABCA.

¹Coalition member designating. ²prioritized by Coalition. RBM = Regulated Building Materials, COCs = Contaminants of Concern; ESA = Environmental Site Assessment; ABCA = Analysis of Brownfield Cleanup Alternatives.

1.a.iv. Identifying Additional Sites: The Coalition has completed a cursory review of brownfields in our region that identified several properties within and outside of our identified TAs where assessment and revitalization would have significant positive economic and social impacts. Franklin County has also received funding from the State to develop a county-wide brownfield inventory to supplement existing priority sites. Each community will be asked to participate, to nominate sites and develop the inventory.

Sites will be mapped using GIS and a description of each site and key revitalization opportunities will part of the database. The deliverables will include digital overlay mapping of existing and proposed state/federal EJ and CEJ areas to identify and prioritize additional sites where assessment funding can best serve our communities. As part of our ACG management approach, a Brownfield Advisory Committee (BAC) will be formed to maximize community outreach engagement using the methods identified in section 2.b. Additional sites will be evaluated based on funding eligibility with priority given to sites located in underserved communities and disadvantaged CTs.

1.b. Revitalization of the Target Areas: 1.b.i. Reuse Strategy & Alignment with Revitalization Plans:

Selection of the priority sites in the TAs reflects a general reuse strategy for focusing FY25 funding on projects where extensive planning has been completed to identify priority redevelopment sites. The City of Winchester Land Use and Transportation Plan, 2024 identifies a planning focus on mixed commercial uses, along with future development to enhance residential, industrial, and recreational uses in the community. The plan also identifies the need to promote the historical downtown area with a combination of commercial, residential, civic, and institutional uses in a walkable environment characterized by wide sidewalks that have direct access to storefronts and building entrances^d. Franklin County participates in ThreeStar Tennessee’s Community Development Program implemented by the state which assists counties to prepare for economic success. Comprehensive planning for Cowan and Huntland is at various stages of updating with final versions expected to mirror the principles identified by the City of Winchester. The sites identified below are catalytic and will spur development consistent with these plans. The TAs were chosen for the EPA ACG because they: **(a)** offer connectivity/support to recent investments, **(b)** support economically/environmentally disadvantaged neighborhoods; **(c)** include existing infrastructure; and **(d)** are the focus of recent planning initiatives; address brownfield exposure concerns and blight. These factors provide a strong foundation for transformational revitalization of our TAs, potential to attract private investment, and ability to focus revitalization on neighborhoods having the greatest EJ and CJ needs. The following table summarizes redevelopment strategies and local land use/revitalization plans for priority sites.

Table 1.2 Reuse Plans and Alignment With Revitalization Plans			
TA	Priority Site	Table 1.2 Reuse Plans/Strategy	Alignment with Revitalization/Land Use Plans
Franklin County	Former Dickies Market	Rehab/demolition of existing structures with options for commercial, mixed residential, office, medical, restaurant space with available utilities.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
	725 David Crockett Hgwy.	Adaptive reuse for commercial/residential mixed office, community center and restaurant space with available utilities.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
	Old Farmers Pavilion	Abatement followed by demolition of existing structure to address potential RBMs Conceptual reuse includes civic, recreational and housing with available utilities.	Support local/regional plans to create recreational and housing space.
	Former Exxon Fueling Station	Assessment will inform decisions regarding conceptual reuse options including commercial space.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
Winchester	202 1 st ave, SW	Conceptual reuse is commercial (winery, distillery, gift shop, etc) to support a boutique hotel coming soon next door.	Supports near-term development and long term opportunities for the TA a goal of local/regional plans.
	Steele Salvage Yard	Potential reuse includes commercial/light industrial to bring new job opportunities to this TA.	Support regional goals to attract employers and stabilize the industrial employment base.
Cowan	Former Fueling Station, 210 Cumberland St. W	Address contamination concerns to position site for new community general store in underserved area.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
	210 Cumberland St E.	Assessment will inform decisions regarding conceptual reuse options including commercial space such as offices and shops.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
	Former CSX Station	Rehab existing rail station to support ongoing Mountain Goat Trail Project	Support near-term recreational project that will attract tourism and economic benefit.

^d City of Winchester Land Use and Transportation Plan.

Huntland	Former Allegheny Shirt Factory	Adaptive reuse of vacant manufacturing facility to attract new employer.	Support regional goals to attract employers and stabilize the industrial employment base.
	Former Gas Station 443 Main St.	Address contamination concerns to position site for new Commercial retail in underserved area.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.
	Former Auto Service Station 700 Main St.	Address contamination concerns to position site for new Commercial retail in underserved area.	Support local/regional plans to create commercial space that will provide basic goods/services in underserved areas.

1.b.ii. Outcomes & Benefits of Reuse Strategy: The Coalition’s revitalization plans are focused on vacant and underutilized sites and the projects proposed will not cause the displacement of residents or businesses. Table 1.3 shows the anticipated number of new jobs, and residential, industrial, and commercial space created from proposed projects. The narrative below Table 1.3 highlights additional outcomes.

TA	Priority Site	New Residential Space ⁽¹⁾⁽²⁾	New Industrial/Commercial/Recreational ⁽¹⁾	Jobs Created ⁽³⁾
Franklin County	Former Dickies Market	30	30,000 ft ² – Office, restaurants	30
	725 David Crockett Hgwy.	n/a	15,000 ft ² – industrial, Solar Energy	15
	Old Farmers Pavilion	60 units	n/a	10
	Former Exxon Gas Station	n/a	5,000 ft ²	5
Win.	202 1 st Ave, SW	n/a	15,000 ft ²	15*
	Steele Salvage Yard	n/a	40,000 ft ²	40*
Cowan	210 Cumberland St. W	n/a	5,000 ft ²	5*
	210 Cumberland St E.	n/a	5,000 ft ²	5*
	Former CSX Station	n/a	5,000 ft ²	5*
Huntland	Former Allegheny Shirt Factory	n/a	40,000 ft ²	40*
	Former Gas Station 443 Main St.	n/a	5,000 ft ²	5*
	Former Auto Service Station 700 Main St.	n/a	8,000 ft ²	10*
	Total Estimates	90	173,000 ft ²	185

¹⁾ Square footage (sf²) based on size of existing structure(s) or proposed size of new structure. ⁽²⁾ Unit estimates based on average apartment size of 860SF. SFH = Single family home, ⁽³⁾ Job estimates based on the USEIA’s most recent employment estimates for industrial, commercial, retail, restaurant, and mixed-use spaces. *Denotes jobs created in CEJ/EJ area.

Create Jobs & Reduce Poverty: Returning brownfields to productive use aligns with local Plans to prioritize employment opportunities in areas with unemployed populations and bring high-quality technical jobs to abandoned facilities. As shown in the above table, we estimate the proposed projects will *create ~185 new jobs, including 125 in disadvantaged and underserved areas suffering high unemployment rates.*

Generate New Tax Revenue: By restoring vacant/abandoned tax-delinquent parcels to TA tax rolls, Franklin County will significantly increase local tax base. Returning industrial/commercial parcels to productive use will also increase property values enhancing the generation of higher tax revenues.

Stimulate Private Investment: Quantifying environmental liabilities will provide and option for potential developers to take ownership of priority sites removing redevelopment barriers (e.g. liens, fractured ownership, title flaws), and marketing them for purchase. Removing these barriers will make sites marketable for badly needed housing and business development.

Provide affordable, quality housing: Existing development plans focus on providing housing for our residents. We will use the priority sites and others to promote affordable housing projects by reducing the need to develop new water and sewer lines thereby also reducing sprawl.

Redevelopment of the priority sites will also result in an array of other transformational community benefits including improving climate adaption, mitigation, and resiliency; creating & enhancing parks and recreation; incorporating energy efficiency into construction; and increasing transportation access.

1.c. Strategy for Leveraging Resources:

1.c.i. Resources Needed for Site Reuse: As a local unit of government, Franklin County is eligible and experienced with leveraging funding from a variety of public and private sources. The State of Tennessee recently provided the County with multiple Brownfield Redevelopment Area Grants (BRAG) to address brownfields throughout the County. This funding was secured for a variety of uses including completion of an updated brownfield site inventory, environmental assessments, reuse planning and site cleanup. The Coalition will continue to tap into these funding sources and others identified below to advance reuse of sites assessed with EPA FY25 ACG funds. Assessment and reuse planning completed under the ACG will be integrated with other funding for targeted demolitions and cleanups at priority sites. This will position our Coalition to leverage the following additional funding sources to advance brownfields reuse:

- **Tennessee Main Street Program:** The Main Street Four-Point Approach is a unique multi-faceted economic development tool that enables communities to revitalize their downtowns by leveraging local assets - from historic, cultural, and architectural resources to local enterprises and community pride.
- **Tennessee Downtowns:** Tennessee Downtowns is an affiliated program of Tennessee Main Street designed to help communities embark on a comprehensive revitalization effort for their downtown.
- **Downtown Improvement Grant Program:** Grants of up to \$300,000 are available to organizations that can illustrate the need for improvements and the ability to execute an effective design plan for building facades, wayfinding signage, courtyard improvements, gateways, streetscapes, lighting and sound, and EV charging.
- **EPA Cleanup Grants will also be pursued** If assessment activities identify remediation is necessary prior to redevelopment.

1.c.ii. Use of Existing Infrastructure: Like many of the communities in the US the TAs need infrastructure upgrades including water, sewer, broadband, highway, rail, and public transit access in the region to promote the greatest opportunity for reuse of brownfield sites. EPA brownfield funding will be used primarily to address priority properties with existing infrastructure service unlocking near term development and promoting revitalization in our most impacted neighborhoods. This will also provide opportunities to preserve the unique natural resources and history of our communities. The priority sites have existing sewer, water access, natural gas, electric, transportation access and telecommunications with capacity to promote mixed forms of reuse. **Brownfield redevelopments will reuse existing road, sidewalk, broadband, and utility** (gas, electric, water, and sewer) **infrastructure and buildings** to the fullest extent possible.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a. Community Need: 2.a.i. The Community's Need for Funding: As shown in Table 2.1 The TA communities are comprised of micro-communities which have populations <15K each including the largest Winchester at a total population of 12,125. As communities with small populations, financial resources are limited, and the Coalition is unable to draw on other initial sources of funding without an EPA Grant. This is further exacerbated by an aging population, declining incomes, high poverty rates (including child poverty), and lower than average workforce participation compared to the State and US. Demographic data provided below demonstrate lower than average tax revenues due to high poverty, below average median household income and home values. In addition to mills and factories, store fronts have shuttered, and the TA communities have lost out on tax generation from these potential businesses. Together these factors indicate much lower than average discretionary income, which results in less spending, decreasing local business revenues and taxes.

The income and tax revenue characteristics described above demonstrate the inability of the Coalition members to allocate funding to brownfields in a meaningful way without EPA Grant funding. As tax revenue and population decreased, the tourism market continues to demand funding community services such as fire, police, health, transportation, and infrastructure. Without the use of ACG funds to supplement other sources, the TAs will not have the resources necessary to complete site assessments, reuse planning and cleanup plans on our existing Brownfield properties and sites that could otherwise be used to meet critical needs like housing and commercial services will remain dormant.

Data Type	BROWNFIELD TARGET AREA by CENSUS TRACT				Tennessee	US
	Franklin County	Huntland	Cowan	Winchester		
	47051960400	47051960800	4705190600	47051960500		
Total Population	8,208	1,226	2,040	3,917	6.95M	331M
Senior Population*	19.6%	20.8%	18.2%	19.6%	16.3%	16.5%
Median Income*	\$58,054	\$62,778	\$33,955	\$58,054	\$64,035	\$75,149
Poverty Rates*	15.4%	6.5%	36.0%	15.4%	14%	12.5%
Persons with a disability	19%	22%	23%	19%	19.7%	12.9%
Population not in Labor Force	43.4%	44.8%	52.4	43.4%	38.1%	36.5%
Child/Youth Poverty (< 18 yrs)*	22.1%	6.6%	60.5%	22.1%	19.2%	16.7%
Median Home Value*	\$192,400	\$134,800	\$109,400	\$192,400	\$232,100	\$281,900

*Data not reduced by Census Tract

2.a.ii. Threats to Sensitive Populations: 2.a.2.(1) Health or Welfare of Sensitive Populations: As shown in the Table 2.1 above, the TAs are home to a disproportionate number of sensitive populations including children impacted by high levels of poverty, disabled persons, and the percentage of persons not in the workforce and unemployed residents^e. Percentages of households receiving Supplemental Nutrition Assistance Program funding are also higher in all of the TAs as compared to state and federal level. **Welfare concerns** in the TAs include high flood risk, high energy costs, transportation barriers, low educational attainment, and proximity to Risk Management Plan facilities. As detailed in this Section and 2.a.ii (3) below, **health concerns** in the TAs include heart disease, cancer, exposure to lead paint, and low life expectancy. **Ageing infrastructure and lack of safe and quality housing** must also be addressed. A large volume of the housing stock in the TAs was built pre-1960 increasing potential exposure to RBMs. The ACG will help address the above challenges by returning brownfields to productive uses that **create jobs** for residents **in all the TAs** (reducing unemployment, poverty levels and need for public assistance), and **create quality, affordable housing** to support the goals of community revitalization plans.

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

Health Measure	Franklin/TAs
Cancer Incidence	78/78
Asthma	75¹
Low life expectancy	90-97¹
Heart Disease – per 100,000	64/82

¹ US data only (EJScreen). **Bold** indicates distress factors above or below (depending on factor) US averages. Shaded indicates distress factors above or below (depending on factor) State averages.

Franklin County is fairing worse than the average county in Tennessee for health factors, and worse than the average county in the nation.^f Table 2.2 summarizes prevalence rates for several chronic disease and health indicators for Franklin County residents. EJSCREEN Health Indicators for the TAs show incidences of asthma, cancer, and heart disease at percentiles > 70. Low

life expectancy is indicated at 90-97%. With a high percentage of pre-1960 housing and commercial structures there is a high exposure risk to regulated building materials (RBM) such as lead paint and asbestos. With RBMs in residences, commercial structures, and brownfields in the TAs it is not surprising that asthma and cancer incidences are higher than NYS and US indicators.

With the history of industrial activity (including coal burning for heat and steam generation), homes built before 1960 (with asbestos/lead/radon/vapor intrusion) and brownfields located near residents, there is a strong case to link the noted health indicators to historical contamination and current Brownfields. Health impacts will be reduced

^e Environmental Screening Tool accessed 11/10/2024
^f Robert Wood Johnson Foundation, County Health Rankings and Roadmaps, 2023

as contaminants and exposure pathways are identified and mitigated. For example: removal of soil impacts will reduce exposure to hazardous substances from dermal contact, ingestion, and inhalation of vapors; removal of dissolved contaminants that threaten aquifers and surface water will reduce potential exposure to carcinogens; and abatement of asbestos from aging/decaying structures will reduce potential health impacts (asthma, mesothelioma and others).

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: Sensitive populations within the TAs where our priority sites are located are disproportionately impacted by environmental issues (Table 2.3) that are directly related to brownfield sites. Shaded and bold areas of Table 2.3 show the magnitude of environmental and climate change impacts in the TAs. Our TA CTs eastern Winchester, Cowan, and Huntland are located within EPA designated Disadvantaged Communities^h due to low median incomes of residents and high poverty, climate change impacts and environmental burdens. Demographic data shows income and poverty levels in the TAs are above national averages. EPA’s EJSCREEN Tool shows sensitive populations range between the 70th and 80th percentile (US averages) for disproportionate burden/vulnerability to exposure to lead paint, above the 60th percentile, and drinking water non-compliance. Our coalition has eight priority sites located in the census tracts identified by EPA as disadvantage communities. These sites create significant economic and environmental justice issues in a historically underserved area.

Table 2.3. Climate Economic and Environmental Justice Indicators ^g	Percentile in US		
	Target Area		
	Huntland	Cowan	Winchester
Lead Paint Indicator	62nd	68th	78th
Transportation Barriers	91st	74th	42nd
Drinking Water Non-Compliance	87th	85th	78th
Population Loss	85th	85th	87th
Disadvantaged	Yes	Yes	Yes

Demographic data shows income and poverty levels in the TAs are above national averages. EPA’s EJSCREEN Tool shows sensitive populations range between the 70th and 80th percentile (US averages) for disproportionate burden/vulnerability to exposure to lead paint, above the 60th percentile, and drinking water non-compliance. Our coalition has eight priority sites located in the census tracts identified by EPA as disadvantage communities. These sites create significant economic and environmental justice issues in a historically underserved area.

(b) Advancing Environmental Justice: The ACG will be used to assess environmental impacts related to brownfields in our TAs and identify remedial measures necessary to address threats at priority sites. A significant amount of ACG funds will be used to complete RBM surveys and remove asbestos/lead-based paint from structures in the TAs to support adaptive reuse and/or demolition at priority sites. The ACG will fill funding gaps providing a vehicle for revitalizing brownfields in the TAs addressing longstanding environmental issues such as lead and asbestos exposure that are disproportionately impacting low-income, disabled, and elderly residents. The coalition will encourage the reuse of brownfields to advance EJ objectives with a focus on removing blight, providing housing, jobs and improving access to services such as transportation and broadband to our most disadvantaged areas. The work will be completed without displacing residents and/or businesses in our underserved communities.

2.b. Community Engagement: The County has a strong record of working with our towns, cities, project partners and community stakeholders to form productive partnerships on our grant programs. Community involvement during planning and implementation ensures stakeholders have a voice in decision making so residents and businesses alike benefit from the revitalization of brownfields in their neighborhoods. Coalition partners are located within identified EJ and CEJ areas and will assist with community engagement. They will also assist with outreach efforts to maximize opportunities for underserved populations to have a voice in shaping their neighborhoods. As a foundation for community engagement the coalition will form a brownfield advisory committee (BAC) consisting of stakeholders that best represent the community. The BAC will meet monthly to share project information, discuss site prioritization and selection strategies, share regional challenges and successes, and discuss revitalization and economic development opportunities. The County advertises all engagement opportunities through public notices, email blasts to project partners, Board meetings, and via word of mouth in existing community networks. These community engagement methods will allow stakeholders to provide informed feedback that can influence all phases of work. Strong public involvement will lead to community buy-in and more effective and representative redevelopment projects. Additional elements of the community engagement plan will include:

- **Webpage & Fact Sheets:** The County webpage will inform the community on the brownfield project providing fact sheets, informative details about the site assessment and cleanup process and a

^g Generated using EPA Environmental Justice Screening (EJSCREEN) Tool on 11/1/21.

^h Climate and Economic Justice Screening Tool

streamlined approach to the site nomination process. Fact sheets will be updated to summarize FY25 ACG Grant accomplishments.

- **Email, social media & Newsletters:** A stakeholder distribution list will be created, and periodic emails will be sent. Our partners will communicate progress via regular meetings/organizational newsletters.
- **Special Events:** Planned events, realtor meetings, loan officer tours and meetings with local Business Council, Chambers of Commerce, and Rotary Clubs, are used to capture busy parents, business owners and residents without regular access to the Internet. This provides stakeholders and avenue to provide meaningful input throughout the grant lifecycle.

2.b.i. Project Involvement: 2.b.ii. Project Roles: The Coalition will work with numerous community partners to guide grant implementation and bring important community voices to the table. All of our non-lead coalition members and many of the strategic partners have already confirmed their participation on the BAC and/or pledged valued support for the FY24 Grant. The public will have opportunities to suggest sites for assessment, investigation, and reuse through monthly scheduled BAC meetings. Table 2.4 provides a summary of project partners and their roles. Additional partners will be recruited throughout the project.

Table 2.5. List of Program Partners and Roles

	Partner Name	Organization Purpose	Point of Contact	Project Role
Economic	Chamber of Commerce, All TAs	Unite/promote businesses, professional firms, community organizations, government entities.	Cassie Fulmer 931-967-6788	Support local businesses, organize community events, and advocate for economic development.
	Franklin County Industrial Board	Promote industrial growth in the County.	P. Kreidenweis 931-967-2905	Marketing brownfield sites to industrial developers.
CBOs	Cowan Ministerial Association	Promote Christian fellowship among congregations.	Rev. L.Z. Johnson CFirstBaptist316@gmail.com	Provide essential services to residents, including food assistance, spiritual guidance, and community-building initiatives.
	S. Central Human Resources Agency (All TAs)	Provide community assistance programs, housing support, job training.	Paul Rosson 931-433-7182 X1107	Site selection, outreach, reuse planning, housing development.
	Winchester Housing Authority (All TAs)	Provide safe, affordable, drug-free housing county wide to low-income families and opportunities for self-sufficiency/economic independency.	Lydia McBee 931-967-0344	Site selection, outreach, reuse planning, housing development.
Health	Franklin County Health Department	Promote, protect, maintain, and improve health/safety for Franklin County citizens/visitors.	Sofia Leon-Meza 931-967-3826	Provide health information for specific target area to support health risks and remediation/reuse planning.

With an outpouring of support, we anticipate many others to add value as project partners.

2.b.iii. Incorporating Community Input: The County will utilize media outlets including local daily and weekly newspapers, public libraries in the TAs, and regularly scheduled Board and BAC meetings to solicit community input. The County will also develop a project-specific webpage for providing program updates and surveys. Fact sheets and other reference materials will be created for the project webpage and distributed at public facilities. and all literature will include a statement that citizens may request alternative formats or special accommodations. The County’s social media accounts will provide the public real time information about the project. Community meetings will be held during all phases of the project and will be accessible to those who rely on public transportation and will be held at ADA-compliant facilities in the TAs to ensure equal access to sensitive populations and residents. Special outreach efforts (e.g. translation services for non-English speaking and hearing impaired) will also be used as needed to provide equal access to project information. To reach the broadest audience possible, the Coalition will enlist our project partners to assist with distributing project-related information on their websites and social media pages. The Coalition anticipates hosting 12 BAC meetings/year and 3-4 neighborhood meetings/year. This outreach along with the response we have already observed in the TAs will provide an “information out, feedback in” process that will continue throughout the brownfield assessment, cleanup and redevelopment processes.

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

3.a. Description of Tasks/Activities & Outputs: The scope of work has been organized into the tasks below.

Task 1 – Project Management, Reporting & Other Eligible Activities
i. Project Implementation: The County will oversee Consultant (QEP) activities and manage the project in accordance with the terms and conditions established in the Cooperative Agreement (CA). At the County’s direction, the QEP will assist with compliance reporting (quarterly and final reports, ACRES updates, annual DBE and Financial Reports, etc.) and other eligible

project activities identified in the CA Work Plan. With s QEP support, the County will facilitate monthly check-in meetings with the Coalition. Up to 2 Coalition personnel will attend 1 regional and 1 national brownfields-related conference.

ii. Anticipated Project Schedule: Activities will be ongoing throughout the 4-yr period.

iii. Task/Activity Lead(s): The County with support from the QEP.

iv. Output(s): 16 Quarterly Performance Reports; 1 Final Performance Report; 4 DBE Utilization Reports; 4 Federal Financial Reports; ACRES updates within 30 days of completing site-specific activities; 4 conferences; ~48 monthly check-in meetings.

Task 2 – Community Outreach & Site Prioritization

i. Project Implementation: Our community outreach program will include a BAC comprised of the Coalition members, project partners (see 2.b.ii), property/ business owners, residents and other stakeholders. The BAC will meet 2-3x/year to review and prioritize nominated sites for grant funding. The priority sites identified via the brownfield inventory to be completed by Spring 2026 (see Section 1.a.ii) will be used by the BAC for prioritization in the first project quarter (1Q). The BAC will establish scoring criteria that will be applied to the inventory to rank sites and identify priority redevelopment opportunities that will provide the greatest socioeconomic benefits with an emphasis on disadvantaged and underserved communities. The inventory will be updated to derive an overall score for each site and the BAC will review the highest scoring sites to confirm the most strategic are prioritized. Refining the inventory will provide the County with a valuable tool that will be leveraged to inform assessment activities on this project and future projects. Additionally, a project-specific webpage and fact sheets will be posted on the County’s website and a Public Participation Plan will be developed during 1Q.

ii. Anticipated Project Schedule: The project webpage and fact sheets will be prepared during 1Q 2026. The BAC will be convened every 3-4 months with the first meeting during 1Q. Additional stakeholder meetings will be held as needed.

iii. Task/Activity Lead(s): The County will lead outreach with support from Coalition members and partners (in-kind services). The QEP will facilitate stakeholder, BAC and public meetings. The QEP will also develop a Public Participation Plan. The Coalition and BAC will lead site prioritization efforts. The QEP will develop/maintain a focused inventory list of sites nominated/ prioritized.

iv. Output(s): Project-specific webpage & fact sheets; 1 Public Participation Plan, 10 BAC shareholder meetings (in addition to monthly meetings); 8 other stakeholder meetings; Inventory list of sites nominated & sites prioritized for funding.

Task 3 – Phase I/II ESAs & Regulated Building Material (RBM) Surveys

i. Project Implementation: At least two priority sites selected by each Coalition member will be prioritized for assessment activities. We estimate 20 to 24 sites will be assessed under this project (final total will depend on the number of sites for which more than 1 type of activity is performed). The QEP will prepare Eligibility Determination requests for sites prioritized by the Coalition. The QEP will conduct Phase I ESAs for ~18 sites in accordance with the AAI Final Rule and the standards set forth in the ASTM E1527-21 Phase I ESA Process, Phase II ESAs for ~10 sites and RBM Surveys for ~10 sites. Prior to initiating sampling or other field or laboratory investigation activities, the QEP will develop a Master Quality Assurance Project Plan (QAPP) for EPA approval. The QEP will also prepare Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each site selected for a Phase II ESA and/or RBM Survey. The SAPs (as addendums to the QAPP) will be submitted to EPA for approval prior to fieldwork.

ii. Anticipated Project Schedule: Year 1: 5 Phase I ESAs, Master QAPP, 3 Phase II ESAs, 3 RBM Surveys | Year 2: 5 Phase I ESAs, 4 Phase II ESAs, 3 RBM Surveys. | Year 3: 5 Phase I ESAs, 2 Phase II ESAs, 3 RBM Surveys. | Year 4: 3 Phase I ESAs, 1 Phase II ESAs, 1 RBM Surveys.

iii. Task/Activity Lead(s): The QEP will lead technical activities at the direction of the County. Access Agreements will be secured by the County with support from the Coalition members.

iv. Output(s): Up to 25 site eligibility requests; 18 Phase I ESAs; 1 Master QAPP; 10 Phase II ESAs (including SAPs); 10 RBM Surveys (including SAPs) and public meetings.

Task 4 – Cleanup/Reuse Plans & AWP

i. Project Implementation: The QEP will prepare Analysis of Brownfield Cleanup Alternatives (ABCAs) and/or Remedial Action Plans (RAPs) for ~6 sites where contamination is confirmed. The QEP will prepare reuse plans, market studies, and/or redevelopment feasibility studies for ~3 sites and one County-wide Brownfield Comprehensive Plan to advance redevelopment and adaptive reuse of catalyst sites.

ii. Anticipated Project Schedule: Year 1: 1 ABCA/CAP | Year 2: 1 ABCA/CAPs, 2 Reuse Plan, 1 County-wide BF Comprehensive Plan | Year 3: 3 ABCA/CAPs, 2 Reuse Plans. | Year 4: 1 ABCA/CAPs, 1 Reuse Plan.

iii. Task/Activity Lead(s): The QEP will lead all technical activities at the direction of the County.

iv. Output(s): 6 ABCAs/CAPs; 5 Site Reuse Plans, 1 Area-wide/County-Wide Plan

3.b. Cost Estimates: The following tables provides a breakdown of estimated costs by task. An average rate of \$150/hr was used to calculate the cost for contractual services.

Category	Cost Basis & Assumptions
Task 1 – Project Management, Reporting & Other Eligible Activities	
Travel Total: \$18,400	
<ul style="list-style-type: none"> • 2 National Brownfields Conference: \$10,000 (\$2,500/person x 2 Coalition staff x 2 conferences) • 2 Regional/State Brownfields Conference: \$3,200 (\$800/person x 2 Coalition staff x 2 conferences) 	
Other \$4,000: Conference Registration fees (\$500/person x 4 conferences x 2 personnel).	
Contractual Total: \$40,500	
<ul style="list-style-type: none"> • 48 monthly check-in meetings: \$16,500 (55 hours x \$150/hr x 2 staff) 	

Category	Cost Basis & Assumptions
	• Compliance reporting: \$24,000 (160 hours x \$150/hr)
Task 2 – Community Outreach & Site Prioritization	
Contractual Total: \$48,000	
<ul style="list-style-type: none"> • Develop Project Fact Sheets, Webpage Content & Public Participation Plan: \$6,000 (40 hours x \$150/hr) • BAC Meetings (prepare materials [presentation, activity, posters, handouts, meeting notes/minutes, etc.] & facilitate meetings): \$22,500 (150 hrs x 150/hr) • Site prioritization activities & inventory of sites nominated: \$4,500 (30 hours x \$150/hr) • Update Brownfield Inventory/GIS Link with EJ Overlay Mapping: \$15,000 (100 hours x \$150) 	
Task 3 – Phase I/II ESAs & RBM Surveys	
Contractual Total: \$829,100	
<ul style="list-style-type: none"> • Site eligibility requests: \$9,000 (60 hours x \$150/hr) • Phase I ESAs: \$108,000 (18 x \$6,000/site) • Master QAPP \$5,100 • RBM Surveys: \$195,000 = 1 complex site @ \$75,000, 1 site @ \$40,000 and 8 @ x \$10,000/site^(a) 	<ul style="list-style-type: none"> • Phase II ESAs: \$210,000 (6 sites x \$35,000/site)^(a,b) • Phase II ESAs: \$80,000 (2 sites x \$40,000/site)^(a,b) • Phase II ESAs: \$165,000 (2 sites x \$82,500/site)^(a,b) • Cleanup Plans: \$57,000 (6 sites x \$9,500)
<small>a. Costs include developing site-specific HASPs and SAPs to supplement the Master QAPP. b. We anticipate several priority sites will require medium/complex Phase II ESAs and budgeted for those</small>	
Task 4 – Cleanup/Reuse Plans	
Contractual Total: \$260,000	
<ul style="list-style-type: none"> • Areawide Planning: \$60,000 (Sustainable County-Wide brownfield plan, market analysis, adaptive reuse) • Site Specific Reuse Plans: \$200,000 (5 sites x \$40,000/site) 	

A summary of the overall proposed budget for grant funded activities is provided in the following table. Please note grant funds are not requested for personnel, fringe benefit, equipment, supplies, or other costs nor are grant funds requested for indirect costs. Therefore, those budget categories are not included in the table.

Budget Categories	Task 1: Project Management, Reporting & Other Eligible Activities	Task 2: Outreach & Site Prioritization	Task 3: Phase I/II ESAs & RBM Surveys	Task 4: Cleanup/ Reuse Plans	Total
Travel*	\$18,400	\$0	\$0	\$0	\$18,400
Contractual	\$40,500	\$48,000	\$829,100	\$260,000	\$1,177,600
Other**	\$4,000	\$0	\$0	\$0	\$4,000
Total Budget	\$62,900	\$48,000	\$829,100	\$260,000	\$1,200,000

*Travel costs for up to 2 Coalition personnel to attend 2 regional & 2 national brownfields-related conferences **Conference registration fees (\$500/person x 4 conferences x 2 personnel).

3.c. Measuring Environmental Results: The County will establish a schedule with key milestones defined in the CA. The status and estimated completion dates for **outputs** identified in 3.b will be tracked/reported to EPA via Quarterly and Final Performance Reports and **ACRES** updates. ACRES tracking/updates will include standard outcomes required to be reported (i.e., dollars of public or private funding leveraged, acres of land made available for reuse, number of jobs created, etc.) as well as progress towards key outcomes identified by the community for the TAs (i.e., creating “quality” local jobs, creating affordable housing, and expanding and improving parks/green space). To measure results, the following **outputs** will be tracked on a spreadsheet maintained by the County and QEP: (1)# brownfield sites nominated/considered for funding; (2) # brownfield sites prioritized for funding; (3) # Phase I ESAs; (4) # Phase II ESAs; (5) # of RBM Surveys; (6) # ABCAs/RAPs; (7)# site reuse plans; and (8)# community meetings. Anticipated **short- and long-term outcomes** identified in 1.b.ii (# jobs, # affordable residential units, etc.) will be tracked and reported to EPA. We will also track and evaluate the following outcomes: (1) # sites cleaned up; (2) # sites for which off-site risks are identified; (3) # sites for which property title transfers are facilitated; (4) # sites and acres redeveloped; (5) # parks/greenspace acres created; (6) \$ private investment and other funding leveraged; (7) # jobs created or retained; (8) increased property /sales tax revenue generated; (9) increased property value; and (10) # in-kind hours contributed by each Coalition member. By using the detailed tracking mechanisms described the County will be able to confirm the project is progressing as planned and track key performance indicators. This will ensure the project progresses on schedule and addresses EPA objectives and community goals.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE: 4.a. Programmatic Capability: 4.a.i. Organizational Capacity: 4.a.ii. Organizational Structure: The County has the programmatic, administrative, and financial capability/capacity to manage this grant. The County will administer the grant and be accountable to EPA for management of the Cooperative Agreement (CA) and will procure and oversee a QEP to implement technical activities. We will use a two-person management team to ensure timely completion of key milestones established in the CA. The County will execute a Memorandum of Agreement (MOA) with Coalition members to document the

roles/responsibilities of each partner. The County will use a collective governance structure that ensures Coalition member interests are represented. The BAC will include representatives from each Coalition member and include project partners, and community stakeholders. The BAC will guide site prioritization and assist with stakeholder outreach. The BAC will participate in monthly check-in calls facilitated by the County and QEP to ensure Coalition members and the community have meaningful involvement in the project and clear objectives are established for timely and successful expenditure of funds. Grant funds will be used to conduct assessments at a minimum of two sites within the jurisdiction of each Coalition member and at least 80% of the funding for site specific activities will be used for sites in underserved communities.

4.a.iii. Description of Key Staff: Brief descriptions of key staff and their project roles are provided below.

Chelle Daniels – Project Director/Manager: Chelle is an accomplished Grants Manager for Franklin County bringing over 25 years of experience in education, educational consulting, grant writing and management. Chelle has a solid background in securing funding for community development and local initiatives. She excels in collaborating with local organizations to ensure projects meet community needs.

Pam Kreidenweis - Assistant Project Manager: Pam is the Economic Dev. Dir. for the County fostering growth and sustainability within the community. With a background in planning and economic strategy, Pam works to enhance the county's economic landscape by attracting new businesses, supporting local entrepreneurs, and implementing innovative development initiatives that align with community visions.

Andrea Smith - Finance Director: With over 34 years of experience in financial management and public service, Andrea serves as the Finance Director for the County. Andrea's expertise encompasses budgeting, financial analysis, strategic planning, and grant management.

4.a.iv. Acquiring Additional Resources: Following a competitive qualifications-based bid process that is compliant with 40 CFR 31.36 and follows USEPA's requisite Request for Proposal Guidelines, The County will procure a QEP experienced in environmental assessment and brownfields redevelopment to assist with site prioritization, site assessments, community outreach, and other eligible programmatic activities. The County routinely contracts with consultants and has established equal opportunity procurement procedures for ensuring a fair bidding process that complies with EPA's six "Good Faith Efforts" for involving disadvantaged business enterprises. The County also has a procurement policy governing purchases of goods and services that requires compliance with all federal funding source requirements.

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: Franklin County receives annual federal/state funding for a variety of planning and economic development projects. In the last two years alone, the County has received 9.45M in grant funding from state and federal projects (23 grants total) for all types of projects including Tennessee BRAG funding to assist with Brownfield investigation and cleanup. The BRAG grants are ongoing and will dovetail with funding from this grant to address brownfield inventory preparation, Phase I and II site assessments, and planning and cleanup.

4.b.ii.(1) Purpose & Accomplishments: The funding noted above has been and continues to be used for community improvement and revitalization projects such as critical service upgrades to our fire and police facilities in municipalities like Cowan, Decherd, Winchester and others. Other projects have included female emergency housing, broadband access and improvements, equipment purchases for our fire services, property evaluations, signage, a community Center and playground, workforce development programs, virtual health monitoring and virtual education. These projects noted here serve community comprehensive plans and administrative components and technical assessment/planning similar to this ACG.

4.b.ii.(2) Compliance with Grant Requirements: For all the grant projects noted, the County successfully completed requirements and complied with work plan, schedule, terms and conditions, and progress reports and met expected results on time. At grant conclusion a review was completed to determine the overall success and/or areas of improvement. Reporting requirements within each grant were completed on time, in required formats, and through the designated portal. No corrective actions were required during the grant period.

Threshold Criteria for Assessment Coalition Grants

1. APPLICANT ELIGIBILITY:

1.a. Applicant Type:

As a County Government, Franklin County Tennessee is a “general purpose unit of local government” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.

1.b. Federal Taxation Exemption Status:

Not applicable. (The County is not a 501(c)(4). As a unit of local government, the County is exempt from federal taxation.)

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

Franklin County has formed a Coalition with three non-lead members, and each represent separate geographic areas (referenced as Target Areas) of the region where brownfield revitalization projects will be focused. The ***non-lead members include***: the City of Winchester, the City of Cowan, and the Town of Huntland, Tennessee. These organizations were identified as key partners for the EPA Brownfield Assessment Coalition Grant project because of ongoing partnerships with the County and our collective goals of improving economic conditions, addressing housing shortages, making our communities safer, and preserving greenspace through infill development. The target areas are described below.

All three non-lead Coalition members are eligible applicants for EPA Brownfield Assessment Grants. Detailed eligibility information is provided below:

Eligibility documentation for each Coalition Non-Lead Member is provided below:

- The City of Winchester is a General-Purpose Unit of Government as defined under 2 § CFR 200.64. A Letter of Commitment to participation as a coalition member is provided in Attachment A.
- The City of Cowan is a General-Purpose Unit of Government as defined under 2 § CFR 200.64. A Letter of Commitment to participation as a coalition member is provided in Attachment A.
- The Town of Huntland is a General-Purpose Unit of Government as defined under 2 § CFR 200.64. A Letter of Commitment to participation as a coalition member is provided in Attachment A.

3. TARGET AREAS:

The Franklin County TA covers the westernmost CT of the City of Winchester, southwestern Decherd, home to a large Nissan automobile assembly plant, and rural lands to the southeast. In addition to multiple brownfield sites, residents in this TA are faced with an expected agriculture loss rate in the 77th percentile, population loss 83rd, building loss 67th, transportation barriers, and higher than average health impacts. Decherd also notes low-income levels in the 90-95th percentile. The Coalition has identified four priority brownfield sites in this TA that would immediately address these challenges with a goal of bringing much needed housing, commercial and recreational space to these communities.

The City of Winchester TA covers the westernmost CT in the City of Winchester. It is an EPA designated disadvantaged area as it meets several required burden thresholds including climate change, low-income, and health indicators. Residents face significant EJ impacts living among numerous brownfields (abandoned industries, landfills, and service stations), exposing them to

Threshold Criteria for Assessment Coalition Grants

contaminants in groundwater, sediment, soil, and regulated building materials (RBMs) such as asbestos, lead paint and PCBs. While there are multiple brownfields scattered in this TA, the Coalition has identified two priority brownfield sites (a large former salvage yard, and former auto repair facility) that would immediately address social and economic challenges with a goal of bringing much needed commercial/manufacturing space to address blight and create jobs.

The City of Cowan TA is comprised of the entire geographic boundary of this small, historic community and lands to the southeast to the Alabama border. Surrounded by lush forests and rolling hills, Cowan is ideal for outdoor activities and nature-based tourism. It also benefits from its proximity to the Great Smoky Mountains and local attractions like South Cumberland State Park. The Cowan Railroad Museum is a focal point of the city, commemorating its railroad history with historic displays, relics, memorabilia, and a model railroad layout. While recreational amenities draw interests from nature-based enthusiasts, Cowan is an EPA identified disadvantaged community with multiple brownfields and a full suite of legacy environmental, social, and economic impacts. In addition, all the CTs meet the definition of an American Rescue Plan Act (ARPA) qualified CT¹. Cowan also faces challenges with limited access to modern healthcare services and high-speed internet in some rural areas. The Coalition sees these challenges as unique opportunities for growth and has selected three priority brownfield sites in Cowan where EPA ACG funding will be a catalyst to support initiatives to improve healthcare access, expand educational programs, upgrade local infrastructure, and promote sustainable tourism. This will give an otherwise underserved community the opportunity to bring commercial and recreational business and related jobs/economic benefits to residents.

The Town of Huntland TA covers the boundaries of the Town and surrounding lands and is located just North of the Alabama state line and bordering the Cowan TA to the Northeast. The area is known for its picturesque landscape with Huntland nestled between rolling hills, lush forests, and scenic farmlands. Huntland has a rich history and a deep connection to agriculture, with farming and outdoor activities being central to its local economy and culture. The TA also has access to various recreational areas, including nearby parks, lakes, and hiking trails, making it a go-to location for families and individuals seeking a rural lifestyle while maintaining proximity to urban amenities. Huntland has a strong sense of pride in its heritage, and its residents are committed to preserving the town's charm while working toward progress and growth. Residents in the TA face significant socio-economic, climate change and other EJ impacts such as low income, agricultural loss, flood risks and energy cost burdens. Residents also live among numerous brownfields including blighted former manufacturing facilities warehouses, and services stations exposing them to contaminants in groundwater, sediment, soil gas and RBMs. The Coalition has identified three priority brownfield sites that immediately begin addressing the noted challenges and ultimately bringing transformational change for the community.

4. EXISTING BROWNFIELDS GRANTS TO NON-LEAD MEMBERS:

Franklin County nor any of the non-lead coalition members have ever been awarded an EPA Brownfield Grant. Therefore, none of the Coalition members are a recipient of an open

¹ American Rescue Plan Act (ARPA) Qualified Census Tracts (CT) are those in which at least 50% of households have incomes below 60% of the Area Median Gross Income (AMGI) or have a poverty rate of 25% or more.

Threshold Criteria for Assessment Coalition Grants

Cooperative Agreement for Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant funding and none were awarded a MARC Grant closed in 2016 or later.

5. COALITION AGREEMENT:

Letters of commitment confirming the membership of the City of Winchester, the City of Cowan and the Town of Huntland in the Coalition are provided in Attachment A. Following grant award, Franklin County will create a Memorandum of Agreement (MOA) for the Brownfield Assessment Coalition Grant project in accordance with the terms and conditions issued by EPA for the FY25 Grant.

6. COMMUNITY INVOLVEMENT:

The County has a strong record of working with our towns, cities, project partners and community stakeholders to form productive partnerships on our grant programs. Community involvement during planning and implementation ensures stakeholders have a voice in decision making so residents and businesses alike benefit from the revitalization of brownfields in their neighborhoods. Coalition partners are located within identified EJ and CEJ areas and will assist with community engagement. They will also assist with outreach efforts to maximize opportunities for underserved populations to have a voice in shaping their neighborhoods. As a foundation for community engagement the coalition will form a brownfield advisory committee (BAC) consisting of stakeholders that best represent the community. The BAC will meet monthly to share project information, discuss site prioritization and selection strategies, share regional challenges and successes, and discuss revitalization and economic development opportunities. The County advertises all engagement opportunities through public notices, email blasts to project partners, Board meetings, and via word of mouth in existing community networks. These community engagement methods will allow stakeholders to provide informed feedback that can influence all phases of work. Strong public involvement will lead to community buy-in and more effective and representative redevelopment projects. Additional elements of the community engagement plan will include:

- **Webpage & Fact Sheets:** The County webpage will inform the community on the brownfield project providing fact sheets, informative details about the site assessment and cleanup process and a streamlined approach to the site nomination process. Fact sheets will be updated to summarize FY25 ACG Grant accomplishments.
- **Email, social media & Newsletters:** A stakeholder distribution list will be created, and periodic emails will be sent. Our partners will communicate progress via regular meetings/organizational newsletters.
- **Special Events:** Planned events, realtor meetings, loan officer tours and meetings with local Business Council, Chambers of Commerce, and Rotary Clubs, are used to capture busy parents, business owners and residents without regular access to the Internet. This provides stakeholders and avenue to provide meaningful input throughout the grant lifecycle.

7. EXPENDITURE OF EXISTING GRANT FUNDS:

Franklin County affirms it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

8. CONTRACTORS AND NAMED SUBRECIPIENTS:

- **Contractors:** Not applicable. (Contractor procurement will occur following grant award.)
- **Name Subrecipients:** Not applicable. (No subrecipients have been identified.)