IV.D. Narrative Information Sheet

1. Applicant Identification:
   City of Sullivan
   32 North Court Street
   Sullivan, IN 47882

2. Funding Requested:
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested:
      i. $305,700
      ii. We are not requesting a Site-specific Assessment Grant waiver of the $200,000 limit.

3. Location:
   a. City of Sullivan
   b. Sullivan County
   c. Indiana

4. Target areas:
   • Section Street Corridor (SSC) - comprising a 0.75 mile stretch of Section Street and extending roughly north to Wolfe Street, east to Railroad Street, south to Johnson Street, and west to N. Cross Street, this 0.31 mi² (in Census Tracts 503.01 and 503.02) includes much of downtown Sullivan. The SSC is a focal point of our redevelopment efforts due to its location along our main north-south thoroughfare and its proximity to nearby low-income neighborhoods.
   • Priority Sites:
     Former Auto Salvage, 548 S. Main Street, Sullivan, IN
     Former Globe Cleaners, 208 W. Wall Street, Sullivan, IN
     Industrial Site, 320 N. Court Street, Sullivan, IN
     Former Gas Station, 207 N. Section Street, Sullivan, IN
     Appliance Repair Shop, 498 S. Section Street, Sullivan, IN

5. Contacts:
   a. Project Director:
      Ms. Elanna Luttrell
      Grant Administrator
      812-268-6077
      elanna.luttrell@cityofsullivan.org
      32 North Court Street
      Sullivan, IN 47882
b. Chief Executive/Highest Ranking Elected Official:
   Mayor Clint Lamb
   812-268-5464
   clint.lamb@cityofsullivan.org
   32 North Court Street
   Sullivan, IN 47882


7. Other Factors:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page#</th>
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<tr>
<td>Community population is 10,000 or less.</td>
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<td>The applicant is, or will assist, a federally recognized Indian tribe or</td>
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<td>United States territory.</td>
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<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
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<td>The priority site(s) is adjacent to a body of water (i.e., the border of the</td>
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<td>priority site(s) is contiguous or partially contiguous to the body of water,</td>
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<td>or would be contiguous or partially contiguous with a body of water but for</td>
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<td>a street, road, or other public thoroughfare separating them).</td>
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<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
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<td>The reuse of the priority site(s) will facilitate renewable energy from wind,</td>
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<td>solar, or geothermal energy.</td>
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<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
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<td>30% or more of the overall project budget will be spent on eligible reuse/</td>
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<td>area-wide planning activities, as described in Section I.A., for priority</td>
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<td>site(s) within the target area.</td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired power</td>
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<td>plant has recently closed (2011 or later) or is closing.</td>
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</tbody>
</table>

8. Letter from the Indiana Department of Environmental Management, Indiana Brownfields Program (attached).

9. Releasing Copies of Applications: Not Applicable
December 1, 2021

Ms. Elanna Luttrell
Grant Administrator
Park Board
32 North Court Street
Sullivan, Indiana 47882

Re: IDEM Acknowledgement Letter
U.S. EPA Brownfields Grant Proposal
Community-wide Assessment
City of Sullivan
Sullivan County, Indiana

Dear Ms. Luttrell:

This letter is provided in support of the City of Sullivan's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for $305,700. IDEM understands that this funding will be utilized to expand the existing brownfield inventory with an initial prioritization of identified brownfield sites based on the following: community environmental justice, as well as environmental or human health impact potential; redevelopment potential; and community input. IDEM is aware that the City also has identified several disadvantaged areas – portions of Census Tracts 503.01 and 503.02 (Section Street Corridor (SSC)) – with at least five targeted priority sites as focal points for environmental assessments based on need and large-scale redevelopment goals at this time, which will likely include mixed residential/commercial reuses.

IDEM believes that the City of Sullivan has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered by U.S. EPA (current grantee) and by the Indiana Brownfields Program (Program participant with 8 projects enrolled for a variety of assistance, having redevelopment success). This assessment grant funding will help the City continue its efforts to address brownfields in the community. Should an opportunity arise for Sullivan to need petroleum eligibility determinations or cleanup/closure or liability assistance at any of the sites investigated with this grant funding, IDEM realizes that the City will participate in the Indiana
Brownfields Program or the IDEM Voluntary Remediation Program for technical oversight/closure of grant-funded site activities.

Based on the information submitted, IDEM considers the City of Sullivan an excellent candidate to receive U.S. EPA grant funding again to continue its brownfield redevelopment efforts, which support Indiana’s brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City of Sullivan. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,

Kevin Davis, Chief
Remediation Services Branch
Office of Land Quality

KD/mmo

cc: (via electronic transmission)
Len Hinrichs, BCA Environmental Consultants, LLC
1. Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area: The City of Sullivan is a micro community with less than 10,000 residents. Serving as the seat of Sullivan County, it is located roughly 80 miles southwest of Indianapolis in a rural setting. With a population of 4,264 (2020 Decennial Census) and a size of < 2 mi², Sullivan is the largest city within 20 miles. Historically, Sullivan’s economy has centered on row-crop agriculture and coal mining (the county is home to Bear Run, the largest surface coal mine in the eastern US). As a result of economic factors, regulatory pressures, and equipment modernization, the once thriving coal mining industry has dramatically reduced its workforce, resulting in closure of many area mines. Decades of strip mining have left mine-scarred land scattered throughout the area. Although some reclamation has occurred, many mine sites remain unrestored. Current City industries include machine/welding shops, chemical processing/bulk plants, plastic products manufacturing, and sawmills. These industries historically supported the larger mining and farming industries, but since their decline, these allied industries have struggled to survive. Many have been forced to close as revenues dropped. From 2000 to 2020, Sullivan County workforce declined by 14.2% (Indiana Dept of Workforce Development). As job losses mounted, many residents left for employment opportunities elsewhere. Those who have stayed in the City are experiencing lower income ($40,514 Median Household Income (MHI)), higher unemployment (4.4%), and higher poverty (16%) compared to state and national figures (2019 ACS; see IV.E.2.a.i).

The target area selected for this grant is the Section Street Corridor (SSC) including the surrounding downtown area where the highest number of priority brownfield sites are located. These residential and/or mixed-use areas are the core of the community, with the SSC serving as the City’s economic engine. Consequently, the SSC offers the greatest opportunity for successful redevelopment. However, the target area is also an area of low-income residents in depressed residential properties where economic struggles are aggravated by nearby brownfields, such as the former Globe Cleaners and Abandoned Gas Station on N Section Street. Even with such social and economic constraints, we recognize the great redevelopment potential of the SSC. We are working hard to repurpose and reshape downtown businesses and commerce to replace those that have closed or moved away. Recent reuse of a portion of the former Central Sullivan School brownfield site into a new hotel, created 30 much-needed, high-paying jobs ($1MM annual wages) and generates an estimated $200K in incremental annual tax revenue. As this and other revitalization projects demonstrate, Sullivan is striving to create a place where people can live, work, play, and prosper.

**SSC** – Consists of a 0.75 mile stretch of Section Street and extending north to Wolfe Street, east to Railroad Street, south to Johnson Street, and west to N. Cross Street, this 0.31 mi² (in Census Tracts 503.01 and 503.02) includes much of downtown Sullivan. The SSC is a focal point of our redevelopment efforts due to its location along our main north-south thoroughfare and its proximity to low-income neighborhoods. Residents living among brownfields in the SSC experience high unemployment, poverty, and low MHI (2.a.i). The SSC is a combination of low-income residential and vacant, derelict, or underutilized commercial and industrial properties in the heart of the City. Without this revitalization, brownfields will continue to impact those living in and near the SSC, and residents will continue to experience the lack of well-paying jobs, poor neighborhood upkeep, difficulty finding adequate medical care, limited alternative transportation options, increased crime, etc. We have made a focused effort to invest in the SSC to address priority brownfields (Table 1 in 1.a.ii) and leverage additional funding for this depressed area of our community. Redeveloping the SSC will revitalize this portion of our community and reduce area crime, making it more attractive to new businesses, developers, visitors, and residents.

**1.a.ii. Description of the Priority Brownfield Site(s):** To date, over 20 brownfields have been identified and inventoried in the City. Dilapidated conditions and presence of environmental contaminants at these sites contribute to economic, health, and public safety threats. Many properties are closely adjacent to or comingled with surrounding homes, parks, businesses, schools, and churches. They are often unsecured and trespassers, including children, risk exposure to toxic chemicals, asbestos containing materials (ACM), unsafe structures, and uncharacterized releases of contaminants. For example, the Former Gas Station has remained vacant for over a decade. Environmental conditions at the site are unknown, representing increases in already high health risks to adjoining neighborhoods from exposure to petroleum, solvents, and other industrial chemicals. Due to its location in the City’s core with easy access
to downtown shopping and restaurants, the site is ideal for mixed-use commercial/residential redevelopment, removing environmental and health threats and transforming it into a community asset. Its redevelopment will dovetail nicely with current Sullivan projects like the Greenway System (pedestrian and bike trail) connecting the City core to parks and green spaces throughout the surrounding area (per Sullivan Revitalization Plans (IV.E.1.b.i.)).

Our priority sites (Table 1) offer the greatest opportunity to trigger successful redevelopment and resurgence in this hard-hit corridor of our community.

<table>
<thead>
<tr>
<th>Table 1</th>
<th>Priority Sites, Size and Proximity to Target Area Residents</th>
<th>Historic / Current Use and Condition / Planned Reuse (1.b.i.)</th>
<th>Suspected Contaminants*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Former Auto Salvage, 546 S Main St, 0.58 acres, Near Low-income Residents</td>
<td>Former Scrap Yard / Vacant Building / Mixed-Use Dev. / Trailhead</td>
<td>Petroleum, PCBs, Metals, Solvents, ACM, Lead Paint (LBP)</td>
<td></td>
</tr>
<tr>
<td>Former Globe Cleaners, 208 W Wall St, 0.04 acres, Adjoins Low-income Residents</td>
<td>Former Dry Cleaner / Retail Shop / Mixed-Use Commercial/Residential</td>
<td>Chlorinated Solvents, Metals, ACM, LBP</td>
<td></td>
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<tr>
<td>Industrial Site, 320 N Court St, 0.56 acres, Adjacent Low-income Residents</td>
<td>Unknown Industrial / Vacant Building / Commercial</td>
<td>Petroleum / Lubricants, PCBs, Metals, Solvents, ACM, LBP</td>
<td></td>
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<tr>
<td>Former Gas Station, 207 N Section St, 0.25 acres, Near Low-income Residents</td>
<td>Former Gas Station &amp; Car Wash / Vacant Lot / Mixed-Use Commercial/Residential</td>
<td>Petroleum / Lubricants, PCBs, Metals, Solvents, ACM, LBP</td>
<td></td>
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<tr>
<td>Appliance Repair Shop, 498 S Section St, 0.15 acres, Adjacent Low-income Residents</td>
<td>Former Appliance Parts &amp; Repair Shop / Vacant Building / Health Clinic</td>
<td>Petroleum/Lubricants, PCBs, Metals, Solvents, ACM, LBP</td>
<td></td>
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</tbody>
</table>

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

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: The City’s Revitalization Plans include our 2013 Comprehensive Plan and several robust programs in place for prioritizing the health and well-being of residents, improving transportation safety/connectivity, expanding mixed-use high density commercial/residential development with affordable housing choices, adding City parks and trails, and enhancing the livability and economic vitality of our community. Additional plans/programs further outline our redevelopment strategies, including the “They Gotta Go” Blighted Property Elimination Program (2012) (over 80 unsafe homes have been demolished making way for new housing since 2012); Neighborhood Revitalization Initiative (2020), focusing on developing new homes on previously blighted properties; “Paths to Progress” Plan (2012) (sidewalk replacement plan – over 140 sidewalks constructed/replaced since 2012); and Greenway Trail System Plan (2015), which emphasizes the need for biking/walking trails, leading to the construction of 18 trails covering 76 miles, linking parks and historic Carnegie Library to downtown Sullivan. Additionally, Sullivan was selected as an Indiana State University (ISU) Sustainable Cities’ inaugural partner city – this program leverages ISU to create more sustainable cities while providing unique experiential learning opportunities to ISU students. Together, these initiatives and plans make up our Revitalization Plans.

Our Revitalization Plans focus on the SSC, where brownfields reuse offers the strongest catalyst for spurring growth in the community. Redevelopment of our priority sites will help us to realize the goals in these plans. Reuse strategies for the SSC include stimulating commercial/residential growth with mixed-use development, adding green space connected to trails, adding commercial retail, and attracting medical facilities. Our Redevelopment Plans emphasize the SSC revitalization as a key initiative to create a more livable, walkable, vibrant, pedestrian friendly, and safe downtown.

Sullivan is requesting $305,700 in grant funding, essential to complete assessments of target area brownfields, providing the initial, highest risk investment necessary for brownfields reuse. Funding will also be committed to updating/prioritizing our existing inventory and conducting cleanup/redevelopment planning. These funds will help us reach reuse goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the SSC. This approach will allow us to maximize grant value and trigger further environmental and redevelopment funding (IV.E.1.c.i). For example, plans are underway to redevelop the former Globe Cleaners and former Abandoned Gas Station into mixed-use commercial/residential properties and greenspace/trailhead ($700K already committed for trailhead from the Dept. of Transportation); the former Industrial Site is scheduled for reuse as light industrial or commercial services; the Appliance Repair Shop is identified as a location for a new Health Clinic; and the former Auto Salvage on Main Street is slated for reuse as
park/greenspace and trailhead connecting to the greenway system and Sullivan City Park.

Connecting parks, commercial, and residential areas of our City is outlined in our Revitalization Plans. In the past few years Sullivan has completed redevelopment of the former Sullivan Central School brownfields site ($27.5MM investment), yielding three important community venues – Sullivan Civic Center, Central Park Plaza, and Sullivan Central Park. These developments are close to and accessible from downtown, and the Greenway Trail System has been utilized to enhance connectivity to other areas of the City. These projects combined with brownfields redevelopment enabled by the EPA grant will propel redevelopment. Significant investment dollars have already been pledged for the redevelopment of downtown properties (IV.E.1.c.i), and with EPA grant funds to cover environmental assessment costs, we will make the outcomes outlined below a reality.

1.b.ii Outcomes & Benefits of Reuse Strategy: Brownfield assessments will be linked to successful reuse outcomes, creating affordable housing, bringing new commercial retail/restaurant to the SSC, addressing environmental justice issues (2.a.ii), and create a more connected, safe, and walkable community. Reuse of brownfields will generate higher tax revenue, create jobs through increased investment, new residential units will be constructed, and property values will be enhanced. City estimates suggest that the redevelopment of all the priority sites listed in Table 1 will create an estimated 250 temporary construction jobs, over 125 permanent jobs, generate an estimated $100K in annual income tax revenue, and $100K in annual incremental real estate tax revenue. Using these sites as examples, this success story can be duplicated at other sites in the community. Revitalization of the former Globe Cleaners will remove real and perceived environmental contamination (Table 1) and eliminate environmental threats to nearby residents. For this priority site, up to 75 temporary jobs and twenty-five permanent jobs needed to operate the planned commercial redevelopment will be created, stimulating other area investment from the private sector. Developing greenspace and connecting to the Greenway Trail at the former Auto Salvage site will enhance the surrounding low-income community and provide a much-needed venue for safe recreation and exercise.

Brownfield redevelopment improves the health of residents by quantifying contaminant risks and removing blight and hazards. Siting of a Health Clinic on the Appliance Repair Shop property will directly improve the health of SSC residents, transportation safety and connectivity will be enhanced via the expanded trail system and creation of pedestrian and bicycle friendly roadways/sidewalks to supply more options for safe recreation and exercise. The need for affordable, safe housing will be addressed, including mixed-use commercial/residential development. All of these results from brownfields reuse/redevelopment contribute to economic improvement and quality of life in the target area. Additional economic gains from job creation and tax revenues described above are an added bonus of brownfields redevelopment.

This revitalization of our priority sites will create affordable housing, improve economic competitiveness of the SSC, create sustainable, commercial developments and land recycling opportunities, create sustainable transit options through trail development, leverage current and future investments, and create healthy, safe neighborhoods. Residents and commercial property owners will benefit from increased property value, improved energy efficiency, and lower maintenance costs associated with new construction. New, energy efficient construction on priority sites, including the use of solar and LEED certification, will reduce energy usage and operating cost on sites where new construction is planned (Globe Cleaners, Appliance Repair Shop, Salvage Yard). This will create jobs, improve property values, and increase wages for our residents. Addressing priority sites in the SSC as described above will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of minorities and low-income residents. EPAs investment in brownfields in the SSC will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our trail network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economy. These accomplishments will deliver justice to disadvantaged (due to low-income, high unemployment/underemployment, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.) residents.

1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: The City of Sullivan has a history of leveraging investment in projects throughout the community. For example, the
City leveraged $441K in Community Development Block Grant - Disaster Relief funding to redevelop the Former Sullivan Central School brownfields site to create the Sullivan Civic Center, Central Park Plaza, and Sullivan Central Park. Demolition of the former school eliminated environmental hazards and blight and paved the way for future development of a new hotel ($8M invested). Without EPA funding for the initial high-risk environmental assessment of brownfields, redevelopment will stagnate. Sullivan will pursue many different funding sources from the state and federal levels, as well as the private sector to use as leveraging as outlined below.

- **Tax Increment Financing (TIF):** Property tax revenue used as subsidy for redevelopment, infrastructure, etc. Sullivan to invest TIF funds for brownfield redevelopment on a case by case basis.
- **EPA:** Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) grants to further the brownfield redevelopment goals of the City ($500K-$1M)
- **Federal Highway Administration:** Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. $5M+)
- **Indiana Economic Development Corp:** Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. $1M+)
- **Indiana Brownfields Program Loan:** Low-interest/partially-forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. $1M)
- **Indiana Finance Authority:** SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites ($500K+)
- **Indiana Brownfields Program (IBP):** Petroleum Orphan Site Initiative (POS) funding may be used to complete the investigation of sites identified and partially assessed in this Grant and other sites in the target area (Est. $75K)
- **Indiana Office of Community and Rural Affairs – Main Street Revitalization Program (Est. $500K); Blight Clearance Program for demolition of unsafe structures ($500K)
- **Excess Liability Trust Fund:** State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to $2M)
- **Private Funding:** to remediate sites ineligible for state/federal funding. Such sites may need encouragement and redevelopment support from the City to conduct necessary clean-up prior to redevelopment (unlimited)
- **Liability Insurance Funding:** Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The City will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often $1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana (e.g. Plymouth, Logansport, Jeffersonville), commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

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

**I.c.ii. Use of Existing Infrastructure:** Our Revitalization Plans’ land use goals emphasize build-out of existing parcels via rehabilitation and infill development before additional land is considered for development. Modern utility infrastructure is available to the priority sites and in the SSC (e.g. 3-phase electricity, natural gas, city water and sewer, telephone, and fiber optic service), providing connectivity to new development. Additionally, Sullivan was recently awarded a $700K grant for development of an extended Greenway Trail System to make downtown a pedestrian-friendly, walkable community. Combined, these features will attract new investment in area brownfields, reducing associated redevelopment costs. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in the SSC. With revitalization ranging from residential to industrial, existing infrastructure will allow for easy access to developers and enable residents the opportunity to live, work, and recreate in the same neighborhood. Additional funding for roads, trails, or other infrastructure necessary for planned reuse will be sought from the US DOT Rebuilding American Infrastructure with Sustainability and Equity.
(RAISE) Grant program, the recently enacted Infrastructure and Jobs Act, local funds (when available), and CDBG funds. 

2. Community Need and Community Engagement, a. Community Need, i. The Community’s Need for Funding: The City of Sullivan needs US EPA’s financial assistance to complete brownfield assessments because we do not have funds to complete this work in our general budget (estimated $12.1M for 2021) to complete brownfield assessments in our target area. The SSC has numerous key economic and demographic indicators of need, for example, unemployment is 25% higher than Indiana’s while the MHI is half and the poverty level is twice that of the US and state. Many downtown businesses have been forced to close as revenues dropped. From 2010 to 2020, our workforce declined by 14% (US Census), and as job losses mounted, many residents left for employment opportunities elsewhere. In fact, since 1930, Sullivan has seen a steady decline in population (over 22%), including a 10% drop over the past 20 years. The large number of vacant buildings on our brownfields have resulted in a twofold increase crime within the SSC (per City officials) compared to the rest of the City, further limiting local government resources (consuming first responder assets). Priority brownfield sites listed in Table 1 add to the financial burden of target area residents by suppressing residential property values and adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites due to an increase in crime.

In the past decade, numerous large, high paying employers have closed (principally mining), resulting in the loss of over 480 jobs (2019 ACS), a decline of $200K in local income taxes, and roughly $750K in annual property tax revenue according to City estimates. All these issues highlight the simple truth that with a budget barely sufficient to provide essential services and much-needed infrastructure maintenance, we lack the discretionary funds necessary to complete the proactive assessment and planning activities that this grant will provide for brownfields sites, including clarifying environmental issues, encouraging developers to seek out and invest in brownfields, and eliminating the risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow Sullivan to fulfill our revitalization needs for our target areas, creating unique, healthy, safe, and walkable neighborhoods.

2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: For years, Sullivan has suffered low wages and a high poverty rate. Because many of our target area brownfields are near sensitive populations (low-income and impoverished residents), brownfields have likely adversely impacted their health. Our unemployment is higher (4.4%) than the state (3.4%) (Bureau of Labor Statistics (BLS)), at $30,481, the target area MHI is half of the US ($62,843) and state ($56,303), and a large percentage of SSC residents live in poverty (26%) compared to US and state figures (both 13.4%) (all stats from 2019 ACS unless otherwise noted). Because of the concentration of brownfields in the area, many of our less fortunate residents are routinely exposed to soil, water, and air contamination with little ability to improve their condition or even move away due to their financial situation. Potential contaminant pathways from brownfields (e.g. vapor intrusion due to shallow groundwater, groundwater used for drinking, irrigation, etc., and surface soil exposure) are a threat to residential neighborhoods. Historic development did not consider environmental impacts on nearby neighborhoods, and now, contaminants suspected in our brownfields (Table 1) are potentially causing unknown harm, raising significant environmental justice issues. For example, the former Globe Cleaners, former Gas Station, and Auto Salvage sites are potentially impacted by chlorinated solvents, petroleum, metals, VOCs, PAHs, and other contaminants that are known to cause various cancers, respiratory disease, and kidney disease, all of which are experienced by Sullivan residents at a higher rate than Indiana (2.a.ii(2)). The proximity of such a large number of brownfields to low-income neighborhoods drives down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a distinct disadvantage to SSC residents with no real relief in sight, if nothing changes.

An infusion of funding from this EPA grant will provide needed capital for the assessment of these blighted properties, clearing the way for remediation, redevelopment, and revitalization of the SSC to include much needed low-and moderate-income housing, increased green space, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality, diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Sullivan’s underserved and sensitive populations, including removal of blight, lower crime, safer neighborhoods,
and access to better public services. This grant will help our community to understand the environmental conditions at our brownfields and reduce the risk of exposure, eliminate sources of contamination, improve the health of our community, and incorporate livability and equitable development principles.

2.a.ii (2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Contaminants from target area priority sites (1.a.ii) are affecting our residents’ health. Many of the priority sites are believed to be impacted by PCBs, VOCs, petroleum, metals, asbestos, lead paint, etc. The perceived chlorinated solvent groundwater plume from Globe Cleaners and others have impacted our neighborhoods and communities for decades. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancer, kidney conditions, and heart and lung diseases. As Table 2 below shows, Sullivan County has significantly higher rates of these diseases, potentially linked to impacts from nearby brownfields. Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable people living in them.

<table>
<thead>
<tr>
<th>Disease/Health Condition</th>
<th>Sullivan County Rate</th>
<th>US Rate</th>
<th>Difference % Higher than US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kidney</td>
<td>21.48</td>
<td>12.71</td>
<td>69.0%</td>
</tr>
<tr>
<td>Lung Disease</td>
<td>62.44</td>
<td>38.18</td>
<td>63.5%</td>
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<tr>
<td>Cancer</td>
<td>211.82</td>
<td>146.15</td>
<td>44.9%</td>
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<tr>
<td>Stroke</td>
<td>55.53</td>
<td>36.96</td>
<td>50.2%</td>
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<tr>
<td>Heart Disease</td>
<td>272.57</td>
<td>161.52</td>
<td>68.8%</td>
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</table>

Table 2 – Health Indicators

The City has 18 sites on the Institutional Controls Registry and 15 leaking underground storage tank (LUST) sites listed with IDEM. EPAs NEPAssist lists 13 hazardous waste generators in Sullivan. The cumulative effects of these sites and our brownfield likely contribute to the adverse health conditions impacting our residents. Removal of the sources of environmental contaminants present at brownfields in our community will reduce the exposure of our disadvantaged populations to these materials. This in turn will help to reduce disproportionate incidences of disease and other poor health outcomes that these residents are currently experiencing.

2.a.ii (3) Promoting Environmental Justice: The public health impact from our target area brownfield properties and industrial operations, and their proximity to our sensitive populations, including impoverished and elderly residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to improve or in some cases, maintain their health and wellbeing. Two nearby Title V Air Permit sources (Hoosier Energy Merom Station and Midwestern Gas Transmission) are located within five miles of the SSC. The EPA’s EJScreen tool indicates that SSC residents are in the 93rd percentile for Ozone and the 73rd percentile for Hazardous Waste Proximity. Nearly half of SSC residents live in or near buildings impacted by LBP. The high poverty rate and low-income in the SSC are significant when compared to US, State, and City figures (2.a.i). Per the Urban Institute/Center on Society and Health (2015), reduced access to and ability to pay for healthcare means that low-income patients are less likely to receive adequate health care services, are more likely to experience negative health effects from exposure to brownfield contaminants, become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. Children living in poverty are 4 times more likely to be in poor or fair health than those in high-income households, and they experience higher rates of asthma, heart conditions, hearing problems, digestive disorders, and elevated blood lead levels. As such, it is easy to see that our impoverished residents are at a distinct disadvantage, resulting in significant environmental justice concerns.

Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the SSC by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on priority sites. New jobs in the target area will create gainful employment for residents who currently lack such opportunities in the SSC, reducing poverty and improving the state of our housing by redeveloping some sites as much needed residential, such as the Auto Salvage Yard and Gas Station, which when complete, will add up to 50 housing units. Further, repurposing the Appliance Repair Shop into a Health Clinic will improve SSC residents’ access to health care. The EPA grant will assess LBP in brownfield buildings, and other federal programs (e.g. CDBG) will help to fund abatement.
and other residential improvement. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health indicators such as increased cancer and kidney disease (2.a.ii(2)) will no longer be influenced by environmental impacts caused by target area brownfields. This will be accomplished in areas where low-income populations are concentrated, supporting environmental justice goals.**

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several project partners have pledged supporting roles for our brownfields program described herein (Table 2). This assemblage of community groups is best suited to engage the community at a grass roots level. These groups have regional influence and local ties, maximizing the benefits they bring to the project.

<table>
<thead>
<tr>
<th>Table 3 – Project Partners</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Partner Name</strong></td>
</tr>
<tr>
<td>Sullivan Co. Chamber of Commerce</td>
</tr>
<tr>
<td>Sullivan Rotary Club</td>
</tr>
<tr>
<td>Heart of Sullivan</td>
</tr>
<tr>
<td>Southwest School Corporation</td>
</tr>
<tr>
<td>Wabash Valley Community Foundation</td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input: Sullivan has a well-established culture of community involvement that we will maintain throughout implementation of this grant. Our most recent community engagement event was held on November 9, 2021 to inform residents of the planned grant effort. **6 to 9 outreach events (2-3 per yr.) will be held throughout the grant period** to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The community will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on City and partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. The City has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging target area residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Our Mayor hosts an ice cream social, where citizens and community leaders gather in an informal setting, specifically to discuss a planned or pending redevelopment project. We will take advantage of this well-established tradition by making brownfields a topic at the 2022 and 2023 Mayor’s Ice Cream Social, highlighting the success of brownfield work already completed and providing a forum for input from stakeholders on future grant activities. Similarly, brownfields will be a recurring topic during the Mayor’s monthly radio program to increase awareness and answer questions. Regional developers will be contacted through the City, the Redevelopment Commission, and the Chamber of Commerce to bring awareness of the redevelopment opportunities priority sites offer. When developers
are identified, they will attend public meetings to describe their plans for redevelopment. As a project progresses, we will actively involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on site reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: Sullivan will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. After the Cooperative Agreement period begins, Sullivan and its QEP will complete the following tasks:

Task/Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization:
- i. Project Implementation: City staff will travel to the national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the City, QEP, EPA, etc., and to manage the grant’s Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries, and will carefully track contractor costs, comparing to the budget, expenditures, and project progress to ensure that grant funds are utilized within the prescribed 3-year project period. The City, with QEP support, will also update/prioritize the inventory. Inventoried sites will be prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input.
- ii. Anticipated Project Schedule: QEP will be selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period.
- iii. Task/activity Lead(s): City & QEP
- iv. Output(s): Travel - City staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: Quarterly, Annual, and DBE Reports; ACRES Entries; calls, meetings, and correspondence between City, QEP, EPA, etc. to manage the Cooperative Agreement.

Task/Activity 2: Environmental Investigation:
- i. Project Implementation: Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESA activities on sites selected by the City. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (anticipated E1527-21) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (as well as Sampling & Analysis Plans/Health & Safety Plans (SAP/HASP) for EPA approval. Once approved, the QEP, directed by the Municipality, will complete Phase II ESAs based on environmental conditions identified in the preceding Phase I ESAs.
- ii. Anticipated Project Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval-early 2nd Quarter; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted 45 days before end of grant period.
- iii. Task/activity Lead(s): City & QEP
- iv. Output(s): 10 Phase I ESAs; QAPP and SAP/HASP, estimated 6-8 Phase II ESAs.

Task/Activity 3: Clean-up Planning:
- i. Project Implementation: The QEP, directed by the City, will prepare site specific clean-up plans/documents, including Analysis of Brownfield Cleanup Alternatives (ABCAs), remediation plans, site closure letter requests, and clean-up funding development (1.c.i).
- ii. Anticipated Project Schedule: Prepared after Phase I and II ESAs are complete, contamination is present, and cleanup is even necessary. Task 3 activities will continue throughout the grant period.
- iii. Task/activity Lead(s): City & QEP
- iv. Output(s): 5-10 cleanup planning documents
Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 6-9 public meetings will be held during the grant period to update the community on ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may also be funded under this task. The City will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and other online media will be developed/maintained, particularly during the COVID-19 pandemic, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning activities and provide marketing resources for future development.

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

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

iv. Output(s): 6-9 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the schedule above. The City will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 3-year Cooperative Agreement Contract. Extremely high demand for assessments and site access for some of the highest priority sites in 1.a.ii indicate funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access in anticipation of grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: The costs outlined in Table 4 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. The City will allocate $247,500 to Phase I and II ESAs (or 81% of total grant funding assigned to ESAs).

<table>
<thead>
<tr>
<th>Table 4</th>
<th>Budget Categories</th>
<th>1. Program Mgmt, Training Support, Inv / Prioritization</th>
<th>2. Phase I / II ESAs</th>
<th>3. Clean-up / Reuse Planning</th>
<th>4. Community Outreach &amp; Involvement</th>
<th>Budget Category Total</th>
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<tbody>
<tr>
<td>Travel</td>
<td>$3,000</td>
<td></td>
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<td></td>
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<td>Contractual</td>
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<td>$12,700</td>
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<td>$305,700</td>
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<tr>
<td>TOTAL BUDGET</td>
<td>$15,300</td>
<td>$247,500</td>
<td>$30,000</td>
<td>$12,700</td>
<td></td>
<td>$305,700</td>
</tr>
</tbody>
</table>

Table 4 only includes budget categories with costs. *In accordance with Federal, State, and local procurement regulations.

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

1. Program Management & Training Support, Inventory/Prioritization: $15,300 – Travel: Attend National Brownfield Conf.: airfare x 2 @ $1,000, 2 rooms, 3 nights lodging @ $1,400, meals @ $450, ground transportation @ $150 = $3,000, Contractual: total $12,300, includes approximately 100 hrs. $77/hr. = $7,700 for inventory, and approximately 60 hours $77/hr. = $4,600 for program management.

2. Env. Investigation: $247,500 – Contractual: 10 Phase I ESAs at an average cost of $3,750 each = $37,500, & 6-8 Phase II ESAs at an estimated cost of $25,000-$45,000 (depending on site complexity/environmental conditions) = $210,000 (@ $30,000 average cost). Though our budget will support 10 Phase I’s and 6-8 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Reuse Planning: $30,000 – Contractual: 5-10 ABCAs/clean-up plans expected to cost $3,000-$6,000 each = $30,000.

4. Community Outreach & Involvement: $12,900 – Supplies: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = $200, Contractual: approx. 165 hours at an estimated $77/hr. = $12,700.

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

4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organization Capacity, ii. Organizational Structure & iii Description of Key Staff: Sullivan’s Redevelopment Commission (SRC) will manage this grant. This office has previously managed many other economic development projects valued at well over $20M in the past 10 years. The SRC, along with other city staff, have the technical, budgetary, and administrative ability in place to implement this grant project successfully. Ms. Alanna Luttrell, City Grant Coordinator, will serve as the City’s Project Manager. Ms. Luttrell has played an important role in the success experienced by the City since she began her tenure in 2019. She manages all of our current funding assistance programs. Ms. Luttrell will be supported by Mayor Lamb and Jim Exline, President of the SRC. Both Lamb and Exline have extensive experience in brownfield redevelopment and have provided similar support for other redevelopment and brownfields initiatives for the City. Together, they will complete all technical and administrative requirements of the grant (quarterly reports, MBE/WBE reporting, annual financial reports, ACRES entries, etc.), ensuring grant funds will successfully be expended in a timely fashion and leveraged most effectively. Ms. Sue Pitts, Sullivan Clerk-Treasurer will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. Ms. Pitts has over a decade of experience managing the financial responsibilities of funding assistance programs for the City. She will be assisted by Ms. Lisa McCammon, Deputy Clerk/Treasurer.

4.a.iv. Acquiring Additional Resources: City staff has a history of working cooperatively with state and federal environmental agency personnel and procuring contractors including QEPs. Through a competitive proposal and procurement process, the City will select a QEP experienced with EPA Brownfields Grant funded projects and working with the Indiana Department of Environmental Management (IDEM) and the Indiana Brownfields Program. The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 3-year project period. This team will be supported by other city departments including treasury, utilities, recreation, building commission, and the office of the Mayor. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Technical Assistance for Brownfields (Region 5 TAB program) to maximize the incorporation of community input.

4.b. Past Performance & Accomplishments, i. Currently Has or Previously Received an EPA Brownfields Grant (1) Purpose & Accomplishments: The City previously received an FY19 EPA Community-wide Brownfields Assessment Grant (BF00E02721) for $300K (in-progress/70% complete). Skillful execution of the Work Plan thus far has resulted in inventorying and prioritizing over 20 properties and the successful assessment of five priority sites. Within the next 8 months, we will leverage $500K to demolish and remediate one of our FY19 priority sites (apartment at 324 N Court), with additional future leveraging anticipated. At the time of this submission, all outputs and outcomes related to the grants have been met and are accurately reflected in the ACRES system.

4.b.ii(2) Compliance with Grant Requirements: All completed Work Plan goals, outputs, and outcomes of the FY19 grant have been achieved and all reports, including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc., were completed on time. The City is in full compliance with the terms and conditions of the FY19 grant Cooperative Agreement and 70% of the funds have been expended through the initial 2 years of the grant period. As with the FY19 grant, the City has a clear plan in place for this FY22 grant to aggressively address targeted brownfields and seek firm leveraging commitments to redevelop sites into viable community assets.
III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility
The City of Sullivan meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement
Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community’s Brownfields program’s success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. 6 to 9 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.B.3 Named Contractors and Subrecipients
The City of Sullivan has not procured/named any contractors or subrecipients.

III.B.4 Expenditure of Assessment Grant Funds
Sullivan received a FY2019 EPA Community Wide Brownfields Assessment Grant. Payment was received from EPA (drawn down) for over 70% of that Assessment Cooperative Agreement by October 1, 2021. Documentation is attached.

III.C. Additional Threshold Criteria for Site-Specific Proposals Only
This criterion is not applicable for a U.S. EPA Community-wide Brownfields Assessment Grant application.

III.D. Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes Only
This criterion is not applicable because Sullivan is a local unit of government, not a State or Tribe.