



IV.D. Narrative Information Sheet

1. Applicant Identification:
Southeast Tennessee Development District (Chattanooga Area Regional Council of Governments d/b/a as Southeast Tennessee Development District)
1000 Riverfront Parkway
PO Box 4757
Chattanooga, TN 37405

2. Website URL:
 - a. Southeast Tennessee Development District – <https://sedev.org>
 - b. City of Cleveland- <https://www.clevelandtn.gov>
 - c. City of East Ridge -- <https://www.eastridgetn.gov>

3. Funding Requested:
 - a. Assessment Grant Type: Brownfields Coalition Assessment Grant

 - b. Federal Funds Requested: \$1,200,000

4. Location (non-lead members):
 - a. City of Cleveland
 - b. Bradley County
 - c. Tennessee

 - a. City of East Ridge
 - b. Hamilton County
 - c. Tennessee

SETD will utilize funding from this FY25 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 17-county service area (Bledsoe, Bradley, Catoosa, Chattooga, Dade, Gordon, Grundy, Hamilton, Marion, McMinn, Meigs, Murray, Polk, Rhea, Sequatchie, Walker and Whitfield Counties).

- East Ridge, TN Target Area (ERTA) – consists of a 1.1 mi long by 0.3 mi wide corridor along Ringgold Road that runs east & west between Landsdell Rd. to the west and New Scruggs Rd. to the east in City of East Ridge, Hamilton Co., TN. The ERTA encompasses an area of 0.33 mi² in Census tract (CT) 47065011600. The ERTA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods and commercial areas. We are focusing on two priority brownfield sites including a vacant former nursing home and a former dumping site for this target area.
- Cleveland, TN Target Area (CTA) – is bound by 8th St NE to the north, E. St. SW to the east, 9th St. SE to the south, and S. Ocoee St. to the west in Cleveland, Bradley Co., TN. The CTA encompasses an area of approximately 0.59 mi² in CT's 47011010400 & 47011010700. The CTA contains several closed former industrial and commercial brownfield properties in disadvantaged neighborhoods. We are focusing on two priority brownfields sites, including a former gray iron foundry and a textile manufacturing facility for this target area.
- SETD Target Area (SETA) – is bound by E. Morris St. to the north, Martha Sue Dr. to the east, E. Walnut Ave. to the south, and Claude St. to the west, in Dalton, Whitfield Co., GA. The SETA encompasses 0.27 mi² in CT 13313001300 and contains numerous closed and underutilized brownfield sites in a mixed commercial/residential neighborhood. We are initially focusing on a former machine shop site in this target area.

6. Contacts:

a. Project Director:

Mr. Sam Saieed

SETD-Director of Community and Economic Development

423-424-4269

ssaieed@sedev.org

1000 Riverfront Parkway

PO Box 4757

Chattanooga, TN 37405

b. Chief Executive:

Chuck Hammonds

SETD-Executive Director

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PO Box 4757

Chattanooga, TN 37405

7. Population:

City of Cleveland, Bradley County, TN– population 49,086

City of East Ridge, Hamilton County, TN – population 21,961

City of Dalton, Whitfield County, GA – population 34,366

(2022 ACS 5-YR Estimates)

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority 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, 3
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4
At least 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 that has recently closed (2014 or later) or is closing.	

9. Letter from the Tennessee Department of Environmental & Conservation, Division of Remediation (attached).

10. Releasing Copies of Applications: Not Applicable



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

November 4, 2024

Sam Saieed
Director of Community Development
P.O. Box 4757
1000 Riverfront Pkwy
Chattanooga, TN 37405

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

Dear Mr. Saieed,

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 the Southeast Tennessee Development Districts' area of service (including 17 counties), partnering with the City of Cleveland and the City of East Ridge.

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program

1. Project Area Description & Plans for Revitalization, a. Coalition Members, Target Areas & Brownfields, i. Coalition Members:

The Southeast Tennessee Development District (SETD) is a legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. The SETD (Coalition Lead -- pop. 1,044,496)(2022 American Community Survey (2022 ACS)) is an association of 65 municipal and 17 contiguous county governments (in Bledsoe, Bradley, Grundy, Hamilton, Meigs, Polk, Marion, McMinn, Rhea, Sequatchie, Catoosa, Chattooga, Dade, Gordon, Murray, Whitfield and Walker counties) centered in rural Southeastern Tennessee and Northwest Georgia (the Region). The Region has long been serviced by Interstates 59, 75, and 24. Our mission is to advance our communities by enhancing well-being through a people centered approach focused on forging successful partnerships with local governments benefiting individuals, families and businesses.

With our non-lead members, City of East Ridge (pop. 21,961) and City of Cleveland (pop. 49,086)(2022 ACS), both local units of government, we comprise the SETD Coalition (Coalition). East Ridge and Cleveland are non-lead members of the Coalition because they like other communities in SETD have need but don't have the capacity to apply for and manage brownfields grants, partly due to their size and their lack of access to brownfield resources to address their brownfields on their own.

1.a.ii. Overview of Brownfield Challenges and Description of Target Areas: The geographic boundaries for which we propose to conduct assessment activities encompass the 17-county Region noted in 1.a.i above, with the western part historically dependent on the coal and iron industries; the central part being more densely populated, attracting significant manufacturing including appliances, paper, furniture, textiles, clothing, and chemicals; and the northeastern part remaining mostly agrarian, with some areas of industrialization. Although communities in the SETD are not traditional "rust belt" communities, we have historically depended greatly on industry to provide quality employment for our residents. Industry and commerce grew in our downtowns alongside neighborhoods, allowing residents to work near their homes. Unfortunately, after our industry peaked in the 1960's, many of our communities have experienced a steady decline in prosperity due to the business closures, transfer of manufacturing jobs overseas, and increased automation. Closures and manufacturing/service industry reductions at local facilities in SETD communities (Waupaca Foundry, Resolve Forestry, Shaw Industries, Mohawk Industries, Brown Industrial, Airxcel, IAC Dayton, International Paper, Mount Vernon Mills, etc.), resulted in over 12,000 jobs lost in the Region over the last 10 years (TN Dept. of Workforce Dev. (TN DWD), adversely affecting many SETD communities that have not fully recovered from deindustrialization that started in the 1980s and escalated after the 2008 global financial crash and the recent economic downturn. **This left behind hundreds of brownfields throughout our Region, totaling more than an estimated 950 acres of blighted or underutilized land, much of it within or adjoining poor neighborhoods and our downtowns, both in urban and rural areas.**

If awarded, SETD will utilize funding from this FY25 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout the 17-county Region (see 1.a.i). We have chosen three (3) target areas as our focus where EPA Brownfields Assessment Grant funding will have the greatest initial impact and move these sites towards redevelopment.

East Ridge, TN Target Area (ERTA) – consists of a 1.1 mi long by 0.3 mi wide corridor along Ringgold Road that runs east & west between Landsdell Rd. to the west and New Scruggs Rd. to the east in City of East Ridge, Hamilton Co., TN. The ERTA encompasses an area of 0.33 mi² in Census tract (CT) 47065011600. The ERTA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods and commercial areas. We are focusing on two priority brownfield sites including a vacant former nursing home and a former dumping site for this target area.

Cleveland, TN Target Area (CTA) – is bound by 8th St NE to the north, E. St. SW to the east, 9th St. SE to the south, and S. Ocoee St. to the west in Cleveland, Bradley Co., TN. The CTA encompasses an area of approximately 0.59 mi² in CT's 47011010400 & 47011010700. The CTA contains several closed former industrial and commercial brownfield properties in disadvantaged neighborhoods. We are focusing on two priority brownfields sites, including a former gray iron foundry and a textile manufacturing facility for this target area.

SETD Target Area (SETA) – is bound by E. Morris St. to the north, Martha Sue Dr. to the east, E. Walnut Ave. to the south, and Claude St. to the west, in Dalton, Whitfield Co., GA. The SETA encompasses 0.27 mi² in CT 13313001300 and contains numerous closed and underutilized brownfield sites in a mixed commercial/residential neighborhood. We are initially focusing on a former machine shop site in this target area.

Residents living among brownfields in the CTA, ERTA, and SETA experience **low income (Median Household Income (MHI) is 30% to 67% less than the US and 25% to 61% less than TN and GA). The CTA & ERTA experience high poverty (98% & 286% higher than the US and 77% & 244% higher than TN) and high child poverty (44% & 187% higher than the US and 75% & 120% higher than TN). Our target areas also have a high minority populations, especially in the ERTA & SETA (86% & 99% higher than the US and 66% to 180% higher than in GA & TN), and the SETA has a very high Hispanic population (302% higher than the US and 1,153% higher than TN).**

The financial challenges experienced by our target area residents have perpetuated a cycle of low-quality jobs, inadequate affordable housing, unhealthy nutritional options, food deserts, insufficient park/recreational space and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. We recognize the great redevelopment potential of the CTA, ERTA and SETA and are making a focused effort to address priority brownfields (see 1.a.ii) and leverage additional funding for these hardest hit parts of our communities where redevelopment investment has the greatest opportunity for success. We are already working hard to repurpose and reshape the businesses and commerce of the CTA, ERTA and SETA. For example, the **City of East Ridge recently structured an economic development Payment in Lieu of Taxes (PILOT) for a 2023 project that brought in \$21million in private investment for 90 new jobs on what was previously a brownfield site.** We believe that strategic investment of EPA assessment funds will revitalize our target areas, making our communities more attractive to new businesses, developers, visitors, and residents.

1.a.iii. Description of the Priority Brownfield Site(s): There are more than 60 brownfield sites in the CTA, ERTA and SETA combined, ranging in size from less than half an acre to over 100 acres in size. Table 1 presents our priority sites that offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical/current uses, likely environmental issues, potential health effects from exposure to these sites, and planned reuses are listed below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse	Suspected Contaminants*
Cleveland Foundry, 685 6th St NE, Cleveland (in CTA) , – 3 acres, adjoins low-income neighborhood & creek (Fillauer Branch)	Former metal casting facility / Vacant buildings / Light industrial or commercial redevelopment	VOCs, PAHs, metals, PCBs, petroleum, PFAS, asbestos, lead paint
American Textile, 180 6th St. SE, Cleveland (in CTA) -- 2.92 acres in commercial area; adjoins low-income neighborhood, in flood zone AE	Textile factory / Vacant buildings / Mixed-use, multi-family redevelopment	VOCs, PAHs, metals, PCBs, petroleum, PFAS, asbestos, lead paint
Gateway Building, 1403 Mack Smith Rd., East Ridge (in ERTA) – 7.3 acres in low-income neighborhood	Former nursing home / Vacant buildings / Mixed-use redevelopment.	VOCs, PAHs, metals, PCBs, petroleum, PFAS, asbestos, lead paint
Former Dump Site, 6750 Ringgold Rd., East Ridge (in ERTA) – 5.65 acres in industrial area, adjoins creek, in flood zone AE	Former Dump Site / Vacant lot / Commercial-light industrial redevelopment	VOCs, PAHs, metals, PCBs, petroleum, PFAS
Machine Shop, 503 11th Ave., Dalton (in SETA) – 2.54 acres adjoining low-income neighborhood & creek	Former machine shop / Vacant buildings / Mixed-use redevelopment	VOCs, PAHs, metals, PCBs, petroleum, PFAS, asbestos, lead paint

*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include damage to skin, liver, kidneys, heart, spleen; nervous, respiratory, hormonal, blood, & immune systems; may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).

These sites are our highest priorities because they will meet immediate needs in our target areas, align with our revitalization plans, and redevelopment is imminent due to funding already committed: City of Cleveland invested nearly **\$7M in infrastructure improvements** throughout the city, including 20th & 17th Street Sidewalks, Raider Drive Bridge, Blythe & Peerless Connectors, and the Parker Street Streetscape. Most of these amenities are near CTA brownfield priority sites. The investment to redevelop historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in our target areas and throughout the Coalition (we have an initial inventory of over 100 brownfield properties) will serve as examples of success, triggering further investment. For example, the **American Textile site in the CTA potentially impacts the adjoining low-income neighborhood and creek with historical solvents or other industrial chemical releases**. The city has plans to repurpose this site, removing the environmental and health threats and transforming it into a much-needed mixed-use, multi-family residential/commercial development, bringing desperately needed affordable housing and high-paying jobs to this part of our community (as specified in our Revitalization Plans (1.b.i.)).

1.a.iv. Identifying Additional Sites: Our focus at the outset of this grant will be the ERTA, CTA and SETA target areas. As we complete assessment of all priority sites, additional sites will be identified using the brownfield inventory and community input and will meet the demographic and environmental justice conditions used to define our disadvantaged ERTA, CTA and SETA areas, which means they will be in an underserved community and/or a disadvantaged census tract (as defined by EJScreen and/or CEJST).

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: The 2024 SETD Comprehensive Economic Development Strategy Annual Update; 2019 Cleveland Downtown Revitalization Initiative; 2021 (amended) Hamilton Countywide Comprehensive Plan, and 2023 Whitfield County Joint Comprehensive Plan 2024-2028 (Revitalization Plans) specify revitalization of the CTA, ERTA, and SETA target areas as a key initiative and outline critical infrastructure and renovations to enhance our role as a regional economic hub. This mix of brownfields to industrial and mixed-use commercial/residential redevelopment and increased walkability/connectivity in the CTA, ERTA, and SETA will allow target area residents to live, work, shop, and recreate within their neighborhoods and throughout target area communities.

The key to revitalization of our target areas and other portions of the Region is brownfields reuse, for which this EPA brownfields grant is vital. These funds will help us reach redevelopment goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the CTA, ERTA, and SETA, triggering further environmental and redevelopment funding (see 1.c.i). Increasing our stock of mixed-use commercial/residential properties and accessible owner-occupied, moderate-income housing near our commercial centers will alleviate our housing shortage and align with our goal to increase the walkability/connection of our downtowns to area neighborhoods. **Revitalizing the former Foundry and American Textile sites in Cleveland as multi-tenant light industrial and multi-family mixed-use respectively, will bring much needed space for small business development** as well as commercial and housing opportunities to the CTA. **Revitalizing the Gateway Building site in East Ridge will eliminate blight, and create needed jobs, while providing affordable housing and walkable greenspace within the ERTA.** The revitalization efforts for our priority sites will create needed jobs, affordable housing, and walkable greenspace within our target areas, improving our residents' quality of life and meeting the visions outlined in our Revitalization Plans. **Significant resources have already been pledged for reuse of CTA, ERTA, and SETA properties (see 1.c.i), including infrastructure improvements along the Inman Street Corridor in Cleveland** which lies between the two target census tracts in CTA. With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits outlined below.

1.b.ii Outcomes & Benefits of Reuse Strategy: Reuse/redevelopment of all Table 1 properties will create an estimated 585 construction jobs and over 362 permanent jobs and will generate more than \$8.5M in annual income tax revenue, according to projections. Additionally, since our priority sites are in designated Tax Increment Financing (TIF) districts, incremental increases in property taxes

retained for redevelopment purposes by our communities could **generate up to \$1.1M in annual incremental tax revenue which will be reinvested in the CTA, ERTA, and SETA.**

Assessment and reuse of priority sites such as the former Machine Shop in Dalton will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties. This in turn will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in our target areas, where many of our low-income, minority, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will also generate higher tax revenue for our communities, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise.

During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficient measures such as energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. Addressing priority sites in the CTA, ERTA, and SETA will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of low-income residents. **EPA's investment in brownfields in our target areas will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our parks network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economy.**

Transforming priority sites such as **American Textile in Cleveland, Gateway Building in East Ridge, and Machine Shop in Dalton into multi-use redevelopments**, will create a more walkable community. This in turn will help **mitigate community vulnerability to climate change by reducing carbon emissions and encouraging green transportation (walking, biking, etc.)**, ultimately providing justice to disadvantaged residents (due to low-income, high minorities, distressed neighborhoods) who experienced a disproportionate exposure to environmental and climate change impacts from brownfields, etc.).

I.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Our target communities have a history of leveraging investment in projects. For example, Cleveland, East Ridge, and Dalton have **leveraged over \$16M in grant funding and over \$7M in local funds to improve their industrial parks, streets, sidewalks, greenways, and other infrastructure** over the past several years to help revitalize their communities. More investment is planned, focusing on the CTA, ERTA, and SETA as outlined below.

- *Private/Public Funding* – see above
- *EPA* - Additional EPA Assessment, Cleanup, Multipurpose, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the city (\$500K-\$5M)
- *EPA – Targeted Brownfield Assessment Program* – provides Phase I & Phase II assessments, and cleanup planning for eligible brownfields properties (\$50K-\$100K)
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Tennessee Department of Environment and Conservation (TDEC) Brownfield Area Redevelopment Fund* – Will provide grants, targeted for investigation and remediation/mitigation at brownfield sites, to local governments for local investments in brownfield sites (up to \$500K per year)
- *Southeast Tennessee Development /USDA Rural Small Business Loan Fund* - provides loans for development projects in rural areas within most of SETD service area (\$250K)
- *Southeast Tennessee Development/EDA Revolving Loan Fund (RLF) Program* - RLF funds are intended to provide bridge or gap financing for projects in rural or urban areas that would not otherwise be able to be completed (\$250K)

- *Tennessee Brownfields Redevelopment Tax Credits* - Tax Increment Financing (TIF) and Franchise/Excise Tax Credit for qualifying development projects enrolled in the TDEC Voluntary Oversight and Assistance Program (\$ variable)
- *Community Development Block Grant* – available to non-entitlement communities for projects that eliminate blight, benefit low-moderate income citizens, and/or address imminent health & safety problems (\$400K-\$600K)
- *TN Main Street Program* - revitalize community traditional downtowns (up to \$600K)
- *TN Department of Economic Development/Community & Rural Development Program Petroleum Underground Storage Tank Fund* - State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan due to individual status and eligibility.

1.c.ii. Use of Existing Infrastructure: Land use goals in our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill development in our community's core neighborhoods in our target areas before additional land is considered for development. All priority sites have full utilities already present including 3-Phase electricity, natural gas, city water and sewer, telephone, and fiber optic service. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, on- and off-street parking and commerce (I-59, I-75, and I-24), the Cleveland/Bradley County Greenway, and Dalton's greenway trail systems to attract new investment in area brownfields, reducing redevelopment costs of these sites. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in our target areas. Revitalization ranging from mixed use commercial/residential to light industrial existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: SETD needs EPA's financial assistance because we do not have the necessary funds for environmental assessments in our general budget (\$7.5M FY24) to address brownfields anywhere in our service area, let alone in our target area. Indicators of need in the SETD are evident in numerous key economic-demographic factors: **low income (Median Household Income (MHI) is 30% to 67% less than the US and 25% to 61% less than TN and GA). The CTA & ERTA experience high poverty (98% & 286% higher than the US and 77% & 244% higher than TN) and high child poverty (44% & 187% higher than the US and 75% & 120% higher than TN). Our target areas also have a high minority populations, especially in the ERTA & SETA (86% & 99% higher than the US and 66% to 180% higher than in GA & TN), and the SETA has a very high Hispanic population (302% higher than the US and 1,153% higher than TN) (see 2.a.ii) (2022 ACS).**

The large number of vacant buildings on target area brownfields has resulted in an estimated twofold increase in crime within the CTA, ERTA, and SETA when compared to other parts of their respective communities (according to community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfield sites. The SETD's priority brownfield sites further add to the financial burden of target area residents by suppressing residential property values and straining municipal budgets through a reduced tax base.

Parts of Cleveland and the East Ridge area were negatively impacted by severe storms and tornadoes as indicated by the April 24th, 2020 Presidential Major Disaster Declaration (DR 4541 Amendment 1). The damage caused by this disaster event in conjunction with the disastrous effects on the Region as a result of COVID-19, slowed economic recovery in many areas of Southeastern Tennessee and northwest Georgia. We were disproportionately impacted by the coronavirus due to the reduction of tourism and retail industries. Repairing damaged buildings and delayed re-openings slowed the economic rebound for many small businesses in SETD's communities. **The loss of Waupaca Foundry, Resolve Forestry, Shaw Industries, Airxcel, IAC Dayton, International Paper, Beresdorf Mfg, Hardwick Tactical and others in the Region since 2014 (TN DWD), has**

added substantially to the economic challenges facing our communities diminishing local income and property tax revenues, and increasing poverty. Because of our communities’ small populations, and with budgets barely able to provide essential services and needed infrastructure maintenance, our target area communities lack the discretionary funds necessary to complete the proactive assessment or remediation, and reuse planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow SETD to fulfill the revitalization needs for our target areas and beyond, creating unique, healthy, safe, and walkable neighborhoods.

2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations:

Table 2 ¹	US	TN	GA	CTA 7	CTA 4	ERTA	SETA
Median Household Income	\$75,149	\$64,035	\$71,355	\$34,063	24,882	\$47,750	\$50,102
Percent Minority	41.1%	27.4%	49.2%	28.8%	33.3%	76.6%	81.7%
Percent Hispanic	18.7%	6%	10.1%	10%	18.1%	1.6%	75.2%
Individuals Living in Poverty ²	12.5%	14%	13.5%	25.5%	48.2%	46.9%	11.2%
Children Living in Poverty ²	16.7%	19.2%	18.9%	36.6%	42.2%	33.6%	12.1%
Elderly Living in Poverty ²	10%	10.1%	10.3%	26.2%	42.5%	28.3%	29.4%
¹ All Stats from 2022 ACS ² Last 12 months							

Our most sensitive populations (low-income residents and individuals living in poverty, especially children & elderly, minorities, and Hispanic population (SETA))(Table 2), live in and around our CTA, ERTA, and SETA brownfield sites that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, soil and groundwater contamination, and unsafe structures. Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, PFAS, lead paint, and asbestos are potentially causing harm to our sensitive populations. **67% of houses in the CTA were constructed before 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. The former Cleveland Foundry site, adjoining a low-income neighborhood, is potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, and other contaminants that are known to cause various cancers, heart diseases, and respiratory diseases, which are experienced by CTA, ERTA, and SETA residents at higher rates than TN and the US (2.a.ii(2)).** The proximity of brownfields to low-income neighborhoods in our **CTA, ERTA and SETA** drives down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a disadvantage for target area residents with no relief in sight.

Assistance through funding from this EPA grant will provide much needed capital for the assessment of blighted properties, clearing the way for remediation and revitalization of the SETD to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system and constant investment in infrastructure. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit SETD’s underserved and sensitive populations, including removal of blight, reducing exposure to toxic chemicals, lowering crime, providing safer neighborhoods, and better access to public services, ultimately improving the health of our communities.

2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Contaminants from target area brownfields are affecting the health of our residents. Many of the priority sites are believed to be impacted by PCBs, VOCs, PAHs, petroleum, metals, asbestos, lead paint, and/or other chemicals. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancers, chronic respiratory disease, asthma and heart disease among other ailments. As Table 3 below shows, our target area counties have high incidences of cancer, asthma, heart disease and chronic respiratory disease. asthma and all are very potentially linked to impacts from nearby

brownfields. Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable people living in them.

Table 3 – Health Indicators

Disease/Health Condition	US Rate	Bradley Co. TN Rate	Hamilton Co. TN Rate	TN Rate	Whitfield Co. GA Rate	GA Rate	SETD Targets vs US
Lung Cancer ¹	53.1	64.2	62.4	68.1	65.0	56.8	7-28% higher
Kidney Cancer ¹	23.3	-	29.7	26.9	26.7	24.5	19-27% higher
Asthma ²	7.7%	-	-	10.3%	-	9.4%	22-33% higher
Death Rates Heart Disease ³	167.5	255.1	186.9	213.5	204.5	184.2	11-52% higher
Death by Chronic Resp Disease ³	36.9	58.2	53.2	52.1	56.1	42.4	44-57% higher

¹ Incidence per 100K Residents CDC -2022 ²% of pop CDC-2022 ³ Incidence per 100K Residents -NIH 2022

There are 4,058 Coalition properties with environmental records on EPA’s Envirofacts Mapper. The cumulative effects of these sites likely contribute to the adverse health conditions impacting our residents. **Removal of sources of environmental contaminants present at brownfields in our target areas will reduce exposure of our underserved populations to these materials and in turn, reduce disproportionate incidences of disease and other poor health outcomes that these residents currently experience.**

2.a.ii(3) Environmental Justice (a) Identification of Environmental Justice Issues: The public health impact from CTA, ERTA and SETA brownfields and commercial and industrial operations, and their proximity to our underserved populations, including low-income and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. **EPA’s EJScreen tool indicates that CTA residents are in the 90th & 92nd percentile for Underground Storage Tanks and 91st & 96th percentile for Wastewater Discharge when compared to the US and TN. ERTA residents are in the 75th & 83rd percentile for Superfund Proximity and 80th percentile for Unemployment Rate when compared to the US and TN. SETA residents are in the 85th & 90th percentile for Lead Paint and 95th & 98th percentile for Toxic Releases to Air when compared to the US & GA.** EPA’s Climate and Economic Justice Screening Tool (CEJST) indicates the CTA as disadvantaged for Health (Asthma Diabetes, Heart Disease), Legacy Pollution (Proximity to RMP Facilities), and Workforce Development (High School Education); the ERTA as disadvantaged for Workforce Development (High School Education), Climate Change (Projected Flood Risk), Health (Heart Disease & Low Income); and the SETA as disadvantaged for Workforce Development (Linguistic Isolation & High School Education). **All 5 priority brownfields sites in 1.a.ii are located within a disadvantaged CEJST census tract.**

2.a.ii(3)(b) Advancing Environmental Justice: Brownfield assessment, cleanup, and reuse strategies will improve the welfare of sensitive populations in the CTA, ERTA and SETA by eliminating the health risks they pose. This EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on various sites. New jobs in our target area will create gainful employment for residents, reducing poverty, minimizing displacement, and improving the state of our housing by redeveloping sites as residential properties. For example, **repurposing the former Nursing Home site in East Ridge will eliminate blight, reduce potential exposure to contaminants, provide needed mixed-use commercial/residential development and jobs to the community, and minimize displacement of residents and businesses in the surrounding disadvantaged neighborhoods.** Grant funds will assess lead-based paint, spurring other federal programs (e.g. Community Development Block Grants (CDBG)) to assist in funding lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of our community neighborhoods, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health indicators such as cancers, asthma, & heart disease (2.a.ii(2)) will no longer be influenced by environmental impacts caused by ERTA, CTA and SETA brownfields. Socioeconomic indicators such as linguistic isolation, low HS completion**

rates, and proximity to Superfund sites also will no longer be influenced by environmental impacts caused by CTA, ERTA, and SETA brownfields. This will be accomplished in areas where disadvantaged communities as identified by CEJST are concentrated, supporting environmental justice for SETD residents.

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community organizations have pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups is well suited to engage the community and public at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project. For example, Cleveland Chamber, East Ridge Economic Development and Dalton JDA will help connect workers to job opportunities created by this grant, including temporary jobs created during the redevelopment of brownfield sites, as well as permanent jobs for new businesses on redeveloped brownfield properties.

Table 4 – Project Partners and Roles

Partner Name	Entity's Mission	Point of Contact	Description and Project Roles
Cleveland/Bradley TN Chamber of Commerce	Promote econ dev of the region, business dev of its' members & quality of life of the community	Douglas E. Berry VP of Economic Development www.clevelandchamber.com	Local economic & workforce development organization, site selection & prioritization; identify potential buyers; disseminate information about the grant
Dalton/Whitfield, GA Joint Development Authority	Promote econ dev in Dalton & Whitfield County with a focus on responsible job creation	Carl Campbell Executive Director campbell@daltonchamber.org	Local economic & workforce development organization, site selection & prioritization; identify potential buyers; disseminate information about the grant
City of East Ridge, TN Dept of Economic and Community Development	Promote econ dev by coordinating grant funding, community outreach and managing capital projects and infrastructure	Cameron McAllister Administrator cmcallister@eastridgetn.gov	Business, workforce development & growth advocate – promote brownfield sites to prospective businesses; identify potential funding sources for brownfield redevelopment projects, community outreach
Southeast TN Brownfield Task Force	Promote quality of life by working with the public to revitalize and reuse brownfields in our region	Troy Keith Troy.keith@tn.gov	Brownfield Subject Area Expert Partner, provide stakeholder input on development, monitor & update community brownfield program sites.
MainStreet Cleveland	NFP organization dedicated to revitalization & promotion of DT Cleveland	Sharon Marr Executive Director mainstreet@clevelandtn.gov	Inform property owners and other stakeholders of the importance of revitalizing our brownfield properties

2.b.iii. Incorporating Community Input: SETD has a culture of community involvement that we will maintain throughout this grant. **A total of 8-12 public meetings will be held during the 4 -year grant period** in various Region communities to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The Region will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on SETD and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community

input without access to digital resources. SETD has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging Region residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and schedule future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the community Planning & Zoning Departments, Plan Commissions, and Chambers of Commerce to bring awareness of the redevelopment opportunities priority sites offer. Developers will be identified and invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: SETD will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by EPA's PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, SETD and its QEP will complete the following tasks:

Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: SETD staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the SETD, QEP, EPA, etc. to manage the grant's Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries. We will carefully track contractor costs, comparing to budget, expenditures, and project progress, to ensure that grant funds will be utilized within the prescribed 4-year project period. SETD, with QEP support, will update its existing brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Additional sites will be identified by the community leaders, local governments, redevelopment investors, and through community outreach. Priority will be granted to sites within areas identified as disadvantaged by the CEJST and to sites near residential areas that pose health risks to an underserved community. Priority will also be considered for sites that have a higher chance of redevelopment and a greater economic impact potential within our target areas.

ii. Schedule: QEP selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period

iii. Task/activity Leads: SETD & QEP

iv. Output(s): Travel - SETD staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 16 Quarterly Reports, ACRES entries, 4 MBE/WBE reports, 4 annual reports, etc.; calls, 8-12 public meetings to update communities on the brownfield program, and correspondence between SETD, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

Task/Activity 2: Environmental Investigation

i. Project Implementation: Prior to applying for site eligibility, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESAs activities on sites selected by SETD. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (E1527-21) and the All-Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1. The QEP will prepare a Quality Assurance Project Plan (QAPP) as well as Sampling & Analysis Plans/Health & Safety Plans (SAPs/HASPs) for EPA approval. Once

approved, the QEP, directed by SETD, will complete Phase II ESAs based on environmental conditions identified in the Phase I ESAs.

ii. Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 15th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Lead(s): SETD & QEP

iv. Outputs: 36 Phase I ESAs; QAPP, SAPs/HASPs, estimated 32 Phase II ESAs.

Task/Activity 3: Clean-up & Reuse Planning:

i. Project Implementation: QEP, directed by SETD, will prepare site specific clean-up plans/documents including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up/reuse funding development (1.c.i).

ii. Schedule: Prepared after Phase I and II ESAs are complete, contamination is present, and if cleanup is necessary. Task 3 activities will continue throughout the grant period.

iii. Task/activity Lead(s): SETD & QEP

iv. Output(s): estimated 12 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 8-12 public meetings will be held at various venues throughout SETD's service area during the grant period to update ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. SETD will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning and provide marketing resources for future development. Additional sites can be identified during public community outreach meetings. These meetings will be focused on public engagement including what sites the community views as a priority for redevelopment. Priority will be granted to sites identified by underserved communities, especially when those sites are within areas identified as disadvantaged by the CEJST.

ii. Schedule: 2-3 public meetings per year; the 1st planned for the 2nd Quarter of the grant period.

iii. Task/activity Lead(s): SETD & QEP

iv. Output(s): 8-12 public meetings to update communities on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to ensure startup activities are completed per the schedule above. SETD will allocate all grant funds to project properties before the final quarter of the grant period to ensure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites in 1.a.ii, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: The SETD Coalition is requesting \$1,200,000 in grant funding, which is essential to complete environmental assessments of target area priority brownfields. The costs outlined in Table 5 were developed by anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. SETD will allocate \$1,006,700 (84% of total grant funds) to Phase I and II ESAs.

Table 5 Budget	Budget Categories ¹	1. Program Mgmt. Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Travel	\$8,000				\$8,000
	Supplies				\$950	\$950
	Admin. Costs	\$24,000			\$12,000	\$36,000
	Fringe Benefits	\$12,000				\$12,000
	Contractual ²	\$30,150	\$1,006,700	\$90,000	\$16,200	\$1,143,050
TOTAL BUDGET		\$74,150	\$1,006,700	\$90,000	\$29,150	\$1,200,000

¹Table 5 only includes budget categories with costs. ²In accordance with Federal, state, and local procurement regulations.

Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management & Training Support, Inventory/Prioritization: \$74,150 – *Travel:* Attend 2 National Brownfield Conferences (2 people each): airfare x 4 @ \$2,400, 2 rooms, 3 nights lodging for 2 confs. @ \$3,240, meals @ \$960, ground transportation @ \$400, conf. registration for 2 people x 2 events @ \$1,000 = \$8,000 *Contractual:* total \$30,150, includes approximately 175 hrs. \$90/hr. = \$15,750 for inventory, & approximately 160 hours \$90/hr. = \$14,400 for program mgmt. *Personnel:* Direct admin. Cost includes 50 hrs. \$60/hr. & 120 hrs. \$25/hr. = \$24,000. Fringe Benefits = \$12,000.

2. Env. Investigation: \$1,006,700 – *Contractual:* 22 Phase I ESAs at an average cost of \$3,600 each = \$79,200, & 25 Phase II ESAs at an estimated cost of \$37,100 (depending on site complexity/environmental conditions) = \$927,500 (@ \$37,100 average cost). Though our budget will support 22 Phase I’s and 25 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in inventories as priority sites listed in 1.a.ii.

3. Clean-up & Re-use Planning: \$90,000 – *Contractual:* 12 ABCAs/Clean-up plans or Re-use plans/Design Charettes expected to cost \$5,000-\$15,000 each = \$90,000.

4. Community Outreach & Involvement: \$29,150 – *Supplies:* printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$950, *Contractual:* approx. 180 hours at an estimated \$90/hr. = \$16,200. *Personnel:* Direct admin. Cost includes 25 hrs. \$60/hr. & 60 hrs. \$25/hr. = \$12,000.

3.c. Plans to Measure & Evaluate Environmental Progress & Results:

We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve anticipated outputs on schedule. The Assessment Grant will also have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, SETD staff will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites is done, it is in the SETD’s best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Output and outcomes following the close of the grant will be uploaded to EPA’s ACRES page for continued monitoring of the program’s success.

4. Programmatic Capability & Past Performance, a. Programmatic Capability, i. Organizational Capacity, ii. Organizational Structure & iii Description of Key Staff:

SETD staff will manage this grant. SETD has previously managed many other economic development resources valued at over \$65M over the past 10 years. SETD has the technical, financial, and administrative capacity to

implement the EPA Brownfield Assessment Grant successfully. Mr. Sam Saieed, SETD Director of Community & Economic Development, will be the manager of the brownfields Coalition Grant. Mr. Saieed has extensive experience with grant management having performed these duties on many projects in the past, including a 2015 EPA Brownfields Assessment Grant. Ms. Staci Willoughby, SETD Director of Project Administration, will assist Mr. Saieed. Ms. Willoughby has served as Project Administrator for SETD since March 2021. Mr. Saieed, Ms. Willoughby, and SETD staff currently conduct numerous public meetings and are in regular communication with State of Tennessee representatives as well as regional and local officials. Mr. Jim McClure, SETD Director of Finance, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. With a degree in accounting, Jim has served as CFO and Director of Finance for SETD since March 2021. Jim is skilled in Not-for-Profit finance and management.

In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the SETD team, with over 50 dedicated economic development and planning professionals, will allow for a seamless transition to other experienced grant management handlers.

4.a.iv. Acquiring Additional Resources:

SETD and our QEP will make every effort to contract with disadvantaged business enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. SETD staff have a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. Through a competitive bidding and procurement process, SETD will select a QEP with experience administering EPA Brownfields Grants and working with the Tennessee Department of Environmental Conservation (TDEC) and the Tennessee Brownfields Redevelopment Program (TBRP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 4-year project period. This team will be supported by other SETD departments including community and economic development, rural planning, infrastructure, finance, and housing. We will work with the Small Business Administration (SBA) to identify small businesses in the area with strong labor practices who have been vetted by the SBA as qualified to perform remediation activities and other contracted services. We will invite vetted contractors through the competitive bidding process noted above. We will also work with Cleveland/Bradley Chamber, East Ridge Dept. of Community & Economic Development and Dalton/Whitfield JDA (see 2.b.ii) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

4.b. Past Performance & Accomplishments, i. Currently Has or Previously Received an EPA Brownfields Grant, (1) Accomplishments: SETD previously received an FY15 EPA Community Wide Brownfields Assessment Grant (BF - 00D31915-0 (10/01/2015 - 09/30/2018 for \$500,000.00). Skillful execution of the Work Plan resulted in expending 100% of grant funds by the end date, resulting in inventorying and prioritizing over 40 properties and the completion of 12 Phase I ESAs and 8 Phase II ESAs. At the time of this submission, all outputs and outcomes related to the grants (completed brownfield inventory, community engagement, 12 Phase I ESAs, QAPP, 8 Phase II ESAs, remedial planning, reporting and ACRES entries) have been met and are accurately reflected in the ACRES system. **To date, over \$425M has been leveraged from work performed during the FY15 grant with much more leveraging imminent.**

All Work Plan goals, outputs, and outcomes of the previous EPA Brownfields Grant were achieved, and all reports including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc. were completed in a timely manner, and no corrective measures were needed. The city was fully compliant with the terms and conditions of their previous Cooperative Agreement. As with our previous grant, SETD has a clear plan to aggressively address targeted brownfields in the community, and firm leveraging commitments to redevelop sites into viable assets. Due to budget constraints, lower tax revenues, and pressures to complete projects necessary to maintain our infrastructure, EPA grant funding is the only way we will successfully redevelop brownfields.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

Chattanooga Area Regional Council of Governments d/b/a Southeast Tennessee Development District (SETD) (applicant and Coalition Lead) is a legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. (documentation attached). The applicant is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Number and Eligibility of Non-lead Coalition Members

SETD (Coalition Lead) has two (2) coalition non-lead members for this application:

- City of East Ridge is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.
- City of Cleveland TN is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.3 Target Areas

Target areas for the coalition lead and non-lead members are presented in the Narrative Information Sheet.

III.B.4 Existing Brownfields Grants to Non-lead Members

Non-lead coalition members, City of Cleveland and City of East Ridge have never been awarded an EPA Brownfields MARC Grant. Additionally, SETD affirms that each non-lead coalition member is not the recipient of an open cooperative agreement for MARC Grant funding.

III.B.5 Coalition Agreement

Non-lead coalition members, City of Cleveland and City of East Ridge, have submitted signed letters of agreement to the SETD agreeing to participate in the Coalition (documentation attached).

III.B.6 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions, and solutions. 8-12 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.B.7 Expenditure of Existing Grant Funds

SETD does not have an open EPA Brownfields Assessment Grant or EPA Brownfields Multipurpose Grant.

III.B.8 Contractors and Named Subrecipients

N/A -- SETD has not procured/named any contractors or subrecipients.