



301 West Court Street * Paragould, Arkansas 72450

Mayor's Office
(870) 239-7510
Fax (870) 239-7509
City Clerks Office
(870) 239-7500
PO Box 1175
City Police Headquarters
(870) 236-7621
Fax (870) 239-7554
101 N. 3 ½ Street

RO6-24-A-001

1. Applicant Identification

City of Paragould
301 West Court Street
Paragould, AR 72450

2. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$500,000

3. Location

a) City of Paragould b) Greene County c) Arkansas

4. Target Area and Priority Site Information

- Target Area Information: City of Paragould – Commercial Historic District
(Census Tracts 05055480500 & 05055480700)
- Priority Site Information:
 - Site 1: Cotton Gin Company – West Garland & South 2nd Street, Paragould, Greene County, AR, 72450
 - Site 2: Recycling Scrap Yard – 110 E Hunt Street, Paragould, Greene County, AR, 72450

5. Contacts

- a. Project Director
Allison Hestand, Economic Development Director
870-236-7684
ahestand@paragould.org
301 West Court Street
Paragould, AR 72450
- b. Chief Executive/Highest Ranking Elected Official
Josh Agee, Mayor
870-239-7510
josh.agee@paragouldcity.org
301 West Court Street
Paragould, AR 72450



Mayor's Office
 (870) 239-7510
 Fax (870) 239-7509
City Clerks Office
 (870) 239-7500
 PO Box 1175
City Police Headquarters
 (870) 236-7621
 Fax (870) 239-7554
 101 N. 3 ½ Street

301 West Court Street * Paragould, Arkansas 72450

6. Population

City of Paragould, Arkansas: 29,327 (US Census: 2017–2021 American Community Survey)

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	NA
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.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	1, 3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	NA
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 Attached.

9. Releasing Copies of Applications

Not Applicable.



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

October 30, 2023

Electronic Mail Only

Allison Hestand
Director of Economic Development & CEO
Paragould Regional Chamber of Commerce
P.O. Box 124 | 300 West Court Street
Paragould, Arkansas ZIP

**RE: Letter of Support for Federal Fiscal Year (FFY) 2024 EPA Brownfields
Community-wide Assessment Grant Application**

Dear Ms. Hestand:

This letter serves as acknowledgement and support from the Division of Environmental Quality Office of Land Resources (DEQ) that the City of Paragould is seeking to become a recipient of a Brownfields Community-wide Assessment Grant in Federal Fiscal Year 2024.

The Brownfields Community-wide Assessment Grant, if awarded, will facilitate assessments of Brownfield properties within Paragould, focusing on the Commercial Historic District. DEQ will continue to offer Targeted Brownfield Assessments and technical assistance under the state response program.

Please feel free to contact me at 501-682-0616 or by email at addie.smith@arkansas.gov if further assistance is needed.

Sincerely,

A handwritten signature in black ink that reads 'ASmith'.

Addie Smith, Brownfield Program Coordinator
Division of Environmental Quality



City of Paragould, AR
FY24 Brownfields Assessment Grant
Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: A long history of successful timber and agriculture production in the City of Paragould (City) eventually gave way to social, economic, and environmental hardship triggered by industrial shifts and outsourcing. The City, located at the crossroads of the Missouri Pacific and Cotton Belt Railroads, was once the principal trading center for Northeast Arkansas, which allowed for a period of prosperity. Incorporated in 1883, the City grew tremendously with the timber industry. By the 1920s the timber industry began to slow, and the vacant timber lots were transformed into farmland producing cotton, corn, and soybeans. With this shift to agriculture, the cotton gin mill (priority site 1) opened and became the economic driver for the City. The opening of the mill brought other new businesses such as the local scrap yard (priority site 2). As the textile industry flourished, highways and roadways were created, which diminished the need for the railway. With the outsourcing of the textile industry overseas in the late 1990s, business shuttered, hundreds of jobs were lost, and environmental concerns from past industrial practices created vacancy, blight, and brownfield sites throughout the City's downtown.

The **geographic boundary** for this application is the **city limits, with a target-area focus on the Commercial Historic District (CHD)** that comprises **Justice 40 Initiative Disadvantaged Census Tracts 05055480500 & 05055480700**. This target area is a major focus for City leadership because the entire community needs a thriving downtown to prosper. Paragould's downtown, the heart of both the City and Greene County, embodies the city's history, hosts its most distinctive buildings, and is distinguished by its compact form. But the target area is full of potential brownfield sites bookended by the two priority sites. The City has doubled down on its leadership redeveloping the CHD by investing in the Paragould Main Street Program and the Paragould Historic District, restoring the Greene County Courthouse, constructing the Power Plant Park, and creating the Innovation Center and the 8 Mile Creek Trail. These ongoing initiatives and the widespread recognition of the downtown's importance has sparked more interest in its revitalization and expansion, which will only grow as assessments are completed on potential brownfield sites throughout the target area. The **Discover Paragould 20 Year Plan** was created with brownfield redevelopment in mind by means of pursuing EPA Brownfield grant funding, **making this application for EPA Brownfield Assessment funding one of the City's key objectives**. Paragould intends to use this grant to address the abandoned and derelict downtown properties and allow for better connectivity via multiuse trail systems, improve climate resiliency by supporting and increasing current infrastructure, and reestablish a thriving downtown to promote sustainable economic growth for the CHD underserved community.

ii. Description of the Priority Brownfield Site(s): Within the CHD there are over a dozen vacant commercial and industrial buildings, such as gas stations, warehouses, restaurants, storage buildings, and a laundromat. The City will work with target-area residents to identify additional sites through a grant-funded site inventory followed by the creation of an evaluation ranking tool which will prioritize additional identified brownfield sites. The CHD hosts two priority sites, the **Cotton Gin Company** and the **Recycling Scrap Yard**, which were selected for assessment and reuse due to their environmental impacts and redevelopment potential to draw visitors from the neighboring interstate. They also bookend the downtown to the north and south and are proximate (<1 mile) to schools, churches, and parks.

The first priority site, the **Cotton Gin Company** (1 acre), is located on the south end of downtown, surrounded by the city's largest and oldest church and Dollar General, and businesses. Established in the early 1900s, operations ceased in 2018. The site has sat vacant since its closure.

The unsecured site allows unfettered access and consists of an idle, rusty cotton gin, cotton house structures (10,000 sq. ft.), and a gravel parking lot. Potential environmental concerns include volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), nitrates, pesticides, total petroleum hydrocarbons (TPHs) for oils and fuels and, based on the age of the site buildings, asbestos containing materials (ACMs) and lead-based paint (LBP). **The City received site access from the property owner for assessment.** Reuse plans include mixed-use commercial and affordable housing.

The second priority site is the **Recycling Scrap Yard** (6 acres) that has been in operation for over 100 years. Bookending the CHD's north side, the site houses three structures (3,000 sq. ft.) and is littered with discarded piles of metal. The scrap yard is currently an active business. Their heavy-truck activity destroys city streets and causes trash and debris to be discarded in public thoroughfares, creating safety concerns for the public. The City is in discussion with the owners to **redevelop this site into affordable housing** as the site connects to the new \$2 million Power Plant Park via the adjacent multiuse trail system. Potential environmental concerns include VOCs, SVOCs, metals, polychlorinated biphenyls (PCBs), and based on the age of the site buildings, ACMs and LBP. **The City has received site access from the owner to determine the environmental concerns for the purpose of future redevelopment.**

iii. Identifying Additional Sites: The City will focus on identifying sites for assessment throughout the target area's two census tracts, which are defined by **Climate Economic Justice Screening Tool (CEJST) as Justice 40 disadvantaged communities**. In preparation of this grant application, the City conducted a windshield survey of the target area and identified over a **dozen** potential brownfield sites. During this grant project, a more in-depth, grant-funded site inventory and evaluation ranking criteria process (Budget Task 2) will be established as the City will work diligently with target-area residents to identify and prioritize sites within the underserved community. Those properties will be researched further by City staff using the property appraiser's website. The evaluation criteria used to determine which sites are added to the inventory will be based on community need, project partner and resident input, and CEJST and US Census data to ensure underserved communities are benefiting from the project. In the event all target-area sites have been addressed with grant funding, **the City will work with project partners and residents throughout the geographic boundary of the city limits to identify abandoned and underused properties**. Once identified, the City will apply the already established evaluation ranking criteria (based on need of the underserved) to determine the order sites will be addressed.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: The underserved community and city officials put in a strong planning effort when creating the City's **Discover Paragould 20 Year Plan**, which serves as a guide to address the City's struggles while also building on its successes with a focus on the CHD. "The vision for downtown calls for a strong connection to the Kings Highway Corridor on the south by way of a redesigned entrance into the district. To the north, the vision includes a clear connection to the 8 Mile Trail through the revitalized North End neighborhood. Expanded historic preservation efforts, incorporation of surrounding neighborhoods into the fabric of downtown, and expansion of bicycle and pedestrian infrastructure to other parts of Paragould" are crucial. Key planning themes include **(1) Stewarding the Future of Paragould's Core Places & Community Anchors** and **(2) Guiding Growth and Development for New Neighborhoods, Shopping, Recreation & Employment**.

The two priority sites bookending the downtown area have created obstacles for the City's CHD redevelopment. To jump-start revitalization, the City redeveloped the old rail depot into a thriving farmers market located between the two bookends. But without redeveloping the two priority sites,

the economy won't thrive. The intended redevelopment of the **Cotton Gin Company Priority Site 1** will be a **mixed-use commercial property comprised of retail and affordable housing** connecting the downtown CHD via the 8 Mile Creek Trail. The redevelopment plan for the **Recycle Scrap Yard Priority Site 2** as **affordable housing** will connect the downtown and the adjacent the 8 Mile Creek Trail, Power Plant Park (**greenspace**), and farmer's market. Both planned redevelopments will address the planning theme 1, "identifying and envisioning the future of core places through best development practices related to *preservation, infill and redevelopment*," and theme 2, identifying the areas of "new growth through the development and application place types and the application of best community development practices." To further solidify the immediate need for environmental assessment to promote downtown redevelopment, the community added **Action Item #29** to the **Plan** which is to "**Obtain Brownfield Assessment Grant**" funding to "identify the potentially contaminated sites within the target area to further the established redevelopment goals." EPA Brownfield funding will resolve the issue of blight, remove potential contaminants located throughout the community, and create opportunities for an affordable and healthy lifestyle by connecting the priority sites via 8 Mile Creek Trail. As part of this project, a Brownfield Revitalization Plan will be created for the City to create a long-term tool to address and redevelop brownfield properties as they are identified.

ii. Outcomes and Benefits of Reuse Strategy: The City is committed to creating a vibrant, economically stable, and community-centered culture while eliminating adverse historical environmental impacts and improving residents' health. The assessment and revitalization of target-area properties are major steps in accomplishing these objectives. Studies during the planning process predicted the City population would grow by 9,000 over the next 20 years (current pop. 29,327).¹ With this population boom looming, renewal of the priority sites and other blighted properties in the CHD will accomplish the mission of Paragould's 20 Year Plan by creating **new businesses and job opportunities that will increase the tax base (economic benefit)** and by **improving downtown business and neighborhood aesthetics, creating new affordable housing options, and providing better connectivity via the already established trail systems (non-economic benefit)**. A newly redeveloped downtown will also draw an influx of visitors from the adjacent Highway 412, who will patron the CHD businesses and bring in revenue benefiting the local community (**economic benefit**).

By protecting the sensitive populations of the target area, the **planned redevelopment will also improve climate adaptation/mitigation capacity and resilience**. The 8 Mile Creek Trail will allow more bike and foot traffic to access the Power Plant Park and downtown, thus decreasing levels of atmospheric and greenhouse gases. Currently the trail has over 6,500 visitors per month.² This number will only increase as sites are assessed and redeveloped, significantly decreasing climate issues. The City will work with developers to use **energy efficient sources and renewable energy, including solar panels** on all redeveloped buildings, **energy-efficient water heaters, wind, and/or renewable natural gas from agricultural processes** in their redevelopment plans.

c. Strategy for Leveraging Resources i. Resources Needed for Site Reuse: The City is eligible to pursue private, state, and federal grant options to further redevelopment efforts. City staff is well-versed in applying for and obtaining available funding for projects. City leadership recently established a Land Bank that lets the City's Economic Development Tax fund a surplus for facilitating the **affordable housing redevelopment planned within the CHD**. The City's initial calculations shows this funding vehicle will bring in \$1.5 million per year over the next five years to meet the Plan's housing objectives. In the event further assessment is needed within the target

¹ US Census: 2017–2021 American Community Survey (ACS)

² City of Paragould, AR – Trail Counter Installed on Trail

area upon the close of this grant, the City can apply to the State of Arkansas' Targeted Brownfields Assessment Program. Community Development Block Grant (CDBG) funding will be pursued to address blight via demolition during site redevelopment. As sites are identified for cleanup, the City will seek EPA Brownfield Cleanup Grant funding for remediation of assessed sites. Tax incentives such as the Opportunity Zones and state redevelopment tax incentives will be used by the City and developers for the planned redevelopment in the CHD.

ii. Use of Existing Infrastructure: The City's plans for target-area redevelopment will include the use of existing infrastructure (streets, transportation, water/sewer, power). The **infrastructure to support brownfield redevelopment is already in place at the priority sites and throughout the CHD** as the City upgraded all sewer lines in 2023 and a comprehensive sidewalk upgrade was completed within the last five years. As CHD redevelopment progresses, additional funding will be used to upgrade the multiuse trails and lighting as needed. In the event additional infrastructure improvements are needed, the City will look to state and federal funding.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need** i. The Community's Need for Funding: The CHD is home to a **small and impoverished population (9,760)**.³ The downtown is an economically depressed area as shown by a **low median household income of \$35,078** compared to the state (\$52,123) and the US average (\$69,021).³ In addition, the **CHD has an average poverty rate of all people at 38%, unemployment rate of 9%, and per capita income of \$15,556**.³ These levels differ significantly from those for the US: poverty rate 13%, unemployment rate 6%, and per capita income \$37,638.³ CEJST reports the target area is in the **93rd percentile for poverty** where income is at or below 100% of the federal poverty level and **95th percentile for low income** where household income is less than or equal to twice the federal poverty level. In addition to high poverty rates, the City lacks available funding for environmental assessments that would be necessary to redevelop this underserved community. The City has the lowest city sales tax rate of any city of its class in the state, which helps the local consumers and impoverished residents. But consequently, the City's entire tax revenue is spent on services, with no surplus available for assessment activities to create momentum for redevelopment. Although the City does not have discretionary funding to pursue assessment activities on its own, they do routinely apply for federal and state funding for projects to supplement existing City programs. With no additional funding for environmental assessment, residents will endure blight and potential ongoing negative health effects from underused properties in the target area. EPA Brownfield Assessment Grant funding will serve as a critical initial step in identifying environmental risks, spurring revitalization, breaking the cycle of poverty, and establishing a stronger community.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The sensitive populations living in the CHD are the those living below the poverty level: **34% of all families (US 9%); 46% of female head of household with no spouse present (US 25%); 54% of children under the age of 18 (US 17%); and 38% of all residents (US 13%)**.³ The target area also has an elevated number of **residents dependent on government food assistance (32%)**, nearly three times the US average (11%), and residents in desperate need of job opportunities with an average **unemployment rate of 9%** with a **CT 05055480700 rate of 22%** (US 6%).³

The redevelopment of both priority sites into affordable housing units and mixed-use commercial development will address **welfare issues** plaguing the city such as the need **for new job opportunities, better access to fresh foods, and the lack of affordable housing options**. Within the target area, **9% of target-area households have no vehicle access**, compared to the County

³ US Census: 2017–2021 ACS

at 5%.⁴ This reality makes it more difficult for residents to access local job opportunities and obtain healthy food, and highlights the importance of target-area walkability via the 8 Mile Creek Trail. Exacerbating this issue, the CHD is located in a **USDA Food Desert**. The redevelopment of the two priority sites bookending downtown and the City's 8 Mile Creek Trail will provide connectivity for residents to pursue job opportunities, access fresh food from the farmers market (in the center of downtown) and visit the new Power Plant Park without the need for a vehicle.

Welfare issues such as a **lack of affordable housing** within the target area is affecting the residents. Within the CHD, the homeowner vacancy rate is double the national average at 2.5%.⁴ Within the target area, the average monthly rent is \$722 (US \$1,163), and the average median value of a home is \$86,000 (US \$244,900).⁴ Even with the low cost of monthly rent and low home values, the community is suffering as a significant portion of their annual income goes to cover housing costs. **According to the CEJST**, the target area is in the **70th percentile of low-income households spending more than 30% of their income on housing**. To make matters worse, existing housing within the target area is aged, with 55% of all homes being constructed prior to 1979, creating an environmental concern of **asbestos and lead**.⁴ The Environmental Justice (EJ) Screen Report **Lead Paint indicator** reports the target area in the **78th percentile** in the state. Vacant and underused properties created from the loss of commercial and industrial businesses has produced an economic and social drain, resulting in gradual disinvestment and high levels of poverty in the target area. Using EPA Brownfield Assessment funds to identify contamination and reduce the threat to sensitive populations will be the first positive step toward redevelopment through planned affordable housing development and the creation of new businesses in the CHD allowing for job opportunities that will lead to economic prosperity for generations to come.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations face more significant risk of disease and health conditions such as **cancer and asthma** because of conditions present at brownfield sites. Based on their age and deteriorated condition, **target-area buildings** create an ongoing air quality threat as the LBP and ACM continue to sit and decay. In addition, other environmental concerns for both priority sites include VOCs, SVOCs, nitrates, and metals. Historical site uses at the **Cotton Gin Company (Priority Site 1)**, including cotton storage, may also impact this property with pesticides and herbicides associated with the farming industry. The **Recycle Scrap Yard (Priority Site 2)** being located along a railroad line may have resulted in contamination from old creosote railroad ties and polychlorinated biphenyls (PCBs). Additional target-area properties identified through the City's windshield survey include former filling stations and suspected laundry/dry-cleaning facilities situated near homes, parks, and churches. Historical releases of hazardous substances and petroleum products from leaking underground storage tanks (**USTs; 79th percentile in the state**) and old dry cleaners can go undetected for years and present a continuing threat for vapor encroachment conditions (VECs) inside buildings.⁵ Many of the compounds are carcinogenic and can lead to **cancer**.

Lead paint and asbestos exposure typically associated with aging structures pose increased risks to sensitive populations, especially for the target area's children-living-in-poverty residents. The target area ranks in the **78th percentile in the state for lead paint indicator**.⁵ Lead exposure can result in severe health and developmental consequences in **infants and children**, and asbestos exposure can result in many forms of **cancer** and breathing problems such as **asthma**. The 2023–2026 Greene County Community Health Needs Assessment (**city/target-area data not available**) lists **cancer as the second leading cause of death** with a rate of 178.9 per 100k (US 144.1 per 100k). Respiratory diseases, including **asthma**, are the 6th leading cause of death with a rate of 93

⁴ US Census: 2017–2021 ACS

⁵ EPA EJ Screen Report – CHD Target Area

per 100k (US 36.4 per 100k). The **target area is in the 77th percentile nationwide for air toxics cancer risk and 70th percentile for toxic releases to air statewide.**⁶ CEJST ranks target-area CT 4807 **in the 91st percentile statewide weighted percentage of people told they have asthma.** Without the EPA Brownfield Grant funding for site assessments, the City will be unable to identify potential target-area contaminants that can exacerbate these underlying health conditions. By addressing brownfield sites and removing these contaminants, the City can mitigate the serious health concerns they cause for residents.

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: The CHD target area and **both priority sites are located within the CJEST Justice 40 disadvantaged census tracts.** Many properties within the target area are vacant or abandoned and present an ongoing environmental threat and a continuous source of blight for the community. The environmental issues stemming from the **two priority sites** bookending the CHD create a ripple effect of negative consequences, including **decreased taxable revenue, decreased property values, a reduced ability to market properties for redevelopment,** and environmental justice (EJ) issues such as **low income, high unemployment, substandard housing, lack of transportation options, and distressed neighborhoods.**⁷ Obtaining the Brownfield Assessment Grant will help address and reduce the EJ issues facing this underserved community. The City’s **low-income residents (95th percentile), high poverty residents (93rd percentile), and unemployed residents (82nd percentile)** are the most adversely affected by these conditions as properties continue to sit idle and vacant.⁸ (b) Advancing Environmental Justice: Industrial shifts over the century have led to numerous abandoned properties in the target area, leading to ongoing exposure to contaminants and poverty through the lack of job opportunities. Focusing on President Biden’s Justice40 Initiatives, EPA Brownfield funding will address several EJ issues plaguing this community by reducing the **EJ burden, decreasing the number of abandoned and blighted properties, creating new and affordable housing, and creating new jobs for the community.** Redevelopment of the priority sites into commercial mixed-use and affordable housing will address EJ issues and set the stage for revitalization, enabling new businesses to occupy revamped commercial spaces and creating a neighborhood with an improved standard of living. The proposed reuse of the priority sites will improve the health and well-being of the sensitive populations and remedy the many inequalities in health risk, fresh food access, lack of housing, access to greenspace, transportation barriers, and lack of employment options affecting this underserved community. None of the planned redevelopment discussed in this grant application will displace residents, and the City will employ redevelopment strategies that will prevent and/or minimize the potential of any future displacement for businesses or residents. The City’s Economic Development Corporation is in discussion with the Recycling Scrap Yard Priority Site 2 owner, as it is still an operational business, to purchase the property for the new affordable housing redevelopment. **The owner has given approval for assessment to determine the site’s issues to allow for a property sale.**

b. Community Engagement i. Project Involvement & ii. Project Roles

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Economic Development Corporation of Paragould (EDC)	Robert Thompson 870-239-9581	The EDC nonprofit (501c6) is charged with directing all economic development efforts within the city ensuring there are land, buildings, and other necessary resources ready for redevelopment. The EDC will assist with site identification and prioritization and future reuse planning.

⁶ EPA EJ Screen Report – CHD Target Area
⁷ Justice40 Memorandum – White House
⁸ CEJST Screening Tool

Paragould Regional Chamber of Commerce (COC)	Kevin Young, Chairman 870-236-7684	Nonprofit (501c6) serves Paragould in business, economic development, tourism, and education. The COC will assist in site identification and marketing assessed sites to interested developers for revitalization.
Main Street Paragould (MSP)	Judith Wheelis, President 870-240-0544	Nonprofit (501c3) will act as a downtown business liaison and coordinate with local industry to ensure historic preservation of City assets. Will assist with education & community outreach via small business connections.
Greene County Future Fund (GCFF)	Kimberly Dale 870-239-9581	A local grassroots nonprofit (501c3) organization comprised of young professionals committed to providing a bright future in their community by supporting the promotion of urban biking/hiking trails, greenspace, and recycling efforts. The GCFF will assist with future land-use planning and community outreach/education.
First United Methodist Church	Rev. Dane Womack 870-239-8541	Church (501c3) located in the target area (located next to Priority Site 1) will assist with community outreach and education.

iii. **Incorporating Community Input:** The City informed the public of their intent to pursue an EPA Brownfield Assessment Grant for the CHD at the City Council Meeting held on April 24, 2023. Paragould understands that working closely with community members is the key to implementing a successful Brownfield Program. The City will cultivate productive and thought-provoking interactions between target-area residents and community organizations, **especially those underserved directly impacted by the project.** The City has and will continue to seek valuable input from residents and community organizations to help identify potential brownfield sites, as they are the most aware of where its most important needs lie. After a grant is awarded, the City will create a Community Involvement Plan (CIP) which will provide an event schedule, an outline of planned community engagement activities, a project background, and a list of key players. The CIP will be made available for review at City Hall and on the City’s website and will ensure engagement with the CHD’s underserved community.

To identify potential brownfield sites in the target area, the City will perform community outreach and review the suggested brownfield sites provided by community members during quarterly meetings. The Brownfield Project Team will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City’s Brownfield Program webpage. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City’s Brownfield Program goals. Priority will be given to those sites that most benefit underserved, sensitive populations in the target area. The City’s CIP will incorporate several forms of media. Brownfields updates will be posted to the City’s Facebook Page in addition to the City’s Brownfield Program webpage. The City will provide resident **interaction via website and social media as an alternative to in-person community engagement.** The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. All promotional materials and the names and contact information of the City’s Brownfield Program Team will be posted on the City’s brownfield webpage, facilitating community-member contact with Brownfield Project Team members.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs:

Task 1: Outreach

i.	<i>Project Implementation:</i> The City’s Brownfield Project Director with the assistance from their procured Environmental Contractor (EC) will develop a Community Involvement Plan (CIP), outreach materials, Brownfield Project website, and social media posts, and host community meetings to keep the public informed about the project. Supplies: printing of outreach materials (brochures/handouts) and office supplies to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within three months of award. Community Meetings held 1 st and 3 rd quarter Year 1–3 and 1 st quarter of Year 4. Website and Outreach Materials created in the 1 st quarter and posted quarterly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: Allison Hestand, Brownfield Project Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Site Inventory & Assessment	
i.	<i>Project Implementation:</i> The City’s Brownfield Project Manager will work with target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by target-area residents will be researched further by City staff using the property appraiser’s website. Once a list is compiled, the EC will work with City staff to create an evaluation ranking tool to determine, with the help of residents, the order in which the sites will be addressed. The EC will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task 2, starting first with the two priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs that will include the SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Community meeting held in the 1 st quarter will continue the preliminary inventory process that began with this application and initial windshield survey of the target area. The evaluation ranking process will take place in the 3 rd quarter and continue throughout the grant project. Assessment activities will begin in the 2 nd quarter and continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> EC will implement the technical aspects of the project with oversight from the City: Miranda Reynolds, Brownfield Project Manager.
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List, 20 Phase I ESAs; 1 Generic QAPP; 10 Phase II ESAs including SS-QAPP, Site Access Agreements, and Property Eligibility Determinations.
Task 3: Remediation/Reuse Planning	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA). Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site appropriate remediation and/or reuse planning to reduce health/environmental risks. The EC will assist the City in hosting charrettes/visioning sessions to be held for key properties. A planner will create Site Reuse Assessments and a Brownfield Revitalization Plan.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes to begin in the 6 th quarter and will continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Miranda Reynolds, Brownfield Project Manager.
iv.	<i>Outputs:</i> 4 ABCAs, 2 Vision Sessions/Charrettes, 2 Site Reuse Assessments, 1 Brownfield Revitalization Plan.
Task 4: Programmatic Support	
i.	<i>Project Implementation:</i> The City’s Brownfield Finance Director with the City’s Brownfield Project Team will procure an EC to assist with the Brownfield Assessment Grant Project. The City’s Brownfield Finance Director oversees grant administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The selected EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The City staff travel budget allows for two staff to attend three national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES & Quarterly Reporting begins in the 1 st quarter and continues throughout the grant project. Annual Reporting and Forms created in 5 th , 9 th , and 13 th quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> City: Shelia Ragsdell, Brownfield Finance Director.
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three training events/conferences.

b. Cost Estimates: Below are the anticipated cost estimates for this project *based on past*

Brownfield Projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes travel, supplies, and contractual costs only. **Sixty-two (62%) percent of the budget will be spent on site-specific work through the Assessment Task.** **Task 1 Outreach:** Contractual: Community Involvement Plan \$4,000 (40hrs x \$100); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,500 (35hrs x \$100); 7 Community Education Meetings \$10,500 (105hrs x \$100; \$1,500/meeting). Supplies: Outreach Supplies \$1,500 (printed brochures \$1,000 [1,000 x \$1.00]; printed display boards \$200 [2 x \$100]; notebooks, paper, pens, other miscellaneous office supplies \$300). **Task 2 Site Inventory & Assessment:** Contractual: Brownfield Site Inventory and Evaluation Ranking Tool Creation \$10,000 (100hrs x \$100); 20 Phase I ESAs \$3,500 each for a total of \$70,000; 1 Generic QAPP \$5,500; 10 Phase II ESAs including SS-QAPP at \$23,500 each for a total of \$235,000. **Task 3 Remediation/Reuse Planning:** Contractual: 4 ABCAs \$6,500 each for a total of \$26,000; 2 Visioning Sessions \$7,000 (\$3,500/meeting); 2 Site Reuse Assessment Plans at \$20,000 each for a total of \$40,000 (Planner: 100hrs x \$150; Market Analysts: 25hrs x \$125; Environmental Professional: 15hrs x \$125 x 2 plans); 1 Brownfields Revitalization Plan \$50,000 (Planner: 200hrs x \$150; Market Analysts: 100hrs x \$125; Environmental Professional: 60hrs x \$125). **Task 4 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$25,000 (250hrs x \$100). Travel: 2 staff to attend 3 events \$12,000 (flights at \$800, \$300 x 3 nights, incidentals and per diem at \$75 per day [4 days] x 2 attendees x 3 events).

Category	Tasks				Totals
	<i>Outreach</i>	<i>Site Inventory & Assessment</i>	<i>Remediation/Reuse Planning</i>	<i>Programmatic Support</i>	
Travel				\$12,000	\$12,000
Supplies	\$1,500				\$1,500
Contractual	\$18,000	\$320,500	\$123,000	\$25,000	\$486,500
Totals	\$19,500	\$320,500	\$123,000	\$37,000	\$500,000

c. Plan to Measure and Evaluate Environmental Progress Results: To ensure this EPA Brownfield Project is on schedule, the City’s internal **Brownfield Project Team**, which includes the environmental contractor, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the four-year time frame. Site specific information will be entered and tracked in the ACRES database. The outputs to be tracked include the number of neighborhood meetings, public meetings, meetings with community groups and project partners, environmental assessments, ABCAs, and cleanup/redevelopment plans. The outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not being achieved in an efficient manner, the City has countermeasures in place to address this problem by making monthly calls to its EPA Project Officer and, if needed, create an EPA Corrective Action Plan.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: The City operates under a Mayor-Council form of government. The City Council is comprised of eight members and is the legislative and policy-making body of City government. The City is partnering with the Economic Development Corporation of Paragould to assist in the administration of this grant project as they do with a majority of their grant-funded

projects. City staff is very familiar with successfully managing federal- and state-funded grant projects for their jurisdiction. The Team, described below, and their supporting staff are more than adequate and capable to successfully manage this Brownfield Assessment Grant. **Ms. Allison Hestand**, the City's CEO and Director of Economic Development for Paragould Regional Chamber of Commerce, will serve as the **Brownfield Project Director**. Ms. Hestand has served in her position for three years and leads this nonprofit in serving the businesses and citizens of the region through economic development, tourism, and education. Prior to holding this position, she was an agency manager and CFO for Block Insurance, where she managed over a \$20 Million Book of Business. Ms. Hestand will be the primary point of contact for the project and will be responsible for the overall management of the grant, including directing team members. **Ms. Miranda Reynolds**, the City's Main Street Paragould Director, will serve as the **Brownfield Project Manager**. Ms. Reynolds has served in this position for two years and leads this nonprofit in their economic development program that enacts revitalization through historic preservation. She holds monthly meetings with the downtown district and will serve as the liaison between the grant administration team and downtown property owners. Ms. Reynolds will assist Ms. Hestand in the day-to-day tasks involved with this project. **Ms. Shelia Ragsdell** will serve as **Brownfield Finance Director**. She has been with the City for 15 years and is the assistant to the mayor. She is responsible for the financial and programmatic reporting for the City's state and federal grants. She will be responsible for managing the finances of this grant and will complete all drawn downs through ASAP.gov. The EC will handle the technical and reporting portions of this project.

iv. Acquiring Additional Resources: The City will procure a qualified environmental contractor and subcontractors to assist with technical and reporting aspects of the Brownfield Community-wide Assessment. Procurement procedures will comply with both the local contracting and procurement process and with EPA requirements for "Professional Service." The City will promote strong practices, local/hiring, and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and project updates to project partners.

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: In 2017, the City was awarded Phase I of an Arkansas Department of Transportation – Transportation Alternatives Program Grant, followed by an award for Phase II in 2019 and Phase III in 2020. These three separate grants totaling \$956,000 in awards for a project total of \$1,543,808 were used to create the 8 Mile Creek Trail, a multiuse trail for bike and pedestrian activity. All funds were expended, and the project was successfully completed on November 21, 2022. The trail boasts 6,500 visitors a month (78,000 annually). In 2022, the City was awarded \$45,400 from the Arkansas Highway Safety Office for the Select Traffic Enforcement Program (STEP). The funds were used to cover personnel overtime and equipment for STEP activities such as speed detection, distracted driving, and driving while intoxicated enforcement activities. The City purchased one new radar unit and two portable breath units, in addition to funding the staff work time. All funds were expended, and the project was completed in September 2022. (2) Compliance with Grant Requirements: The City has a history of compliance with grant work plans, schedules, and terms and conditions and has an excellent history of timely reporting with all award agencies. The City is on schedule on all active grants. Ms. Ragsdell along with the Brownfield Project Team is skilled in project management and will monitor all grant activities to ensure compliance with all financial reporting requirements. Ms. Hestand is well versed in grant reporting and will input all project information into ACRES.



City of Paragould, AR
FY24 Brownfields Assessment Grant
Threshold Criteria

Threshold Criteria

1. Applicant Eligibility

- a. The City of Paragould, Arkansas is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a unit of local government as defined under 2 CFR § 200.1.
- b. The City of Paragould, Arkansas is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Community Involvement

The City informed the public of their intent to pursue an EPA Brownfield Assessment Grant for the Commercial Historic District (CHD) at the City Council Meeting held on April 24, 2023. Paragould understands that working closely with community members is the key to implementing a successful Brownfield Program. The City will cultivate productive and thought-provoking interactions between target-area residents and community organizations. The City has and will continue to seek valuable input from residents and community organizations to help identify potential brownfield sites, as they are the most aware of where its most important needs lie. After a grant is awarded, the City will create a Community Involvement Plan (CIP) which will provide an event schedule, an outline of planned community engagement activities, a project background, and a list of key players. The CIP will be made available for review at City Hall and on the City's website and will ensure engagement with the CHD's underserved community.

To identify potential brownfield sites in the target area, the City will perform community outreach through educational meetings, project partners, social/digital media, and local news. It will also review the suggested brownfield sites provided by community members during quarterly meetings. The Brownfield Project Team will review and evaluate comments and community during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City's Brownfield Program webpage. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City's Brownfield Program goals. Priority will be given to those sites that most benefit underserved, sensitive populations in the target area.

The City's CIP will incorporate several forms of media. Brownfields updates will be posted to the City's Facebook Page in addition to the City's Brownfield Program webpage. The City will provide resident **interaction via website and social media as an alternative to in-person community engagement**. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. All promotional materials and the names and contact information of the City's Brownfield Program Team will be posted on the City's brownfield webpage, facilitating community-members contact with Brownfield Project Team members.

3. Expenditure of Existing Grant Funds

The City of Paragould, AR affirms it does not have an active EPA Brownfields Assessment Grant or Multipurpose Grant.



4. Contractors and Named Subrecipients

Not Applicable.