1. Applicant Identification: Rome Floyd County Development Authority, 800 Broad Street, Suite 102, Rome, GA 30161

2. Funding Requested
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested
      i. $500,000
      ii. Not Applicable

3. Location
   a. City of Rome
   b. Floyd County
   c. Georgia

4. Target Area and Priority Site/Property Information – Community-wide
   o North Rome, Georgia (Census Tracts 5 and 6)
   o Northwest Georgia Regional Hospital (NGRH) - 705 North Division Street, Rome, GA 30165; O’Neill Manufacturing Company – 102 Anderson Street, Rome, GA 30161

5. Contacts
   Project Director
   Missy Kendrick, EDFP, IOM
   President/CEO
   Rome Floyd County Development Authority
   800 Broad Street, Suite 102
   Rome, GA 30161
   Office: 706-413-4213 x 1
   Cell: 770-584-5234
   missykendrick@developromefloyd.com

   Chief Executive/Highest Ranking Elected Official
   Missy Kendrick, EDFP, IOM
   President/CEO
   Rome Floyd County Development Authority
   800 Broad Street, Suite 102
   Rome, GA 30161
   Office: 706-413-4213 x 1
   Cell: 770-584-5234
   missykendrick@developromefloyd.com

6. Population: Rome - 36,716
7. Other Factors. If none of the Other Factors apply to your community/proposed project, please provide a statement to that effect.

<table>
<thead>
<tr>
<th>Sample Format for Providing Information on the Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td></td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<td><strong>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).</strong></td>
<td>2</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td></td>
</tr>
<tr>
<td><strong>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</strong></td>
<td>4</td>
</tr>
<tr>
<td><strong>The reuse of the priority site(s) will incorporate energy efficiency measures.</strong></td>
<td>3, 4</td>
</tr>
<tr>
<td><strong>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.</strong></td>
<td>9</td>
</tr>
<tr>
<td><strong>The target area(s) is located within a community in which a coal-fired powerplant has recently closed (2011 or later) or is closing.</strong></td>
<td>6</td>
</tr>
</tbody>
</table>

8. Letter from the State or Tribal Environmental Authority: See attached

9. Releasing Copies of Applications
The applicant understands that the information included will be treated in accordance with 40 CFR §2.203. No passages are considered confidential.
VIA ELECTRONIC Mail missykendrick@developromefloyd.com
Ms. Missy Kendrick, EDFP, IOM
President/CEO
Rome Floyd County Development Authority
800 Broad Street, Suite 102
Rome, GA 30161

RE: State Acknowledgement Letter – Brownfield Community-Wide Assessment Grant Application
Rome Floyd County Development Authority

Dear Ms. Kendrick:

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

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the Rome Floyd County Development Authority for such assessment and planning. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Sincerely,

Shannon Ridley
Brownfield Coordinator

File: FFY 2022, EPA Grant Applicants, Rome Floyd County Development Authority - Assessment
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: Rome-Floyd Development Authority (RFDA) currently serves as the joint development authority for the City of Rome and Floyd County and will serve as lead on their behalf for this project.

The City of Rome (population 36,716) is in Floyd County in Northwest Georgia situated at the confluence of the Oostanaula and Etowah Rivers, which join to form the Coosa River as it flows southwest out of the city. Floyd County was created from Cherokee Indian lands in 1832 and was named for General John Floyd who led Georgia’s 1st Brigade during the War of 1812. People moved between what is now Alabama and northwest Georgia via area rivers and valleys. Abundance of water for power and rail for distribution led to Rome’s development as a manufacturing and transport hub, as massive railroad expansion led to more rail miles in Georgia than in any other southern state by the beginning of the Civil War. In 1839, the Rome Railroad connected Rome and the Coosa Valley to the Western and Atlantic Railroad eighteen miles away at Kingston. On the infamous March to Atlanta, Union troops advanced through Rome and 70 miles south along the W&A route. Fighting destroyed many of Rome’s industrial buildings, which led to an era of industrial redevelopment after the war. The tri-state cotton trade depended on Rome as a clearing house, and in 1851, the W&A opened the Tennessee and Ohio valleys to Rome by connecting to Chattanooga. Numerous other rail lines followed, connecting Rome to critical transportation centers in Alabama, Tennessee, and Atlanta. This expansive rail network supported a diverse industrial economy bolstered by local iron works, the timber industry, and cotton trade. The local iron production led to at least five firms producing stoves in Rome, making it the stove center of the South. Beginning with Massachusetts Cotton Mills in Lindale around the turn of the 20th century, Floyd County became a textile manufacturing hub. Rome was a major producer of cotton duck, hosiery, chenille bedspreads, carpet, and rayon. In the 1930’s the Dellinger Bedspread Company produced popular chenille bedspreads, considered the precursor to the region’s carpet industry, which grew after World War II as the textile mill production waned.

The historical manufacturing area of North Rome and neighboring communities serve as the Target Area of this grant application. North Rome includes the area north of the Etowah and Coosa Rivers consisting of Floyd County Census Tracts 5 and 6. The area totals approximately 8 square miles and, in addition to historical and present-day manufacturing areas, includes the historically African American Five Points business district and Blossom Hill neighborhood. The Target Area is bisected east-west by the Norfolk Southern Railroad and north-south by the Oostanaula River and is home to 9,038 people, which represents one-fourth of Rome’s population (U.S. Census, 2019 5-year estimates, abbreviated CENSUS throughout). Fifty-seven percent of residents in the Target Area are people of color, 61% are low income, and 34% did not finish high school, which is in the 93rd percentile nationwide. These numbers are even more pronounced in the census blocks containing the priority sites where the combined rates are 73% minority, 67% low income, and 40% of the population do not have a diploma (EPA EJ Screen).

Following WWII, Rome’s industrial economy diversified into several manufacturing sectors including carpet, paper, baked goods, metal, lumber, and agriculture. Post-WWII manufacturing plants in North Rome and nearby communities have closed, leaving a lack of jobs, blight, and environmental concerns for area residents.

The collapse of Rome’s industrial economy resulted in numerous blighted and deteriorating Brownfield sites and a loss of accessible jobs opportunity for populations centered on these former industries in the Target Area. Historically, Freed African Americans settled in various neighborhoods beginning with Blossom Hill (adjacent to Priority Site 2), south of which emerged the Five Points business district after the Civil War. Today, the census blocks that include the historical Blossom Hill neighborhood and Five Points business district have a Demographic Index (combination of percent low income and percent minority population) in the 87th percentile nationwide, and in the 75th – 100th percentile nationwide for all 11 EJ Indexes (EPA EJScreen).

Environmental justice issues and needs persist at the County and City levels, as well. With a 2019 median family income of $48,336, Floyd County is less affluent than the regional ($50,675) and state ($58,700) averages (CENSUS). Floyd County residents are less likely to graduate high school (18%), less likely to have
health insurance (13.5%), and more likely to live in poverty (18.4%) than the average American (12%, 8.8%, 13.4% respectively [CENSUS]). In the City, the poverty rate (24.8%) and the population without a high school diploma (22%) is 83-85% higher than national averages (CENSUS). The County is working to revitalize this former industrial space to reignite the local economy and replace lost jobs. However, these efforts were impeded by the COVID 19 pandemic, which hit Floyd County’s manufacturing sector hard with 24% of jobs lost. Textile mills and rubber products manufacturing led unemployment claims (NW GA Regional Commission Econ. Impact Report, 8/2021).

1a.ii. Description of the Priority Brownfield Site(s): North Rome is bisected by railroad lines, which provided the focus for historical industrial development. With the exodus of industry, North Rome was left with vacant industrial facilities. As a direct result, the area of North Rome ranks in the 77th and 89th percentile for proximity to Superfund and Hazardous Waste sites in EPA Region 4 (EPA EJScreen). The priority sites below have been selected based on input from community meetings (discussed in section 2.b.iii), and in accordance with the Rome-Floyd County-Cave Spring Comprehensive Plan and the 2017-2022 Regional Comprehensive Economic Development Strategy discussed in 1.b.i. Input on additional sites will be solicited during the planned community engagement meetings described in section 2.b.

Priority Site 1: Northwest Georgia Regional Hospital (NGRH) – 705 North Division Street, Rome, GA 30165 – Initially utilized by the United States military in 1943 for use as Battey General Hospital, the property was conveyed to the State of Georgia in January 1947 and used as a nationally recognized tuberculosis treatment facility. The hospital grounds underwent several modifications and expansions between the 1940s and 1980s with many of the historic barracks being replaced by hospital offices, laboratory buildings, and treatment facilities. In the 1970s, the hospital was partially transitioned to a mental illness facility and renamed Northwest Georgia Regional Hospital. The campus continued to treat tuberculosis patients until 1996 when it became solely a mental health treatment facility (City of Rome, 2009). This vacant 132.5-acre campus is located in the Target Area approximately 2 miles northwest of downtown, supports 35 structures, and contains an unnamed tributary of the Oostanaula River in its southwestern portion. The on-site structures include a security kiosk; main hospital; ancillary medical and administrative offices; laboratory/pharmacy; on-campus patient and staff housing; events pavilion; laundry building; maintenance, grounds keeping and equipment storage areas; warehouse storage; propane tank farm; steam and chiller plants; and incinerator/bio-hazard storage building. During operation, the hospital grounds supported six aboveground storage tanks (ASTs), petroleum underground storage tanks (USTs), a railroad spur, industrial structures, and vehicle/equipment maintenance shops. The hospital closed in 2011 due to a lack of funding and rising maintenance costs associated with the aging facility (Northwest Georgia News, 2013). With its closing, the community lost 700 jobs (Coosa Valley News, 2021). The campus has remained largely inactive, resulting in the buildings’ continued deterioration. The hospital is a blighting influence on the surrounding community and a potential threat for community exposure to hazardous substance and petroleum constituents. Known Environmental Concerns: Phase I Environmental Site Assessments (ESA) were conducted on the campus in January 2012 and October 2021 as part of due diligence associated with RFDA’s planned acquisition of the property. The ESAs identified the following environmental concerns associated with the property’s historical operations: an on-site rail spur, former fuel oil ASTs and USTs, on-site electrical transformers, former operation of two on-site incinerators, and on-premises vehicle maintenance. The reports also identified several off-site concerns, including the former GE Transformer Plant (2,000 feet west) with a known release of polychlorinated biphenyls (PCBs) from historical manufacturing operations. Further, unquantified asbestos-containing materials (ACMs) have been reported in the 35 on-site buildings surveyed in the early 2000s. Given the age of most onsite buildings, there is also the potential for other hazardous environmental issues including lead-based paint. A limited Phase II was recently completed in 2021 as part of due diligence associated with the RDFA’s planned acquisition of the property. Results of the Phase II found low-level concentrations of petroleum, solvents, and PCBs. Given the size and historical complexity of the property, additional funding for assessment and cleanup planning is necessary in order to proceed with acquisition, building demolition, and redevelopment. Potential Reuse: In keeping with the Rome-Floyd County-Cave Spring Comprehensive Plan (section 1.b.i.) Site-specific redevelopment plans commissioned by the City of Rome for the NGRH property include industrial, advanced manufacturing, high-
tech, and civic uses. Of note, RFDA has identified two investors planning to establish businesses that will creating much-needed commercial/light industrial jobs for the nearby disadvantaged communities.

**Priority Site 2: O’Neill Manufacturing Company – Forsyth & Anderson Street, Rome, GA 30161 –** Founded in 1878, this family-owned business moved from Atlanta to its 102 Anderson Street address in the Target Area (1 mile north of Downtown Rome) around the turn of that century. For more than 100 years, this facility has been a staple in a heavy mixed industrial and residential area, with industrial properties to the north, east, and south, including two foundries and various manufacturing operations. The company treated and manufactured custom wood products through 2000, and closed following the unexpected death of its chief executive officer. The property is currently vacant and supports numerous buildings on approximately 10 acres comprising three tax parcels. Several structures, including former wood storage warehouses and offices are dilapidated and the site is overgrown, making it a haven for drug users and the homeless. The facility also includes a paint/spray booth, a shavings bin that also served as a former power plant, two kilns, wood treatment operations, and storage warehouses (all potential sources of contamination). The former O’Neil facility is adjacent to a residential neighborhood and Eagle Park. It is likely that that the referenced site operations, as well as other area industries have impacted the adjacent park and neighborhood. This brownfield site has significant environmental justice implications with the Demographic Index (combining percent low-income and minority data) for the site and adjoining community in the 90-95th percentile for the U.S. (EJScreen). *Known Environmental Concerns:*. In 2000 when the site closed, an environmental assessment found two 500-gallon containers of Wood Life, a wood treatment preservative known to consist largely of *pentachlorophenol*, a potential carcinogen according to the Agency for Toxic Substances and Disease Registry (ATSDR). A 750-gallon UST was removed in 1997 in which elevated levels of benzene were detected; however, residual impacts may persist. Further, based on historic uses, the O’Neill site may also be impacted by *dioxins/furans*, compounds that persist in the environment with toxicity profiles similar to PCBs. These discoveries resulted in the site’s subsequent listing on the Georgia Environmental Protection Division (EPD Hazardous Site Inventory (HSI# 10738). Based on historical uses and previous investigations, additional assessment and significant cleanup may be needed to facilitate redevelopment. **Potential Reuse:** RFDA’s plans for the site are consistent with the needs of the adjacent Blossom Hill neighborhood as determined from community meetings (discussed in 2.b.iii) and in accordance with the Rome-Floyd County-Cave Spring Comprehensive Plan discussed in section 1.b.i. Again, the Blossom Hill community faces high unemployment (9.4%; CENSUS) and job insecurity due to the percentage of residents without a high school degree (95th %ile in EPA Region IV; EPA EJScreen). Preliminary reuse concepts include a community center, greenspace expansion of the adjacent Eagle Park, and a small business incubator/makerspace. The business incubator/makerspace specifically addresses job insecurity with the promotion of self-employment and skill development. Further, greenspace expansion and improvement of the adjoining Eagle Park will provide recreational activities, beautification, and improve community quality of life. These actions will also attract and leverage additional investment in the area leading to an increased tax revenues.

**1.b. Revitalization of the Target Area**

1.b.i. Reuse Strategy and Alignment with Revitalization Plans - The Rome-Floyd County-Cave Spring Comprehensive Plan identifies the need for developing land with existing infrastructure. The Future Land Use section promotes redevelopment over new development and preservation of agricultural and natural resources. The priority sites take advantage of existing zoning and infrastructure to balance redevelopment and preservation goals. These sites will also use existing roadways and rail connections.

The Northwest Georgia Regional Commission (NWGRC) addresses economic development planning for the 15-county region in the 2017-2022 Regional Comprehensive Economic Development Strategy (Strategy), which is the supporting document for eligibility for U.S. Economic Development Administration grants. Regarding industrial properties, a goal in the Essential Infrastructure section of the Strategy states, “*Ensure northwest Georgia has sufficient, ready to develop industrial properties available to meet the region’s current and future needs.*” This statement bolsters the case for advanced manufacturing or industrial redevelopment of these brownfield sites. The NWGRC also issued a Northwest Georgia Economic Recovery Plan (Recovery Plan) in August 2021 stating that the economy suffered significant harm from the pandemic and is still
rerecovering. According to NWGRC data, manufacturing, accommodations, and food service sectors continue to have the highest unemployment claims. The report recommends developing industrial parks and marketing a current inventory of industrial properties as an economic strategy.

Floyd County is in a good position to drive site redevelopment towards manufacturing jobs, which are key to the local and regional economy. With a high concentration of manufacturing jobs and plentiful training opportunities at local colleges, technical schools, and the Floyd County Schools’ College and Career Academy, these sites stand to gain employment in the county and are key to successful implementation of the Strategy and Recovery Plan described above.

Site 1: NGRH – In 2015, the City of Rome and RFDA commissioned a redevelopment plan for the NGRH site that includes industrial, advanced manufacturing, high-tech, and civic uses. Redevelopment of this site is also recommended in the Comprehensive Plan. The accompanying Short-Term Work Program lists the following actions on this plan in years 2021-23: 1. Acquire the site from the State, and negotiate costs related to demolition and maintenance from the State. 2. Provide incentives to attract economic development prospects to the site, such as an Opportunity Zone and Tax Allocation Districts, and 3. Create a non-profit development corporation to carry out the implementation of the plan. Associated costs in the plan include $4 million for demolition, and $50,000 to establish an approved Tax Allocation District for the site. Upon acquisition, RFDA plans to demolish most of the buildings (grant funds to be utilized to complete pre-demolition asbestos survey) and prepare the site for redevelopment into a light industrial/manufacturing/office park. Two adjacent industrial landowners have expressed interest in purchasing some acreage to accommodate their expansion needs.

Site 2: O’Neill Manufacturing - O’Neill Manufacturing Company is a blighting force on the historically African American Blossom Hill section of North Rome. The RFDA plans to acquire the property to increase accessible job opportunities for residents. Redevelopment concepts include light industrial/advanced manufacturing or the creation of a community center with small business/tech incubator and makerspace. 1.b.ii. Outcomes and Benefits of Reuse Strategy- Once redeveloped, these properties can bring renewed hope to residents and connection to the community at large. Blighted, decaying properties such as the priority sites can have psychological health impacts in addition to physical health impacts on the people in the neighborhoods they inhabit. Residents can lose hope when assaulted daily with a visual reminder of the disinvestment in their surroundings.

The benefits of this reuse strategy extend to the whole community. Successful implementation of the redevelopment plans will lead to increased tax revenue for the City, not only by putting the sites back into productive use, but by catalyzing additional investment in the Target Area and capturing Rome’s share of the regional economic growth. In addition to these economic benefits for the City, there are immediate non-economic, development-oriented benefits for the surrounding disadvantaged neighborhoods such as added amenities, increased livability, environmental protection, beautification, and safety. Furthermore, updating ceiling heights and access to vacant, aging industrial space is more cost-effective and energy-efficient than building farther out, with the additional benefit of putting employers in close proximity to employees, providing for greater workforce reliability and reduced commutes for workers.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse - The RFDA is leading this project on behalf of the City of Rome and Floyd County, which combined forces to place the NGRH property (Priority Site 1) under contract from the State of Georgia for $2.25 million using special purpose local option sales tax funds. If the assessment project determines that cleanup is necessary at the priority sites, then RFDA will consider supporting an application for an EPA Brownfields Cleanup grant. Identifying and cleaning up brownfield conditions are the initial steps needed to bring these properties back into productive use. Contaminated properties are difficult to market for redevelopment. As previously mentioned, two adjacent industrial landowners have expressed interest in purchasing some acreage of the NGRH property to accommodate their expansion needs. These and other potential buyers are looking for a clean, ready to build site when making location decisions. With the environmental barrier removed, the RFDA can move the site towards reuse by new and expanding industries, creating accessible employment opportunities for workers displaced during the pandemic.
Several State of Georgia finance programs can be used to finance industrial development on the sites once they are deemed ready. Key programs include State CDBG-funded Employee Incentive Program offering up to $500,000 for publicly-owned infrastructure like rail spurs or roads or low-interest loans for eligible construction activities on an income-producing site that creates a significant number of jobs, or the Redevelopment Fund, which is used to clear slum and blighting conditions with up to $500,000.

Floyd County is eligible for Appalachian Regional Commission grants that can fund workforce readiness and infrastructure. Floyd County is conditionally eligible for One Georgia Authority funding on applications with a joint development authority for grants like the Equity and the Edge Fund that finance land acquisition, infrastructure, and equipment. Federal sources include USDA and EDA grants. If either project includes an affordable housing component, Low-Income Housing Tax Credits can be added to the mix; however, much of that would depend on the extent of contamination, as residential uses require extensive remediation and monitoring for human habitation. Both properties are eligible for federal New Market Tax Credit private equity investments by virtue of being in Severely Distressed census tracts.

1.c.ii. Use of Existing Infrastructure - Rome and Floyd County are committed to redevelopment as a sustainable economic development practice that creates jobs, preserves rural character, and increases the tax base, ultimately benefiting residents and workers. Both local governments have a long history of using federal, state, local, and private resources to redevelop property. The subject sites will be rehabilitated with care for environmental best management practices. Existing infrastructure will be employed and upgraded when required. Infrastructure at the two locations include roads, stormwater, water, electricity, and propane at the O’Neill site. Rail spurs exist close to each site and add to the benefit of manufacturing or industrial uses.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

The RFDA’s financial tools to facilitate economic development are limited to acquisitions and supporting private industry. Following acquisition of the hospital site, minimal funds will remain for asbestos assessment and cleanup. Further, the environmental encumbrances existing on many of the target area brownfield sites limit the interest for private development to assess and transition properties out of vacancy. There is need of funds to prepare these sites for redevelopment, including assessment and cleanup of environmental contamination that make the properties unattractive to developers. Due to limited resources, the local tax base is unlikely to support the full cost of redevelopment beyond the SPLOST revenue already pledged; incomes in Rome and Floyd County are moderate, the poverty rate is higher (18-25%) than state and national averages (CENSUS), and the Target Area lists in the 87th and 89th percentiles for low-income population in comparison to the state and US, respectively (EJScreen).

Assessing and cleaning up brownfield conditions is the first step towards accessing other development funds. The priority sites have remained vacant or underutilized for decades and it is likely the Target Area will continue to languish without EPA funding. EPA grants are available for cleanup, and brownfield insurance can help control costs. Additionally, the RFDA is exploring various programs for financing redevelopment and infrastructure improvements, such as the state and federal programs listed in the previous section, bond financing through creating a Tax Allocation District, and using its authority to issue tax-exempt bonds repaid through project revenue; however, EPA funding is an essential step in catalyzing this redevelopment strategy.

2.a.ii. Threats to Sensitive Population

(1) Health or Welfare of Sensitive Populations: EJScreen data for the target area depicts a concentration of sensitive populations who are predominately low-income (89th percentile for the US), a Demographic Index (low income and minority population) in the 81st percentile for the US, and a less than high school education level in the 95th percentile with respect to the State. Floyd County is facing the double-edged sword of an aging population with a large cohort of minors, and not as many working-age adults to support these two vulnerable groups. According to CDC figures, three out of five residents are either under 18 or over 65. In 2019, a Community Health Assessment by the Georgia Department of Public Health identified several community weaknesses that will be factored in considering brownfield site redevelopment. These weaknesses include closure of large industrial facilities, substance abuse, an aging population, lack of youth development, access to
healthcare, lack of funding, and behavioral health. The report also identified a lack of safe sidewalks, recreational activities, and resources focused in areas of the city. The reuse plans for the two priority sites will have an immediate beneficial impact by providing increased tax revenue and funding opportunities, increased access to youth development and recreational activities, and increased safety/reduction in crime.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the 2019 Floyd County Community Health Assessment, the county has a 38% obesity rate, and higher rates of diabetes and kidney disease than average. Lead-based paint is considered an environmental risk because of the high number of houses built before 1960. Lung-related illnesses make up the 3rd and 4th leading causes of death in the county. Lung cancer has the highest death rate for all cancers in the county and is the 2nd leading cause of death for Black residents. The impact of brownfield sites are compounded by the coal-fired Plant Hammond electric plant that operated upwind of the target area (closing in 2019). The assessment showed that Black residents are affected disproportionately by diabetes, high blood pressure, heart disease, and stroke by almost double. The health assessment documents that suicide is the 2nd leading cause of premature death in Floyd County and fatal drug overdoses are 48% higher than the state average. Violent crime (28%) is also higher in Floyd County than in Georgia (24%) or the US (23%). Redevelopment of the priority sites will be a catalyst for redevelopment in the Target Area and will directly remove havens for criminal activity in the community while providing jobs, recreational activities, beautification, and increased livability for area residents.

(3) Promoting Environmental Justice - Floyd County has 327 sites listed in EPA Envirofacts including 145 RCRA sites, indicating a high potential for contamination across the County, and the likelihood of more brownfields adversely impacting our communities.

**The EPA EJ Screen tool puts the Target Area in the 95-100th percentile for lead paint risk in Georgia.** Lead is a highly toxic substance that can cause health problems such as damage to the brain, kidneys, nerves, and blood. Given the age of the deteriorating structures at both priority sites, there is a strong chance of lead contamination both inside the structures and the surrounding soil, impacting the area and nearby residents. The other EJ Screen indicators of concern are Superfund Proximity (94th NGRH, 92nd O’Neill), RMP Proximity, i.e., a nearby facility poses the risk of a dangerous chemical spill (90-95th percentile for both sites), and Hazardous Waste Proximity (88th NGRH, 91st O’Neill).

The makeup of the Target Area illustrates a continuing trend of poverty and disinvestment. In the O’Neill tract, 28.8% of residents live below the poverty line. The picture is even worse for the NGRH census tract where 33.8% of residents live in poverty, the 2nd most impoverished tract in the County. Vacant housing units in the O’Neill census tract make up 25% of all units (EJSCREEN) adding to the blight of abandoned brownfields in the Target Area.

The census block population for the NGRH site is 70% minority and is 78% minority for the O’Neill site, which is located in the historic African American community of Blossom Hill. The prevalence of vacant industrial facilities, vacant homes, superfund sites, and hazardous waste sites has increased the potential for environmental hazards and health issues for residents, and is a significant environmental justice concern for our community. This Brownfield grant will help remedy the situation by subsidizing due diligence and reuse planning, incentivizing sustainable redevelopment of the priority sites, and bringing much needed jobs and benefits to the surrounding disadvantaged communities. Specifically, the grant-funded activities of assessment and reuse planning are necessary steps towards reducing the community's exposure and fostering equitable development through public engagement and visioning.

2.b. Community Engagement

2.b.i. and ii. Project Involvement and Project Roles: The RDFA and community partners have support from local organizations (described in the table below) that align with the project’s community improvement goals. The brownfields project advisory team will be formed from the RDFA and community partners for participation in monthly meetings and to solicit and curate community input at public forums and unrelated community events. Project information will be made available on the RDFA website and social media platforms. Virtual meeting options will be offered in accordance with COVID-19 protocols to ensure the team can continue to meet.
### Name of organization

<table>
<thead>
<tr>
<th>Name of organization</th>
<th>Point of contact (name, email &amp; phone)</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Georgia Power Community Development Dept</td>
<td>Elyse Davis, Community Development Manager, 706.581.5504 <a href="mailto:edavis@southernco.com">edavis@southernco.com</a></td>
<td>Redevelopment planning re: economic impacts, business marketing needs. Commercial and Industrial business information and trends.</td>
</tr>
<tr>
<td>Manis Logistics</td>
<td>Mike Konicek, 678.794.8146, <a href="mailto:mkonicekliga@aim.com">mkonicekliga@aim.com</a></td>
<td>Meeting space, tables and chairs.</td>
</tr>
<tr>
<td>Rome Floyd Chamber</td>
<td>Pam Powers-Smith, 706.291.7663, <a href="mailto:psmith@romega.com">psmith@romega.com</a></td>
<td>Provide forums for community meetings and actively engages in the public meetings</td>
</tr>
<tr>
<td>North Rome Action Committee</td>
<td>Charles Love, 706.290.3437, <a href="mailto:charleslove3596@yahoo.com">charleslove3596@yahoo.com</a></td>
<td>Participate in public meetings and offer ongoing input in decision-making.</td>
</tr>
<tr>
<td>Greater Rome Existing Industries Association</td>
<td>John Cothran, 706.235.6315, <a href="mailto:john.cothran@brugg.com">john.cothran@brugg.com</a></td>
<td>Participate in public meetings and offer ongoing input in decision-making.</td>
</tr>
<tr>
<td>Rome Rotary</td>
<td>Brent Bell, 706.266.8861, <a href="mailto:bbell@darlingtonschool.org">bbell@darlingtonschool.org</a></td>
<td>Participate in public meetings and offer ongoing input in decision-making.</td>
</tr>
</tbody>
</table>

### iii. Incorporating Community Input

RFDA has been successful in garnering participation with average attendance at community meetings ranging from 10-12 attendees. Building on this success, the RFDA plans a minimum of two public meetings per year to communicate information and to solicit additional input specific to the brownfields program, additional brownfields inventory, and site reuse. The achievement of project milestones or discovery of new information may warrant additional meetings. During work at priority sites, less formal information sessions will be held (1-2 times per site per year, depending on size and interest in pending reuse) to keep the community informed of progress, answer resident questions about ongoing work, and obtain information about resident perceptions/concerns. To address COVID-19 concerns, Rome Floyd County Development Authority is offering virtual meeting options (through Zoom and telephone conference calls) for those unable to travel and/or to provide program services and community meetings during any necessary lockdown measures. As we move through the project, the RDFA will consider other community tools, such as outdoor meetings, to engage a wider audience in a safe and responsible manner with respect to pandemic protocols. Meetings will also be conducted inclusive of Hispanic/Spanish-speaking community members.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### 3.a. Description of Tasks/Activities and Outputs:

**Task/Activity 1: Programmatic Support**

**i. Project Implementation:** Project management of EPA-funded activities for the priority & non-priority site(s), cooperative agreement oversight; budget management; contractor procurement consistent with federal procurement requirements; scheduling and coordinating of subcontractors; monthly team meeting; conference/workshops travel for purposes of staff development and efficiency improvement.

*Non-EPA grant resources needed:* in-kind resources including project team staff effort

**ii. Anticipated Project Schedule:** Months 1-33, project activities will commence immediately upon issue of cooperative agreement. The project team will meet bimonthly throughout the program.

**iii. Task/Activity Lead(s):** Project Director with support from Qualified Environmental Professional (QEP) and project staff

**iv. Output(s):** quarterly reports, ACRES data entry; notes from monthly team meetings complete and accurate project information repository

*Notes:* Given the pre-emptive community engagement activities and community input on sites, the RFDA expects to complete assessment project activities in 30 months and closeout the grant within 33 months.

**Task/Activity 2: Community Engagement**

**i. Project Implementation:** Coordination and delivery of active community engagement throughout the project lifetime that builds on previous efforts of the RFDA, including securing site access; community engagement meetings that educate community members on brownfields and the importance of addressing these sites; site selection through community input. Discussion of EPA-funded activities for non-priority
site(s), if applicable: A minimum of four community engagement meetings that will include a brownfields education program; community input on site recommendations, suitable reuse and redevelopment of assessed sites; and meeting planning with community partners and members. Updates and presentations given at public meetings.

*Non-EPA grant resources needed:* in-kind resources including project team staff effort and efforts of community partners who will host and promote participation of community members

**ii. Anticipated Project Schedule:** Months 3 through 30, first meeting will happen within 4 months

**iii. Task/Activity Lead(s):** Project Director with support from QEP and project staff

**iv. Output(s):** Community Involvement Plan; meeting summaries; community input for reuse plans

### Task/Activity 3: Assessments

**i. Project Implementation:** EPA-funded activities for the priority site(s): Based on community site recommendations, All Appropriate Inquiry (AAI-) and ASTM-compliant Phase I ESAs will be completed and Phase II ESAs as appropriate based on Phase I findings. EPA-funded activities for non-priority site(s): Identical work will be completed at sites that are identified in the public engagement and brownfields inventory processes.

*Non-EPA grant resources needed:* in-kind resources including staff time for oversight of the QEP and review of all findings/reports/technical activities

**ii. Anticipated Project Schedule:** Months 2-24, assessment of the priority sites initiated prior to month 6

**iii. Task/Activity Lead(s):** QEP with oversight by the RFDA project director

**iv. Output(s):** site inventories; 10 Phase I and 5 Phase II Environmental Site Assessment reports; 1 Asbestos and Lead Based Paint survey on Hospital Priority Site, then up to 5 additional (as needed); Generic Quality Assurance Plan (QAPP); 6 Site-Specific QAPPs

*Notes:* QEP has been contracted through an open bid process as described in section 4.a.iii, which means that the RFDA is poised to initiate activities upon submission of a work plan and execution of cooperative agreement. Pre-award services will be specified in the work plan, including the completion of Phase I ESAs relative to the three target sites. (Access agreements are in place).

### Task/Activity 4: Remediation and Reuse Planning

**i. Project Implementation:** EPA-funded activities for the priority site(s): cleanup planning at a specific site; creation of market feasibility study for specific sites and/or Disposition Strategies for sites/assemblages; Georgia EPD Hazardous Site Inventory compliance and de-listing corrective action plan (O’Neill Priority Site); Georgia EPD Brownfield reporting

EPA-funded activities for non-priority site(s): identical work will be completed at sites that are identified in the public engagement and brownfields inventory processes, if warranted and as funds allow

*Non-EPA grant resources needed:* in-kind resources - staff effort

**ii. Anticipated Project Schedule:** Months 3 through 24

**iii. Task/Activity Lead(s):** project director with assistance from QEP

**iv. Output(s):** Three Analyses for Brownfields Cleanup Alternatives (ABCAs); Market Feasibility Study for the RFDA; an investment/redevelopment funding strategy report; community input on planning activities garnered at public engagement meetings/activities

### 3.b. Cost Estimates:

The following cost estimates are based on past project management experiences, with input from our QEP. RFDA plans to allocate 60% of the budget to assessment activities.

#### Budget Table

<table>
<thead>
<tr>
<th>Project Tasks</th>
<th>Task 1: Programmatic</th>
<th>Task 2: Community Engagement</th>
<th>Task 3: Assessment</th>
<th>Task 4: Planning</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel</td>
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<td></td>
<td></td>
<td></td>
<td>$7,000</td>
</tr>
<tr>
<td>Supplies</td>
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<td>$25,000</td>
<td>$300,000</td>
<td>$150,000</td>
<td>$500,000</td>
</tr>
</tbody>
</table>

**Task 1 – Program Management: Travel:** $7,000 in travel expenses for attendance for two persons at one
FY2022 EPA Brownfield Community-Wide Assessment - Rome-Floyd Development Authority

national and one regional brownfields-related training conferences/workshops. **National brownfields conference attendance** = $3,700 [Breakout - $1,400 hotel (2 persons X 4 nights x $175 per night), $700 registration ($350 per person), $800 flights ($400 per person), $600 per diem expenses ($75 per person X 2 for 4 days) and $200 ground transport (parking and airport transfers, taxis). **Regional brownfields conference attendance** = $3,300: $1,400 hotel (2 persons X 4 nights (including travel days) x $175 per night), $400 registration ($200 per person), $800 flights ($400 per person, or mileage for drivable location), $600 per diem expenses ($75 per person X 2 for 4 days) and $100 ground transport. Remaining travel funds would be applied to local or regional travel/mileage to meetings with property owners, developers or to public meetings by RFDA staff members (@$5.50 mile X 1,000 miles = $500). *If workshops are held virtually, the RFDA will apply any excess funds towards community engagement and assessment.*

**Supplies:** $1,000 is allocated to typical offices supplies, including stationary, paper, ink, printing, and postage for all administrative and programmatic tasks over the three-year grant project.

**Contractual:** $17,000 is budgeted for program support by a contracted QEP, which will provide for 170 hours at $100 per hour over the three-year project period. The RFDA, with support from the QEP, will complete EPA quarterly reports, MBE/WBE forms, & EPA ACRES database and other programmatic support with contractor assistance while providing oversight and review of the programmatic grant elements. **Task 1 total:** $25,000

**Task 2 – Community Engagement:** Contractual: QEP support is budgeted for developing a Community Involvement Plan ($4,000) and approximately 210 hours (over three years) at $100 per hour ($21,000) for community-wide meetings, meeting planning, outreach, focus groups & visioning sessions as well as for meetings with site owners and potential developers. **Should COVID-19 safety precautions be required, the RFDA and QEP are experienced at conducting virtual community engagement activities online.** **Task 2 total:** $25,000

**Task 3 – Assessment:** Contractual: QEP to conduct Environmental Site Assessment activities:

- 10 ASTM-AAI compliant Phase I ESAs @ $3,500 each = **$35,000**; one Generic Quality Assurance Plan (QAPP) = **$5,000**; six Site Specific QAPPs (SSQAPP) @ $3,000 each = **$18,000**; six lead/asbestos assessments, one @ $74,000 **Hospital Priority Site** & five @ $3,500 non-priority sites = **$91,500**; and five Phase II ESAs (approx. $25,000-35,000 per site, **costs vary due to the complexity of sites**) = **$150,500**. **Task 3 total:** $300,000

**Task 4 – Planning:** Develop site appropriate remediation/ reuse plans to reduce health & environment risks for selected sites. Community vision and input will continue to be considered in planning. **Five Analysis for Brownfields Cleanup Alternatives (ABCAs)** @ $5,000 per = **$25,000**; five state Brownfield applications @ $5,000 per = **$25,000**; one state Voluntary Remediation Program corrective action plan @ **$15,000** for **O’Neill Priority Site**; one GIS-Based Development Opportunities Inventory (total **$20,000**), Market Feasibility Study at a set fee of **$41,000**; further evaluation of market viability for six sites @ $4,000 each ($24,000). Any remaining funds will be used to develop site-specific reuse and Brownfield redevelopment plans. **Task 4 Total:** **$150,000**

3.c. **Measuring Environmental Results:** The Project Director with support from key staff and the QEP will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and in monthly communication with the EPA Project Officer. The activities and outcomes are tracked through a project management and invoice management system. **Outputs:** Number of sites assessed (Phase I/II ESAs); Number of ABCAs; Number of formal community meetings, updated Community Involvement Plan; ACRES data entry **Outcomes:** Number of sites for which property title transfers are facilitated; Acres of land redeveloped, and square footage of buildings positioned for adaptive reuse; Amount of private investment and other funding leveraged; Jobs created or retained; Increased property and sales tax revenue generated. An overall gauge of success will be the creation of jobs and the improvement in environmental justice conditions. Should the project run into delays or obstacles, the city will work the assigned EPA Project Officer and the QEP to implement countermeasures, such as budget reallocation.

4. **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

4.a. **Programmatic Capability**

4.a.i and iii  **Organizational Capacity and Key Staff:** The RFDA leads the project team, including Floyd County and the City of Rome. Combined, the team has over 75 years of experience in economic development, and possesses the technical, administrative, and financial requirements to successfully lead this project. For
example, RFDA has successfully managed contractors, consultants and QEPs on numerous redevelopment efforts for the community partners and is currently working as the lead in the acquisition of the two priority sites. The County and City will report directly to RFDA with respect to Brownfield identification, assessment, and redevelopment planning. Missy Kendrick will serve as Project Director, and as a full-time employee of RFDA has the capacity to successfully lead this project. Ms. Kendrick is the President and CEO and a full-time employee of RFDA, and has 26 years of economic redevelopment experience. Missy has obtained and managed over $1.5 million in Edge funds for local industries and $1.2 million in EDA grant funds. Doc Kibler will serve as Fiscal Manager of the EPA funds. He has served on the Development Authority board since 2013 and as Treasurer since 2019. Doc has experience managing finance and operations for a variety of organizations, as he is the Vice President of the Board of the Coosa River Basin Initiative, principal at Decision Management Consulting, president of Big Cedar Creek Farm, and a manager at Coosa River Mitigation Resource. Jimmy Byars, CEO/Broker of Hardy Realty, has been the owner of the company since 1994 and will serve as Technical Coordinator. Hardy Realty is the largest and oldest real estate company in Northwest Georgia. Jimmy Byars has served as the chairman of the RFDA Board since 2015 and has extensive involvement in economic development. The project team meets on a bi-monthly basis, and Mr. Kibler and Mr. Byars, as committed members of the RFDA Board, have the capacity to fulfill their grant-related duties and successfully implement this grant.

4.a.ii. Organizational Structure: RFDA will work with the experienced Brownfields QEP contractor to meet the required programmatic objectives. Ms. Kendrick, the Project Director, will oversee day-to-day project operations and will be responsible for oversight of the contracted QEP. Mr. Byars, the Technical Coordinator, will support the Project Director in QEP oversight. Mr. Kibler, the Financial Coordinator, will be responsible for ASAP drawdowns and the fiscal management. RFDA has mechanisms in place to replace lost staff and obtain additional contractor resources if needed. In the event of unforeseen employee turnover, the project team will assist the Project Director to ensure the project success. The Project Director will work with the EPA Project Officer and QEP to implement countermeasures, such as reevaluating management strategies to resume the project schedule and meet workplan milestones should delays or obstacles be encountered.

4.a.iv. Acquiring Additional Resources: RFDA procured a qualified environmental professional (QEP) through a fair and open bid process consistent with federal procurement requirements, 2 C.F.R. 200 and EPA rule 2 C.F.R. 1500. A QEP with vast experience with EPA brownfield grant projects was selected. If additional support is required, RFDA will use the same fair open process to procure it.

4.b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

<table>
<thead>
<tr>
<th>Successful Grant Awards</th>
<th>Award Amount</th>
<th>Purpose</th>
<th>Accomplishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020 EDGE Grant</td>
<td>$500,000</td>
<td>Economic Development</td>
<td>Allowed Ball Corporation to offset cost of air handlers in new facility.</td>
</tr>
<tr>
<td>2021 EDGE Grant</td>
<td>$575,000</td>
<td>Economic Development</td>
<td>Allowed Kerry, Inc. to offset the cost of ovens for expansion of existing facility.</td>
</tr>
<tr>
<td>2018 EDGE Grant</td>
<td>$850,000</td>
<td>Economic Development</td>
<td>Offset the cost of machinery and equipment for Meggitt</td>
</tr>
<tr>
<td>2013 EDA Grant</td>
<td>$1.2 Million</td>
<td>Economic Development</td>
<td>Clearing, grading and infrastructure for new Piedmont Green Power plant.</td>
</tr>
</tbody>
</table>

(2) Compliance with Grant Requirements: RFDA was in full compliance with all associated work plans, schedules, terms and conditions of the grants identified above. All funds were expended, and results achieved in a timely manner. No corrective measures were necessary. The extent of the compliance include schedule, workplan, terms, conditions, and grants deliverables. The RFDA maintains a history of timely and thorough reporting as required by the awarding agencies and has met all grant closeout conditions.
1. **Applicant Eligibility**

   The lead applicant, Rome-Floyd County Development Authority (RFDA), is a local unit of government (local public authority) as defined under 2 CFR § 200.64. In 1962, the Georgia General Assembly amended to the Georgia Constitution to create the RFDA as an official local public authority of Floyd County, Georgia.

   *Documentation attached of Georgia Constitution Resolution (HR 491-965) creating RFDA as a local public authority.*

2. **Community Involvement**

   RFDA acknowledges that broad-based support and community participation in the process of executing the Brownfields Assessment grant will be essential to ensure the overall acceptance and success of the Brownfield Program, and we recognize that it is essential to include community residents and stakeholder input throughout all phases of project planning, decision-making, and implementation. To guide this process, a formal Community Involvement Plan (CIP) will be drafted and adopted within 30 days of issuance of the Cooperative Agreement. This document will provide a formal communication strategy to solicit input from local residents of the target area. This process mirrors the community engagement process used to develop the Rome-Floyd County-Cave Spring Comprehensive Plan.

   RFDA has been successful in garnering participation with average attendance at community meetings ranging from 10-12 attendees. As will be further detailed in the CIP, the RFDA plans a minimum of two public meetings per year to communicate information and to solicit additional input specific to the brownfields program, additional brownfields inventory, and site reuse. The achievement of project milestones or discovery of new information may warrant additional meetings. During work at priority sites, less formal information sessions will be held (1-2 times per site per year, depending on size and interest in pending reuse) to keep the community informed of progress, answer resident questions about ongoing work, and obtain information about resident perceptions/concerns. Public input and feedback will be sought on project planning, site selection and prioritization (for additional sites as funds permit), cleanup decisions (ABCAs) and reuse planning. To address COVID-19 concerns, Rome Floyd County Development Authority is offering virtual meeting options (through Zoom and telephone conference calls) for those unable to travel and/or to provide program services and community meetings during any necessary lockdown measures. As we move through the project, the RDFA will consider other community tools, such as outdoor meetings, to engage a wider audience in a safe and responsible manner with respect to pandemic protocols. Meetings will also be conducted inclusive of Hispanic/Spanish-speaking community members.

   A central printed repository of information will be established at the RFDA office to allow those without computer access to view plans, voice concerns, and provide input towards redevelopment. All information will be disseminated via the RFDA’s webpage in addition to being produced in leaflet form and distributed at information repositories at the RFDA office.

3. **Named Contractors and Subrecipients**

   Not Applicable - no contractors or sub-recipients are named in this application. RFDA pledges full compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 in the selection of all consultants and contractors.

4. **Expenditure of Existing Grant Funds**

   RFDA does not have an open EPA Brownfields Community-wide Assessment or Multipurpose Grant.