1. Applicant Identification:
City of Perry, 1211 Washington Street, P.O. Box 2030, Perry, GA 31069

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

3. Location:
a) City of Perry
b) Houston County
c) Georgia

4. Target Area and Priority Site/Property Information – Community-wide:
o Target Areas: Georgia Midland Railroad Corridor and Highway 127 Commercial Corridor
o Census Tracts (CTs) for Georgia Midland Railroad Corridor: CT 212.02
  Census Tracts for Highway 127 Commercial Corridor: CT 212.02
o Priority site addresses:
  Argos & Mullins Site: 400-618 Hampton Court Extension, Perry
  Lumpkin Assemblage: 1428 – 1438 Swift Street, Perry

5. Contacts:
Project Director:
Robert Smith
478-988-2757
robert.smith@perry-ga.gov
1211 Washington Street, P.O. Box 2030, Perry, GA 31069

Chief Executive/Highest Ranking Elected Official:
Mayor Randall Walker
478-988-2700
randall.walker@perry-ga.gov
1211 Washington Street, P.O. Box 2030, Perry, GA 31069

6. Population: City of Perry: 20,624
7. Other Factors:

<table>
<thead>
<tr>
<th>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>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>2</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>3</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>3, 9</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>
</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.
October 18, 2021

VIA ELECTRONIC Mail robert.smith@perry-ga.gov
Mr. Robert Smith
Assistant City Manager
1211 Washington Street
P.O. Box 2030
Perry, GA 31069

RE: State Acknowledgement Letter – Brownfield Community-Wide Assessment Grant Application
City of Perry

Dear Mr. Smith:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the City of Perry 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 City 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 City of Perry for such assessment and planning. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Sincerely,

[Signature]

Shannon Ridley
Brownfield Coordinator

File: FFY 2022, EPA Grant Applicants, City of Perry-Assessment
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1. a. Target Area and Brownfields

1. a. i. Background and Description of Target Area: After the U.S. Civil War ended in 1865, Perry, Georgia remained a bustling city with textile mills and factories supporting a significant portion of its workforce. However, the jobs that once underpinned the economy of this small town in middle Georgia are now overseas – higher shipping costs outweighed by vastly cheaper labor and raw material costs. The buildings where people once earned a living to provide for their families are all that remain of this prosperous history; now empty, neglected and falling into disrepair.

Founded in 1824, this historic community in Houston County, is now home to 16,595 residents and encompasses approximately 27 square miles along Interstate 75 in the center of Georgia. Textile mills and raw material processing plants were a natural fit for the small community of Perry, at an advantageous location in the geometric center of the largest cotton producing state of the day and along major transportation routes (stagecoach, railways and later, highways). A healthy ranching industry and complimentary landscape laid the foundation for the meat packing industry to thrive here. With this industrial change, a population shift occurred providing jobs to minorities, with a black population increase of >32% since 1990 (US Census, 2019 5-year estimates – abbreviated as USC, 2019 throughout). The construction of the Georgia National Fairgrounds and Agricenter facility within the community in 1990 supported these uses well. The tide turned as significant and transformative changes in the local and national economy took hold in the mid-1990s; one by one the plants in Perry shut their doors, victims of off shore outsourcing. According to state and local records, well over 1,200 living wage jobs were lost during this period. In the 1990s, Perry experienced a series of facility closures (Textile Mill, Northrop Grumman, PPG Glass), leaving hundreds of thousands of square feet of industrial space vacated, and nearly 30% of the work force jobless, and the City’s prime commercial corridor was left to decay.

Today, more than twenty years later and in a period of robust economic growth nationally, Perry is still struggling to rebrand and rebuild along its former commercial corridor. The loss of the textile industry devastated the middle class and left an industrial graveyard behind, which has disproportionally impacted our communities in need. Blight ensued and unable to find work, much less equitable pay, generational poverty took hold that persists today with a minority poverty rate of 21% compared to a white poverty rate of 10.5% (USC, 2019).

In order to address these issues, Perry seeks funds for brownfield assessment of the following target areas for this proposed project: (1) The Georgia Midland Railroad Corridor and (2) the Highway 127 Commercial Corridor. The Georgia Midland Railroad Corridor consists of the property along a 2.5-mile rail corridor extending west from Fort Valley into the industrial center of Perry. This railway corridor is the transportation gateway for numerous industrial facilities, including warehouses, the former Argos cement plant, and Interfor US, Inc., which operates the largest wood treatment and sawmill in Middle Georgia. The US Highway 127 Commercial Corridor is the commercial gateway into Perry, connecting US Highways 41, 341, and 127 with Interstate 75. Specifically, this corridor follows Highway 127 approximately 2.5 miles from I-75 Exit 135 and the Georgia National Fairgrounds through Downtown Perry. However, this commercial gateway is littered with abandoned, dilapidated structures, including gas stations and former dry cleaners, which have proven a significant barrier to not only redevelopment along the corridor, but the overall economic well-being of the City. With each site there is significant potential for hazardous material or petroleum impact.
1. a. ii. **Description of the Priority Brownfield Site(s):** The two target sites selected for assessment include almost 23-acres of blighted industrial and commercial property that were identified by the City as key gateway properties into the commercial and industrial heart of Perry. Further, these sites represent the highest redevelopment potential while also addressing potential petroleum, PCBs, and metal environmental impacts to human health and the environment to predominantly underserved communities. These priority Sites include:

   (1) The **Argos & Mullins Priority Site** (Georgia Midland Railroad Corridor) is located south of Hampton Court on the western central portion of the city along interstate 75 and serves as an industrial gateway property to the City, with the railway to the north. This approximately 22.5-acre assemblage supported a former Argos cement plant closed circa 2005, leaving over 30 people without jobs. Since closing its doors, the building has remained vacant and poses serious public safety and health issues. The 623,000 square foot building on a 10-acre lot is falling apart, with half the roof and south eastern façade having caved in. Immediately adjacent to a low-income neighborhood (47% live under 2x the poverty level [enviroatlas.gov]), teenagers often use the site as a playing field and the property has become an attractive nuisance. Petroleum and PCB-containing oils, both containing known carcinogen constituents, were commonly used as releasing lubricants for concrete forms and may be present in the subsurface. Further, the silica dust from disintegrating cement represents a respiratory threat, with Houston County having an asthma prevalence of 15.4% in adults, the highest in Georgia (Georgia Department of Public Health). This priority site contains a 1.1-acre pond that was used as a stormwater detention basin. Impacted runoff and sediment from the facility collects in the pond, which eventually discharged into the Ocmulgee River (Ocmulgee). It should be noted that the Ocmulgee provides drinking water for over 120 communities (Altamaha Riverkeeper). Additional concerns are likely associated with the auto repair and car salvage adjacent and to the east of the Argos & Mullins Priority Site. Potentially reuses for this facility include industrial or commercial warehousing.

   (2) The **Lumpkin Assemblage** (Highway 127 Commercial Corridor) is located at the northeast gateway to the City along Highway 127 (Address: 1428-1438 Swift Street), and supports the Lumpkin Shell gasoline service station, retail building, and automate repair garage. This approximately 0.17-acre assemblage historically supported a gas station and auto repair operations since 1978, and currently is a vacant blighting force on the community. Five underground storage tanks (USTs) that were used to store gasoline and diesel fuel remain on-site. Given their age, there is a high propensity for these USTs to have deteriorated and released petroleum products that may have impacted the soil and groundwater of the adjoining church, playground, and single-family residences to the east, north, and south.

   Additional sites identified within the target area and elsewhere in the City include a former dry cleaning facility along Main Street, the Blue Jay Meat Packing facility, and a vacant textile mill. Perry will work with community stakeholders to identify and prioritize these and other sites for assessment, and cleanup/ruse planning.

1. b. Revitalization of the Target Area

1. b. i. **Reuse Strategy and Alignment with Revitalization Plans:** The City of Perry is included in Houston County’s Joint Comprehensive Plan (Plan), which was recently updated in 2017 with significant community input and is currently undergoing community planning meetings for its 2022 update. The Plan focuses on regional strategies, partnerships, and solutions to strengthen and diversify the economic competitiveness and quality of life within the County and City of Perry. Keys to developing a strong diverse economy include addressing blight in downtown
Perry, focusing on nodal and smart growth commercial redevelopment along gateway corridors (including along the Highway 127 corridor into Perry) instead of new structures on undeveloped land, and support growth of industrial corridors along railroads and I-75. The major long-term work elements of the Plan specifically include assessment and reuse of priority sites that lay the groundwork for new investments by stimulating the availability of other funds and resources, creating jobs, developing affordable housing, as well as generating higher wages and improving property values and increasing property tax revenues for the City.

As outlined in the Plan, solutions for its economic needs align directly with the redevelopment of the target areas and priority sites. Specifically, the Plan references smart development of existing industrial areas, specifically transportation infrastructure planning for easier access for workers via walking, biking, or public transit. The redevelopment of the former Argos Cement plant with a new light industrial or warehousing facility would have the added benefit of providing a direct connection of the nearby neighborhoods to the industrial corridor, providing much need public access for workers. The Plan also discusses the need to address sprawled blight along key commercial corridors, including Highway 127. The redevelopment of the Lumpkin Assemblage with a mixed-use development. The City of Perry will benefit from assistance provided by this grant to create a comprehensive strategy for these sites. To this end, the City intends to utilize **30% of this project budget for cleanup and reuse planning** as detailed in section 3.a. and 3.b. With this funding, plans for the targeted sites and area will be further refined and developed based on the findings of environmental assessments, community input, and data gathered through redevelopment planning efforts.

1. **b. ii. Outcomes and Benefits of Reuse Strategy:** The outcomes and benefits of this project will promote the goals and objectives of the 2017 Comprehensive Plan and will benefit the target areas’ communities, as well as the citizens of the City of Perry overall. To support this effort, this project will provide environmental due diligence, cleanup planning, and reuse planning services necessary to position the priority properties and other sites for sale and redevelopment; approximately 23 acres will be available for reuse from the priority sites alone. These activities will accommodate new investments by stimulating the availability of other funds and resources. Further, redeveloping blighted properties that incorporate renewable energy options or energy-efficient building practices will further promote best practices in natural resource protections and improve air quality by using sustainable heating systems as alternative to outdated wood stoves. Incentives will be offered to investors who can leverage associated tax benefits. Addressing the stigma, blight and health issues created by brownfields is the essential first step in enabling the City to effectively re-visit available economic revitalization strategies (See section 1.B.i) and create new opportunities.

1. **c. Strategy for Leveraging Resources**

1. **c. i. Resources Needed for Site Reuse:** The reuse and redevelopment projects proposed in this brownfield assessment project will require both public and private investment. The City is eligible for various programs identified ensure the redevelopment and reuse of the priority sites and future sites identified by the City and community members. Specifically, the target areas are eligible for infrastructure improvements via Special Purpose Local Option Sales Tax (SPLOST) funds. The City has currently invested significant resources in Brownfield redevelopment, including $300,000 under its previous FY2018 EPA Assessment Grant which helped facilitate the redevelopment of eight key properties, several which are being redeveloped and repurposed including the Stanley Assemblage consisting of an extremely environmentally impacted former dry cleaner. The redevelopment of the Stanley Assemblage has already required over $116,000
of the City’s general funds for abatement of asbestos containing materials exposed to the public, which demonstrates the City’s commitment for public safety and brownfield redevelopment. Further resources available include Georgia Department of Transportation (GDOT) funding for road improvements along the gateway corridors around I-75. Finally, as outlined in the Comp. Plan, the City will also seek additional resources from SPLOST, CDBG, and USDA grants for additional infrastructure and development needs.

**1. Use of Existing Infrastructure:** The City is working to utilize existing infrastructure and create sustainable development opportunities within the project area. The priority sites have existing buildings, roadways; utilities, such as power, water, sewer, and broadband. These grant activities will help the City of Perry understand the short- and long-term availability of public and private infrastructure servicing the brownfield sites and to identify necessary infrastructure improvements and priority investments as outlined in the Plan, such as transport and accessibility to industrial facilities. Currently, Perry is working with GDOT to access funding for road improvements in the target areas.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

2. a. Community Need

2. a. i. The Community’s Need for Funding: The City’s median household income is only $49,219 vs. $58,700 in the state and 26% of households have a median income below $25,000 (USC, 2019). Moreover, with a small population and therefore small tax base, local taxes are barely sufficient to support normal government operations. Additionally, the Georgia Department of Labor estimates 6.2% unemployment rate in the region of August 2020. The high vacancy rates in the City’s business district limit the ability for low-income residents to easy access to goods and services. This hardship is compounded by the City’s high rate of households without a vehicle (17.5% vs. the state average of 6.5%, USC, 2019). Absent intervention, the historic building stock will struggle to transition into a valued community resource for jobs, improved community aesthetics, and important tax base resources. Local businesses have been struggling and do not generate enough sales tax revenue for the City to combat blight in the target areas, or elsewhere in the community. City tax revenues prohibit the ability of the local governments to implement assessment, remediation, and reuse projects without this EPA grant. **EPA funding will allow the City to conduct assessment activities and complete additional reuse planning, as described in section 3 that would not otherwise be possible.** Ultimately, the grant funds will be used to dispel any environmental stigmatization or aid in quantifying environmental liabilities, thus removing uncertainty and risk involved in rehabilitating historic properties.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The City of Perry is home to several sensitive populations, including: minors (24% aged <18); disabled (10.7%); families living below the poverty line (14.1%); and minorities (mainly African American at 36%; USC 2019). This is further demonstrated in the target areas, primarily in Census Tract (CT) 212.02, which includes the commercial and industrial corridors going through downtown Perry and incorporates the Argos priority site. CT 212.02 has a 53.7% African American population, which is an 11% increase from 2010 (UCS 2019). This EJ community is directly impacted by potential environmental impacts from blight in the target areas, including a low-income neighborhood to the southeast of the former Argo site and single-family residences to the east, south, and north of the Lumpkin Assemblage.
Sensitive populations are more susceptible to the risks of exposure to environmental contamination suspected at the priority sites. For example, silica dust from former cement manufacturing will migrate into the soil and air causing respiratory issues or VOCs migrating through groundwater may impact private homes through vapor intrusion. Soils contaminated with heavy metals may be transported to neighboring properties via dust or storm water runoff. Stormwater runoff with contaminants originating from the Argos priority site would flow into the Ocmulgee River, which would impact not only the adjoining EJ community, but over 120 communities downstream that rely on the river for drinking water. Safety is a concern, as the brownfield properties tend to be either un-fenced or exist in such a state of blight that efforts to keep trespassers and criminal activity out are futile. The former Argos cement plant has unsafe abandoned structures that are havens for vagrancy, drug-related crimes, and other illicit activity, contributing to Perry having a 17% higher crime rate than Georgia as a whole (FBI, 2020). By redeveloping the priority sites in the Target Areas, it will clean up the known and potential environmental impacts that affect the health of our citizens, remove safe havens that illicit crime, and provide jobs and tax revenues to increase the overall quality of life to sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Area Health data is available at the county level: in Houston County, 15.4% of adults (6.5% higher than Georgia overall) and 9.5% of children are affected by asthma, and another 10% have been diagnosed with COPD (2020 Community Health Needs Assessment). In the 2021 Houston County Community Health Needs Assessment, the annual average death rate per 100,000 persons for Chronic Lung Disease was significantly higher in Houston than in the State and US; 57.2 for Houston as compared to 46.4 in Georgia and 40.4 in the US. People with these respiratory diseases are especially sensitive to poor air quality and are disproportionately affected by airborne contaminate, such as silica dust, like that found at the Argos & Mullins Priority Site. Silica dust is also associated with higher rates of lung cancer. The annual average death rate per 100,000 persons in Houston with lung cancer is 42.6 vs. 39.0 statewide and 36.6 nationally (2021 Houston County Community Health Needs Assessment). Like many cities in Georgia, Perry was affected by Covid-19 and with a population consisting of 36% African Americans, a group more highly affected by the virus, the city was greatly affected by the impacts of the pandemic (CDC).

(3) Promoting Environmental Justice: Key environmental indicators within a 1-mile radius around the priority sites are in the following percentiles nationwide (EPA EJ Screen):

<table>
<thead>
<tr>
<th>Priority Site</th>
<th>PM 2.5</th>
<th>NATA Cancer Risk</th>
<th>Lead Paint Indicator</th>
<th>NATA Respiratory HI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argos</td>
<td>81</td>
<td>80-90</td>
<td>57</td>
<td>90-95</td>
</tr>
<tr>
<td>Lumpkin</td>
<td>80</td>
<td>80-90</td>
<td>47</td>
<td>80-90</td>
</tr>
</tbody>
</table>

As indicated by EPA EJ Screen, residents living near the priority sites and in the surrounding vicinity are in areas with greater exposure or environmental risk for cancer, respiratory health problems, particulate dust, and lead paint, as compared to the rest of the country. Further, the EJ Screen Demographic Index (combination minority and low-income population) for a 1-mile radius around both sites is in the 73rd percentile nationwide, which represents a significant environmental justice concern for our community. Implementation of this grant will help the community that would without support struggle to accomplish the proposed achievements due to limited financial resources. Encouraging the reuse of the sites, as outlined in our comprehensive plan, will attract new commercial and residential developments that will create
local jobs, new diverse housing opportunities, improved property values, and healthier communities by drawing much needed qualified medical professions to a revitalizing economy. Specifically, the redevelopment of the Argos priority site will eliminate blight and exposure pathways from potential harmful contaminants such as asbestos building materials, silica dust, and petroleum that are directly impacting sensitive EJ communities. The redevelopment of a 22.5-acre vacant industrial property will create high wage jobs and safe pedestrian pathways in a high trafficked corridor. The redevelopment of the Lumpkin Assemblage will serve as a catalyst for smart nodal commercial growth, providing livable jobs and commercial services to the surrounding impoverished neighborhood.

2. b. Community Engagement

2. b. i.-ii. Project Involvement and Project Roles: Project partners will facilitate community involvement in the brownfields project as described below. Perry is a small rural community with limited numbers of available local partners. However, the City has been able to foster significant support, regardless of perceived limited resources. The general public will be provided a venue to offer support in site selection during community meetings.

<table>
<thead>
<tr>
<th>Community Based Organization</th>
<th>Contact Information</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Georgia Technical College</td>
<td>Andrea Griner, VP for ED <a href="mailto:agriner@centraltetech.edu">agriner@centraltetech.edu</a></td>
<td>Workforce Training Partner</td>
</tr>
<tr>
<td>Perry Main Street Advisory Board</td>
<td>Jazmin Thomas, Downtown Manager</td>
<td>Promotion, marketing, and redevelopment of the targeted corridor.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Jazmin.thomas@perry-ga.gov">Jazmin.thomas@perry-ga.gov</a></td>
<td></td>
</tr>
<tr>
<td>Perry Downtown Development Authority</td>
<td>Jazmin Thomas, Downtown Manager</td>
<td>Marketing, outreach, and information dissemination to Downtown District. Steering Committee Service.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Jazmin.thomas@perry-ga.gov">Jazmin.thomas@perry-ga.gov</a></td>
<td></td>
</tr>
<tr>
<td>Faith Bible Fellowship</td>
<td>Willie King, Pastor &amp; Councilmember</td>
<td>Outreach to African American Community, Provide Meeting Space, Steering Committee Service.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Willie.king@perry-ga.gov">Willie.king@perry-ga.gov</a></td>
<td></td>
</tr>
<tr>
<td>Habitat for Humanity</td>
<td>Bill Goggins, Executive Director</td>
<td>Will commit to service on steering committee</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:hocosahabitat@att.net">hocosahabitat@att.net</a></td>
<td></td>
</tr>
<tr>
<td>Perry Chamber of Commerce</td>
<td>Maggie Schuyler, President</td>
<td>Moving into project area, Meeting Space &amp; Outreach</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:maggie@perrychamber.com">maggie@perrychamber.com</a></td>
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iii. Incorporating Community Input: The City acknowledges that broad based support and community participation in the process 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. Brownfield program planning began in December 2015 with a series of public workshops. A formal Brownfield Steering Committee was established to further foster community involvement. The Committee is comprised of seven representatives from critical community partners, including members of the target areas EJ community, and will guide the City’s Community Engagement as laid out in the Community Involvement Plan. To guide this process, a formal Community Involvement Plan will be drafted and adopted within 30 days of issuance of the cooperative agreement for the grant. A total of six public workshops are planned to occur within the project period, beginning following issuance of the cooperative agreement and will provide a formal communication strategy to solicit input from local residents of the target area, as well as serve as a platform to communicate project progress. Notice of all public meetings will be consistent with the City’s established process for public notices. In the event that the community experiences high volumes of people affected by Covid-19, social distancing will be implemented, such as virtual meetings conducted via Zoom.
Further, outdoor community engagement activities will be planned, including presenting Brownfields at community events in the target areas. Public input will be sought on project planning, site selection and prioritization (for additional sites as funds permit), cleanup decisions (ABCAs) and reuse planning. A central printed repository of information will be established within the target community to allow those without computer access to view plans, voice concerns, and provide input towards redevelopment.

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

<table>
<thead>
<tr>
<th>Task/Activity 1: Programmatic Support</th>
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<tbody>
<tr>
<td>i. <strong>Project Implementation</strong>: Project management of EPA-funded activities for the priority and non-priority site(s), cooperative agreement oversight; budget management, scheduling and coordinating of subcontractors, monthly team meetings, travel to conferences, workshops for purposes of staff development and improvement of project efficiencies</td>
</tr>
<tr>
<td><strong>Non-EPA grant resources needed</strong>: in-kind resources including project team staff effort</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule</strong>: Months 1-30</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead(s)</strong>: Project Director with support from a Qualified Environmental Professional (QEP) and project staff</td>
</tr>
<tr>
<td>iv. <strong>Output(s)</strong>: quarterly reports, ACRES data entry; notes from monthly team meetings, close-out report</td>
</tr>
</tbody>
</table>

**Notes**: Given community input on sites, the City expects to complete assessment project activities in 24 months and closeout the grant within 30 months. The City has not included health-monitoring activities as these activities will be dependent on the type of hazardous substances found at the brownfield site during the assessment phase, site cleanup plans, and other issues of concern. The City will coordinate with the County Health Department as appropriate for in-kind monitoring activities.

<table>
<thead>
<tr>
<th>Task/Activity 2: Community Involvement</th>
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</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation</strong>: Coordination and delivery of active community engagement with safety protocols in place throughout the project lifetime that builds on previous efforts of the City, including securing site access; ongoing community engagement meetings (or alternative formats as dictated by COVID-19 status) that will include a brownfields education program and community input on site recommendations, suitable reuse and redevelopment of assessed sites; and a community meeting with community partners and members. Community engagement will also include the same for discussion of EPA-funded activities for non-priority site(s), if applicable. Updates and presentations given at public meetings.</td>
</tr>
<tr>
<td><strong>Non-EPA grant resources needed</strong>: in-kind resources including project team staff effort and efforts of community partners who will host and promote participation of community members</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule</strong>: Months 3 through 20, the first meeting will be conducted by month 6</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead(s)</strong>: Project Director with support from QEP and project staff</td>
</tr>
<tr>
<td>iv. <strong>Output(s)</strong>: 1 Community Involvement Plan; 5 community meeting summaries; community input for reuse plans</td>
</tr>
</tbody>
</table>

**Notes**: Our rural location means that we do not have many community partners; however, our participation rates in community meetings indicate that we are poised for a vibrant community engagement process

| Task/Activity 3: Phase I and Phase II Assessments |
FY22 EPA Brownfields Community-wide Assessment Grant - City of Perry, Georgia

i. Project Implementation: Brownfield site inventory will be conducted after the grant agreement executed; Based on inventory results and community site recommendations, Phase I ESAs will be completed. Phase II ESA investigation(s) will be completed for the Nesmith garage priority site, and additional properties as indicated by Phase I ESA 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 3-24, priority site activities will commence by month 3

iii. Task/Activity Lead(s): QEP with oversight by the City project director and technical director

iv. Output(s): site inventories; 12 Phase I ESAs and 6 Phase II ESA reports; Asbestos and Lead-Based Paint surveys (as needed); one Generic Quality Assurance Plan (QAPP) and 6 sites-specific QAPPs

Notes: QEP will be contracted through an open bid process, as described in section 4.a.iii. The City will prepare for the process in advance of the EPA award announcement to be poised to initiate project activities upon execution of a cooperative agreement. The City has not included health monitoring in the project as these activities will be dependent on the type of hazardous substances found at the brownfield site during the assessment phase or will be addressed in the site cleanup planning. The City will coordinate with the County Health Department as appropriate for in-kind monitoring activities.

Task/Activity 4: Remediation and Reuse Planning

Project Implementation EPA-funded activities for the priority site(s): specific-site cleanup planning; drafting of reuse concepts in presentation form (such as renderings); resource road map preparation to move sites towards suitable reuse

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

Non-EPA grant resources needed: in-kind resources, including City planning department and economic development staff efforts

ii. Anticipated Project Schedule: Months 3 through 24, market analysis and opportunity analysis will commence early in the project to move priority sites and other sites to support City’s economic development efforts

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

iv. Output(s): minimum of 6 ABCAs & Reuse plans with visual renderings; 1 GIS-Based Development Opportunities Inventory, and Disposition Strategy Reports for 2 key sites.

Notes: As per the project budget below, the City has devoted 30% of the budget to planning efforts.

3.b. Cost Estimates

The following cost estimates were derived by the City based on our experiences and the project expenses from our previous EPA brownfields grant. The City is requesting a $500,000 Brownfields Assessment grant.

<table>
<thead>
<tr>
<th>Project Tasks</th>
<th>Categories</th>
<th>1: Project Management</th>
<th>2: Community Involvement</th>
<th>3: Assessment</th>
<th>4: Planning</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Travel</td>
<td>$5,000</td>
<td></td>
<td></td>
<td></td>
<td>$5,000</td>
</tr>
<tr>
<td></td>
<td>Contractual</td>
<td>$15,000</td>
<td>$20,000</td>
<td>$310,000</td>
<td>$150,000</td>
<td>$495,000</td>
</tr>
<tr>
<td></td>
<td>Totals</td>
<td>$20,000</td>
<td>$20,000</td>
<td>$310,000</td>
<td>$150,000</td>
<td>$500,000</td>
</tr>
</tbody>
</table>
Costs were estimated with the City’s current QEP that has more than 20 years of brownfields project experience. The proposed program will consist of the completion of four tasks:

**Task 1 Project Management:** $5,000 for travel to two EPA National Brownfields conferences and/or regional brownfields events for one City staff member (includes approximate costs of $800 in registration fees; $2,000 for 8 nights @ $250/night in the conference hotel(s), $1,200 airfare for 2 round trip tickets, $400 ground transportation/parking and $600 per diem expenses for 8 days @ $75 per day. Any remaining travel funds will be utilized by city staff for travel to meet with local/regional developers or property owners. $15,000 contractual support is also allocated to this task for the QEP to support city staff in drafting reports, updating EPA ACRES, scheduling meetings and overall project management activities($125 per hour for 120 hours over the three-year project period) **Task 1 Total: $20,000**

**Task 2 Community Involvement:** One Community Involvement Plan (CIP) at a set fee of $4,000; six community engagement meetings with contractual support in planning and delivery at $16,000 ($125 per hour for 128 hours of work over the three-year project period). **Task 2 Total: $20,000**

**Task 3 Brownfield Site Assessment:** 12 ASTM-AAI compliant Phase I ESAs at $3,500 each (total $42,000). One Generic Quality Assurance Project Plan at $5,000; 6 Site Specific Quality Assurance Project Plans (QAPPs) at $4,000 (total $24,000); 6 Phase IIs for a total of $238,000 (cost is based on complexity and can range from $25,000 to $80,000), average cost at $34,800 per five, and Nesmith Gas Station Phase II and tank removal is estimated at $65,000 based on previous Phase I results. **Task 3 Total: $310,000**

**Task 4 Site-specific Cleanup and Reuse Planning:** 6 ABCAs at $5,000 each (total $30,000) & 6 Reuse plans with visual renderings at $10,000 each (total $60,000); 1 GIS-Based Development Opportunities Inventory (total $20,000); and 2 Disposition Strategy Reports at $20,000 each ($40,000). **Task 4 Total: $150,000.**

**3.c. Measuring Environmental Results**
The Project Director with support from key staff and the environmental consultant will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and in monthly calls with the EPA Project Officer. The activities and outcomes will be tracked through an Excel project management spreadsheet, invoice management system, through EPA ACRES, and documented in a final closeout report. **Outputs:** 12 (minimum) sites assessed (Phase I/II ESAs); 6 ABCAs with concept level reuse plans; 5 community meetings (and CIP development/revision); a city-wide GIS-based development opportunity inventory, and 2 disposition strategy reports; and the number of community members participating in public meetings and activities. **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; and increased property and sales tax revenue generated. An overall gauge of success will be the creation of jobs and improvements in environmental justice concerns.

**4. a. Programmatic Capability and Past Performance**
i. Organizational Capacity ii. Organizational Structure and iii. Description of Key Staff
The City of Perry has the internal capability to manage all technical and administrative aspects of the subject grant. **Robert Smith, the City of Perry’s Assistant City Manager,** will serve as **Project Director and Financial Manager** for the FY 2022 Community-wide Assessment grant. Mr. Smith has 12 years’ experience in municipal government and holds a Master’s degree in Public Administration. He has successfully administered a wide array of local, state, and federal grants including CDBG grants, EDA grants, and DNR grants. Most importantly, Mr. Smith managed the City’s successful FY2018 EPA Community-wide Brownfield Assessment Grant. As Assistant City Manager, Robert works with Mayor and Council which includes oversight of the Perry Main Street Advisory Board and associated Perry Downtown Development Authority. Mr. Smith will be assisted by **Ansley Fitzner, Public Works Superintendent** who will serve as **Project Coordinator and Community Engagement Specialist.** Ms. Fitzner graduated from the University of Georgia with a bachelor’s degree in Landscape Architecture, and has extensive experience in grant writing and grant management. Further Ms. Fitzner will be responsible for successful implementation of the City’s formal CIP, meeting coordination, and media updates.

iv. Acquiring Additional Resources
To ensure the highest caliber of technical expertise is available and to meet state and federal procurement requirements, the City intends to procure the services of a Qualified Environmental Professional (QEP) with experience in Georgia to execute the technical aspects of the grant. As a proactive step, the City will begin the procurement process in the spring of 2022 so as to be ready to start assessment activities once the cooperative agreement is issued. This action will be completed in full compliance with Federal Procurement guidelines 2 C.F.R. 200 and EPA’s rule at 2 C.F.R. 1500.

b. Past Performance and Accomplishments
i. Currently Has or Previously Received an EPA Brownfields Grant
(1) **Accomplishments** The City received a FY2018 EPA Assessment Grant. The project team who achieved the results outlined in the table below remain the same. These accomplishments have been recorded in the EPA ACRES Database.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Program</th>
<th>Amount</th>
<th>Funds Remaining</th>
<th>Date</th>
<th>Grant Accomplishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>US EPA</td>
<td>Brownfields Assessment</td>
<td>$300,000</td>
<td>$42,634.55 as of 9/23/21</td>
<td>FY2018</td>
<td>8 Phase I ESAs, marketing materials; 8 asbestos surveys, one wetland assessment, and 9 Phase II ESAs (ACRES as of 10/21/21)</td>
</tr>
</tbody>
</table>

(2) **Compliance with Grant Requirements**
The City complied with work plans, schedules, terms and conditions for the FY2018 grant. Quarterly reports and deliverables were submitted to EPA and entered into ACRES in a timely fashion. All terms/conditions have been met. **As of September 23, 2021, 85% of funds have been drawn down in ASAP.** The City will submit its closeout report in the next quarter with no funds remaining as the activities conducted over the last two months of the project have utilized those funds, and the invoices are in the payment process.
Threshold Criteria
FY2022 EPA Brownfield Community-Wide Assessment –
City of Perry, Georgia

1. **Applicant Eligibility**
The City of Perry, Georgia is a general-purpose unit of local government and therefore an eligible entity as defined under 2 CFR § 200.64 pursuant.

2. **Community Involvement**
The City acknowledges that broad based support and community participation in the process 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. Brownfield program planning began in December 2015 with a series of public workshops. A formal Brownfield Steering Committee was established to further foster community involvement. The Committee is comprised of seven representatives from critical community partners, including members of the target areas EJ community, and will guide the City’s Community Engagement as laid out in the Community Involvement Plan. To guide this process, a formal Community Involvement Plan will be updated and adopted within 30 days of issuance of the cooperative agreement for the grant. A total of six public workshops are planned to occur within the project period, beginning following issuance of the cooperative agreement and will provide a formal communication strategy to solicit input from local residents of the target area, as well as serve as a platform to communicate project progress. Notice of all public meetings will be consistent with the City’s established process for public notices. In the event that the community experiences high volumes of people affected by Covid-19, social distancing will be implemented, such as virtual meetings conducted via Zoom. Further, outdoor community engagement activities will be planned, including presenting Brownfields at community events in the target areas. Public input will be sought on project planning, site selection and prioritization (for additional sites as funds permit), cleanup decisions (ABCAs) and reuse planning. A central printed repository of information has been established to allow those without computer access to view plans, voice concerns, and provide input towards redevelopment.

3. **Named Contractors and Subrecipients**
Not Applicable - no contractors or sub-recipients are named in this application. The City of Perry 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**
The City has one ongoing EPA Brownfields Community-wide Assessment Grant. As of October 1, 2021, 85% of grant funds were drawn down and dispersed. All remaining funds will be expended prior to closure of the current grant period. See attached ASAP documentation.

The City has complied with the EPA-approved work plan, schedule and terms and conditions for the FY 2018 grant. Quarterly reports and grant deliverables were prepared and submitted to EPA and entered into the ACRES database.