



Narrative Information Sheet – Itawamba County Development Council

1. **Applicant Identification:** Itawamba County Development Council (“ICDC”), a 501(c)3 serving as the regional economic development authority for Itawamba County, with an address of 107 West Wiygul Street, Fulton, Itawamba County, Mississippi 38843, requests consideration of the following EPA Brownfield Assessment Grant proposal.
2. **Funding Requested:**
 - a. **Assessment Grant Type:** Community-wide
 - b. **Federal Funds Requested:** \$500,000
3. **Location:** Itawamba County, Mississippi
4. **Target Area and Priority Site/Property Information:**
 - a. **Target Area(s):**
 - i. Downtown Fulton (Census Tracts 28057950300 and 28057950100)
 - b. **Priority Site(s) Address(es):**
 - i. Cummings Hotel: 118 N. Cummings Street, Fulton, Mississippi 38843
 - ii. Blue Side Café: 114 N. Cummings Street, Fulton, Mississippi 38843
 - iii. Pool Hall: 106 North Cummings Street, Fulton, Mississippi 38843
 - iv. Fulton Tires: 201 N Gaither Street, Fulton, Mississippi 38843
 - v. Public Alleyway: Between 107 N Cummings Street and 110 North Gaither Street, Fulton, MS 38843
 - vi. Gaither Street Commercial Buildings: 103-107 Gaither Street, Fulton, Mississippi 38843
 - vii. Blue Bell Mill: 207 North Gaither Street, Fulton, Mississippi 38843
 - viii. Waterways Quick Stop: Southwest corner of Vo Tech Rd and N Cummings Street, Fulton, Mississippi 38843
5. **Contacts**
 - a. **Project Director:** Ms. Mary Sue Boggs, the Interim Executive Director of ICDC will serve as the Project Director for this proposal. Ms. Bogg’s contact information is as follows: Phone: (662) 862-4571, Email: msboggs@itawambams.com, mailing address: 107 West Wiygul Street, Fulton, MS 38843
 - b. **Highest Ranking Executive Official:** Ms. Mary Sue Boggs, the Interim Executive Director of ICDC will also serve as the highest-ranking executive for this proposal. Ms. Bogg’s contact information is as follows: Phone: (662) 862-4571, Email: msboggs@itawambams.com, mailing address: 107 West Wiygul Street, Fulton, MS 38843
6. **Population:**
 - a. Itawamba County’s Population: 23,396 (2020 Decennial Census)
 - b. Priority Site(s) Population:
 - i. Cummings Hotel: (The City of Fulton) Population: 3,968
 - ii. Blue Side Café: (The City of Fulton) Population: 3,968
 - iii. Pool Hall: (The City of Fulton) Population: 3,968



- iv. Fulton Tires: (The City of Fulton) Population: 3,968
- v. Public Alleyway: (The City of Fulton) Population: 3,968
- vi. Gaither Street Commercial Buildings: (The City of Fulton) Population: 3,968
- vii. Blue Bell Mill: (The City of Fulton) Population: 3,968
- viii. Waterways Quick Stop: (The City of Fulton) Population: 3,968

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
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).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	3-4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3-4
At least 30% of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	8-9
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority:

See attachment.

9. Releasing Copies of Applications:

NA; No portions of the application are confidential.



State of Mississippi

TATE REEVES
Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

October 13, 2023

Ms. Mary Sue Boggs
Interim Executive Director
Itawamba County Development Council
107 Wiygul Street
Fulton, MS 38843

**RE: EPA Brownfield Grant Application Acknowledgement
FY24 104(k) Community-Wide Assessment Grant
Itawamba County Development Council**

Dear Ms. Boggs:

The Mississippi Department of Environmental Quality (MDEQ) hereby acknowledges Itawamba County Development Council's (ICDC) plans to conduct brownfield assessments and apply for federal grant funds through the United States Environmental Protection Agency's (EPA) Brownfields initiative. MDEQ believes the targeted areas within the ICDC community are in considerable need of brownfield assessment and future redevelopment opportunities.

Since many brownfields are abandoned, underutilized, and contaminated, MDEQ is expressly interested in seeing entities like ICDC taking the initiative to assess, remediate, and return these sites to productive use. These efforts are consistent with our mission to safeguard the health, safety, and welfare of present and future generations of Mississippians. We look forward to our continued role in the ICDC's Brownfield Initiative and are available to assist you at any time. Should you have any questions or comments concerning this matter, please contact me at (601) 961-5240.

Sincerely,

Thomas L. Wallace

Thomas L. Wallace, P.E.
Division Chief – GARD
Mississippi Brownfield Coordinator

OFFICE OF POLLUTION CONTROL

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AN EQUAL OPPORTUNITY EMPLOYER

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Nestled within Mississippi’s Hill Country, Itawamba County is located in the northeastern corner of the state. The County is situated 130 miles southeast of Memphis, TN and shares a border with Alabama. In 1836, the Mississippi Legislature created the County from land secured from the Chickasaw Nation, naming the County after a prominent Native American leader. An influx of migrants, mainly European-Americans from Central Appalachia, later settled the area. With a population density half that of the United States average, the County’s sparse population has severely hindered economic growth. Itawamba has experienced an ongoing growth and bust pattern since its founding due to the rise and fall of local manufacturing industries. Composed mainly of unincorporated communities and numerous ghost towns, the County is home to 3 incorporated communities: Fulton, Mantachie, and Tremont. The City of Fulton is the County’s only city and serves as the county seat.

Today, the County is home to approximately 23,000 residents (American Community Survey (ACS), 2021). A relatively recent trend of steady population growth has allowed the County to invest in crafting economic strategies, which has included the conception of the Itawamba County Development Council (ICDC). The non-profit strives to create a better quality of life for County citizens, through attracting new residents, businesses, and tourists. Prior to 2014, the Council encompassed the Itawamba Port Commission and Itawamba Rail Authority. The Council worked tirelessly to obtain necessary infrastructure to secure industrial businesses which today are responsible for providing numerous employment opportunities. Following the 2014 split, the Council has re-evaluated its priorities, shifting emphasis to redeveloping brownfields, revitalizing Downtown Fulton and historical town centers, preserving greenfields, and promoting sustainability. As a part of this initiative, ICDC has established a brownfield inventory of 61 sites by compiling data garnered from regulatory databases and individual communities. From the established inventory, **North Downtown Fulton** has been selected as the brownfield program’s focus and Target Area.

The City of Fulton has the largest population within Itawamba (pop: 4,036 (ACS)) and is geographically centered within the County. The Tombigbee River and Tennessee-Tombigbee Waterway flow south along the western third of the County, bordering Fulton to the west. Target Area boundaries include the City’s proposed Art and Entertainment District, a 9-block area with Main Street at its southern border. The Target Area then extends a half mile north along the primary north/south corridor of Cummings Street, leading into the largest populated disadvantaged census tract within the County (Climate and Economic Justice Screening Tool (CEJST)). This stretch of Cummings Street is the primary gateway from the north into the downtown, and the Art and Entertainment District. Within and a half mile from the Target Area, approximately 1,267 residents call the area home (EPA Environmental Justice Screen (EJ SCREEN)). This population consists of the highest minority population within the County, (28%; 4x that of the County-wide percentage), and 29% of residents are considered low income (earning \$25,000 or less annually) (Census, EJ Screen) . The Art and Entertainment District within the Target Area is characterized by narrow streets and short blocks, lined with one and two-story brick buildings. Diagonal parking, awnings, glass storefronts, and sidewalks welcome the casual shopper or pedestrian. Just north of the commercial buildings, the landscape shifts abruptly as density decreases and sidewalks vanish. Here, residential dwellings and industrial warehouses intermingle, and the area generally lacks a distinguished sense of character. The landscape of the northern portion of the Target Area is transitional, as commercial buildings disappear and forests, waterways, and residential homes dominate.

The long-standing lack of investment has resulted in blight, depressed property values, and brownfield sites. To establish a community vision for the Target Area and prioritize and assess brownfields throughout the entirety of Itawamba County, ICDC is applying for an EPA Brownfield Assessment grant. ICDC is determined to utilize placemaking tactics to redevelop Fulton’s brownfields and encourage local craftsmanship to pave the way for community revitalization. This redevelopment will strengthen the local economy, and in-turn, support the County’s existing population by ways of employment, well-being, and health. Due to the high number of brownfields within the County, ICDC is requesting a \$500,000 community-wide assessment grant to both carry out the projects described within this application, as well as assess sites identified within the secondary inventory.

ii. Description of the Priority Brownfield Sites

Within the Target Area of North Downtown Fulton, 10 vacant brownfields have been inventoried which consist of commercial, light industrial, and warehouse buildings. From this inventory, 6 properties were identified as priority sites. These sites were carefully selected based on community input and environmental, economic, and human impacts. Moving from southwest to northeast, the first priority site consists of 3 adjoining commercial buildings on Cummings Street. Spanning a total of 0.19 acres, the vacant buildings include a single story former Pool Hall (1,933 SF), two-story Blue Side Café (2,155 SF), and vacant three-story former Cummings Hotel (2,853 SF). It is believed that all 3 buildings were constructed in the 1930s, therefore, Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP) are likely incorporated within the buildings materials. Historical uses included an auto repair garage and a blacksmith shop. Operating prior to environmental regulations, soil contamination from general hazardous substances and petroleum products is to be expected. Additional redevelopment challenges are found within the Cummings Hotel, as the building suffers from structural damage and a faulty roof. Regular flooding within the building has allowed mold and mildew to flourish. The **Cummings Street Commercial Buildings** are a priority because they hold great revenue potential, possess complimentary redevelopment plans, and an opportunity to increase access to jobs for our residents.

Moving to the northeast, at the center of the Target Area, is the former **Fulton Tires** property. Operating between 1953 and 2006, the vacant, deteriorated buildings consist of a commercial office, hugged on either side by an auto garage. The narrow, tightly crowded lot consists of 0.34 acres. Historical interior waste streams associated with the former service garage operations would have consisted of general hazardous substances and/or petroleum products. A portion of this time preceded major environmental regulations and current waste management and disposal procedures. The historical waste management practices

are unknown and may be a source of subsurface contamination. Furthermore, automotive waste is both a direct contact and inhalation hazard; and is a probable human carcinogen, causing rashes, anemia, and nervous system impairment (Agency for Toxic Substances and Disease Registry (ATSDR)). Additionally, due to the build date, the presence of ACMs and LBP are also likely hazards found within the buildings. In addition to its blighted and likely contaminated condition, Fulton Tires is a priority site because the site acts as a focal point within the Target Area, geographically connecting the priority sites and future redevelopments. Furthermore, the property is adjoined by a church and a residence, posing greater risk to our residents for direct contact and vapor inhalation exposures. The 3rd priority site, a **Public Alleyway**, is situated between Cummings and Gaither Streets, across from Fulton Tires. The property is adjoined by multiple historic environmental concerns including a former gas station, dry cleaner, and grist mill directly east of the Public Alleyway. Operating prior to environmental regulations, petroleum products, general hazardous materials, and Perchloroethylene (PERC), a common dry cleaning solvent, may have migrated onto the site. The Public Alleyway is a priority site because the space further improves the connectivity of Downtown while providing an outdoor gathering space for the public. Assessment of this area can also inform if neighboring businesses are unknowingly exposed to contaminants. To the east are the **Gaither Street Commercial Buildings**. Built in 1940, the property consists of three vacant and adjoining commercial buildings. The properties' former uses included a beauty store (closed in 2017), cabinet manufacturer (operating 2014-2017), and screen/newspaper printing (closed in 2017), where the Itawamba Times was formerly printed. Each building spans approximately 2,845 SF for a total square footage of approximately 8,535. The single-story buildings' façades consist of red and tan brick, varying roofline heights, and an assortment of mismatched doors. Both furniture manufacturing and screen/newspaper printing utilize chlorinated solvents, which are used to clean machinery and strip furnishes, and other Volatile Organic Compounds (VOCs) and organic Hazardous Air Pollutants (HAPs) (EPA). These carcinogenic compounds can cause conjunctival irritation, headache, nausea, damage to the liver, kidney, heart, central nervous system, and immune system (EPA). The Gaither Street Commercial Buildings are a priority site because a developer purchased the properties in 2021 and is currently exploring pre-development planning for the buildings. Assessment activities will assist in driving development forward.

The 5th priority site is located on the northeastern edge of the Target Area. The **Blue Bell Mill** is adjoined by industrial, municipal, commercial, and residential properties. The single-story red brick building sits on a 1-acre parcel and was constructed in 1952. The non-assuming facility spans approximately 20,000 square feet and sports a single loading dock, a tall coal chimney, and a domed roof with internal structural latices. Mill operations primarily consisted of cutting fabric, which in turn would later be sewn to create clothing for numerous well-known brands, such as Wrangler and JanSport. The mill closed in 1986 and the building currently serves as a privately owned storage space. Due to the building's construction date, ACMs and LBP are likely incorporated throughout the structure. Furthermore, the property is likely polluted with chlorinated solvents which are frequently used to degrease cutting and sewing machinery. (Associated VOC health effects are noted within the Gaither Street Commercial Buildings section above.) Historic heating sources specific to the Mill, such as coal and diesel fuel are also cause for concern. Coal and ash may have been buried on site, leaching heavy metals, causing surficial soil contamination. Diesel fuel contains Polycyclic Aromatic Hydrocarbons (PAHs) and other Semi-Volatile Organic Compounds (SVOCs), and exposure to such chemical compounds through ingestion or vapor intrusion can lead to serious health conditions. Diesel fuel, a possible carcinogen can cause reproductive health complications, birth defects, low body weight, lung cancer, skin cancer, stomach cancer, and asthma (World Health Organization). The Mill is flanked by residential properties, with the closest home only 160 feet away. In addition to the proximity to residences and a need to understand potential environmental impacts, the Mill is also a priority site because its reuse is a key component to the proposed Art and Entertainment District. With a developer in place, assessment is the next step towards redevelopment. The 6th and final priority site is located half a mile north of the site groupings, along Cummings Street corridor. As a gateway site, the former **North Road Market** fueling station is estimated to have operated between 1977 and 2007; briefing reopening between 2018 and 2019. The 0.75 acre property is now vacant, the majority of the cracking concrete is covered by vegetation, which is all that remains of the abandoned gas station. Vacant fields, forests, and residential properties surround the Quick Stop. According to the Mississippi Department of Environmental Quality's (MDEQ's) GUARD Database, the facility has inactive underground storage tanks remaining which was reported to have a release. While the release was "closed", residual impact from closed USTs in Mississippi often still remains. Additionally, impact may have migrated into the nearby Cummings Creek, which is only a distance of 380 feet away. Further reason for concern is the fact that Fulton's drinking water is sourced downstream from this site, at a distance less than three miles. The consumption of water contaminated with petroleum products can cause health effects that include irritation of the throat, stomach, skin, and eyes, central nervous system depression, and difficulty breathing. Some compounds found in petroleum products can also affect the blood, immune system, liver, spleen, kidneys, developing fetus, and lungs (CDC). North Road Market is a priority site due to its location as a gateway to the Downtown and within a disadvantaged Census Tract, placing residents at risk for potential health implications.

iii. Identifying Additional Sites

ICDC will develop a site nomination form and evaluation process to appropriately rank and select candidate sites to ensure the prioritization of underserved communities, and projects within our disadvantaged census tracts. The site nomination form will be used as a first step for the ICDC to gather information about a project. At a minimum, the form will request the following information: A) site location and degree to which underserved communities are being served, B) proposed uses and ability to address specific community needs (i.e. affordable housing, grocery stores, health care, etc.), C) site history; perceived or actual degree of contamination, D) level of future/obtained investment, and E) future economic impact; potential to catalyze additional redevelopment projects and estimated job creation and tax base increase. Site nomination forms will be publicly available (i.e., at public meetings and online) so that the community can nominate sites. A scoring system will be utilized to provide more weight to the projects that will support underserved communities. Nomination forms will be readily available online, in our offices, and

at all public input meetings as described within section 2b. Each public meeting will begin with an opportunity to identify sites and discuss with the public. Our community partners will also maintain the form for distribution to the residents they represent.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The Target Area and priority sites were chosen based on both regional and Target Area specific planning efforts. Three Rivers Planning & Development District (TRPDD) a regional planning district that encompasses the county, published their 2017-2021 Comprehensive Economic Development Strategy (CEDS) to guide regional planning and implementation. Goals from the CEDS include 1) strengthening and diversifying local and regional economies within new and emerging sectors, job opportunities, and entrepreneurship, 2) improving quality of life measures such as health care, housing, and cultural and recreational opportunities, and 3) creating local comprehensive plans to strengthen regional competitiveness. Additionally, Mississippi Main Street in tandem with the Fulton Main Street Association, recently completed a Downtown Roadmap, providing the City with a strategic framework or “roadmap” for short-term downtown revitalization activities which include the following: A) create and improve downtown destinations, B) landscape and beautification, C) improve building appearances, and D) attract new businesses and uses. The redevelopment plans for the Cummings Street buildings is based upon the Main Street Roadmap planning documents. As the **Cummings Hotel** is beyond repair, following ACM abatement, the City of Fulton will fund the building’s demolition. A local developer plans to construct a new, three-story, energy-efficient boutique hotel and ground level coffee shop on the lot. The hotel will keep its namesake, thus preserving the area’s history. The new businesses will meet CEDS goal 1 and Roadmap goals A and D. To the west, the former **Blue Side Café** will be renovated to serve as a restaurant once again, meeting goals 1, 2, A, C, and D. The neighboring former **Pool Hall** will be redeveloped as retail space, providing sought after Downtown store frontage and meeting goals 1, 2, A, B, C, and D. Visioning for **Fulton Tires** includes demolishing the existing buildings to construct a three-story mixed-use building. Sustainable materials and energy-efficient appliances and fixtures will be utilized. The ground level would be occupied by retail to further activate the streetscape and the second and third floors would provide additional apartment housing for both college and retirement populations. Housing within Downtown is limited, and the nearby expansion of Itawamba Community College puts rental housing in high demand; therefore, these new apartments will help ease the demand, meeting goals 1, 2, A, C, and D. Approximately 13,000 square feet will be reserved as a parking lot for patrons and residents.

Local planning has determined that reclaiming the **Public Alleyway** would best be suited as a public gathering space, thus meeting goals 2 and B. Next, following assessment, the owner of the **Gaither Street Commercial Buildings** has conveyed interest in redeveloping the southernmost building (former print/newspaper press) as a restaurant and redividing the two northern properties (former beauty store and cabinet shop) to create studio apartments. These developments will meet goals 1, 2, A, C, and D. A developer has initiated redevelopment efforts for the **Blue Bell Mill**, with plans to create a mixed-use space featuring local expanding retailers, a brewery, and restaurant. As the surrounding area lacks defined zoning, the location is perfectly suited for a mixed use development, serving a wide range of needs. Of the 20,000 square foot building, approximately 3,000 SF of former office space will be converted into retail. Retailers will include Porch Swing Pickings (an antique store) and 2 Girls Pickin’ (an Amazon product resale operation). An estimated 8,500 SF will be dedicated to brewing artisanal beer. The remaining 8,500 SF will become a restaurant and bar where live music will be regularly scheduled. Original finishes and hardware will be reused where appropriate to create a trendy, industrial space. Future renovation plans for the building include constructing an 18,000 SF 2nd story addition to provide conveniently located apartment units. The redeveloped Blue Bell Mill will meet goals 1, 2, A, C, and D. Finally, **North Road Market** is envisioned as once again serving as a market space with deli, providing quick lunch options for those working within Fulton’s Industrial Park to the north or those visiting or working in the downtown, meeting goals 1 and D. To ensure a comprehensive downtown redevelopment strategy, a Community Wide Revitalization Plan will also be prepared under the grant, meeting CEDS goal 3. ICDC will hire a planner to collaborate with community stakeholders to identify or refine reuse goals, stakeholders, and funding opportunities. Site assets and limitations, as well as neighborhood features will be considered to provide realistic redevelopment scenarios that incorporate community needs and objectives. The final document would be used to secure project developers and funding where lacking.

ii. Outcomes and Benefits of Reuse Strategy

The resulting investments will improve walkability throughout the Target Area (thus addressing climate change concerns by reducing driving and CO2 emissions) and provide additional revenue through commercial spending, employment, and property taxes. Additionally, the investments will act as a catalyst for future redevelopment and the new housing stock will ease current housing strains within the City. These benefits will further guarantee the long-term success of the proposed projects. On the whole, the investments aim to improve quality of life for local residents while simultaneously strengthening the County’s economic resiliency. Furthermore, policies within the MS Emergency Management Agency District 2 Regional Hazard Mitigation Plan, published by TRPDD discusses a risk assessment for Itawamba County, which includes: hazard identification, hazard profiles, and a vulnerability assessment. The risk assessment aims to protect local life, property, and public resources. Finally, ICDC will make concerted efforts to promote local job placement to ensure equitable employment opportunities by partnering with Itawamba Community College (see section 2bi/ii and 4aiv). Additional outcomes and benefits are outlined below.

Priority Site(s)		Building Reuse	Outcomes and Benefits
Cummings Street Properties	Hotel/Coffee Shop	N/A: new hotel of 7,059 SF and coffee shop of 1,500 SF	5 jobs** & \$245,280 in 1st yr. revenue**, 4 jobs; increased property tax revenue
	Restaurant	YES: restaurant (~2,155 SF) building reused	13 jobs** & \$700,144 in 1st yr. revenue**, increased property tax revenue; 3% special restaurant tax

	Retail	YES: retail (~1,933 SF) building reused	2 jobs* & \$700,144 in 1st yr. revenue**; increased property tax revenue
Fulton Tires		N/A: new build: 5,500 SF retail; 11,000 SF rentable living space;	4.5 jobs*; \$80,880 in 1st yr. revenue; increased property tax revenue
Public Alleyway		N/A	Improved connectivity Downtown; Free public greenway space with landscaped elements, including a rain garden to help mitigate climate change; construction jobs will be created and spending from increased foot traffic will benefit nearby businesses
Gaither Street Commercial Buildings		YES: ~6,500 SF of 3 existing buildings reused	12 jobs*; 2,845 SF restaurant; 5,690 SF rentable living space; 3% special restaurant tax
Blue Bell Mill		YES: existing 20,000 SF building reused + ~18,000 SF new addition	39 jobs*; 3,000 SF retail; 8,500 SF restaurant; 8,500 SF brewery; new addition: 18,000 SF rentable living space; opportunities for entrepreneurship growth; community event space; improved walkability, thus reducing reliance on personal automobiles, reducing CO2 emissions, easing climate change; 3% special restaurant tax
North Road Market		N/A; new market (~6,000 SF)	Remediate potential drinking water contamination; ~6,000 SF market/deli to provide convenient food options for Fulton residents, the majority of which live within a low [food] access census tract; 3% special restaurant tax

* U.S. Energy Information Administration

** Mississippi State University Extension- Center for Government and Community Development

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

To prioritize investment, this grant will provide assessment dollars to position properties for reuse and determine what, if any, remediation needs exist. Following assessment, the available incentives and grants listed below will allow ICDC and partners to maximize the leveraging of resources within the Target Areas. ICDC will be eligible to apply on behalf of or in partnership with another municipal entity and/or developer for all leveraging resources.

Funding Source	Purpose /Role (Assessment/Remediation/Reuse)
The City of Fulton	Reuse: The City of Fulton is prepared to allocate approximately \$12,000 (the in-kind contribution cost is based on previous jobs) to demolish the Cummings Hotel as the building is structural unsound. An ACM survey/potential ACM cleanup is required prior to demolition.
ICDC: Fixer Up Grant	Reuse: The Fixer Up Grant assists small, ICDC member businesses in making aesthetic improvements to their storefront. The grant provides reimbursement for up to 50% of eligible costs, not to exceed \$1,000 per project. Funding would allow businesses relocating to the Blue Bell Mill, Blue Side Café, or Former Pool Hall to customize their storefront, thus expanding customer bases.
National Association of Realtors: Placemaking Program	Reuse: This program allocates grant funds between \$1,500 and \$5,000 to create an outdoor public lounge space for the proposed alleyway investment. The space will provide an area for the public to gather, eat, and enjoy art; activities which will increase community livability and support Downtown revitalization. ICDC will be eligible to apply for the grant on behalf of or in partnership with another municipal entity or a developer. Eligible activities include street furniture, paint, signage, material, landscaping, mural, site preparation, etc.
Itawamba Friends of Itawamba Responding to Secure Tomorrow (FIRST) Foundation	Reuse: Established in 2008, the local nonprofit coordinates charity efforts to invest in the well-being of Itawamba County by funding cultural, recreation, education, transportation, and food security programs. With a rolling deadline, ICDC will apply for up to \$10,000. Funding will be used to create signage, and install benches, trash receptacles, and craft lighting throughout the Target Area, creating an Arts District which will function as a regional destination.
U.S. Department of Housing and Urban Development: Community Development Block Grant (CDBG)	Reuse: CDBG program provides flexible funding (up to \$600,000) that the city of Fulton or Itawamba County could apply for to carry out a wide range of community development activities directed toward neighborhood revitalization, economic development, and improved community facilities/services. Funding would be prioritized to install sidewalks and lighting throughout the Target Area so as to improve walkability and safety.
MS Development Authority (MDA): MS Economic Redevelopment Act (MERA)	Remediation: MERA would divert sales, income, and franchise taxes collected from businesses located in the redevelopment project area to reimburse costs of environmental cleanup. The Developer would be reimbursed at 2.5 times the cleanup costs. The project must first be approved by Mississippi Department of Environmental Quality (MDEQ) and MDA.
MDEQ: EPA Revolving Loan Fund Grant	Assessment/Remediation: MDEQ was awarded a \$1 million Revolving Loan Fund Grant from the EPA in FY22. Under this Grant, the City of Fulton is eligible as a sub-entity to receive funding for assessment and/or remediation.

ii. Use of Existing Infrastructure

ICDC will utilize current municipal and building infrastructure wherever possible in order to prioritize funding and sustainability. All priority brownfield sites have direct access to municipal utilities that are readily available. These utilities include municipal water, sanitary sewer, natural gas, electrical, and high-speed telecommunications. However, sites will require updated connections, funding via future developer investment. Street and/or onsite parking is available for all priority sites. CDBG funds will be applied for to install sidewalks and lighting throughout the Target Area.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

Despite extremely low unemployment rates, Itawamba County’s small population experiences high poverty rates (9.9%) (ACS). These indicators convey that most residents are earning low wages at their place of employment. Poor compensation, compounded with a lack of economic diversity has created communities with limited entrepreneurial and consumer opportunities. The stagnant landscape offers little to support county-wide revenues. Furthermore, it should be noted that the vast majority (73%) of the County's population lives in an unincorporated community (ACS). Therefore, huge amounts of taxes are forfeited, leaving the County with a stifled operating budget. With a limited budget, the local government is forced to focus on providing only essential governmental services (i.e., police, fire, public utilities, etc.) and does not have the additional budget to assess potential brownfield sites. ICDC itself is a non-profit organization, funded through membership dues. ICDC’s budget is carefully allocated to equally provide its communities with contractually agreed upon planning and economic development services. The cost to assess brownfield sites poses a large financial burden for the small community developers and businesses and is not something our organization can offset within our standard budget. Additionally, these brownfields are contributing very little to the local tax revenues. Redevelopment of the target area would provide new property, personal, and sales tax revenue for communities to invest in future economic development.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Children and low income individuals have been identified as sensitive populations within the Target Area and a portion of the Target Area is defined by EPA’s Climate and Economic Justice Screening Tool (CEJST) as disadvantaged. Sitting north of Downtown Fulton and encompassing the North Road Market, Census Tract 28057950100 ranks 89th percentile in low income, 89th in lack of indoor plumbing, 89th in transportation barriers (average of relative cost and time spent on transportation), and 69th in wastewater discharges. While Downtown Fulton Census Tract 28057950300 is in the 83rd percentile for wastewater discharges and 79th percentile for people in household with incomes at or below 100% of the Federal poverty level. Wastewater discharges, coupled with high poverty, and a lack of indoor plumbing is a cause for concern as many in this position utilize groundwater for washing and consumption, which is problematic considering the volume of wastewater discharges that are likely contaminating groundwater reserves. Furthermore, transportation barriers decrease the likelihood of individuals traveling to obtain both potable water and healthcare. The per capita income for the Target Area hovers at only \$32,385 (compare this number to the average U.S. per capita income of \$37,638) and Itawamba County residents are 37% more likely to be without health insurance than the average American (EJ SCREEN; ACS; CHR). These factors combined, makes accessing health care an overwhelmingly expensive pursuit for Fulton residents. Redevelopment following a successful assessment will reduce environmental threats, strengthen the economy, and provide communities with financial resources to alleviate welfare hardships and care for sensitive populations. Within the Target Area, all proposed projects will result in new jobs for our residents, providing access to health insurance to those that are currently uninsured. Furthermore, these developments will increase residential housing stock, thus easing the economic stress of finding housing. Finally, remediating environmental contamination throughout the Target Area will eliminate health risks to sensitive populations living nearby.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

In 2022, Mississippi was ranked as having the 2nd worst overall health outcomes out of all states by America’s Health Rankings (United Health Foundation). Health outcomes include cancer deaths, cardiovascular deaths, diabetes, disparity in health status, frequent mental and physical distress, infant mortality, and premature death. This statement is backed by statistics published by County Health Rankings (CHR). Itawamba’s premature death rate is 25% higher than the Top U.S. Performers (CHR). This measure can be traced back to poor diet, lack of exercise, environmental contaminants, and inadequate medical care. As childhood health is a good indicator for a community’s general well-being, consider the March of Dimes 2022 Premature Birth Report Card graded the State of Mississippi as an “F”. The premature birth rate for the state is 15.0% and the infant mortality rate is 8.3 per 1,000 live births (March of Dimes). Compare the state’s infant mortality rate to the national average of 5.4 to find a discrepancy of 42.3% (March of Dimes). Additionally, statistics published by the CDC (2016-2020), show elevated rates of new cancer diagnoses and cancers deaths related to liver and intrahepatic bile duct and lung and bronchus. Itawamba County residents were diagnosed with liver cancer 43.5% more often than the average American and died from this illness 92.3% more often (<https://gis.cdc.gov/Cancer/USCS/#!/StateCountyTerritory/>). Liver impairment could possibly be traced back to chlorinated solvents found at the Blue Bell Mill, cabinet manufacturer, and printing buildings, or petroleum products found at North Road Market. Furthermore, County resident deaths related to diseases of the nervous system are 68.6% more prevalent than compared to the national average (CDC Wonder, 2018-2021). This statistic is a cause for concern as nervous system impairment may be correlated to several priority brownfields, where contamination includes auto waste oil (Fulton Tires) and chlorinated solvents (Blue Bell Mill, cabinet manufacturer and screen/newspaper printing shop). It should be noted residential homes, a church, and a park are located mere feet from priority sites. Within the downtown portion of the Target Area (Census Tract 28057950300) populations are in the 91st percentile for low life expectancy, and 73rd percentile of people who have asthma; within the northern

portion of the Target Area (Census Tract 28057950100) asthma increases to the 75th percentile and heart disease becomes more prevalent in the 89th percentile. The successful identification of contaminants will contribute to identifying and mitigating causes of elevated diseases, cancers, and premature death, leading to long-term public health improvements within the County.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

According to CEJST, a portion of the Target Area is located within a disadvantaged Census Tract and nearly 30% of residents in the Target Area are considered low income (earning \$25,000 or less annually) (EJ SCREEN). On average, 24% of residents in Census Blocks 280579503001 and 280579501001 have less than a high school education (CEJST). The cumulative result of these environmental and socioeconomic disparities is a major environmental justice issue in our County and includes **low life expectancy** – the low life expectancy percentage for residents in the Target Area is significantly elevated and in the **92nd percentile nationwide**. These disparities came about, in part, due to global trade policies, which have forced businesses within the Target Area to compete within the international market. In an effort to maintain and attract additional industry, the local and state government have implemented overly competitive tax breaks for corporations, which in turn, place additional strain on local budgets as they attempt to balance present finances and future prosperity (<http://itawambams.com>). The sustained hardship has forced once viable commercial and industrial companies out of business and resulted in blighted, underutilized, or vacant properties in the Target Area. These brownfield properties which once progressed the County forward have created environmental liabilities which unfairly impose health and safety hazards upon our struggling communities and vulnerable populations. Within the Target Area, low income and minority populations live and work in close proximity to these brownfields and numerous homes are merely feet away from priority sites.

(b) Advancing Environmental Justice

This grant will assist ICDC in locating environmental hazards throughout the Target Area. Following assessment, additional financial resources will be utilized to eliminate exposures. The consequential redevelopment will create job opportunities for the County as we fight to become competitive in the regional market. New job opportunities along with remediation of the contaminated brownfields will help to alleviate both environmental and economic stressors for our low-income minority populations by providing adequate, equitable employment and livable wages in a clean, revitalized community. No businesses nor residents will be displaced by the planned assessment and future reuse plans for the priority site. To minimize the potential for unintended displacement, ICDC will work with our local governments and community-based organizations such as the Itawamba Rural County Development Councils to incorporate strategies through planning and visioning that preserve affordable housing and small business opportunities in the Target Area. Such efforts will include providing ample notice for any required relocation, providing relocation costs, and assisting businesses/residents in identifying alternative locations that are of similar or better circumstances.

b. Community Engagement

i. and ii. Project Involvement and Project Roles

A table with names and contact information for partners providing their commitment to the brownfield program is provided below. ICDC will continually build upon this list to ensure inclusion of all stakeholders.

Organization & Point of Contact	Role
<p>GWC Properties, Inc. & “Porch Swing Pickings” Antique Store Jimmie Wilson, Owner (662) 401-7650 [REDACTED]</p>	<p>Mr. Wilson owns multiple companies, including Porch Swing Pickings and GWC Properties, Inc. Mr. Wilson has completed numerous renovation and new build projects throughout the County and his high-quality craftsmanship has gained him a strong positive reputation among locals. He is currently strategizing long-term redevelopment plans for the Blue Bell Mill. As one of the Target Area Developers, Mr. Wilson will participate in the Brownfields Advisory Committee (BAC), aiding with various aspects and phases of the Mill project, including community engagement, public meetings, and providing input on upcoming decisions for future reuse.</p>
<p>Itawamba Rural County Development Councils (RCDCs) Carolina President: Teresa Blake teresa.blake@journalinc.com Pleasant Grove President: Larry Nichols (662) 963-1421 Ryan’s Well President: James Dickens (662) 213-8176 Houston Community President: Karen Burns [REDACTED]</p>	<p>Itawamba’s RCDCs act as informal governance for the following unincorporated communities: Carolina, Pleasant Grove, Ryan’s Well, and Houston Community. Since 1925, the RCDCs have provided an avenue for the scattered communities to come together to express concerns, solve common problems, raise funds for area needs, and socialize. RCDC’s assistance with community engagement will be critical for dispersing and collecting project-related information. The councils will discuss the project as a whole as well as site selection, which will be determined by reuse potential, contamination levels, and proximity to individuals, during regularly held “town hall meetings” which take place at local community centers.</p>
<p>Daniel Chavez, Property Owner and Developer (662) 322-1340</p>	<p>Mr. Chavez owns and plans to redevelop the Gaither Street Commercial Buildings. As a project partner, Mr. Chavez will participate in the BAC, aiding with various aspects and phases of the Cummings Street project, including community engagement, public meetings, and providing input on upcoming decisions for future reuse.</p>

<p>First United Pentecostal Church Billy Burselson, Reverend (662) 862-2877 [REDACTED]</p>	<p>With a congregation of approximately 1,200 people, First United Pentecostal Church is located within the Target Area. The Church will aid with various aspects and phases of the project (for all priority sites), including community engagement, public meetings, and providing input on upcoming decisions for future reuse.</p>
<p>Itawamba Community College (ICC) Nina Strother, Director of Marketing and Community Engagement (662) 862-8242 njstrother@iccms.edu</p>	<p>Located just west of the Target Area, ICC will encourage student engagement through communicative fliers, website postings, and word of mouth. Additionally, ICC will aid in the larger community engagement, particularly for the Fulton Tires and Blue Bell Mill redevelopments as additional housing opportunities will benefit the college student population. Finally, ICC will assist ICDC in coordinating locals with quality employment opportunities as a result of this grant through their Workforce and Development Training department.</p>
<p>Farmer Morgan Ben Farmer, Principal (615) 761-9002 bfarmer@farmermorgan.com</p>	<p>Farmer Morgan is an architectural design firm that will assist in creating reuse plans for the AWP. As such, they will host the charrettes, leading the public engagement. During these events, Farmer Morgan will record and later publish public input. They will also create renderings and proformas for redevelopment.</p>

The EPA Mississippi Department of Environmental Quality (MDEQ), and Itawamba County Health Department are also established partners and/or will be involved throughout the grant cycle, each contributing to their own capacity. Specifically, MDEQ will be responsible for assisting in community engagement and education, the technical review and approval of documents, including the Generic Quality Assurance Project Plan (GQAPP), as well as assisting the City, ICDC, and grant partners with applicable cleanup incentives.

iii. Incorporating Community Input

Following this grant’s award, a project kick-off meeting will be held. This meeting will provide an opportunity to establish a Brownfield Advisory Committee (BAC) consisting of representatives from local stakeholders. The Committee will review projects and make decisions to prioritize site assessments based upon the hierarchy explain within section 1.a.iii., above. The kick-off meeting will also outline the goals of the grant, how local residents and business owners can provide public input and how the funds can be utilized, ensuring an educated public and allowing for additional community involvement. Ongoing communication throughout the life of the grant will be conducted in a variety of ways, including regularly held public meetings and charettes that are organized in partnership with community organizations such as those listed in 2.b.i.. Meetings will be held in person at Fulton City Hall to ensure close proximity to the Target Area’s residents. Meetings will be held at hours agreeable to most schedules to ensure a high level of attendance and involvement. Additionally, those that cannot be present during the live meeting, can access the recorded meeting online, at ICDC’s website and/or can utilize a call in number for the meeting. Meetings will provide a platform for public comment to identify additional brownfield sites, reprioritize known brownfield sites based on established criteria, and voice potential concerns. Commentary will be collected through comment cards and via email to the project manager so that affected parties’ input can be captured and documented for use in decision making when selecting and prioritizing sites, and so that input is not overlooked and can be responded to if not specifically addressed in the meeting. These meetings will also be utilized to present potential redevelopment opportunities to interested developers by showcasing available brownfield sites and providing developers technical assistance in obtaining additional financial incentives for planned redevelopment. Input will be considered during public meetings in an open manner that embraces the diversity of the community and focuses on a constructive, forward-looking vision for Itawamba County. Additional communication regarding grant updates and opportunities will be conducted in a variety of ways including press releases with the local newspaper which will include the Itawamba County Times and Northeast Mississippi Daily Journal (online and in print). Brownfield related announcements will also be featured on local news stations, flier distribution via local businesses and community organizations, and online, on local stakeholder websites. The following Facebook pages will be used as well: The Itawamba County Times, The Itawamba County Development Council, and Itawamba County Board of Supervisors, reaching over 13,700 followers.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1: Cooperative Agreement Oversight

- i. Project Implementation: General grant management; develop BAC; Qualified Environmental Consultant (QEC) selection based on a competitive bid process (per 40 CFR 30); meeting facilitation with the BAC, MDEQ, and EPA; required reporting; budget reconciliation.
- ii. Schedule: Quarters 1-16: The BAC will be developed within 1 month of funding and meetings will be held at regular intervals throughout the project. A QEC will be selected within 1-2 months of funding. Quarterly reports will be submitted on a quarterly basis and MBE/WBE reports will be submitted annually. ACRES will be updated throughout the grant period.
- iii. Task Lead: ICDC will oversee this task, with assistance from the BAC and selected QEC
- iv. Outputs: BAC development, 1 Work Plan, 1 Community Involvement Plan, 16 Quarterly Reports, 1 Close-Out Report, regular ACRES reporting, EPA Form 5700-52A for Minority and Women Business Entity Utilization, and Federal Financial Reports SF-425

Task 2: Inventory and Community Outreach

- i. Project Implementation: Develop marketing materials which will be available online and in hard copy; notify the community of site-specific public information meetings and assessment schedules; advertise for public meeting through online and in-person methods; hold public meetings to solicit input, inform, educate, and update the community regarding assessment and redevelopment activities; provide updates as necessary at local development council meetings. ICDC will also attend various brownfield conferences.
- ii. Schedule: Quarters 1-16: Community outreach will be performed for the duration of the grant period; the first public meeting will be held within 3 months; the 2nd public meeting will be held after the first round of assessments have been completed; and the 3rd public meeting will be held when assessments are nearing completion and reuse planning begins.
- iii. Task Lead: ICDC will oversee this task, with assistance from the BAC, MDEQ, QEC, and community partners.
- iv. Outputs: Public meeting advertisements; press releases and project update reports; educational materials to support public meetings (PowerPoint presentations and handouts); kick-off meeting; 3-6 public meetings; one-on-one meetings with property owners as needed; updated brownfield inventory; attend various brownfield conferences, including two EPA Region 4 Conferences and the National Brownfield Conference.

Task 3: Environmental Site Assessments (ESAs)

- i. Project Implementation: ASTM-compliant Phase I ESAs; Phase II ESAs; MDEQ and EPA reviewed Generic Quality Assurance Project Plan (GQAPP) and Site-Specific Quality Assurance Project Plans (SSQAPPs); Hazardous Material (Haz Mat) Surveys. Costs for these activities include contractual consulting and reporting expenses and printing.
- ii. Schedule: Quarters 1-14: A QAPP will be completed within 1 month of selection. Once approved by MDEQ/EPA, site-specific assessment activities will begin within 1 month. Assessment and reporting will occur throughout the grant period, with the goal of completing assessment activities by quarter 10.
- iii. Task Lead: The QEC will oversee this task, with assistance from ICDC and the BAC.
- iv. Outputs: Priority Sites: 9 Phase I ESAs (9 Haz), 5 Phase II ESAs (5 Haz), 7 Haz Mat Surveys; Additional Sites: 5 Phase I ESAs (3 Haz and 2 Petro), 2 Phase II ESAs (1 Haz and 1 Petro)

Task 4: Cleanup Planning and Planning Activities

- i. Project Implementation: Creation of cleanup plans and implementation strategies for developing and utilizing resources; development of Analysis of Brownfield Cleanup Alternatives (ABCAs) for priority sites that require remediation based on Phase II ESA data. The ABCAs will include remedial actions for each identified regulated contaminant that exceeds applicable guidelines. Remedial actions will be compared based on metrics such as cost, feasibility, and effectiveness in protecting human health and the environment. ABCAs will be developed through considering the potential reuse scenario(s) for each site. A public meeting will be held during this reuse planning period to solicit input from the public and community partners; we envision this meeting as a design charettes to encourage public participation. The total estimated budget for this task includes travel to attend meetings with stakeholders related to redevelopment plans, which will incorporate community input, market data, feasibility analysis for various reuse scenarios. The Plans will provide financial projections/estimates, potential leveraging opportunities, incorporate input from project partners, stakeholders, and community members, and respond to the surrounding market and environmental conditions and challenges.
- ii. Schedule: Quarters 5-14: ABCAs will be completed within 3-6 months of finalizing the Phase II ESA reports. The public meeting/design charette will be held after the draft ABCAs are complete, but before they are finalized.
- iii. Task Lead: The QEC will oversee the completion of ABCAs. ICDC will oversee the public meeting/design charettes with assistance from the QEC and BAC.
- iv. Outputs: 6 ABCA reports; 1-3 public meeting/design charette (and associated outreach/presentation materials); and a Community-Wide Revitalization Plan

b. Cost Estimates

All task costs were determined appropriate through input from a qualified consultant and other applicable grant management experience, applicable cost per units is included below.

Task 1: Cooperative Agreement Oversight

- Personnel 65 hours at an average rate of \$80/hour = \$5,200 for programmatic costs such as financial and performance reporting.
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: \$620
- Contractual: 100 hours at an average rate of \$100/hour = \$10,000 to assist in reporting needs throughout the grant's lifecycle.

Task 2: Inventory and Community Outreach

- Personnel: 65 hours at an average rate of \$80/hour = \$5,200 or outreach coordination and meeting attendance.
- Travel: Estimating one staff member traveling for two national conferences averaging three days each; \$400 registration, \$900/round trip flight, \$200/hotel room per night (assuming 3 nights each), and \$60/day per diem (totaling \$4,160). Additionally, one staff member traveling for two local conferences averaging three days each; \$400 registration, \$100 in gas for travel, \$200/hotel room per night (assuming 3 nights each), and \$60/day per diem (totaling \$2,440) = \$6,720
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: \$620
- Contractual: 100 hours at an average rate of \$100/hour = \$10,000 to assist in both information gathering for growth of the inventory and community engagement presentations.

Task 3: Environmental Site Assessments (ESAs)

- Personnel: 65 hours at an average rate of \$80/hour = \$5,200 for report reviews and securing site access.

- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: \$620
- Contractual: \$273,000 (54.6% of budget)
 - Priority Sites: \$212,000
 - 9 Phase I ESAs: estimated cost of \$3,000 per ESA = \$27,000
 - 5 Phase II ESAs: estimated cost of \$23,000 per ESA = \$115,000
 - 7 Hazardous Materials Surveys: estimated cost \$10,000 per survey = \$70,000
 - Secondary Sites: \$61,000
 - 5 Phase I ESAs: average estimated cost of \$3,000 per ESA = \$15,000
 - 2 Phase II ESAs: average estimated cost of \$23,000 per ESA = \$46,000

Task 4: Site Specific Cleanup Planning and Planning Activities

- Personnel: 65 hours at an average rate of \$80/hour = \$5,200 for programmatic expenses associated with cleanup planning, review of reports, and meetings.
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: \$620
- Contractual: \$177,000
 - 6 ABCAs: average estimated cost of \$4,500/ABCA = \$27,000
 - Community-Wide Revitalization Plan: estimated cost of \$150,000 (EPA estimates a total cost of \$50,000-\$175,000); (30% of budget)
 - \$140,000: consulting fees
 - \$10,000: supplies such as mapping, copying, publishing, mailing, etc.

Budget Categories		Project Tasks				
		Task 1: Cooperative Agreement Oversight	Task 2: Inventory and Community Outreach	Task 3: Environmental Site Assessments	Task 4: Cleanup Planning and Planning Activities	TOTAL
Direct Costs	Personnel	\$ 5,200	\$ 5,200	\$ 5,200	\$ 5,200	\$ 20,800
	Fringe Benefits					\$ -
	Travel		\$ 6,720			\$ 6,720
	Equipment					\$ -
	Supplies	\$ 620	\$ 620	\$ 620	\$ 620	\$ 2,480
	Contractual	\$ 10,000	\$ 10,000	\$ 273,000	\$ 177,000	\$ 470,000
	Construction					\$ -
Total Direct Costs		\$ 15,820	\$ 22,540	\$ 278,820	\$ 182,820	\$ 500,000
Indirect Costs						
Total Budget (Direct + Indirect)		\$ 15,820	\$ 22,540	\$ 278,820	\$ 182,820	\$ 500,000

c. Plan to Measure and Evaluate Environmental Progress and Results

Per the requirements of the EPA Assessment Grant, ICDC will submit quarterly reports to the EPA Project Officer. These reports will cover work progress and current status, as well as any difficulties that were encountered, a record of financial expenditures, data results, and anticipated further action. Quarterly reports will also document information regarding a plan to resolve progress if ICDC ever finds itself off track financially or time-wise. ICDC will also complete reporting in the ACRES database for each assessment site, noting specific accomplishments, contaminants found, materials impacted, if clean-up activities are required and the progress of said activities, and other resources that have been leveraged to complete the redevelopment of the site. The ACRES database will also be utilized to track job creation and acres of land assessed as part of this grant, as well as the total number of assessments completed and the type of assessment, the amount of funds expended by project, the total project cost, and anticipated jobs created; essentially acting as a tool for both the EPA and ICDC to track and measure the grant’s progress in achieving the outputs, overall project results, and eventual outcomes. At the end of the four-year grant period, a final report similar to quarterly reports will be produced.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i., ii., iii. Organizational Capacity, Structure, and Key Staff

Project intake forms will be utilized to allow each Brownfield Advisory Committee (BAC) member to review the assessment work proposed and project details such as potential reuse, investment, community input, and leveraging opportunities. The BAC will actively engage with the community and assist in decisions made for the grant through the public meeting process previously described. The BAC will be led by Mary Sue Boggs, the Interim Executive Director of ICDC since 2021, who will be the project manager for this grant and oversee and coordinate community engagement activities. With both Bachelor and Master of Arts in journalism, teaching, and public speaking, Ms. Boggs is an excellent communicator with a passion for community engagement. Ms. Boggs has taught locally, at the collegiate level, for nearly 30 years. Following her teaching career, she took on the role as Executive Director of the Fulton Chamber of Commerce. This position solidified her long-standing relationship with the City of Fulton, working on behalf of the Chamber’s Board of Directors and the community. Ms. Boggs oversaw financial management, grants and associated reporting, business attraction and retention efforts, and community engagement events during this time, providing experience that will guarantee success for the EPA grant. Ms. Boggs will be assisted by the Executive Assistant of ICDC and Itawamba Main Street, Ann Izard. Ms. Izard will act as the backup grant manager, providing administrative support to

Ms. Boggs and the grant. She'll assist in monitoring the project schedule to be further defined within a work plan, monitoring fund invoices and expenditures, and ensuring timely reporting. Ms. Izard's current position and experience with the Itawamba Historical Society, has provided her with the administrative and financial literacy skills critical for this role. She also maintains social media updates on behalf of the ICDC, which will carry over into the community engagement for the assessment grant. Both parties are committed to redeveloping Itawamba's brownfields to improve the quality of life for local residents and their experience will ensure timely expenditure of funds and administration of an assessment grant.

iv. Acquiring Additional Resources

ICDC has extensive experience managing grant funds and thus will begin the contractor procurement process immediately following work plan and cooperative agreement approval with the EPA. The desired consultant will be experienced in brownfield programs including the following services: assisting with Community Brownfield Inventories and Outreach, Phase I and II Environmental Site Assessments (ESAs), Analysis of Brownfield Cleanup Alternatives (ABCAs), and working with state regulators regarding solid waste and brownfield assessment redevelopment planning and remediation. Additionally, the consultant will be expected to prepare the Generic Quality Assurance Project Plan (GQAPP) within the first 60 days of the grant so that proposed assessments and activities are not delayed. These services will be secured in accordance with the EPA's selection protocol and ICDC's established purchasing policies. Standard procedure includes a Request for Qualifications be published for response by qualified firms. Firms will be allotted guidelines with a deadline for submissions and all submissions will be available as public record. Following receipt of proposals, each application will be reviewed by an internal committee composed of ICDC staff and members of the ICDC Board of Directors. The selected consultant will be recommended to ICDC's Executive Director for approval via resolution. ICDC will also collaborate with Itawamba Community College (ICC), with whom Ms. Boggs has an established working relationship through her prior employment. ICDC will utilize ICC's Workforce and Development Training department for assistance in advertising employment opportunities and promoting the hiring of local community members so that they are engaged in training and jobs resulting from brownfields assessment, cleanup, or redevelopment related to the proposed projects within this application. ICDC also participates in the Community College's FIRST Foundation program, which connects families in need with tuition grants for education. Education opportunities through this program often utilizes hands on training, which the projects under this grant may support, furthering equitable learning and employment for future generations.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

Prior to June 2014, ICDC's jurisdiction encompassed the Itawamba Port Commission and Itawamba Rail Authority. The following grants were managed by ICDC and awarded to the Itawamba County Port Commission. **Department of Transportation Maritime Administration: Tenn-Tom Waterway Pilot Project:** Awarded in 2009, the 3-year Pilot Project was provided \$1.76 million. The Project implemented a new Marine Highway service between Itawamba, MS and Mobile, AL as formally designated under America's Marine Highway Program. The Project allows regular service between the ports by utilizing three tows, each capable of towing three container barges. A total of nine barges were purchased and modified for container usage. Infrastructure improvements implemented at the Port of Itawamba included bridge crane upgrades, a spreader bar, and bar cart. The converted barges were leased to the operating company with the company providing in-kind IT and logistic services. Additionally, the Port of Itawamba, in partnership with the Mobile Container Terminal, provided in-kind contributions to include waiver of dockage and fleeting services at Itawamba and free fleeting in Mobile for the 3-year period. **Appalachian Regional Commission, Itawamba Port Crane Improvements:** Awarded in May 2011, the Itawamba Port Commission was provided \$104,460 to purchase a bridge crane for the Port of Itawamba. With a relatively short time-span, the grant was implemented between June 2011 and May 2012. The crane service allows local manufacturers to load and unload barges along the Port. **Mississippi Department of Transportation: Multimodal Capital Improvement Grant:** The Port Commission was awarded \$245,000 in September 2011 to construct an additional railroad spur adjacent to the Itawamba Port's barge slip. The 2-year grant ran from September 2011 to October 2013 and outputs included concrete paving, the creation of a loading dock & ramp, installation of a railroad switch and new trackage, replacement of existing ties, and addition of a new railroad crossing. The project provided trans-loading capabilities, allowing rail cargo to be loaded onto trucks.

(2) Compliance with Grant Requirements

As shown through ICDC's record of no audit findings, benchmark compliance goals on each grant have been met. All grant conditions were met, and money was extended timely. The required reporting under all past grants received has been conducted on time and serves as an integral part of maintaining the grants' timely implementation. Required compliance documentation for the DOT Tenn-Tom Waterway project included annual audit reports, quarterly status reports, and end of project performance measures. The ARC Port Crane Improvement Grant required compliance documentation including an SF-270 request for advance or reimbursement form, which was submitted as required, once every 4 months during the grant's lifetime. The form required maintaining a balanced budget for the grant and ensuring accurate and appropriate backup documentation for expenditures was provided. MDOT Capital Improvement Grant required compliance documentation including payment requests submitted once every 8 months during the 2-year period. Proof of purchases were included with payment requests, as well as detailed receipts/invoices. Each grant was successfully closed out with the associated organization. Because of the successful history of grant management and compliance with reporting, schedules, and terms and conditions, ICDC is better positioned to continue to pursue leveraging opportunities that support the community.

Threshold Criteria – Itawamba County Development Council, Mississippi

1. Applicant Eligibility:

The Itawamba County Development Council (“ICDC”) operates as a 501(c)3 serving as the regional economic development authority for Itawamba County in the State of Mississippi. Please see the attached applicant eligibility documentation.

2. Community Involvement:

Following this grant’s award, a project kick-off meeting will be held. This meeting will provide an opportunity to establish a Brownfield Advisory Committee (BAC) consisting of representatives from local stakeholders. The Committee will review projects and make decisions to prioritize site assessments based upon the hierarchy explain within section 1.a.iii., above. The kick-off meeting will also outline the goals of the grant, how local residents and business owners can provide public input and how the funds can be utilized, ensuring an educated public and allowing for additional community involvement. Ongoing communication throughout the life of the grant will be conducted in a variety of ways, including regularly held public meetings and charettes that are organized in partnership with community organizations such as those listed in 2.b.i.. Meetings will be held in person at Fulton City Hall to ensure close proximity to the Target Area’s residents. Meetings will be held at hours agreeable to most schedules to ensure a high level of attendance and involvement. Additionally, those that cannot be present during the live meeting, can access the recorded meeting online, at ICDC’s website and/or can utilize a call in number for the meeting. Meetings will provide a platform for public comment to identify additional brownfield sites, reprioritize known brownfield sites based on established criteria, and voice potential concerns. Commentary will be collected through comment cards and via email to the project manager so that affected parties’ input can be captured and documented for use in decision making when selecting and prioritizing sites, and so that input is not overlooked and can be responded to if not specifically addressed in the meeting. These meetings will also be utilized to present potential redevelopment opportunities to interested developers by showcasing available brownfield sites and providing developers technical assistance in obtaining additional financial incentives for planned redevelopment. Input will be considered during public meetings in an open manner that embraces the diversity of the community and focuses on a constructive, forward-looking vision for Itawamba County. Additional communication regarding grant updates and opportunities will be conducted in a variety of ways including press releases with the local newspaper which will include the Itawamba County Times and Northeast Mississippi Daily Journal (online and in print). Brownfield related announcements will also be featured on local news stations, flier distribution via local businesses and community organizations, and online, on local stakeholder websites. The following Facebook pages will be used as well: The Itawamba County Times, The Itawamba County Development Council, and Itawamba County Board of Supervisors, reaching over 13,700 followers.

3. Expenditure of Existing Grant Funds:

Not applicable; ICDC does not have an existing EPA Brownfield Grant.

4. Contractors and Named Subrecipients:

Not applicable; ICDC has not selected a contractor nor subrecipient.