December 1, 2021

TO: Ms. Cindy J. Nolan, Chief Brownfields & Redevelopment Section; U.S. Environmental Protection Agency – Region 4

RE: Cover Letter for the PTRC 2022 EPA Brownfield Community-Wide Assessment Grant Application

Dear Ms. Nolan:

The Piedmont Triad Regional Council (PTRC) is pleased to submit this application on behalf of our three municipal Brownfield Assessment Coalition partners – the Town of Haw River (population of 2,252) the City of Eden (population of 15,421), and the City of High Point (population of 114,059). Our predominantly rural region of mill towns has served as the hub of NC manufacturing for 150+ years. However, due to the rapid expansion of the global economy over the past few decades, most of our mills have shut down. Left behind are hundreds of abandoned furniture, textile and tobacco plants. These plant closings have caused significant job losses and created a heavy financial burden on communities in our region.

EPA funding will provide the critical financial resources needed to address the numerous brownfield sites within our community’s targeted neighborhoods. No other mechanisms are readily available from which these communities can access assessment funding. In addition, most communities in our region do not have the financial and/or staff capacity to apply for, let alone manage this grant. The significant number of major plant closings and job losses in the Piedmont Triad over the past three decades has created a huge financial burden on the region, affecting the ability of most towns to rely on their shrinking tax base to address the increasing number of identified brownfield sites.

Our proposed program of work builds on the success of EPA assessment grants in 2009, 2014, and 2018 and is focused on making strategic investments in Phase I and II assessments, clean-up planning, and the sustainable and equitable redevelopment of three major catalyst sites within our targeted marginalized and rural places that serve historically underserved people. These sites will serve as anchors of transformation for these communities.

We respectfully request your consideration of our application to continue the ongoing work necessary to reduce the risk of environmental contamination in these communities and ensure all our residents can access the resources and opportunities they need to flourish.

Sincerely,

Matthew L. Dolge
Executive Director
PTRC Narrative Information Sheet

1. **Applicant:** Piedmont Triad Regional Council (PTRC)  
   1398 Carrollton Crossing Drive  
   Kernersville, NC 27284  
   DUNS#: 144190667

2. **Funding Requested:**  
   i. **Assessment Grant Type:** Community-wide  
   ii. **Federal Funds Requested:** $500,000

3. **Location:** Town of Haw River (Alamance County), City of Eden (Rockingham County), and City of High Point (Guilford County) North Carolina

4. **Target Area/Property Site/Property Information:**  
   i. Haw River Cora & Holt Mills - 205 Stone St, Haw River, NC, 27258 – Census Tract 212.01  
   ii. Eden Nantucket Mill - 100 Morgan Rd, Eden, NC 27288 – Census Tract 404  
   iii. High Point Myrtle Desk – 906-998A Taylor Ave, High Point, NC 27260 – Census Tract 143

5. **Contacts:**  
   - **Project Director:** Jesse Day, Regional Planning Director  
     PHONE: (336) 904-0300  
     E-MAIL: jday@ptrc.org  
     Piedmont Triad Regional Council  
     1398 Carrollton Crossing Drive  
     Kernersville, NC 27284  
   - **Chief Executive:** Matthew L. Dolge, Executive Director  
     PHONE: (336) 904-0300  
     E-MAIL: mdolge@ptrc.org  
     Piedmont Triad Regional Council  
     1398 Carrollton Crossing Drive  
     Kernersville, NC 27284

6. **Population (Source: 2020 Census):**  
   i. **PTRC Service Area (1,701,154)**  
   ii. **Target City/Town population:** Partners: Town of Haw River (2,252); City of Eden (15,421); and City of High Point (114,059)

7. **Other Factors Checklist**

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<th>Other Factor</th>
<th>Page #</th>
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<tr>
<td>X</td>
<td>Community population is 10,000 or less.</td>
<td>1 of Narrative – Town of Haw River</td>
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<tr>
<td></td>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory</td>
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<td></td>
<td>The priority site(s) is impacted by mine-scarred land</td>
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<tr>
<td>X</td>
<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 of Narrative – Nantucket Mill</td>
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<td></td>
<td>The priority site(s) is in a federally designated flood plain.</td>
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<td></td>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
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</table>
X | The reuse of the priority site(s) will incorporate energy efficiency measures.  
|---|---|
|  | 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.  
|  | 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.  

8. **Letter from the State Environmental Authority**  
   *See Attachment A – Letter from State Environmental Authority*

9. **Releasing Copies of Application**  
n/a
November 17, 2021

Jesse Day, Planning Director
Piedmont Triad Regional Council
1398 Carrollton Crossing Drive
Kernersville, NC 27284
jday@ptrc.org

Re: U.S. EPA Brownfields Community-Wide Assessment Grant – PTRC Member Communities

Dear Mr. Day,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the Piedmont Triads Regional Council’s (PTRC) application for a U.S. EPA Brownfields Community-Wide Assessment Grant. We are aware that your grant will focus on the Towns of High Point and Eden as well as Rockingham or Randolph Counties. This grant would be a tremendous economic development achievement for the Council.

We hope that the Council 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

1a. Target Area and Brownfields

i. **Background and Description of Target Area** – The Piedmont Triad is a 12-county region of mill towns – large and small, urban and rural – located in the rolling foothills of central North Carolina. Our region’s rich manufacturing heritage spans nearly two centuries. As North Carolina’s main industrial hub, throughout much of the 20th Century, this region was the largest manufacturer of furniture, textiles, and tobacco products in the nation. Most of the world’s denim, corduroy, and flannel were spun, woven, dyed, cut, and sewn in the Piedmont Triad. Major furniture producers such as *Thomasville* and *Lexington Home Brands* and most tobacco products were produced here. At least one mill has existed in the PTRC’s 68 municipalities while many have multiple large manufacturing complexes. However, as the global economy has expanded exponentially over the past several decades, virtually all of these mills have shut down. Left behind are hundreds of abandoned furniture, textile and tobacco plants, and ancillary support businesses, most of which are surrounded by, and located directly adjacent to, low-income residential (historic mill village) neighborhoods. With such a high concentration of brownfield sites throughout our region, we have strategically focused our past and current assessment and clean-up efforts in targeted areas posing the most risk to human health and the environment, yet with the greatest potential for clean-up, redevelopment, and reuse. To help accomplish these goals, PTRC continues to expand its inventory of over 500 brownfields sites throughout our 12-county region. Over 100 of these sites are located in, or adjacent to, our targeted communities, including 36 closed mills, 31 closed commercial establishments, 14 abandoned gas stations, 19 former truck or auto repair facilities, 7 former dry cleaners, 7 abandoned railroad facilities, 5 farm-related facilities, and a mix of fabrication shops and other unknown uses. *Triad Tomorrow*, our region’s adopted Comprehensive Economic Development Strategy (CEDS), places a high priority on these ubiquitous brownfield sites, recognizing them as unique and highly valuable opportunities for renewal in our region’s communities, and are vital redevelopment catalyst projects central to our Community’s targeted neighborhoods. Selected target areas have a high concentration of people of color, and a long history of being located on the “wrong side of the tracks.” Prevailing west and northwest winds have historically steered more affluent community members upwind and upstream of noxious air-, soil- and water-borne contaminants. Left behind are disproportionately impacted households that cannot afford to move away from potentially high concentrations of soil and water contaminants commonly produced by adjacent textile, furniture, and tobacco manufacturing processes. In partnership with the *Town of Haw River* (2,458), the *City of Eden* (15,055), and the *City of High Point* (111,714) – PTRC will leverage the success of its first three EPA assessment grants (2009, 2014, and 2018), by completing at least three (3) major catalyst projects. These sites have been strategically selected by our community members and their partners through a consensus-building process and scoring matrix tool facilitated by PTRC, based on their high potential to mitigate probable public health and environmental risks in the most economically and environmentally challenged neighborhoods of our communities.

ii. **Description of the Priority Brownfield Site(s)** – Community-wide assessment, clean-up, and redevelopment efforts will focus on three (3) catalyst sites within the above-referenced communities: The Cora & Holt Mills – Located at 205 Stone St, Haw River, NC, 27258, are separated by the North Carolina Railroad. The elevated walkway spanning the railroad was constructed by Tabardrey Manufacturing Company in 1928 to provide a safe, sheltered passage between the two mills. West of the mills, the Haw River runs north/south. The site has laid
dormant since its abandonment in the early 1970s, but there is hope for revitalization yet. The adjacent Granite Mill was recently rehabilitated for workforce housing and encourages like-minded redevelopment efforts for the Cora & Holt Mills. With their centralized location within the Town of Haw River and their innate ability to act as a lynchpin for economic and environmental recovery for the community, the Cora & Holt Mills are primed for success and investment. To build upon existing redevelopment and revitalization efforts in the historic district, Phase II assessment and clean-up planning efforts are needed. Once complete, this site can leverage resources at PTRC such as the Business Investment Fund (BIF), the Lights On Loan Fund (LO), or the pending Brownfields Revolving Loan Fund (BRLF). The Nantucket Mill - Located at 100 Morgan Rd in the City of Eden, Rockingham County, is in the Spray Industrial Historic District. The Mill was built in 1898. It was a textile mill that contained a carpentry shop, boiler house, machine shop, and two warehouses. The considerable size of the five-story tower that looms over the mill is a visually striking aesthetic for the community. Of the 11 mills in Eden, this is the most prominent since its abandonment in the 1950s. The mill remains mostly intact on 4.91 acres as part of the Fieldcrest Mills with approximately 55,000 sq ft of structural space. The current owner has mill tax credits and the site has qualified for low-income tax credits, but additional assessment is needed. The Myrtle Desk Factory – Located at 906 - 998A Taylor Avenue in High Point, Guilford County, NC, occupies a 3.11-acre parcel with five industrial buildings that total approximately 31,000 sq ft. According to EJ Screen data, developed with a one-mile buffer from each priority site, the property ranks above the 90th percentile in the US for Hazardous Waste Proximity (94%), Sites with Risk Management Plans (RMP) Proximity (92%), and Lead Paint (91%). Furthermore, the site is located within a historically marginalized place that services historically underrepresented persons. The census tract demographics show that 65% are people of color and nearly 40% live below the poverty rate, making revitalization efforts imperative to be closely tied with equity and justice. Part of this site has successfully taken advantage of PTRC’s current Brownfields award to conduct both a Phase I and Phase II assessment, but further assessment and clean-up are needed. Furthermore, the private interests that own the site have requested support from the BIF loan fund to revitalize the space and accommodate a Green Manufacturing venture that will help the community achieve substantial environmental justice and reduce the impacts of climate change. There are nearly 10 other sites scattered across the Piedmont Triad Region that have signed site eligibility determination forms from the EPA Region 4 office, and other “waiting list” sites located in impaired stream corridors, town centers, and on key transportation corridors.  

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

i. **Reuse Strategy and Alignment with Revitalization Plan** – The PTRC recognizes the unique and distinct atmosphere surrounding revitalization strategies with Brownfields and other, similar properties in the Piedmont Triad Region. Because of this, the PTRC is committed to working with local governments and community members to best align these revitalization strategies with existing plans and community priorities. Our three catalyst sites are closely aligned with local and regional land use, community revitalization, capital improvement, and water quality plans. The Town of Haw River 2040 Comprehensive Land Use Plan prioritizes the revitalization of a vibrant downtown atmosphere and expanding regional benefits to localized institutions. The Cora & Holt Mills draw from the community priorities to catalyze a redevelopment effort in the heart of downtown and is uniquely positioned to revitalize the downtown by offering affordable housing solutions for the community. The community is very aware and highly prioritizes the shortage of their housing stock and attainable housing by outlining that they “must create a place where younger people will desire to locate while aging members will choose to remain.” This
priority site does just that by offering solutions that meet the community's needs. The Nantucket Mill is situated in the industrial district village of Spray. Spray, Leasville, and Draper were incorporated into one, the City of Eden in 1967. The proposed reuse at this site converts this space into over 100 multi-family, affordable residential housing with road frontage. Since the 1990s, there has been a lack of multi-family dwellings within the City, particularly in this section, west of the Smith River, that has a large population living in poverty. According to the City of Eden’s 2007 Land Development Plan, there is adequate existing sewer and excellent water infrastructure to service this area for the next 10 years. Historic preservation, restoration and reuse ranked as the highest theme during the 2007 Land Development Planning public engagement sessions noting Core Community values for creative new uses of historic and cultural resources, which encourage community character. The importance of greenways and recreational trail systems within the City limits would be established near this brownfield property, projecting the continuation of the Smith River Greenway with spur trails of the Carbon Carbide Greenway and the Spray Heritage Loop connecting to the site. The 2025 City of Eden’s Community vision is “the careful reclamation and creative reuse of historic buildings throughout our City has provided a wide range of new opportunities for people of all ages and income levels to live, work, shop, and be entertained. Once a struggling mill town, our community is showing every sign of living up to its namesake – the Garden of Eden.” This Nantucket Mill brownfield redevelopment helps implement the community’s vision. The Myrtle Desk Facility located in the Southwest Quadrant (SWQ) of High Point activates a Small-Scale Manufacturing Plan, funded by the US Economic Development Administration and Smart Growth America and conducted alongside local public officials, business leaders, and community stakeholders, which outlines redevelopment strategies that can catalyze economic development in the area. The Plan specifically recommends investment in an anchor space or a catalyst project to establish the vision for the SWQ, and the Myrtle Desk Facility offers the opportunity to turn the recommendation into reality. The upshot of the Small-Scale Manufacturing Plan is to explore innovative, equitable, and resilient ways to stimulate the local economy, which directly aligns with the current owner’s vision of reusing the Myrtle Desk Facility, a space that is primed to address the climate crisis through the development of green products, processes, places, and buildings.

ii. Outcomes and Benefits of Reuse Strategy – The cumulative impacts of large-scale blighted industrial properties in our community have led to steady declines in access to quality affordable and attainable housing, convenient medical services and retail stores, safe and healthy public parks, and trails, and libraries and community centers. Also, our region’s economic dislocation as a result of the textile industry flight has resulted in severe economic hardship in certain locations. Where these large-scale industrial properties were once economic hubs of vitality within our region, now they are symbols of hardship that anchor the community to economic injury. This project proposes the assessment and cleanup planning efforts of these blighted industrial properties to return them to their former glory, as pinnacles for the community’s economic vitality and livelihood. Redevelopment of the Cora & Holt Mills will provide the Town of Haw River with affordable and attainable housing and a bridge from economic divide in the heart of the Town. In concert with these efforts, the Town is directing planning efforts to revitalize the industrial hub with high quality, well-paying jobs, commercial space, and affordable housing where this property is located to leverage it as an asset that attracts new talent and unlocks the entrepreneurial spirit of the Town’s existing talent. The renovation of the Nantucket Mill site will provide affordable and attainable housing, retail businesses and jobs, and transit and pedestrian improvements to one of the most economically dislocated areas in Eden. Prior to its amalgamation into Eden, the Town of Spray
was an industrial powerhouse for the community. It has since been in need of immediate economic and environmental planning attention to activate its potential and attract the economic leadership it once had. The redevelopment of the Myrtle Desk Factory will provide the High Point with a premier economic catalyst site that is on the cusp for large-scale redevelopment. The site will provide small scale manufacturing and prototyping space and short term housing, unlocking the potential of environmentally-sustainable development to address the climate crisis through the development and implementation of green products, processes, places, and buildings. Once complete, the project will serve as a community lifeline for generations.

1c. Strategy for Leveraging Resources

The Cora & Holt Mills site plans to use the PTRC Brownfields Community-wide Assessment grant to conduct Phase II assessment and testing on the site. Afterward, the interested developer is anticipating leveraging private financing sources or the PTRC’s pending BRLF to remediate contaminants. When the site overcomes remediation, the interested developer is anticipating leveraging Low Income Housing Tax Credits (LIHTC) from HUD to redevelop the Cora & Holt Mills. Similarly, the Nantucket Mill site plans to use the PTRC Brownfields Community-wide Assessment grant to conduct additional Phase II assessment and testing, while leveraging low-income housing and mill tax credits. The Myrtle Desk site plans to use the PTRC Brownfields Community-wide Assessment grant for cleanup planning efforts and additional assessment needs on adjacent properties. The project leverages funds that were previously used to complete planning products such as the Small-Scale Manufacturing Plan. The interested developer also leverages an obligation of $375,000 from PTRC’s Business Investment Fund to revitalize the property and unlock the potential of green manufacturing that the site has.

Resources Needed for Site Reuse – Our three catalyst sites are primed for the investment of monetary funding from other sources. Each priority site has an interested developer and community passion to help achieve site reuse, but significant assessment costs are a barrier. Both the Cora & Holt Mills and Nantucket Mill sites have the reuse vision of affordable housing. Some preliminary assessment work has been initiated; however, more work needs to be done to perfect this application’s Tasks. Focused activities will stimulate the availability of funds from other local and private funding sources; whereas, the cleanup planning tasks are anticipated to stimulate funds from public sources such as LIHTC to achieve site reuse. The Myrtle Desk Factory planning activities will stimulate the availability of funds from other local and private sources such as the $375,000 from the PTRC’s BIF. Cleanup activities at this site can be paired and will activate several sources, some of which include Opportunity Zones and the BRLF.

Use of Existing Infrastructure – All of the proposed priority sites intend to utilize existing infrastructure to the fullest extent possible. PTRC and the developers will ensure that cleanup planning and revitalization efforts utilize existing utility infrastructure and improve capacity or reduce maintenance costs where necessary. Some examples of this could be the improvement of trail and sidewalk facilities at the Myrtle Desk Facility to accommodate increased capacity uses, the repair and remediation of canal banks at the Nantucket Mill site to accommodate common/open space for the envisioned housing use, or the use of existing corridors that traverse the railway at Cora & Holt Mills.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2a. Community Need

The Community’s Need for Funding – The Piedmont Triad is a 12-county region of mill towns – large and small, urban and rural and is North Carolina’s main industrial hub. The global economy has expanded exponentially in recent decades, shutting down almost all of the mills that
led the region’s former economic prominence, relocating many jobs overseas or to large urban centers or transportation hubs. This is the story of our priority sites and the communities that host them. Marginalized since the great flight of industrial leaders, these sites and communities are in desperate need of investment and cannot undertake the burden or afford reuse strategies themselves. The small towns of Eden and Haw River have suffered from years of disinvestment and the low-income areas of High Point, including the Southwest Quadrant, have yet to recover like other parts of our urban centers. Decades of dislocation have adversely affected the local tax base and labor markets, crippling the jurisdictions with little means to address sites themselves. However, PTRC has successfully rehabilitated brownfield sites that contribute to economic growth and environmental health, and we are confident that these sites have the potential to contribute to a healthier, vibrant, and resilient region.

ii. Threats to Sensitive Populations – Piedmont Together, our region’s Sustainable Communities Plan maintains equity as its guiding principle for building resilience and a better quality of life for all our residents. To underscore the importance of inclusion to our region’s future, we developed the Equitable Growth Profile of the Piedmont Triad Region. This profile draws from the U.S. Census Bureau, the U.S. Bureau of Labor Statistics, and Woods & Poole Economics, Inc., enabling comparative regional and state analyses and tracking of changes over time. The Profile outlines our slow economic recovery and rising inequality that include wide racial gaps in income and education, which places our region’s economic sustainability at risk.

(1) Health and Welfare of Sensitive Populations. From 1990 to 2010 our region saw a 12% decrease in the percentage of our white, non-Hispanic population, while communities of color drove our region’s population growth with a 2% increase in its African American and Asian populations, and an 8% increase in its Hispanic population. Our region will add an estimated 318,854 people between 2010 and 2037 (a 19% increase) and almost all of this growth will be in the minority population. Our minority population will grow by 58% while our white population will grow by 0.2%. In 2037, our regional population will be 44% minority, with much higher percentages in the urban areas. According to 2019 ACS Data (see Table 1 below) the census tracts that host each priority site experience higher than normal levels of Households utilizing SNAP Benefits when compared to the region, Persons with disabilities when compared to the region, and a percentage of people without health services. Two of our priority sites envision affordable and attainable housing in revitalized cores of communities which offer the opportunity to improve social determinants of health burdens through good housing.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions. Furthermore, according to NCSCHS 2019 Data (see Table 2 below) the Counties that host each priority site experience a range of health concerns adding to the population’s sensitivity and endangerment. When compared with the State of NC, many of these performance indicators are experienced at higher than normal frequencies. Possibly the most tragic indicators are those that are often linked to fatalities particularly cancer incidence, which speaks to the need for this assessment grant. In addition to addressing health, and welfare issues, we will also focus efforts on sites located next to impaired streams, so that by identifying and addressing contamination on these catalyst sites, we can also address the real and immediate impact they have on adjacent waterways, and improve the potential for safe and healthy recreational uses along these impaired streams and rivers. Our Brownfields program was formed to help address these realities and threats within our targeted communities and priority sites.
Table 1 – Key Demographic Data for Target Areas

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<td>Population</td>
<td>5,565</td>
<td>6,087</td>
<td>3,220</td>
<td>1.7 M</td>
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<td>331 M</td>
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<td>Minority (%)</td>
<td>43.2%</td>
<td>30.6%</td>
<td>66.1%</td>
<td>30.02%</td>
<td>31.3%</td>
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<td>Poverty (%)</td>
<td>12.2%</td>
<td>28.3%</td>
<td>39.7%</td>
<td>16.06%</td>
<td>14.7%</td>
<td>12.3%</td>
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<td>Unemployment (%)</td>
<td>0.2%</td>
<td>8.8%</td>
<td>7.2%</td>
<td>5.4%</td>
<td>5.6%</td>
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<td>SNAP Benefits (HH%)</td>
<td>17.30%</td>
<td>21.70%</td>
<td>56.20%</td>
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<td>12.6%</td>
<td>11.7%</td>
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<td>HH Income ($)</td>
<td>$37,429</td>
<td>$32,194</td>
<td>$27,102</td>
<td>$50,322</td>
<td>$54,602</td>
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<td>No High School Diploma (%)</td>
<td>18.2%</td>
<td>19.3%</td>
<td>43.3%</td>
<td>13.7%</td>
<td>12.2%</td>
<td>88%</td>
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<td>No Health Insurance (%)</td>
<td>21.6%</td>
<td>15.4%</td>
<td>28.1%</td>
<td>10.7%</td>
<td>10.7%</td>
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<td>Have a Disability (%)</td>
<td>15.5%</td>
<td>19.2%</td>
<td>13.8%</td>
<td>13.2%</td>
<td>13.4%</td>
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<td>No Vehicle Access (%)</td>
<td>4.5%</td>
<td>8.7%</td>
<td>20.6%</td>
<td>6.2%</td>
<td>5.8%</td>
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<td>English as a Second Language (%)</td>
<td>17.2%</td>
<td>8.0%</td>
<td>24.7%</td>
<td>11.8%</td>
<td>11.8%</td>
<td>21.6%</td>
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Table 2 – Key Health Data for Target Area Counties

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<th>Health Data (NCSCHS 2019)</th>
<th>Alamance County, NC</th>
<th>Rockingham County, NC</th>
<th>Guilford County, NC</th>
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<td>Low Birthweight (%)</td>
<td>9.2%</td>
<td>9.7%</td>
<td>9.8%</td>
<td>9.3%</td>
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<td>Infant Mortality Rate (per 1,000 live births)</td>
<td>6.1</td>
<td>9.1</td>
<td>8.7</td>
<td>7</td>
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<td>Diabetes Prevalence (%)</td>
<td>8.8%</td>
<td>9.5%</td>
<td>10.3%</td>
<td>11%</td>
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<td>Cancer Incidence (per 100,000 population)</td>
<td>507.1</td>
<td>507.4</td>
<td>488.9</td>
<td>469.2</td>
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<tr>
<td>Heart Disease (per 100,000 population)</td>
<td>162.2</td>
<td>188.9</td>
<td>136.4</td>
<td>157.3</td>
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</table>

(3) Promoting Environmental Justice. Since the flight of the textile industry in the region and the aftershock that followed, the negative environmental consequences resulting from industrial and commercial operations were disproportionally felt by some of the region’s most vulnerable populations. According to EJ Screen Data, all of the priority sites serve a low-income population greater than 50%, Cora & Holt Mills (55%), Nantucket Mill (64%), and Myrtle Desk Facility (68%). Additionally, when analyzing EJ Indexes generated by EJ Screen for every priority site with a one-mile buffer, they currently pose a threat to dangerously exceed the majority percentile across all geographic comparisons: NC lowest percentile 66, EPA Region 4 lowest percentile 64, US lowest percentile 69. This grant is of the utmost importance to achieve substantial environmental justice. Through our outlined tasks, we demonstrate genuine engagement of equitable development approaches and intentional strategies to ensure that low-income and minority communities can participate and benefit from decisions. Access to high-quality and well-paying jobs, access to affordable housing, and a revitalization strategy that is heavily influenced by trending sustainability and resilience practices are a sample of tactics that this project will use.
to support environmental justice. If this Community-wide assessment grant is not successful, PTRC will not be able to deliver quality assessment services to communities in desperate need of environmental remediation and productive land use.

2b. Community Engagement

i. & ii. Project Involvement & Project Roles – As lead applicant and Project Manager, PTRC will take primary responsibility for implementing all key project activities within the 3-year performance period. Additional entities, groups, and organizations that are relevant to the proposed project and their degree of meaningful involvement in the project include:

- Qualified Environmental Professional (QEP) – Procured under all federal policies, the PTRC will finalize and post its Request for Qualifications (RFQ) for a contractor within the first month and will select and enter into a contract with selected consultants within the first quarter. The QEP will be responsible for providing a range of services that include: environmental site assessments; cleanup and redevelopment planning; and community outreach assistance.

- Brownfield Advisory Committee (BAC) – The BAC will be an appointed group of community champions and local government stakeholders to assist with the delivery and advisory of primary responsibilities and key project activities within the 3-year performance period. The group will meet quarterly and be instrumental in community outreach in the beginning stages of this project.

- International City/County Management Association (ICMA) - ICMA is EPA Region 4’s Technical Assistance to Brownfield (TAB) provider, PTRC and local governments intend to partner with ICMA and NCDEQ Brownfields to co-host Community Outreach Events across the project area. These events and additional outreach play an instrumental role in educating community stakeholders and local governments on providing input to ongoing brownfields programs and efforts.

ii. Incorporating Community Input – The PTRC is committed to incorporating community input to the highest degree possible for this project. We believe that community input is an element that is engrained within the DNA of this project. Although entities like the Southwest Renewal Foundation, Dan River Basin Association, Piedmont Land Conservancy, and Piedmont Authority for Regional Transportation do not have explicit roles within the project scope, they add value by supporting community outreach efforts for equitable and just project completion. Furthermore, the BAC will be a guiding force for effective community engagement as it will be comprised of community champions and local government stakeholders. PTRC will also host a community input section on our Brownfields program page to anonymously solicit feedback from engaged and affected community members. To speak to the degree to which input will be considered, the proposed framework for the BAC includes a presentation of community input collected each quarter. This group will then review the feedback, address any concerns or comments to key staff. PTRC is also conscious that quarterly BAC meetings may not be inclusive, so additional community outreach will consist of at least three public engagement meetings within one-mile proximity of each priority site to solicit meaningful and inclusive input from community members.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Description of Tasks/Activities and Outputs – Key tasks include community outreach, Phase I Environmental Site Assessments (ESAs), and a strong focus on Phase II ESAs and cleanup and corrective action plans (CAPs) as needed.

<table>
<thead>
<tr>
<th>Task/Activity 1: Community Outreach</th>
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<tbody>
<tr>
<td>i. PTRC will conduct community outreach efforts in coordination with BAC, Southwest Renewal Foundation, Dan River Basin Association, Piedmont Land Conservancy, and Piedmont Authority for Regional Transportation. Staff is committed to hosting at least three</td>
</tr>
</tbody>
</table>
community engagement events within one mile of each priority site. Additionally, PTRC will work in coordination with NCDEQ Brownfields Program and ICMA to co-host educational brownfield workshops and community events to further engage the public. PTRC intends to proactively seek community input. The BAC will meet quarterly and interpret community input gathered between each meeting.

ii. Anticipated Project Schedule: Ongoing

iii. Task/Activity Lead: PTRC

iv. Outputs: 9 Community Outreach Events; 10 Quarterly Brownfield Advisory Committee Meetings; 10 Quarterly Progress Reports; 3 Annual Press Releases, and; 3 Annual Newspaper/TV Interviews.

Task/Activity 2: Phase I Assessment Activities & Reporting

i. Under the previous three assessment grants, we conducted Phase I ESAs or smaller properties for as little as $3,000, while one Phase I for a large industrial site can cost nearly $18,000. From our previous Brownfields awards, we can average a consultant cost of $7,500 for a Phase I. Therefore, we estimate to conduct up to ten Phase I ESAs under EPA’s All Appropriate Inquiry Rule and ASTM D1527-05 – Standard Practice for Environmental Assessments, Phase I Environmental Site Process. This task includes financial and performance reporting costs for the first half of the period of performance.

ii. Anticipated Project Schedule: Begin 6 Months after award and then ongoing

iii. Task/Activity Lead: PTRC


Task/Activity 3: Phase II Assessment Activities & Reporting

i. Under the previous three assessment grants, we conducted Phase II ESAs or smaller properties for as little as $16,000, while one Phase II for a large industrial site can cost nearly $110,000. From prior work and the priority sites we expect Phase II costs to range between $25,000 and $45,000. Therefore, we estimate conducting up to seven Phase II ESAs under ASTM E1903-97 or similar protocols. This task includes financial and performance reporting costs for the second half of the period of performance.

ii. Anticipated Project Schedule: Begin 8 Months after award and then ongoing

iii. Task/Activity Lead: PTRC


Task/Activity 4: Cleanup Planning

i. PTRC conferred with other councils of government with EPA assessment grants and estimates the average cost of a Phase III Corrective Action Plan (CAP) to be $12,000. Therefore, we estimate to conduct up to four CAPs. Each CAP will address the screening of several technologies and will propose the most efficient and cost-effective technology based on the site-specific hydro-geologic environments for sites where excessive and widespread soil and groundwater contamination has been encountered and/or that exhibit the greatest threat to human health and the environment based on the distance to sensitive receptors and potential for exposure.

ii. Anticipated Project Schedule: Begin 15 Months after award and then ongoing

iii. Task/Activity Lead: PTRC

iv. Outputs: 4 Phase III CAPs

3b. Cost Estimates

i. Application & Development of Cost Estimates – Costs was developed using a comparative analysis from the previous three Brownfields Assessment grants by PTRC. Indirect and fringe cost
rates are applied to personnel expenses and approved by HUD, PTRC’s cognizant federal agency. The Fringe Benefits cost rate is established as 50.25% of total personnel costs and the Indirect cost rate is established as 28.50%.

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<thead>
<tr>
<th>Work Task</th>
<th>Outputs</th>
<th>Outcomes</th>
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<tbody>
<tr>
<td>Community Outreach Events</td>
<td>• 9 Community Outreach Events</td>
<td>• Community ownership &amp; support of BF redevelopment process &amp; goals</td>
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<tr>
<td></td>
<td>• 10 Quarterly Brownfield Advisory Committee Meetings</td>
<td>• Identification &amp; priority consensus on future BF sites</td>
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<td></td>
<td>• 10 Quarterly Progress Reports</td>
<td>• Establishment of public/private redevelopment partnerships</td>
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<tr>
<td></td>
<td>• 3 Annual Press Releases</td>
<td>• Inclusive solicitation and input</td>
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<td></td>
<td>• 3 Annual Newspaper/TV Interviews</td>
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<tr>
<td>Phase I ESAs</td>
<td>• 10 Phase I ESAs</td>
<td>• Hazardous/Petroleum sites readied for cleanup &amp; redevelopment</td>
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<td></td>
<td>• 7 SSQAPPs &amp; Phase II ESAs</td>
<td>• Sites ready for cleanup &amp; reuse</td>
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<td>• 4 Phase III Corrective Action Plans</td>
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<td>Site Red-</td>
<td>• 15 meetings with commercial real estate brokers &amp; BF developers</td>
<td>• Healthier communities</td>
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<tr>
<td>development</td>
<td>• 8 sites accepted in NC BF Program</td>
<td>• Stormwater management &amp; water quality improvements</td>
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<td>• 10 new businesses &amp;/or public uses</td>
<td>• Increased local tax revenue</td>
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<td></td>
<td>• 50 new local jobs</td>
<td>• Additional public green space</td>
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<tr>
<td></td>
<td>• $50,000 in new local tax revenue</td>
<td>• New businesses &amp; jobs created</td>
</tr>
<tr>
<td></td>
<td>• 40+ acres of new public green space</td>
<td>• Increased pride &amp; quality of life</td>
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Administrative costs are not anticipated to exceed 5% ($25,000) and include the Personnel, Fringe, and Indirect costs outlined under the Community Outreach and Cleanup Planning Tasks. The same costs under Tasks 2 and 3 are reserved for performance and financial reporting expenses.

3c. Measuring Environmental Results – Our strategy for tracking and measuring progress includes the following key elements: 1) Evaluate achievement of output and outcome milestones established in the grant application and work plan (see table below); 2) Generate quarterly documentation of project outcomes and outputs in both narrative and spreadsheet form; and 3) Share quarterly progress evaluations and documentation with EPA, partners, and stakeholders.
4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4a. Programmatic Capability – PTRC has extensive brownfield assessment experience and expertise. Jesse Day, Regional Planning Director, will serve as project manager, and David Putnam, Regional Economic Strategist, will serve as assistant project manager, having successfully co-managed PTRC’s most recent EPA grants. While managing its 2009, 2014, and 2018 Assessment Grants, PTRC successfully illustrated its ability to select and manage outside consultants with specific expertise conducting brownfield site assessments and cleanup planning. Staff successfully manage numerous other programs and leverage resources to address complex environmental, economic, and sustainability challenges faced by our local government members. We will continue to work with communities to ensure meaningful engagement of community stakeholders, expanding our relationships with state and local brownfields professionals; and using environmental consultants, chosen through an RFP process following Federal procurement policies, to perform Phase I and II ESAs, Clean-up Planning, and other assistance as necessary.

4b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments – PTRC successfully used all $200,000 of its first grant (BF–96460406), $600,000 of its 2014 Assessment Grant (BF-00D12113) to conduct 24 Phase I and 8 Phase II ESAs identifying a wide range of soil and groundwater contaminants in communities in our region, and disbursed $427,662 (71%) of its 2018 Assessment Grant (BF-00D72418) by October 1, 2021. Six of these sites have successfully negotiated agreements with the NC Brownfields Program. The Lexington Home Brands Plant has been redeveloped as a brewery and public amphitheater. The Thomasville Plant L project, funded by our 2014 Assessment Grant, have enabled the clean-up and renovation of the historic mill into 70 much-needed, affordable workforce housing rental units located less than a block from downtown shopping and transit services. These exceptional accomplishments are a direct result of the Coalition’s last three grants. However, dozens of other sites remain on our second-tier waiting list for much-needed assessment work, and hundreds more remain to be assessed, cleaned up, and redeveloped in blighted communities throughout our region. Our Coalition’s proposed assessment and clean-up planning activities will make a significant impact in our targeted communities and strongly support our long-term goals of creating more sustainable communities and equitable opportunities for everyone in our region.

(2) Compliance with Grant Requirements – PTRC closed out a $200,000 EPA Hazardous Substance Assessment Grant (BF–96460406) in 2009 on behalf of its local government members. PTRC continued to build its regional brownfields program under a FY2014 EPA-funded Brownfield Assessment Coalition Grant (BF-00D12113). For both grants, PTRC successfully expended all funds and fully complied with all aspects of its project work plans, schedules, and cooperative agreement terms & conditions. PTRC is currently working on perfecting its 2018 Brownfield Assessment Grant, which we expect to be complete by March 2022. All quarterly and annual reports and all financial status reports have affirmed adequate progress towards achieving and exceeding the expected results under all three grants, and all reports and grant deliverables have been submitted and approved on time and all required information concerning project outputs and outcomes has been entered into the EPA on-line ACRES database. Additional EPA assessment funding is desperately needed to enable our community partners to build on our previous successes and continue making strategic investments in our targeted communities by mitigating environmental and community health risks; reducing barriers, and improving social and economic well-being in communities most severely impacted by brownfields.
Threshold Criteria Responses Attachments (Community-wide Assessment Proposals):
1. Applicant Eligibility - see Appendix B – Documentation of Applicant Eligibility
2. Community Involvement – see Appendix C – Description of Community Involvement and \textit{Narrative 2.b.i. and 3.a.}
3. Named Contractors and Subrecipients - see Appendix D – Statement of Certification
4. Expenditure of Existing Grant Funds - see Appendix E – ASAP Adjustment Entry EPA
Attachment B – Documentation for Applicant Eligibility

Part 2. Regional Councils of Governments.

§ 160A-470. Creation of regional councils; definition of "unit of local government".
(a) Any two or more units of local government may create a regional council of governments by adopting identical concurrent resolutions to that effect in accordance with the provisions and procedures of this Part. To the extent permitted by the laws of its state, a local government in a state adjoining North Carolina may participate in regional councils of governments organized under this Part to the same extent as if it were located in this State. The concurrent resolutions creating a regional council of governments, and any amendments thereto, will be referred to in this Part as the "charter" of the regional council.

(b) For the purposes of this Part, "unit of local government" means a county, city, or consolidated city-county. (1971, c. 698, s. 1; 1973, c. 426, s. 71.)

Each unit of local government initially adopting a concurrent resolution under G.S. 160A-470 shall become a member of the regional council. Thereafter, any local government may join the regional council by ratifying its charter and by being admitted by a majority vote of the existing members. All of the rights and privileges of membership in a regional council of governments shall be exercised on behalf of its member governments by their delegates to the council. (1971, c. 698, s. 1; 1973, c. 426, s. 72.)

The charter of a regional council of governments shall:
(1) Specify the name of the council;
(2) Establish the powers, duties, and functions that it may exercise and perform;
(3) Establish the number of delegates to represent the member governments, fix their terms of office, provide methods for filling vacancies, and prescribe the compensation and allowances, if any, to be paid to delegates;
(4) Set out the method of determining the financial support that will be given to the council by each member government;
(5) Establish a method for amending the charter, and for dissolving the council and liquidating its assets and liabilities.
In addition, the charter may, but need not, contain rules and regulations for the conduct of council business and any other matter pertaining to the organization, powers, and functioning of the council that the member governments deem appropriate. (1971, c. 698, s. 1.)

§ 160A-473. Organization of council.
Upon its creation, a regional council shall meet at a time and place agreed upon by its member governments and shall organize by electing a chairman and any other officers

(Excerpted from North Carolina General Statutes)
that the charter may specify or the delegates may deem advisable. The council shall then adopt bylaws for the conduct of its business. All meetings of the council shall be open to the public. (1971, c. 698, s. 1.)

Any member government may withdraw from a regional council at the end of any fiscal year by giving at least 60 days' written notice to each of the other members. Withdrawal of a member government shall not dissolve the council if at least two members remain. (1971, c. 698, s. 1.)

§ 160A-475. Specific powers of council.
The charter may confer on the regional council any of the following powers:

1. To apply for, accept, receive, and dispense funds and grants made available to it by the State of North Carolina or any agency thereof, the United States of America or any agency thereof, any unit of local government (whether or not a member of the council), and any private or civic agency.

2. To employ personnel.

3. To contract with consultants.

4. To contract with the State of North Carolina, any other state, the United States of America, or any agency thereof, for services.

5. To study regional governmental problems, including matters affecting health, safety, welfare, education, recreation, economic conditions, regional planning, and regional development.

6. To promote cooperative arrangements and coordinated action among its member governments.

7. To make recommendations for review and action to its member governments and other public agencies which perform functions within the region in which its member governments are located.

7a. For the purpose of meeting the regional council's office space and program needs, to acquire real property by purchase, gift, or otherwise, and to improve that property. The regional council may pledge real property as security for indebtedness used to finance acquisition of that property or for improvements to that real property, subject to approval by the Local Government Commission as required under G.S. 159-153. A regional council may not exercise the power of eminent domain.

8. Any other powers that are exercised or capable of exercise by its member governments and desirable for dealing with problems of mutual concern to the extent such powers are specifically delegated to it from time to time by resolution of the governing board of each of its member governments which are affected thereby, provided, that no regional council of governments shall have the authority to construct or purchase buildings, or acquire title to real property, except for the purposes

(Excerpted from North Carolina General Statutes)
Attachment B – Documentation for Applicant Eligibility
(Excerpted from North Carolina General Statutes)

permitted under subdivision (7a) of this section or in order to exercise the authority granted by Chapter 260 of the Session Laws of 1979. (1971, c. 698, s. 1; 1975, c. 517, ss. 1, 2; 1979, c. 902; 2005-290, s. 1; 2006-211, s. 1.)

Each unit of local government having membership in a regional council may appropriate funds to the council from any legally available revenues. Services of personnel, use of equipment and office space, and other services may be made available to the council by its member governments as a part of their financial support. (1971, c. 698, s. 1; 1973, c. 426, s. 73.)

§ 160A-477. Reports.
Each regional council shall prepare and distribute to its member governments and to the public an annual report of its activities including a financial statement. (1971, c. 698, s. 1.)

§ 160A-478. Powers granted are supplementary.
The powers granted to cities and counties by this Article are supplementary to any powers heretofore or hereafter granted by any other general law, local act, or city charter for the same or similar purposes. (1971, c. 698, s. 1.)
Attachment C – Description of Community Involvement

PTRC has worked closely with community members and their partners, to pre-select three top-priority catalyst sites in preparation for this funding application. As funding is available, we will address other key sites on our waiting list, based on the same selection criteria used to select our catalyst sites, including: 1) Potential threats to human health &/or the environment; 2) Priorities of communities most affected by brownfields, 3) Interest from prospective developers; 4) Opportunity to achieve substantial environmental justice; 5) Potential environmental, health &/or economic benefit to the community; 6) Estimated assessment costs; 7) Redevelopment potential; 8) Job creation, and; 9) The likelihood of a site serving as a catalyst for promoting community health and welfare, and more sustainable and equitable communities.

Through its standing Brownfields Advisory Committee, PTRC staff will meet quarterly at a time and location to ensure delegates from each of our communities can attend. These meetings provide community members an opportunity to share and receive information on recent community activities; serve to foster strong buy-in and support for our brownfields program from elected officials throughout our region, and; provide an opportunity for the committee to address any input the project has received from members of the community with key staff. In partnership with our local government delegates, PTRC will also coordinate up to 9 Community Outreach events within a one mile proximity of each priority site. As funding is available, we will offer similar commitments to sites on our waiting list. Through these events, interested citizens, local government elected officials and staff, bankers, commercial real estate brokers, developers, and representatives of our community-based partner organizations are able to provide input into PTRC’s ongoing brownfields program of work. Our Advisory Committee will continue to actively participate in the on-going selection and prioritization of sites, the identification of redevelopment needs and interests in each community, and the identification and addition of new community partners. Furthermore, PTRC intends to activate an online comment section of our Brownfields website where community members can offer anonymous input so that we can ensure an inclusive community engagement and input process. This feature will be used to also collect data that would otherwise be missed due to scheduling conflicts or lack of interests that may obstruct community member attendance to Advisory Committee meetings and the Community Outreach events.

In tandem with our partners, PTRC will continue to perform the following outreach activities: 1) Host local jurisdiction events to inform community members about the progress of brownfield activities and provide opportunities to ask questions and provide input to be incorporated into our program of work; 2) Maintain the Piedmont Triad Brownfields Program website, web-based brownfield inventory GIS mapping system, and social media interfaces; 3) Issue press releases; 4) Provide newspaper and TV interviews; and 5) Develop and distribute documents outlining program benefits and opportunities for community involvement. $30,180.71 is allocated for community outreach efforts including: $9,000 for PTRC staff time; $2,620 for PTRC travel ($1,495 for local travel costs and $1,125 to attend one national conferences); $3,184.50 for supplies; and $7,000 for contractual assistance.

PTRC and our community-based partners will continue our on-going outreach activities to foster strong two-way communication in each of our targeted neighborhoods. We will continue to host monthly events to engage key stakeholders in each community, paying special attention to including non-English speaking residents, and providing translation services as necessary. In addition to gathering and incorporating neighborhood input to inform our on-going efforts, PTRC will continue to provide quarterly progress reports and to make presentations to elected bodies, chambers of commerce, planning boards, church and school groups, neighborhood associations,
real estate broker associations and economic development groups. These presentations highlight the benefits of our Brownfields Program and have built a broad network of citizens, organizations and local governments familiar with, and supportive of our efforts. This network has lead to multiple face-to-face conversations with owners, brokers, prospective developers and community members most effected by brownfields. These numerous community-based conversations, have in turn, lead to the selection of top-priority catalyst sites. In partnership with neighborhood and community development organizations and local universities we have, and will continue to facilitate community meetings, door-to-door surveys, host information tables at community events and hold focus-group interviews at neighborhood schools and churches. These one-on-one conversations will continue to provide opportunities to share information and identify the concerns, interests and goals of most importance to community members within each of our targeted neighborhoods.

On-going Brownfields Advisory Committee meetings are open to the public and include quarterly progress reports and opportunities for members and community stakeholders to ask questions, share information, negotiate priorities, make decisions and learn from one another. PTRC also actively maintains a Regional Brownfields Website providing public access to progress reports; community assessment and redevelopment priorities; and a wide range of geographic information and maps. On behalf of our members, PTRC will continue to maintain our website, provide public outreach events and presentations, issue press releases and provide TV and newspaper interviews to share our progress and gather input from community members. Fostering two-way communication is a high priority as we continue working in target communities to keep stakeholders informed and to maintain neighborhood readiness and support in preparation for identifying future catalyst projects. Finally, we will continue to use partner with entities like the Southwest Renewal Foundation, Dan River Basin Association, Piedmont Land Conservancy, and Piedmont Authority for Regional Transportation do not have explicit roles within the project scope, they are committed to supporting PTRC in community outreach efforts for equitable and just project completion.
Attachment D – Affirmative Statement of Non Procurement

PTRC has not procured/named a contractor/subrecipient related to this funding opportunity (RFA: EPA-OLEM-OBLR-21-04) and project.
# Attachment E – ASAP Adjustment Entry EPA

## Book Entry Adjustments

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11/28/2021, ASAPgov Confirmation Page: 1