1. **Applicant Information**  
City of Lenoir  
801 West Avenue NW  
Lenoir, North Carolina 28645

2. **Funding Requested**  
   a. Assessment Grant Type: Community Wide  
   b. $500,000

3. **Location**  
City of Lenoir, Caldwell County, North Carolina 28645

4. **Target Area and Priority Site/Property Information**  
Our Target Areas include three U. S. Census Tracts, CT-301, CT-303 and CT-304. These Census Tracts are adjacent to each other and are situated in a north-south direction. Each census tract includes one of our three priority sites, including the Former Broyhill Manufacturing Facility (CT-301) located at 1429 College Avenue; City-owned Property Adjacent to Former Tapaha Dynamics TSDF Facility (CT-303) located at 825 Fairview Drive; and the Former American & Efird Textile Facility (CT-304) located at 616 Connelly Springs Road. These three priority sites total 69 acres.

5. **Contacts**  
   (a) **Project Director**  
       Radford L. Thomas  
       Director of Public Utilities  
       P. O. Box 958  
       Lenoir, NC 28645  
       Phone: (828) 757-2219  
       Facsimile: (828) 757-2212  
       E-mail: rlthomas@ci.lenoir.nc.us
   
   (b) **Chief Executive/Highest Ranking Elected Official**  
       Joseph L. Gibbons  
       Mayor  
       P. O. Box 958  
       Lenoir, NC 28645  
       Phone: (828) 757-2200  
       E-mails:
6. **Population**
   City of Lenoir – 18,352. U.S. Census, 2020 DEC Redistricting Data, Table P1, (PL 94-171)

7. **Other Factors**

<table>
<thead>
<tr>
<th><strong>2021 City of Lenoir - Other Factors Checklist-EPA-OLEM-OBLR-21-4</strong></th>
<th><strong>Page #</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td></td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
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<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
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<tr>
<td>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).</td>
<td></td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td></td>
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</table>
November 22, 2021

The Honorable Joseph L. Gibbons, Mayor
City of Lenoir
801 West Avenue NW
Lenoir, NC 28645
jgibbons@ci.lenoir.nc.us

Re: U.S. EPA Brownfields Community-Wide Assessment Grant – City of Lenoir

Dear Mr. Gibbons,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the City’s application for a U.S. EPA Brownfields Community-Wide Assessment Grant. This grant would be a tremendous economic development achievement for the City.

We hope that the City is successfully awarded this grant, and we will continue to support you in your Brownfields redevelopment efforts. The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project. This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The Brownfields Program can also assist with outreach efforts to your local community regarding reuse for commercial purposes and the controls to be put in place to make the property suitable. The liability protection offered by a Brownfields Agreement is a benefit to the whole community and can often facilitate additional economic development in the area surrounding a Brownfields Property.

We look forward to working with you regardless of a grant award or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson  Brownfields Program Manager

cc:  NCDEQ Brownfields Public Outreach Team
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
      i. Background and Description of Target Area

The City of Lenoir (City) is centrally located in Caldwell County, North Carolina, 65 miles northwest of Charlotte and 61 miles northeast of Asheville, North Carolina at the foot of the Blue Ridge Mountains. Named after Revolutionary War hero William Lenoir, the City was established by the NC Legislature as the County seat in 1841 and incorporated in 1851. Lenoir has historically been a furniture manufacturing community, especially with the opening of the Chester-Lenoir Railway in 1884. Lenoir Furniture, started in 1889, was followed by Broyhill, Fairfield, Bernhardt, and Kincaid Furniture companies, and businesses that located near the furniture industry to support it.

Furniture’s decline through the 1980s and 1990s left a cultural, economic and employment void in the region. Lenoir, long the leader in the industry, suffered greatly as plants were shuttered and employees, many whose families had been employed by the furniture industry for generations were let go. The significant manufacturing plant closings Lenoir suffered in the past have created many vacant industrial buildings throughout the City. For 2021, the North Carolina Department of Commerce’s County Distress Rankings (Tiers) classifies Caldwell County as a “Tier 1” county, the most economically distressed designation for North Carolina counties. County tier rankings are calculated on 4 criteria: average unemployment rate, median household income, percentage population growth, and per capita adjusted property tax base.

Our proposed brownfield Target Areas encompass a former furniture facility, a former textile facility, and a city-owned property adjacent to a former waste Treatment Storage and Disposal facility (TSDF), recently acquired by Google, with known contamination from waste handling operations. Our priority sites are within one mile of Google’s Lenoir Data Center and property demand is being driven by Google’s investment in our community, with two of our three priority sites under consideration by supporting businesses desiring proximity to Google. The City’s brownfield site inventory also includes a former dry cleaner, chemical coatings facility and auto salvage site.

This proposed EPA Assessment project will focus on the following three US Census Bureau Tracts: CT 301, CT 303, and CT 304 (the “Target Areas”). These Census Tracts are aligned adjacently in a basic north-south configuration, with CT 301 encompassing “Fairfield South”, one of the Target Areas in our 2018 EPA Brownfield Assessment Grant. These Target Areas are discussed below.

   ii. Description of Priority Brownfield Sites

   • CT 301: Former Broyhill Manufacturing – This 15 acre site is owned by the City of Lenoir and was one of the priority sites partially addressed under the City’s 2018 EPA Brownfield Assessment Grant. The site formerly contained a furniture manufacturing facility, which was demolished in the early 2000s. The site is currently vacant. The site is environmentally complex, with the City acquiring a $300,000 Appalachian Regional Commission (ARC) grant, with a $250,000 cash match from the City to partially address over 10,000 cubic yards ground wood debris left on site. The prior owner intended to use the site as a recycling center until he abandoned the site, which was subsequently acquired by the City. The debris is in contact with the ground, which was determined to be contaminated by asbestos containing building materials (ACBMs). The demolition debris had to be removed to provide physical access for environmental assessment activities. The North Carolina Department of Environmental Quality (NCDEQ) has deemed this site eligible for a North Carolina Brownfield Agreement. A partial soil gas assessment conducted under our 2018 Brownfield Grant indicated a vapor intrusion risk at the site. Based on the contaminants identified in the soil gas assessment, high concentrations of Volatile Organic Compounds (VOCs), including benzene, naphthalene, xylene, and ethylbenzene, along with chlorinated compounds, including trichloroethylene (TCE), tetrachlorethylene (PCE), and vinyl chloride are believed to be present in site soil and/or groundwater. NCDEQ’s Brownfield Program
is requiring additional assessment to satisfy Brownfield Agreement Requirements. This assessment will require an additional approximate $100,000 to complete, which outstripped our ability to fully assess the site to NCDEQ brownfield requirements with our initial grant. These findings are of particular concern given that this site is adjacent to residential development. This continues to be the City’s top priority, given its proximity to the Google Data Center, located less than one mile south of this site. Given the availability of high speed fiber optic data capabilities, this site is a primary candidate for a call center or other data-driven industry. Preliminary interest in the site has stalled, given the environmental uncertainty surrounding the site and absence of a North Carolina Brownfield Agreement.

**CT 303: City Property Adjacent to Former Tapaha Dynamics TSDF Facility** – This 28 acre City-owned property sits adjacent to a former TSDF facility that is no longer in operation and has been demolished. The northern one-third of the City’s property is in a Zone AE National Floodway as determined by the Federal Emergency Management Agency (FEMA, Flood Panel 37102749000J). Lower Creek borders the northern property boundary, with a tributary to Lower Creek bifurcating the property. This property also contains the soon to be vacant Caldwell County Animal Shelter, as well as the Foothills Radio Station. The animal shelter and radio station are currently operational and are the only structures remaining on site. Google’s preliminary investigation of the Tapaha Dynamics property as part of their acquisition due diligence identified VOCs, SVOCs, metals, pesticides, and dioxins/furans in site soil and groundwater. There is concern that this contamination, given the shallow groundwater table, may be impacting the City’s property. The City desires to assess the property on behalf of an interested party that has proposed development of a large lithium battery facility on a portion of the property to support the Google Data Center, located less than one-half mile east of the property. Undefined environmental liability and lack of a complete understanding of the environmental conditions are impediments to site redevelopment.

**CT 304: Former American & Efird Textile Facility** – This 21 acre site contains a former textile manufacturing facility, located south of Lenoir’s downtown area. This facility was originally constructed in 1907 for the manufacture of textiles and yarn. Little is known about operations at the facility, which is currently privately owned. The facility has been partially demolished, with approximately 45,000 square feet of warehouse space remaining. Preliminary review of information maintained by NCDEQ shows no publicly available information regarding the environmental condition of the site. Given its former use and historical operations, the unknown environmental conditions pose a potential risk to nearby residential areas and the adjacent former mill village, which is largely intact and occupied by local residents. Textile manufacturing typically includes the use of dyes, chlorinated solvents, and petroleum compounds. Additionally, the site’s use predated its current use of natural gas, and it is possible that former manufacturing operations were fueled by petroleum stored in underground storage tanks (USTs). None of these potential concerns have been investigated. This site is strategically located approximately 0.6 miles southwest of US-321, the major north-south transportation artery in Caldwell County, and one mile south of Google Data Center. The current property owner has indicated a willingness to have the property assessed for its environmental condition as a precursor to a possible transfer of the property for redevelopment.

b. **Revitalization of the Target Area**

i. **Reuse Strategy and Alignment with Revitalization Plans**

The City of Lenoir’s 2005 Comprehensive Plan specifically identifies brownfield redevelopment as a strategy material to the successful implementation of the Comprehensive Plan. This is evidenced by the City’s use of a 2018 EPA Brownfield Assessment Grant to address priority sites in our community. In 2007, after the development of Lenoir’s Comprehensive Plan, Google announced plans to develop a $1.2 Billion data center. According to Google, Lenoir was chosen due to “the right combination of energy infrastructure, developable land, and available workforce for the data center.” This was a
game changer for the City of Lenoir and altered the landscape for new industry and job growth around the technology sector, which was largely non-existent prior to Google’s announcement. Google’s Data Center is in CT 303, in the center of our three primary Target Areas. All of Lenoir’s priority brownfield assessment sites lie less than two miles of each other and none lie more than one mile from the Data Center. Two of our three priority brownfield sites have been targeted for redevelopment, the former Broyhill site is considered an excellent data center site and the City’s property adjacent to the Tapaha Dynamics site is under consideration for development of a lithium battery facility. Both of these uses are driven by Google and are complementary businesses. These are some of the larger tracts of land available for development, with infrastructure already in place. Quantification of the environmental liability through Brownfield Assessment Grant funding for these sites aligns with our Comprehensive Plan strategy and supports a major industry economic driver in our community.

ii. Outcomes and Benefits of Reuse Strategy
Since the demise of the furniture and textile industries in Lenoir, we have struggled to find a footing in a non-manufacturing environment. The announcement and subsequent development of Google’s Data Center has brought a technology focus to Lenoir and our region. Redevelopment and reuse of our priority and other sites in our Target Area will (and is) attract(ing) technology based industry and businesses, providing additional non-manufacturing job growth, and accelerating our non-residential tax base. Redevelopment of two of our priority sites into their proposed use would create 200-500 construction jobs, 100+ additional permanent jobs and an estimated $75,000+ in additional annual tax revenue. Google’s focus on providing renewable energy as part of their business platform incentivizes other businesses to incorporate renewal energy into their business strategy, aligning with the technology industry’s renewable resource commitment. Caldwell County is designated a “Tier 1” county, the most economically distressed designation for North Carolina counties as determined by the North Carolina Department of Commerce. Additionally, residents in CT 301, CT 303, and CT 304 experience higher levels of poverty compared to Caldwell County as a whole. According to 2021 US Census Bureau Data, the percentage of residents below the poverty level is 25.7%, 26.0% and 22.1%, respectively. This compares to Caldwell County’s poverty rate of 15.1%. Redevelopment in our Target Area will provide additional higher-paying technology-based job opportunities for residents in this area.

c. Strategy for Leveraging Resources
i. Resources Needed for Site Reuse
The City is active in acquisition of grant funding to support our redevelopment and infrastructure initiatives and has had an enviable track record in doing so. In 2021 the City, in conjunction with support of the Western Piedmont Council of Governments, received a $300,000 Appalachian Regional Commission (ARC) grant to assist with the debris removal from the former Broyhill site, one of our priority properties. We also acquired a $250,000 cash match from the North Carolina Department of Cultural and Natural Resources for the Lenoir Overmountain Victory National Historic Trail (OVNHT) Greenway Link Project. In 2021 we also received over $164,000 Community Development Block Grant (CDBG) funding and over $5,000,000 from the US Department of Housing and Urban Development’s HOME Investment Partnership Program (HOME). In 2018 the City received a $300,000 EPA Brownfield Assessment Grant. Continued use of EPA Brownfield Assessment Grant funding will provide environmentally-focused funding for assessment and cleanup that compliments and supports a comprehensive community funding framework.

ii. Use of Existing Infrastructure
All our priority sites have a former industrial use. As such, the infrastructure needed for redevelopment into other uses exists in our Target Areas. Privately-supplied telecommunication, high-speed internet, electrical and natural gas services, along with municipal water and sewer services make our Target Areas and priority sites prime redevelopment targets. Existing infrastructure improvements are ongoing, funded by the City through tax revenues, CDBG, and other state/federal funding as appropriate.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
a. Community Need
i. The Community’s Need for Funding

Lenoir’s population, which peaked in 2009 at 19,064 has declined to 18,352 based on the US Census 2020 DEC Redistricting Data. This is despite the addition of technology jobs. The current (2019, US Census) poverty rate for the unemployed in CT 301 is 53.3%; CT 303 is 57.8%, and in CT 304 is 75%. Of the 15,524 estimated people with income below 500% of the poverty level, 12,165 or 78.4% reside in our Target Areas (2019 American Community Survey, 5-year Estimates). According to information maintained in NCDEQ’s Environmental Justice Tool, the Median Household Income in our Target Areas is 33.6% lower than of North Carolina as a whole, or $37,650 annually, compared to $50,320 for the state. Clearly, residents in our Target Areas do not have the resources to cover many basic needs and services, much less funding options to address environmental issues in their areas. Without continued brownfield grant funding, these communities will continue to be exposed to blight and environmental impact.

ii. Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations: Our poor and minority poor are most affected demographic groups in our Target Areas. Many residents located in these areas were geographically close to furniture and textile employment opportunities, which no longer exist. These industries exited our Target Area, leaving behind unquantified contamination, impacting soil and groundwater in areas largely dependent on potable water wells as a drinking source. Some of these properties are often targets for vandalism, illegal dumping, and crime. Given the poverty in our Target Areas, many of our residents lack the resources to relocate away from potential impacts left behind by these industries. With two of our three priority sites in our Target Areas consisting of former textile and furniture uses, application of Brownfield Assessment Grant funds will quantify the nature, extent and impact of contamination left behind and provide us the platform to pursue clean up through application of local, state, and federal resources, including EPA Clean-up Grant funding, which we will pursue. Removal and mitigation of contamination, combined with North Carolina Brownfield Agreements to limit future liability, will enable site financing, making redevelopment possible. This approach will help reduce the environmental threats to our sensitive populations. Redevelopment will provide additional employment opportunities, improving the welfare of residents in our Target Areas.

2. Greater than Normal Incidence of Disease and Adverse Health Conditions:

   When compared to county data compiled by the North Carolina Department of Health and Human Services (NCDHHS), residents in our Target Areas are more likely to suffer from cardiovascular disease, deaths caused by heart disease, cancer, and diabetes. While there are no census tract-specific health data available, based on NCDHHS data for occurrences per 100,000 population, average deaths from cardiovascular disease are 257.9 in Caldwell County compared to 221.9 for North Carolina; heart disease deaths average 192.6 (county) versus 163.7 (state); all forms of cancer deaths are 189.3 versus 169.1, and diabetes deaths at 26.4 versus 22.8. According to information provided by City personnel, Caldwell County ranks 27 out of 100 counties for highest rate of colon cancer. Use of chemicals, especially chlorinated compounds, often used in the manufacturing process have been demonstrated to have significant health impacts if improperly handled. The industrial uses of our priority sites, along with these uses predating many (or all) of our now current environmental laws and regulations, exposes our residents to significant unquantified environment risk. For example, the use and/or disposal of trichloroethylene (TCE), which has been documented on at least one of our priority sites can cause fetal impact in as little as 3 weeks.

3. Promoting Environmental Justice: Use of Brownfield Grant funding will help us start a transformation in our disadvantaged Target Areas by improving the quality of drinking water, removing blighted properties from these communities, and providing additional employment opportunities. These new opportunities will not only provide much needed employment income, but also health insurance to address disproportionate health impacts that the former industries left behind. Redevelopment will also help us reduce the impact from illegal activities and vandalism that our large, unsecured, and vacant properties often attract. These negative impacts disproportionately affect a large segment of our population least able to address it.
b. Community Engagement
   i.& ii. Project Partners and Project Partner Roles

The following local community partners have committed to involvement in the project.

<table>
<thead>
<tr>
<th>Agency/Partner Name</th>
<th>Point of contact (name, email &amp; phone)</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caldwell County Chamber of Commerce</td>
<td>Bryan Moore <a href="mailto:bryan@caldwellchamber.com">bryan@caldwellchamber.com</a></td>
<td>Assist with site identification, prioritization, property owner and community outreach.</td>
</tr>
<tr>
<td>Habitat for Humanity</td>
<td>Pete Kidder <a href="mailto:pete@caldwellhabitat.org">pete@caldwellhabitat.org</a></td>
<td>Assist with site identification, prioritization, property owner and community outreach.</td>
</tr>
<tr>
<td>Caldwell Community College and Technical Institute</td>
<td>Dr. Mark Poarch <a href="mailto:mpoarch@cccti.edu">mpoarch@cccti.edu</a></td>
<td>Assist with workforce development and liaison with small businesses.</td>
</tr>
<tr>
<td>Saint Paul A.M.E. Church</td>
<td>Thomas Nixon 443 Finley Ave. NW, Lenoir</td>
<td>Assist with site prioritization, property owner contacts and community outreach.</td>
</tr>
<tr>
<td>Caldwell Pathways</td>
<td>Rick Rash (828) 728-0768</td>
<td>Assist with site identification, prioritization, property owner and community outreach.</td>
</tr>
<tr>
<td>Caldwell County Economic Development Commission</td>
<td>Deborah Murray <a href="mailto:dmuurray@caldwelledc.org">dmuurray@caldwelledc.org</a></td>
<td>Assist with site identification, prioritization, property owner and community outreach.</td>
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</table>

The City will continue meetings of our Brownfield Steering Committee (BSC) which was formed in 2015 and provided guidance through the implementation of our 2018 EPA Assessment Grant. This committee is comprised by key City of Lenoir representatives, community and business leaders, and economic development personnel. BSC members have assisted City personnel with site access contacts and public outreach and has successfully served as a liaison between our Latino community, small businesses, and our brownfield endeavors. The BSC will continue to facilitate development of prioritization criteria based on community needs, which will be solicited as discussed in 2.b.iii.

iii. Incorporating Community Input

Believing strongly in partnering with citizens and maintaining project transparency, we will continue to engage the local community at all stages of the project. This grant will build upon previous initiatives involving extensive community engagement. Our proposal was developed with input from the BSC, which meets regularly and is comprised of local residents, business owners from banking, insurance, real estate, and local government. Specifically, we will pursue and/or continue the following approach:

(a) We will continue to promote our Brownfield projects on the City webpage to report ongoing progress. Project reports and meeting announcements will be posted on this site. In addition to the website, we will utilize the Caldwell County Government Channel on YouTube and other social media to engage the whole community in the project. We believe internet and social media outlets will provide immediate on-demand access to information to most of our residents.

(b) The City will provide a booth with information on our Brownfield projects at Lenoir’s annual North Carolina Blackberry Festival, sponsored by the Caldwell County Chamber of Commerce. This festival attracts thousands of City residents and is an opportunity to reach the wider community. This outreach event is predicated on the ability to hold the festival per COVID concerns and/or state gathering requirements at the time of the festival, typically held in July of each year.
(c) We will solicit church partners in the vicinity of our brownfield sites to provide a platform for communication by placing project updates in church bulletins, provide notices of meetings and serve as repositories for printed information.

(d) Project reports and brochures will be distributed throughout the community with pertinent project materials posted at City Hall, the library, and other public repositories. Printed materials will be provided in English and Spanish, since 12.3% of our residents in our Target Areas are Hispanic.

(e) Public informational meetings will coincide with primary milestones, e.g., completion of site selection, assessments, and remediation/redevelopment planning, to communicate progress and encourage broad citizen involvement. Public notices will be placed in local print media and posted on our webpage and social media for all public meetings. Meetings will be scheduled in centrally-located in our Target Areas. The meetings will also be broadcast as Zoom meetings for those in our community sensitive to COVID-19 or if in-person meetings are not permissible base on local and/or state mandates.

(f) To expand upon previous community involvement efforts, we intend to provide opportunities for citizens to review project deliverables, especially redevelopment plans, through presentations to local business and civic organizations and through small group meetings and open house style offerings to allow a broad range of perspectives. If needed, linguists for non-English speaking persons and/or interpreters for the hearing-impaired will be used to eliminate these potential barriers to sharing information with the community. Transportation for residents needing transportation to and from in-person meetings will be provided.

Our communication (online, printed, in-person) platform provides a comprehensive and multi-venue approach for outreach and communication of our project information.

3. TASKS DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

<table>
<thead>
<tr>
<th>Task 1: Project Management / Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td>i. Project Implementation: This task entails overseeing the cooperative agreement, reporting requirements, the grant budget, and managing project contractors. Anticipated activities include 6 BSC meetings (minimum), 6 public outreach sessions (minimum) conducted bi-annually, distribution of approximately 1,000 project flyer/factsheets, utility bill inserts and 6 semi-annual project update e-newsletters, and projects updated quarterly on our website.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: October 2022 through end of grant</td>
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<tr>
<td>iii. Task/Activity Lead: Director Public Utilities Radford Thomas with Contractor support.</td>
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<th>Task 2: Public Involvement</th>
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<tr>
<td>Project Implementation: - The City has realized efficiency by laying the groundwork for public outreach in preparation for this and previous grant applications. Outreach will continue under the prospective grant using methods described in Section 2.b to gain trust, educate citizens about the activities underway, and solicit input at project milestones. Anticipated activities include 6 BSC meetings (minimum), 6 public outreach sessions (minimum) conducted semi-annually, development of approximately 1,000 project flyer/factsheets, 6 bi-annual e-newsletters, and website postings. These activities will relate to both priority and the non-priority sites in our Target Areas and will not require non-EPA grant resources. The City will be assisted by the contractor and an outreach specialist to lead visioning sessions for the redevelopment and revitalization of the project focus areas.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: October 2022 through end of grant</td>
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### Task 3: Site Inventory

**i. Project Implementation:** The City developed an inventory of 18 potential sites, 8 of which were addressed through our initial EPA Brownfield Assessment Grant, including 4 of our 5 initial priority sites. We continue to modify our inventory, including the addition of 3 priority brownfield sites. We have developed a database providing the location of each brownfield property, detailed site observations, site photographs, and publicly available environmental data. We have prioritized sites for assessment based on redevelopment potential and community input, among other factors. This information is provided on multiple platforms for community access.

**ii. Anticipated Project Schedule:** To be completed within 6 months of grant award.

**iii. Task/Activity Lead:** Director of Public Utilities Radford Thomas with Contractor support.

**iv. Outputs:** Completed potential pollutant source inventory, completed site prioritization.

### Task 4: ESAs

**Project Implementation** - Complete 10 Phase I ESAs on eligible sites in accordance with ASTM 1527-05/13 and 40 CFR Part 312 (4 on priority sites and 6 on non-priority sites). Complete 6 Phase II ESAs in accordance with ASTM 1903-11 (3 on priority sites and 3 on non-priority sites). Before initiation of a Phase II ESA, Quality Assurance Project Plans (QAPPs) will be prepared and submitted to EPA and NCDEQ for review and/or approval. QAPPs will relate to both priority and the non-priority sites. Task 4 activities will not require non-EPA grant resources.

**ii. Anticipated Schedule:** Phase I ESAs completed by month 18 with Phase II ESAs completed between months 12 and 30.

**iii. Task/Activity Lead:** Contractor

**iv. Outputs:** Ten (10) Phase I ESAs; six (6) Phase II ESAs; two (2) sites in the NC Brownfield Program.

### Task 5: Clean-Up & Reuse Planning (CUP)

**i. Project Implementation**

**Clean-up Planning:** Based on the number of Phase II ESAs that are completed and the results of those reports, the City will supervise the selected consultant in the performance of cleanup planning for up to three Brownfield sites, or as many as possible with the budget remaining. This may involve the preparation of an Analysis of Brownfield Cleanup Alternative (ABCA), which will include comparing site data with appropriate cleanup standards, identifying cleanup options and costs, identifying redevelopment options, performing marketing and outreach to prospective developers, and working with the property owner or developer to devise a cleanup plan. Where applicable, cleanup planning will include applying data from the assessments to facilitate the acquisition of a Brownfield Agreement (BFA) through the NCDEQ.

**Reuse (Redevelopment) Planning:** Funds will also be used to engage a Community Development Specialist to assist with the envisioning and community charrette. Visioning and community feedback will be evaluated in accordance with neighboring residential development and the goals and strategies developed in the 2010 Core Area Plan.

**ii. Anticipated Project Schedule:** To be completed between months 24 and 36.

**iii. Task/Activity Lead:** Contractor with oversight/assistance from City of Lenoir personnel.

**iv. Outputs:** Three (3) ABCAs; one (2) NC Brownfield Agreements; one (1) Community envisioning session/charrette.
b. Cost Estimates

<table>
<thead>
<tr>
<th>Budget Category</th>
<th>Project Management</th>
<th>Public Involvement</th>
<th>Site Inventory</th>
<th>ESAs</th>
<th>CUP</th>
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<td>$6,000</td>
<td>$398,000</td>
<td>$49,000</td>
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Task 1 – Project Management: **Total Budget** – $10,000 **Personnel:** This task entails overseeing the cooperative agreement, reporting requirements, the grant budget, and managing project contractors. Labor is estimated at 90 hours at an average of $50/hour, plus $1,250 in associated fringe benefits. **Travel:** Expenses for travel to Brownfields training for staff is included, with $4,250 budgeted for one City representative to attend the national conference. Therefore, $10,000 is budgeted for project management, or approximately 2.0% of the overall Grant budget.

Task 2 – Public Involvement: **Total Budget** - $37,000 **Contractual:** For our hired contractor’s assistance, this task includes participation in 6 BSC Meetings, 6 public outreach sessions, and an updated website (140 hours at $165/hour); Outreach specialist for visioning sessions (80 hours at $150/hour). **Supplies:** 1,000 project flyer/factsheets ($1,900).

Task 3 – Site Inventory: **Total Budget** - $6,000 **Contractual:** (12 hours @ $165; 30 hours @ $115; $570 travel).

Task 4 – ESAs: **Total Budget** – $398,000 **Contractual:** (10 Phase I ESAs at $4,000 each; Generic QAPP at $6,000; 6 SSQAPPs at $4,500 each; and 5 Phase II ESAs at $45,000 each, with approximately $100,000 for the Broyhill site). We estimate that 2 of the sites may require asbestos testing as part of the Phase I ESA costs.

Task 5 – Clean-up Planning: **Total Budget** – $49,000 **Contractual:** (3 ABCAs @ $5,000 each; 2 NC Brownfield Agreements ($24,000); $10,000 for targeted cleanup/reuse planning).

c. Measuring Environmental Results

Progress will be tracked, measured, and reported by Radford Thomas, with Contractor assistance, using EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES). He will evaluate progress at least monthly in conjunction with our chosen contractor to ensure that we are achieving our outputs, results, and eventual outcomes and that funds are expended in a timely and efficient manner. This includes timely scheduling and completion of public outreach activities, completion of inventory activities by month 6, completion of Phase I ESAs by month 18, Phase II ESAs completed by month 30, and ABCAs and reuse planning completed between months 24-36. Radford will communicate frequently with the EPA Project Manager and submit quarterly reports to EPA, which will also be a mechanism to measure/track results.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity

Lenoir has managed numerous federally funded projects and is fully capable of successfully completing all phases of work under this cooperative agreement. We have a long and successful history implementing and managing grants, including ARC, CDBG and our 2018 EPA Assessment Grant. We are experienced in complying with federal requirements including related terms and conditions, work plans, project schedules, and financial and progress reporting. A team of experienced administrative, technical, and
economic development staff will oversee and administer the grant activities and are expected to remain through the duration of the project. The City of Lenoir, as a recipient of Federal awards, adheres to single audit requirements for internal control.

ii. Organizational Structure
The grant will be directed by Radford Thomas, Public Utilities Director, along with City of Lenoir personnel and assisted by our Contractor. Mr. Thomas successfully directed our 2018 EPA Brownfield Assessment Grant, including financial management and reporting oversight, assisted by the Contractor. Mr. Radford served as the liaison with our Mayor, City Manager and City Council and was responsible for periodic program updates. Mr. Radford has the full support of these parties, including our Mayor, who was a participating member of our BSC.

iii. Description of Key Staff
We are fortunate to have our original Brownfield key staff still in place. They will provide continuity in our ongoing brownfield efforts.

(a) Administrative Experience - City Manager Scott Hildebran will be the primary administrative contact under the grant agreement. Over his 28 years of municipal experience, he has served in numerous roles. As the City Manager, he serves as the Chief Administrative Officer and Budget Officer for the City. Scott will combine his institutional knowledge of the community, administrative and economic development experience to provide the guidance necessary to effectively manage the grant. Mr. Hildebran has an excellent track record of successfully managing federal and state grant funding with excellent results and adherence to grant requirements.

(b) Technical Experience – Radford L. Thomas, Public Utilities Director will serve as the City's technical advisor. Radford has extensive experience working closely with NCDEQ to resolve environmental issues within the City. He has participated closely in the development of Phase I Environmental Assessments for City real estate transactions and will bring this knowledge and grant experience to the team. He will assist our environmental consultant in executing the technical aspects of the project.

(c) Project Management and Economic Development Experience – Ms. Jenny Wheelock, AICP, City of Lenoir Planning Director, will support overall management of economic development efforts. Ms. Wheelock brings impressive experience to the project with 12 years of economic development experience. She has worked with various community members and interest groups to enhance quality of life in the City.

iv. Acquiring Additional Resources
The City has established relationships with engineering and environmental services firms, including experts in brownfields assessment and redevelopment. We have already procured an environmental consultant in compliance with 40 CFR 31.36 and North Carolina local government procurement requirements codified as General Statute 143-129(b). Proactively procuring our consultant in advance will save us approximately 90 days up front and enable us to aggressively plan for addressing our priority sites, update our existing brownfield inventory, and conduct additional community outreach.

b. Past Performance and Accomplishments
   i. Currently Has or PreviouslyReceived an EPA Brownfields Grant
The City of Lenoir has received one EPA Brownfield Assessment Grant, awarded in 2018 and described in more detail below.

(1) Accomplishments: With our initial Brownfield Assessment Grant, the City of Lenoir addressed eight sites, including 4 of our 5 priority sites. In addition, two later identified sites, both owned by Latino
members of our community, were assessed with our Grant funding. One of these sites, the former *Jo Jas Superette*, faced enforcement action by NCDEQ for a previous underground storage tank (UST) issue of which the current owner, a self-employed painting contractor who had just acquired the property with his life’s savings, was unaware. This success was featured in a front page article in the Lenoir News Topic on October 3, 2019, under the headline “EPA grant saves small business”. This site was brought to the City’s attention by one of our BSC members, who at the time was the Director of Caldwell Community College and Technical Institute’s Small Business Center. In addition to the Jo Jas Superette, we successfully completed the following projects, all of which have been entered into ACRES:

- **City Service Cleaners (Priority Site)** – This site was assessed for the presence of dry cleaning compounds. The City of Lenoir, arranged for site access and provided in-kind services including labor and equipment to assist the Contractor with the assessment activities. Successful completion led to a property transfer and pending redevelopment as a craft brewery.

- **Blue Bell Mill (Priority Site)** – Built in the early 1900s, this former textile mill sat largely vacant. Using Grant funds, the City conducted both Phase I/Phase II ESAs, Asbestos, and Lead-based Paint Surveys. This site is currently undergoing redevelopment into 46 much needed multi-family units and is scheduled for occupancy in December 2021.

- **C&NW Railroad Depot (Priority Site)** – The City conducted Phase I and Phase II ESAs on this site, which is planned for redevelopment into restaurant/craft brewery use. This site is adjacent to the Blue Bell Mill redevelopment.

- **Bost Lumber (Priority Site)** – The City conducted Phase I and Phase II ESAs on this site, which is planned for redevelopment into 68 apartment units. The developer of the Blue Bell Mill site is redeveloping this property.

- **Broyhill Furniture** – Phase I/II ESAs, Asbestos surveys, Air Quality Monitoring and Preliminary Soil Gas Assessment was conducted at this City-owned property. This site is one of our 3 priority sites for this application as it lies less than one mile from Google’s Lenoir Data Center. A North Carolina Brownfield Agreement is being pursued; however, NCDEQ is requiring approximately $100,000 of additional assessment to accurately quantify the risk to complete the agreement, which is material to a site transfer.

- **Jo Jas Superette** – as mentioned previously, the City expended grant funding for an UST removal in support of this minority-owned business, who unwittingly purchased the property under the mistaken belief that the previous owner was responsible for the USTs. At the time of this project, NCDEQ was actively pursuing an enforcement action for approximately $30,000 of assessment activities to bring the site into compliance.

- **Gibbons Electric** – The City expended Grant funds for the assessment and removal of 2 heating oil USTs to facilitate building expansion for a minority-owned business.

- **Western Auto** – The City expended Grant funds for completion of a Phase II ESA, Asbestos and Lead-based Paint surveys to support ongoing redevelopment of this historic property.

(2) Compliance with Grant Requirements: The City’s 2018 Brownfield Grant Application identified 5 Priority Sites for consideration. At the conclusion of our 2018 Grant, we had successfully completed assessment on 4 of the 5. Two of the 4 assessed priority sites are currently undergoing redevelopment, with the remaining 2 planned for redevelopment beginning in 2023. Sites were entered into ACRES at the appropriate time. The City and supporting team members participated in monthly program update teleconferences with our Brownfield Project Manager. Our environmental contractor provided monthly updates that were used for the preparation and timely submittal of our Quarterly Reports. For our 2018 Grant, contractor expenditures for assessment activities totaled $215,103.95, with the remainder expended for community outreach, programmatic oversight, EPA Brownfield Conference attendance and related travel expenses. Approximately $1,400 of the original Grant was unused, due to cancellation of the 2020 National Brownfield Conference.