

UPPER COASTAL PLAIN
COUNCIL OF GOVERNMENTS

R04-26-A-067

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WILSON, NORTH CAROLINA 27894

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APPLICATION INFORMATION SHEET

Upper Coastal Plain Council FY2026 EPA Brownfields Assessment Coalition Grant Application

1) Applicant Identification:

Upper Coastal Plain Council of Governments (UCPCOG)
121 West Nash Street, Wilson, NC 27893
PO Box 9, Wilson, NC 27894

2) Website URL:

Upper Coastal Plain Council of Governments: www.ucpcog.org
Town of Weldon, NC: <https://www.historicweldonnc.com>
City of Roanoke Rapids: <https://www.roanokerapidsnc.com>

3) Funding Requested:

- a) Assessment Grant Type: Assessment Coalition
- b) Federal Funds Requested: \$1,200,000.00

4) Locations:

The Upper Coastal Plain Council of Governments region and this application covers a five-county jurisdiction in North Carolina: Edgecombe, Halifax, Nash, Northampton, and Wilson. Priority sites are in the Town of Weldon, City of Roanoke Rapids, and Town of Scotland Neck, NC.

5) Coalition Members' Target Areas and Priority Site Information:

- a) Weldon (non-lead): Mulberry Street, Weldon, NC 27890 (no street #)
Census Tract of Priority Site: 37083930100, Parcel ID: 1200139
- b) Roanoke Rapids (non-lead): 501 Jackson Steet, Roanoke Rapids, NC 27870
Census Tract of Priority Site: 37083930300
- c) Scotland Neck (UCPCOG lead): 710 House Avenue, Scotland Neck, NC, 27874
Census Tract of Priority Site: 37083931101, Parcel ID: 1102413

6) Contacts

- a) Project Director: Ron Townley, Phone: (252)234-5965, CELL: (828) 777-1593 (preferred); email: rtownley@ucpcog.org
Mailing Address: PO Box 9, Wilson, NC 27894
- b) Chief Executive: Robert Hiatt, Phone: (252)234-5950, email: rhiatt@ucpcog.org,
Mailing Address: PO Box 9, Wilson, NC 27894

7) Populations of Priority Site City and Towns:

- a) Weldon, NC: 1,522
- b) Roanoke Rapids, NC: 15,299
- c) Scotland Neck, NC: 1,640

8) Regional Priorities Form/Other Factors Checklist:

| Other Factor | Page # |
|--|----------|
| Community population is 15,000 or less: Weldon and Scotland Neck | 1, 2 |
| 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. Weldon site | 2 |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | 4 |
| The reuse of the priority site(s) will incorporate energy efficiency measures. | 4, 5, 11 |
| The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters. | 4, 5, 11 |
| At least 30% of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section 3.A.(2)., for priority site(s) within the target area(s). | NA |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing. Weldon, closed 2017 | 3 |

9) Letter for State Authority: Attached

10) Releasing Copies of Applications: not applicable



NORTH CAROLINA
Environmental Quality

December 29th, 2025

JOSH STEIN
Governor
D. REID WILSON
Secretary
MICHAEL SCOTT
Director

Ron Townley
Project Manager
Upper Coastal Plain COG
121 W. Nash St.
Wilson, NC 27893
rtownley@upcog.org

Re: U.S. EPA Brownfields Coalition Assessment Grant – Upper Coastal Plain Council of Governments

Dear Mr. Townley,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Redevelopment Section (BRS) acknowledges and supports the Upper Coastal Plain Council of Governments' (UCPCOG) application for a U.S. EPA Brownfields Coalition Assessment Grant. We understand that your grant will focus on the Town of Weldon, Town of Scotland Neck, and the City of Roanoke Rapids, which are within UPCOG's service region. The grant will focus on an abandoned lumber mill in the Town of Weldon, a vacant textile mill in the City of Roanoke Rapids, and an abandoned hospital in the Town of Scotland Neck. Revitalization of these properties will be a wonderful success for these communities.

The goal of EPA Assessment funds is to facilitate redevelopment and economic growth within a community. To that end, BRS offers technical project guidance to help ensure assessments conducted utilizing grant funds are in accordance with our program requirements throughout the life of your project. Coordination with DEQ BRS is critical to ensure that the assessments make efficient use of the federal funds awarded. This will begin at grant initiation and continue with review of site-specific assessment plans. It is imperative that BRS be involved in field sample scope planning to ensure that a property is eligible for future entry into the North Carolina Program should a property owner or future developer desire. A brownfields agreement outlines the controls needed to make the site safe for the intended reuse and is often a marketing tool for developers and instrumental in securing redevelopment financing. Additional tax incentives are also available upon completion of brownfields redevelopment if completed in the State's Program.

We hope that UPCOG is successfully awarded this grant, and we will continue to support you in your brownfields redevelopment efforts whether a grant is awarded or not. We truly believe successful brownfields projects can rejuvenate a community.

Sincerely,

Jordan Thompson
Brownfields Grants Manager

ec: NCDEQ Brownfields Grant Collaborative Team



North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200

4.C. Assessment Coalition Grant Narrative

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Coalition Members, Target Areas, and Brownfields

a. Coalition Members: The Upper Coastal Plain Regional Council of Governments (UCPCOG), authorized in 1970 as a regional planning organization in North Carolina, will serve as the lead coalition member. Non-lead members include the Town of Weldon (local government) and the City of Roanoke Rapids (local government). Located within UCPCOG's five-county region in the northeastern portion of North Carolina, these governments have small populations (1,522 and 15,299, respectively¹) and have NOT previously received an EPA brownfields grant. With extremely limited staff and financial resources, these members lack the capacity or expertise to apply for or manage their own grant, much less the monetary resources to address their brownfields. Local governments in the region rely upon UCPCOG's assistance to pursue and manage redevelopment project grants.

b. Overview of Brownfield Challenges and Description of Target Area: The geographic boundary of this effort covers the UCPCOG Region, consisting of five of the State's most economically distressed counties (Edgecombe, Halifax, Nash, Northampton, Wilson) according to the annual state ranking. This includes 37 chronically impoverished municipalities (including our target areas) therein. This coastal plain is a mix of environmentally important flood prone wetlands, farmlands and forests containing five critically sensitive watersheds that empty into the nearby sounds of NC. Removing blight from the highly disproportionate number of failed commercial and industrial developments is a major challenge that plagues the largely distressed small cities and rural towns within the region. The hundreds of lost manufacturers and industries include lumber and paper products, textiles, and tobacco, once prominent employers that supplied thousands of jobs in the region. The UCPCOG has previously inventoried over 400 brownfields sites located in our region's low-income, persistently impoverished small towns and city neighborhoods. The impacts of brownfields include related environmental threats, blight imposed by shuttered businesses, a lack and a loss of jobs, and potential public health issues. Our challenge is the lack of financial resources to remove the major barrier to these sites' reuse: assessing their unknown environmental conditions. As of November 2025, the region has 70 sites on the NC Department of Environmental Quality's (NC DEQ's) Inactive Hazardous Sites Branch Inventory, over 1,500 leaking UST incidents, 21 confirmed former dry cleaner releases, and 44 unregulated landfills². This grant will address these challenges and impacts by identifying potential contaminant sources and removing the initial environmental due diligence costs, thus moving key sites toward beneficial, environmentally sound reuse that will boost the local economies and support the creation of much needed jobs.

We have selected three Target Areas (TAs), each consisting of chronically distressed populations that have been disproportionately affected by longstanding environmental, social, and economic conditions.

Non-Lead Member Town of Weldon: TA is the small jurisdictional boundary of the town. (Pop: 1,522; Median Household Income (MHI): \$38,725; Poverty: 24.8%, Weldon, located along the Roanoke River and adjacent to I-95 (the east coast's main north-south interstate), identifies itself as "The Rockfish Capital of the World" because Roanoke River is the only natural spawning ground for the North Carolina species of striped bass-Rockfish. The town is actively working to capitalize on this distinction by focusing on attracting tourism with recent improvements in public water access, kayak and bike rental, and RV camping. However, the town struggles with the blight associated with our brownfields and the potential negative impacts contamination may be having on the Roanoke River. Particularly noticeable are those along Highway 158 (the east-west highway through town), including the vacant J.S. Turner & Son lumber

¹ U.S. Census Bureau. "S0101 – Age and Sex, 2023 ACS 5-Year Estimates: Weldon town, North Carolina." data.census.gov, table ACSST5Y2023.S0101, 2023-year estimates, U.S. Census Bureau, <https://data.census.gov/table/ACSST5Y2023.S0101?g=160XX00US3771780>

² NCDEQ "Division of Waste Management Site Locator Tool" <https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=7dd59be2750b40bebefa49fc383f688>. Accessed 19 Nov 2025

mill site, which drains into Chockoyotte Creek and the Roanoke River. Reuse of these key brownfield sites will address their environmental impacts, blight, and bolster riverfront revitalization efforts.

Non-Lead Member Roanoke Rapids: TA – Historic District (Pop 15,299; MHI: \$53,981; Poverty: 22%)³. The City of Roanoke Rapids' economy experienced signs of trouble in the 1980s after the opening of I-95 and expansion of shopping centers nearby, devastating the downtown commercial corridor. The most significant pillar of the City, textiles, began suffering its first major decline in the 1990s and mills began to close. These were closely followed by the closure of major retailers such as Roses, Ames, and K-Mart. From 1997 - 2003, over 2,500 jobs were lost in Roanoke Rapids with mills and supporting businesses left vacant. Nowhere is this decline more prevalent than in this TA, where the Highway 48 corridor runs through Roanoke Rapids Historic District. A corridor and district littered with blight, including a large former textile mill, Roanoke Rapids seeks to revitalize this area through strategic brownfields transformation to boost the local economy. Although I-95 once diverted traffic away from small downtown corridors, experiential tourism is redefining that narrative. By assessing and revitalizing underutilized properties along historic connector routes, the town can establish new gateway destinations and repurpose blighted sites for restaurants, cultural venues, and outdoor recreational hubs that appeal to travelers seeking authentic rural experiences

UCPCOG Lead-Member: TA is the small jurisdictional boundary of Scotland Neck: (Pop: 1,640; MHI: \$18,202; Poverty: 47.7%)⁴. Scotland Neck was once a thriving agricultural town of 164+ farming families and support businesses. UCPCOG's last land-use plan and housing update conducted for the town revealed the land is now worked by 4 major agribusinesses and no new housing has been constructed since the 1970s. The reduction in agricultural diversity has significantly reduced viable job opportunities in the area and contributed to an exodus of residents, undercutting the tax base. The Town will use this grant to capitalize on its greatest asset, Sylvan Heights, the world's largest waterfowl park featuring over 2,500 birds from around the world. This wildlife conservation park is less than two miles from the TA, is a popular educational center, and a major eco-tourism attraction. Despite this park's potential, the Town has struggled to attract new businesses and residents, as evidenced by our closed hospital, abandoned oil company, shuttered service stations and other closed businesses that blot this small community's landscape. These brownfields continue to blunt efforts to bring much needed residents, tourists, businesses and affordable housing to the area.

c. Description of Priority Brownfield Sites: Weldon, located near Roanoke Rapids along Hwy 158, has 19 known UST incidents, a former dry cleaner, 1 pre-regulatory landfill and several abandoned industrial facilities related to textiles and forestry⁵. These sites range from ¼-acre to 75+ acres. Weldon's priority site is the 76.54-acre former J.S. Turner & Son Lumber Mill on Mulberry Street (no street #) that closed its doors in the 80's. The community is concerned with potential petroleum contamination from lubricants and fuels used in the mill machinery as well as chromium, copper, and arsenic from treating lumber that can leach into the soil and groundwater. There are at least 4 dilapidated and vacant buildings on site, each **located in a federally regulated floodplain** which increases the risk of contaminant mobility to an adjacent residential community and nearby elementary school, located less than a quarter mile from the site. A CSX transportation line that connects the City of Wilson and Weldon runs directly in front of the parcel, contributing to additional contamination (e.g. pesticide) risks from rail operations. The complex nature of the investigation needed for this site has deterred private investment without the aid of this grant. Weldon prioritized the **J.S. Turner & Son** site due to its strategic location, with its rail access offering a

³ U.S. Census Bureau. American Community Survey 2023 5-Year Estimates, Tables DP05, S1901, and S1701, for Roanoke Rapids, NC. Accessed via <https://data.census.gov> on 15 November 2025

⁴ U.S. Census Bureau. American Community Survey 2023 5-Year Estimates, Tables DP05, S1901, and S1701, for Scotland Neck, NC. Accessed via <https://data.census.gov> on 15 November 2025

⁵ North Carolina Department of Environmental Quality. *ArcGIS Web Application*, NCDEQ Maps Portal, ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=7dd59be2750b40bebebf49fc383f688. Accessed 19 Nov. 2025.

unique opportunity to attract larger commercial or industrial investors and business tenants once assessed and cleaned up. Additionally, this priority site is 1.37 miles from the former Roanoke Valley Power Facility, a coal-fired power plant that closed in 2017.

Our Historic District in **Roanoke Rapids** (TA) has brownfields ranging from 0.5-acres to 13+ acres and includes old mill sites, vacant store fronts, a fire damaged former HVAC company, 32 sites with known releases from USTs, and at least 2 vacant dry-cleaning facilities⁶. The priority site is the 13.21-acre **former JP Stevens textile manufacturing plant** at 501 Jackson Steet, located just one block off Highway 48 in the heart of the District. The site once provided jobs and housing for residents. Closed in 2003, the plant is in a residential neighborhood and within walking distance to 3 community parks, a public library, and Roanoke Rapids High School. This 500,000 square foot plant is now severely underutilized, with only 25% used for light industrial storage. There are concerns with heavy metals, VOCs, petroleum contaminants and solvents from former operations negatively impacting the nearby residents and community assets, particularly through vapor intrusion. These concerns have also stifled interest in property revitalization. This site is a priority for the town due to its historical significance, strategic location, good infrastructure, potential for mixed use redevelopment, and need to identify environmental threats. Proper assessment will identify the potential health threats to the adjacent residences and community members.

Scotland Neck is home to at least a dozen brownfield sites, including a closed hospital, abandoned oil company, dry cleaners, several closed service stations, and vacant storefronts. They range in size from 1/3-acre to the UCPCOG Priority Site, Scotland Neck's 5.07-acre former **Community Hospital** at 710 House Avenue, which closed in 2017. Although the current owner is interested in redeveloping the property, without financial backing to assess and address the many environmental concerns, the rural medical care building has remained vacant. The former medical campus directly neighbors the Scotland Neck Primary School, Head Start School, and a residential community. The town is concerned that heavy metals, pharmaceutical/chemical waste contaminants, petroleum from USTs, and asbestos and lead-based paint (building was constructed in the 1950's) are impacting nearby residents and threaten future occupants. This site is priority as assessment will identify conditions potentially impacting adjacent residents and students and put the site one step closer to revitalization with the affordable needed by the Town.

d. Identifying Additional Sites: Working with community stakeholders, Coalition members, and local leadership, UCPCOG has already developed an inventory of over 400 Brownfield sites, including sites in the TAs, to supplement this initial inventory with additional sites. We will also use the NCDEQ Site Locator tool, historic land-use records, and other health and economic indicators to ensure we are including sites in areas historically affected by economic disinvestment, health disparities, and environmental burdens. Our project team will prioritize these sites using a matrix and ranking system that weighs site conditions, redevelopment interest, economic impact and job creation potential, and other factors that can deliver the greatest benefit to the surrounding community's needs.

Revitalization of the Target Area (TA)

e. Reuse Strategy and Alignment with Revitalization Plans: The reuse strategies for our priority sites align with established community priorities, municipal revitalization plans and strategies, and the UCPCOG's regional [Comprehensive Economic Development Strategy \(CEDS\) 2027](#). The CEDS is a unanimously adopted plan that outlines strategies to address the environmental, economic, health, and job revitalization challenges across the region and was developed with input from each of the TA communities. CEDS Visions that align directly with this project include: "All residents have the resources necessary to lead a healthy and prosperous life" and "Community wealth is generated throughout the region." Specific supporting Initiatives include: "Work with the region's small towns to develop public incentives and realign development to remove barriers to

⁶ North Carolina Department of Environmental Quality. *Division of Waste Management Site Locator Tool*. "Historic District – Roanoke Rapids, NC", NCDEQ GIS Web Application, 2025, ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=7dd59be2750b40bebebf49fc383f688. Accessed 19 Nov. 2025

downtown infill and building reuse,” and “analyze the region’s needs to help stakeholders prioritize the most strategic investments at existing or additional business and industrial sites.”

Weldon’s J.S. Turner & Son Lumber Mill Site is projected to be reused as commercial or light industrial redevelopment which complements existing residential and office/institutional development per the Town’s *Land Use Plan*. This meets one of the four goals from the Town’s *2020 Healthy Places for Healthy People* plan, which is to “support downtown revitalization and economic development efforts in Weldon.” The strategies to meet that goal include “*identifying potential properties for reuse and redevelopment and envision new opportunities for vacant or distressed buildings*,” which is addressed in this grant application. Town officials noted that new commercial or industrial buildings constructed on the site can incorporate renewable energy from the installation of solar panels and are encouraged to incorporate energy efficiency measures like LED lighting, well-insulated and strategically placed windows, doors, and skylights.

Roanoke Rapids’ revitalization strategies in adopted plans focus on extensive, ongoing improvements to infrastructure, revitalizing a largely vacant downtown, targeted housing replacement/repair programs, and more. A priority is to redevelop mill sites with new, light industrial, commercial/retail, and affordable housing. Plans recognize the **J.P. Stevens Plant** as a brownfield and the City chose this site as it clearly aligns with and advances the local government’s land use and revitalization plans and related community priorities for affordable housing and neighborhood commercial/retail needs. The desired reuse of this site (mixed-use) has been heavily influenced by public input received throughout various planning processes and is fully supported by the current site owner. Plans for reuse of the property leverage new capital investment for additional community-based services and energy efficient housing options through revitalization of the existing mill village neighborhood.

Scotland Neck is an excellent example of a small, rural town that’s formal strategy is to preserve its rural character and charm while embracing change. The small main street still has its family-owned hardware/general store, architecturally preserved and beautiful structures, and is the last remaining town where you can park in the middle of main street via its unique design. The **Community Hospital** site’s affordable housing redevelopment strategy is a community priority with the full support of town leadership and its residents. This reuse perfectly aligns with the federally recognized and regionally adopted CEDS regional housing initiative.

f. Outcomes and Benefits of Reuse Strategy: The redevelopment of the priority sites will significantly stimulate economic development within the target communities by meeting the critical need for new commercial, mixed-use, affordable housing, and/or light industrial space developments. Planned redevelopment will allow the city to ensure adopted resiliency goals, including extreme weather (primarily heat and flooding), and energy efficiency measures are incorporated in the reuse strategy and the plans for cleanup and construction. Redevelopment will create jobs, increase property and tax values, bring new businesses and people to the TAs, and attract/leverage additional private investment. UCPCOG estimates revitalization of the priority sites alone will result in over \$65,000,000 of private investment based on input from the towns’ leadership about past interest in these sites. The Weldon Town Administrator said, “*redevelopment of our site has the potential to create commercial or light industrial space and attract over \$30 million in capital investment.*” Roanoke’s City Manager stated, “*Redevelopment of the (J.P. Stevens) mill must be addressed to successfully market and revitalize the central commercial areas and to preserve Roanoke Rapids’ core identity.*” Reuse of the hospital in Scotland Neck will bring new housing to a town that has seen none since the 1970s, as well as attract new residents, businesses, and additional tax revenue.

All priority site municipalities have been engaged in ongoing extreme weather mitigation planning as outlined in the CEDS and led by UCPCOG. These efforts include supporting industrial solar buildouts, using energy efficient measures in municipal projects, micro-grid systems for community assets, electric vehicle charging infrastructure buildout, and “green” land use plan amendments. As the Lead Applicant, UCPCOG will guide and assist the municipalities with resilience, adaptation, and mitigation planning strategies. Redevelopment will implement stormwater quality Best Management Practices (BMPs) to protect residents and community investments by improving drainage to help prevent localized flooding.

Strategy for Leveraging Resources

g. Resources Needed for Site Reuse: This Assessment Coalition grant is needed to open up and leverage additional funding opportunities for site reuse. UCPCOG is the primary resource for grants and other funding mechanisms for our small, rural communities. We have a strong track record of leveraging funds on brownfield projects, with \$69,000,000+ in leveraged funds documented in ACRES from past EPA BF Assessment Grants. If additional funds are needed for site assessment and/or remediation, we are eligible and will apply funding available through the NC Dry Cleaning Solvent Cleanup Act program, the NC LUST Trust Fund, and/or apply for EPA Brownfields Cleanup or Multipurpose Grants. We also strategically use the NC Brownfields Redevelopment Section (NCBRS), which provides excellent liability protection and tax incentives to prospective developers. For site reuse opportunities resulting from these assessments, UCPCOG has a strong track record of receiving, administering, and leveraging federal, state, foundation and other sources of funds. Select redevelopment activities may be funded by North Carolina’s Clean Water Management Trust Fund (CWMTF) and/or use state and federal Historic Tax Credits. In FY 2024/25, the UCPCOG Planning and Development Services (PDS) Department had 73 active projects representing over \$118M dedicated to site reuse, infrastructure development, community development, and/or economic development. Projects include low-income housing, Energy Efficiency, clean energy, water/sewer/stormwater infrastructure, disaster/extreme weather resilience, and Main Street redevelopment. Lead funders include US EDA, USDA, NC Dept. of Commerce, NC Dept. of Environmental Quality, Southeast Crescent Regional Commission, and Kate B. Reynolds Foundation.

h. Use of Existing Infrastructure: EPA brownfield funding will be used primarily to address priority properties with existing infrastructure service unlocking near term development and promoting revitalization in our most impacted neighborhoods. This will also provide opportunities to preserve the unique natural resources and history of our communities. The priority sites have existing sewers, water access, natural gas, electric, transportation access and telecommunications with capacity to promote mixed forms of reuse. **Brownfield redevelopments will reuse existing roads, sidewalks, broadband, and utility** (gas, electric, water, and sewer) **infrastructure and buildings** to the fullest extent possible.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community’s Need for Funding: Weldon, Roanoke Rapids, and Scotland Neck have no resources to fund site assessment, mitigation/remediation, and redevelopment at these sites due to both small and low-income populations resulting in municipal tax revenues in each target community plummeting over the decades. UCPCOG heavily supports our local governments primarily through grant funded programs, including past EPA Brownfields Grants. EPA Brownfield Cleanup Grants can meet those needs of these communities and State Commerce, EDA, USDA and other sources can assist with reuse/redevelopment costs, All TAs are located within Halifax County, which is ranked as the third most distressed of NC’s 100 counties (NC Department of Commerce) and has a median Household income of \$41,629, well below the North Carolina (\$67,481) and national (\$74,755) averages. The median household income for two of our three target communities is even lower (Weldon - **\$37,330**; Scotland Neck - **\$17,271**).⁷ The accompanying table further demonstrates our TAs need for funding and health and welfare issues of their residents.

| Demographic Data | Weldon | Roanoke Rapids | Scotland Neck | Halifax County | North Carolina | US |
|-------------------------|----------|----------------|---------------|----------------|----------------|-------------|
| Total Population | 1,522 | 15,024 | 1,640 | 48,219 | 10,470,214 | 331,097,593 |
| Median Household Income | \$38,725 | \$53,981 | \$18,202 | \$45,071 | \$73,958 | \$75,149 |

⁷ U.S. Census Bureau. "Selected Economic Characteristics." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP03, 2022, https://data.census.gov/table/ACSDP5Y2022.DP03?q=snapbenefits&g=010XX00US_040XX00US37_160XX00US3756900,3759780,3771780. Accessed November 2025.

| | | | | | | |
|-----------------------------------|-----------|-----------|------------|-----------|----------|-----------|
| Per Capita Income | \$20,453 | \$27,714 | \$19,716 | | \$37,641 | \$41,261 |
| % Unemployment | 18% | 7.0% | 6.9% | | 5.1% | 5.3% |
| % All In Poverty | 24.8% | 21.8% | 47.7% | 25.2% | 12.5% | 12.5% |
| % Families w/ Children in Poverty | 45.0% | 28.9% | 43.2% | | 15.2% | 13.6% |
| Median Home Value | \$109,000 | \$129,000 | \$102,7000 | \$118,600 | \$287200 | \$244,900 |

b. Health or Welfare of Sensitive Populations: Our three TAs score in the highest and second highest quartiles of the CDC Social Vulnerability Index indicating, along with other data below, the very high degree to which sensitive populations in the TAs have SEVERE economic hardship and increased conditions that heighten susceptibility to environmental contamination and poor health outcomes⁸. The sensitive population in each of our TAs experience severe health and welfare issues due to being impoverished citizens and families with disproportionate elderly, children, and working aged people with high unemployment levels (see above table).

Weldon's population consists of 24.8% of people below the poverty level compared to the state average of 12.5%, including sensitive populations such as people with disabilities (19.4%), children under age 5 (7.3%) and adults over the age of 65 (18.4%) which are all well above the state average (13.4%, 5.7%, and 16.9%). The North Carolina DEQ's EJHBSH⁹ data highlights significant health threats to these sensitive populations due to environmental and socioeconomic stressors.

Several environmental burdens, including from exposure pathways related to priority site, present immediate health concerns and include elevated levels of lead-based paint (79th state percentile), wastewater discharge risk (95th state percentile), and the presence of underground storage tanks (83rd state percentile). These pollutants likely originate from the 3 water dischargers, 4 air pollution, 4 brownfields-including these sites, and 1 toxic release inventory site reporting to EPA within the community.¹⁰ Additionally, within the Town of Weldon, the coal-fired Roanoke Valley Power Facility formerly owned by Westmoreland Coal Company closed in 2017 and those risks are still unknown. Through funding of the EPA Brownfields Assessment Coalition Grant, characterizing contaminants at the J.S. Turner & Sons Lumber Mill site will uncover potential contaminants which could be contributing to these health disparities and set the stage to address reuse and redevelopment. It is estimated that this site's redevelopment to mixed use will bring new jobs to this small town, increase the local tax base, and remove a significant source of blight along its major corridor.

The Roanoke Rapids Historic District is defined by three highly economically distressed census tracts (table above). Assessing this site through the EPA Brownfields Assessment Coalition Grant will allow the City to remove the assessment barrier and execute a course to cleanup and reuse this site. Redevelopment of the site to a light industrial, commercial/retail, and/or affordable housing use will enhance economic opportunity, increase adjacent property values, stabilize land use in the community and go a long way to identifying and addressing the health threats associated with its former use.

The NC EJHBS identifies several significant health threats to the community, particularly for its high poverty percentage (21.8%), people with disabilities (19.9%), elderly (18.1% people over age 65), and young children (6.6% under age 5). The area faces elevated environmental burdens including, on average, high levels of diesel particulate matter (74th percentile in the state), nitrogen dioxide (74th percentile), leaking underground storage tanks (81st state percentile), lead based paint (63rd state percentile) and wastewater dischargers (86th state percentile). There is concern that chlorinated solvents from the former J.P. Stevens mill may be causing vapor intrusion issues in the neighborhood surrounding the site.

⁸ Agency for Toxic Substances and Disease Registry. "SVI Interactive Map." *Place and Health – Geospatial Research, Analysis, and Services Program (GRASP)*, 26 July 2024, <https://www.atsdr.cdc.gov/place-health/php/svi/svi-interactive-map.html>.

⁹ NC DEQ EJHBS Tool ArcGIS Experience, https://experience.arcgis.com/experience/4c9561f7a1a7415d86201a785753e56f/page/Page?views=HEALTH#data_s=id%3Awidget_8_output_config_0%3A0%2Cid%3AdataSource_2-18f304e0d39-layer-53%3A50016. Accessed 21 Nov. 2025

¹⁰ EPA "EJScreen Community Report for City: Weldon, NC." <https://ejscreen.epa.gov/mapper/> [17 Oct. 2024]

Scotland Neck has a high population in poverty of 47%, 16.6% of the population are children, 25.9% of the population is disabled, and 28.8% of the population are adults over age 65. These sensitive populations are also encumbered by the inability to access health insurance, with 5.6% of the population is uninsured, and 13.1% of the population is unemployed. All these factors contribute to increased environmental, economic, and social vulnerability.

The community is highly vulnerable to lead based paint risks (61st percentile). Additionally, the community faces risks due to its increased proximity to leaking underground storage tanks including USTs on site (47th percentile) and proximity risk to RMP sites (71st percentile). In addition to addressing potential contaminants through the Assessment Coalition Grant at the former hospital that could be contributing to the adverse health issues in Scotland Neck, its redevelopment as an affordable housing complex will address lack of housing and tax revenue that significantly contribute to the community's welfare issues.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Our partners and communities are concerned that contamination associated with these sites through vapor intrusion, soil and groundwater contamination are contributing to the great-than-normal incidences of disease in our TAs. Each priority site is located adjacent to residential properties, schools, and parks, increasing that risk of pollutant exposure. According to the National Cancer Institute State Cancer Profiles for age adjusted cancer incident rates, Halifax County's rates for colon, rectum, kidney, and lung cancer are all higher than the NC and US averages. Asthma and cancer have been shown to be directly related to contaminants (VOCs, SVOCs, metals) suspected at our priority brownfields sites. These communities rank in the 93rd, 74th and 89th state percentiles, respectively, for asthma. In Roanoke Rapids, the pollutants in the report contribute to respiratory and cardiovascular health risks, with the community experiencing higher-than-average rates of asthma (11.1%) and heart disease (7.6%), both surpassing state averages. Cancer is the leading cause of death in Halifax County and Weldon, Roanoke Rapids, and Scotland Neck rank in the 61st, 60th, and 79th percentiles, respectively, for cancer. The Weldon, Roanoke Rapids, and Scotland communities have high rates of low life expectancy and are in the 95th, 75th, and 79th percentiles, respectively. Utilizing funding from the EPA Assessment Coalition Grant, our project will identify and reduce the threats to our TA's communities by strengthening their environmental conditions through the assessment, eventual potential cleanup and safe reuse of our brownfield sites. The Phase I and Phase II Environmental Site Assessments (ESAs) outputs included in this grant application and project proposal will identify the presence of contaminants (threats) at the sites. If necessary, contaminants will be removed or mitigated, reducing or eliminating the associated threats through site remediation and cleanup. These efforts will accelerate each sites' reuse plans of affordable housing, mixed-use development, by attracting new residents and businesses (retail, healthcare, food, etc.) supporting our communities. Our projected reuses will also reduce blight and bring the services needed (better and more accessible healthcare and healthy food choices) to our residents, thereby improving the overall welfare of the communities.

d. Economically Impoverished/Disproportionately Impacted Populations: Previous zoning and governmental policies in our TAs encouraged the development of these now determined brownfield sites near the residents that worked there. As these sites have become abandoned and idled, the surrounding communities have encountered disinvestment and become inhabited by economically challenging and sensitive populations. The former policies and resulting commercial operations have resulted in environmental contamination, blight, and economic disparities that have disproportionately impacted the communities that now live there. This grant and resulting reuse strategies will help reverse the economic trends by bringing new residents, businesses and jobs to each area with the corresponding increase in the tax base and tax revenue. These new job opportunities will help reverse the trend of population decrease of the TAs. This grant will identify and reduce environmental threats through our ESAs and subsequent cleanup activities as necessary.

Community Engagement

e. & f. Project Involvement & Project Roles: In place since 2010, the UCP Brownfields Coalition has both municipal management and elected leadership representation from throughout the region and each (non-lead) target community. Members provide input on site selection, prioritization, cleanup alternatives, potential health threats, reduction of any identified threats, and site redevelopment opportunities. They approved at a regular meeting the priority sites in this application and likewise approve additional sites for assessment. Non-lead members are more deeply engaged informed regarding their priority sites through step-by-step communication with the UCP Project Manager and QEP including helping organize community engagement, additional site prioritization, reviewing ESAs, Corrective Action Plans (CAPs), Analysis of Brownfields Cleanup Alternatives (ABCAs), resulting Brownfield Agreements (BFAs), etc.

Organizations below are UCP Community Engagement Partners that represent residents and/or businesses directly affected by the project work in the TAs and project geographic boundary. SPECIFIC INVOLVEMENT: All will aid this effort with community outreach, information dissemination, input on potential additional site prioritization choices, site reuse planning, and more. Each have unique and large citizen, community, business, and leadership networks. **A Better Chance, A Better Community (ABC2):** Mission: Build awareness and a deeper understanding of resiliency amongst rural communities by connecting them to resources and programs that activate youth power, allow community growth and advance leadership development to address issues the community is facing amidst a changing social and environmental climate. POC: Kelby Hicks, kelby@abc2nc.org; **Area L AHEC:** Mission: To meet the health and health workforce needs of Edgecombe, Halifax, Nash, Northampton, and Wilson counties by providing educational programs and services that bridge academic institutions and communities to improve the health of the people of North Carolina with a focus on disinvested populations. POC: Debbie Futrell, debby.futrell@arealahec.org; **Choanoke Area Development Organization:** Mission: Assist low-income citizens to achieve self-sufficiency and a better quality of life. POC: Andre Rowe, arowe@nc-cada.org; **Halifax Horizons:** Mission: To support economic development in all of Halifax County; POC: Cathy Scott, cathyscott@halifaxdevelopment.com, **Restoration Weldon:** Mission: A group of volunteers who live, have lived, or consider themselves from Weldon, North Carolina, who will actively participate in the development of Weldon and the surrounding area as a thriving community of people dedicated to creating the best environment for a better life. POC: Alice Irby, [REDACTED]

g. Incorporating Community Input: UCPCOG will modify and use a proven Community Involvement Plan developed under previous EPA BF Assessment grants. UCPCOG understands collaboration is critical and effective engagement of community stakeholders is critical in all stages of the redevelopment effort. TA community members will be involved in all facets including project planning, site selection for assessments, cleanup decisions, and reuse planning through effective promotion of the project, public meetings, obtaining meaningful public input, and informative progress updates. UCPCOG and partners above will communicate opportunities for input and progress to communities through various media outlets, newsletters, email lists, websites, and social media. To solicit input and respond to inquiries, we will engage residents via in-person and virtual community workshops. Community conversations will be held to gather thoughts on site reuse concepts where potential opportunities will be presented including reuse options, related job creation, greenspace/parks, transit access, landscaping concepts, residential/commercial, and overall design. Outreach will be led by Community Engagement specialists at UCPCOG and the partner organizations, who will collaborate to ensure inclusion, including those with limited broadband access. Materials will be produced in English and Spanish. Translators and interpreters will be available during public meetings and upon request for other communications. Assistance for individuals with disabilities will be made by holding meetings at handicap accessible locations. A running log of community input will be maintained and assessed quarterly to identify and determine follow-up actions. Through these activities, the voice of the community will be heard and will inform the project.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Description of Tasks/Activities and Outputs

a. Project Implementation, b. Anticipated Project Schedule, c. Task/Activity Lead, & d. Outputs:

The UCPCOG project team will complete the following tasks within the four-year period of performance. Staff will primarily perform Project Management, coordinate Community Engagement activities, and work with the Qualified Environmental Professional (QEP) to complete Redevelopment Planning tasks. The QEP will complete the Environmental Assessment and Cleanup Planning activities.

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| <u>Task/Activity: Task 1 – Public Involvement – EPA-funded tasks/activities:</u> |
| <i>a. <u>Project Implementation</u></i> UCPCOG Project Manager (PM) will serve as community engagement coordinator <u>leading tasks with at least one liaison partner per community as listed in section (2)e.f. above.</u> Community engagement activities are location specific & will include comprehensive methods for compliant costs and to reach the local community. <i>Non-EPA grant resources needed to carry out tasks/activities, if applicable: N/A</i> |
| <i>b. <u>Anticipated Project Schedule:</u></i> Public Involvement will occur throughout the 48-month grant period. Regularly scheduled Steering Committee meetings will take place semi-annually. Community Involvement Plan (CIP) in 1 st Quarter |
| <i>c. <u>Task/Activity Lead:</u></i> UCPCOG experienced professional facilitators, planners and project managers. |
| <i>d. <u>Outputs:</u></i> 8-12 site specific community engagement workshops; 2-4 general informational sessions for developers, lenders and property owners; 3-5 Pre-Phase II community outreach sessions; 6 bi-annual regional newsletters; 2 newspaper articles annually in 2 newspapers; 6-10 Brownfields Coalition Steering Committee meetings; social media; attend one or two National and one Regional Training Conferences. |

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| <u>Task/Activity: Task 2 – Site Inventory: EPA-funded tasks/activities:</u> |
| <i>a. <u>Project Implementation</u></i> UCPCOG staff led extensive inventory work conducted during previous grants. Our staff and QEP will review/refine the current inventory and update the inventory based on information gleaned during community and Steering Committee meetings and other input received from our member communities. As additional sites are identified for eligible activities throughout the geographic boundary(ies) identified in 1.a.i., they will be prioritized for assistance based on environmental and public health needs with an emphasis on redevelopment interest, potential to improve the community, etc. <i>Non-EPA grant resources needed to carry out tasks/activities: N/A</i> |
| <i>b. <u>Anticipated Project Schedule:</u></i> Inventory work will start immediately and occur throughout the grant period. Selection for assistance will occur once priority sites’ reasonable cost estimations are known. |
| <i>c. <u>Task/Activity Lead:</u></i> UCPCOG staff with support from our QEP. |
| <i>d. <u>Outputs:</u></i> Inventory updates, additional sites ranked, selected by program members, and assessed. |

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| <u>Task/Activity: Task 3 – Environmental Site Assessments: EPA-funded tasks/activities:</u> |
| <i>a. <u>Project Implementation:</u></i> Town officials indicate they have access to each priority site. Our QEP will complete Phase I ESAs on all eligible sites in accordance with ASTM 1527-21 and the EPA’s All Appropriate Inquiries (AAI) rule (40 CFR Part 312). Phase II ESAs will be completed in accordance with ASTM 1903-11. A Generic Quality Assurance Project Plan (QAPP) will be submitted to both EPA and NCDEQ for review and approval along with Site-Specific Sampling and Analysis Plans (SSSAPs) for each site. <i>Non-EPA grant resources needed to carry out tasks/activities N/A</i> |
| <i>b. <u>Anticipated Project Schedule:</u></i> We anticipate our Phase I ESAs to be completed by month 36. We anticipate Phase II ESAs to be completed between months 12 and 30 (some Phase II ESAs will start while Phase I ESAs are completed). |
| <i>c. <u>Task/Activity Lead:</u></i> Our chosen QEP due to their specialized experience with support from UCPCOG staff. |
| <i>d. <u>Outputs:</u></i> 25 Phase I & 8 Phase II ESAs, Generic QAPP, 8 Site-Specific SAPs, 3-5 sites entered into the NC Brownfields Program. |

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| Task/Activity: Task 4 - Cleanup and Redevelopment Planning: EPA-funded tasks/activities: |
| <i>a. Project Implementation</i> We anticipate our Contractor will prepare Analysis of Brownfields Cleanup Alternatives (ABCA) or equivalent documents, asbestos/lead-based paint removal designs or a Property Condition Assessment (PCA). <i>Non-EPA grant resources needed to carry out tasks/activities</i> N/A |
| <i>b. Anticipated Project Schedule:</i> We anticipate these activities to take place between months 12-46. |
| <i>c. Task/Activity Lead:</i> Our chosen QEP due to their specialized experience with support from UCPCOG staff. |
| <i>d. Outputs:</i> A total of 5 ABCAs (or equivalent), asbestos/lead removal designs and/or Property Condition Assessments. |

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| Task/Activity: Task 5 – Programmatic Administrative Tasks: EPA-funded tasks/activities: |
| <i>a. Project Implementation</i> UCPCOG will provide financial and performance reporting, contractor solicitation, selection & oversight, Quarterly Reports, meetings with the EPA Project Manager and EPA team and other eligible duties. <i>Non-EPA grant resources needed to carry out tasks/activities</i> N/A |
| <i>b. Anticipated Project Schedule:</i> Administration will occur throughout the 48-month grant period. |
| <i>c. Task/Activity Lead:</i> UCPCOG experienced professional Planners and Project Managers. |
| <i>d. Outputs:</i> Complete, and on-time, on budget, Federal, State, Local compliance including reports. |

e. Cost Estimates

| Category | Tasks | | | | | |
|----------------------|------------------|-----------------|------------------|-----------------|-----------------|--------------------|
| | 1. Pub. Inv. | 2. Inv. | 3. ESAs | 4. CUP | 5. Admin | Total |
| Personnel* | \$81,406 | \$5,020 | \$26,213 | \$4,462 | \$33,463 | \$150,563 |
| Fringe* | \$28,109 | \$1,773 | \$9051 | \$1,541 | \$11,555 | \$51,989 |
| Travel | \$9,500 | \$1,000 | \$2,500 | \$2,000 | 0 | \$15,000 |
| Equipment | 0 | 0 | 0 | 0 | 0 | 0 |
| Supplies | \$1,500 | 0 | 0 | 0 | 0 | \$1,500 |
| Contractual (QEP) | \$50,000 | \$10,000 | \$823,539 | \$30,000 | 0 | \$913,539 |
| Construction | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Direct* | \$170,514 | \$17,753 | \$861,303 | \$38,003 | \$45,017 | \$1,132,591 |
| Indirect Costs*^ | \$36,446 | \$2,247 | \$11,736 | \$1,998 | \$14,982 | \$67,409 |
| Total Budget | \$206,961 | \$20,000 | \$873,039 | \$40,000 | \$60,000 | \$1,200,000 |

*Personnel, Fringe, TD, and Indirect contains rounding to the single \$ for chart readability. Fringe rate for FY 2026 is 34.53% of Personnel. *^ Indirect is 33.28% of Salary & Fringe per Federally approved cost rate plan included with grant application package.

Task 1 – Public Involvement/Community Engagement (Pub. Inv.): Personnel costs: 1695 hours @ \$48/hour ave. = \$81,406+\$28,109 fringe = \$109,514; Contractor participation: 400 hrs. at \$125/hr. = \$50,000; Travel: \$4,500 for local events and meetings + \$4,000 for staff for National Brownfields Conference + \$1,000 for an EPA Region IV or state level training workshop = \$9,500; \$1,500 in supplies includes materials, printing, etc. for community outreach and engagement; Total budget is **\$206,960** with \$36,446 of indirect support.

Task 2 – Site Inventory: Personnel costs: 105 hours @ \$48/hour ave. + fringe = \$6,793; 80 hours @ \$125/hr. = \$10,000 for contracted assistance + \$1,000 for travel in region. Total budget is **\$20,000** with indirect.

Task 3 – Environmental Site Assessments (ESAs): Personnel: 545 hrs.@\$48/hr.+fringe+travel=\$37,764 Contractor budget is \$823,539: Generic QAPP (\$5,000). 25 Phase I ESAs at approximately \$3,500 each. 8 SSSAPs at \$4,500 each. Estimated Phase II ESAs at the JP Stevens plant = \$100,000, JS Turner

& Son mill = \$95,000, community hospital = \$55,000. With the remaining funds, we anticipate completing 5 additional Phase II ESAs at approximately \$90,000 apiece. Total is **\$873,039** including PM indirect support.

Task 4 - Cleanup and Redevelopment Planning (CUP): Personnel Costs: 93 hours @ \$48/hour ave. + fringe = \$6,003; Contractor = 5 ABCA/designs/PCAs @ \$6,000 = \$30,000 (ave. cost depends on type of document needed and project scope); \$2,000 travel in region. Personnel & travel include community and stakeholder engaged redevelopment planning based on ABCAs. Total budget is **\$40,000** including indirect.

Task 5 - Administrative Tasks (Admin): Personnel costs: 697 hours @ \$48/hour ave. = \$33,463+\$11,555 fringe = \$45,018 + \$14,982 in federally approved indirect for a total of **\$60,000** (5% of EPA funds). Costs are for eligible program tasks: BFA Cooperative Agreement Work Plan, Community Engagement Plan, contractor solicitation/selection/oversight, financial and performance reporting, meetings with the EPA Project Manager and EPA team and other eligible duties.

f. Plan to Measure and Evaluate Environmental Progress and Results: At a minimum, outputs to be tracked include the number and attendees present at community workshops, public meetings, environmental assessments, ABCAs, and reuse plans; and the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, jobs created, clean energy, energy efficiency, and local resilience to the impacts of extreme weather and natural disasters.. The UCPCOG will track/measure/evaluate our project progress through monthly status reports from our QEP and information entered into EPA's ACRES. Monthly calls (minimum) with our contractor will focus on the project budget, accomplishments, outputs/outcomes and how they track with the approved work plan schedule. Site reuse & CUPs will consider energy efficiency. Quarterly reports will be provided to EPA.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Capacity: UCPCOG has the proven capacity and ability to carry out and manage the programmatic, administrative, and financial requirements of this grant. We currently manage over 70 projects representing over \$118M in local, state, federal, and foundation funds. In FY2024, UCPCOG attracted over \$29M in new funds to the region for local and regional projects. Recent grant funding includes CDBG Neighborhood Revitalization, Clean Water & Drinking Water Management Trust Funds, local/healthy food supply chain and access funds, and digital inclusion implementation funds. As detailed in 4.e.(1), our BF program has proven capacity from past EPA BF Assessment Grant projects.

b. Organizational Structure: The UCPCOG is a State Authorized Regional Council of Governments and Federally recognized Economic Development District governed by a Board of Directors comprised of the 46-member governments. In the UCPCOG organizational structure, we have a Brownfields Steering Committee composed of our TA governments and other member governments and led by our UCPCOG Project Manager. The Project Manager and our Steering Committee will ensure the timely and successful expenditure of funds and the completion of the grant's technical, administrative, and financial requirements. Our Technical Coordinating Committee (TCC), a subset of our Steering Committee made up of the UCPCOG Project Manager and representatives of our coalition members and TA leaders, will identify, select, and prioritize sites for assessment, cleanup, etc. The TCC will also work with the Project Manager on technical issues of site eligibility, ownership, priority for redevelopment, etc. This structure ensures each coalition member has meaningful involvement in the decision process and determining how the expenditure of grant funds will benefit their communities.

c. Description of Key Staff: Highly experienced staff at UCPCOG will be responsible for the grant management, maintaining the site inventory, and driving the community engagement process under the direction of partners. The team involved in our last grant, including Project Manager Ron Townley, are in place. Ron Townley has led BF projects using EPA Assessment, Cleanup, and RLF funds since 2001 (an EPA BF Pilot project awarded to Land-of-Sky Regional Council of Governments) and oversees comprehensive disaster and resilience and energy efforts through state funding. Ron has travelled

nationally at the request of EPA to aid communities considering regional approaches to Brownfields. Other staff include Department Director, Ben Farmer, specializing in Planning, Economic, and Community Development; Regional Planner, Mary Jane Lyonnaise, specialist regarding disinvested communities, sensitive populations, food systems, and community health; Betsy Kane, Senior Planner, leads community development and revitalization, downtown/main street redevelopment, housing revitalization, and ARPA technical assistance; Helen Stanford, Senior Regional Planner specializing in water/sewer/stormwater; Planning Technician Sarah Medlin, outreach and administrative support; and Kelly Lancaster, Finance Director, financial administration compliance, budgeting, payroll, and federal funds through the ASAP system. UCPCOG has had no adverse audit findings in 46 years.

d. Acquiring Additional Resources: An RFP will be issued within a month of the award notice to acquire professional environmental contractor services in accordance with the procurement standards contained in 2 CFR 200's relevant sections. A prior successful and EPA compliant system is already in place to review and recommend the most qualified firm to the Executive Director and Board of Directors who are authorized for procurement. The contractor will be primarily responsible for Phase I & II ESAs, Clean-up Plans and will also assist with community outreach, ACRES, and compliance activities. We don't anticipate the need for additional resources. The UCPCOG has been successful in retaining key staff such as those proposed for this project team. However, in the event of turnover, we are experienced in quickly recruiting qualified replacements. Our team's experience with EPA and other grant projects allows for quick acquisition of additional resources should the need arise.

Past Performance and Accomplishments

e. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments: UCPCOG was awarded 3 EPA Community-Wide Assessment grant awards (2011, 2014, 2020), with all outputs and outcomes accurately reported in ACRES at the time this application was submitted. Accomplishments from the first 2 grants resulted in the UCPCOG BF program receiving a 2017 National Association of Development Organizations' (NADO) Innovation Award for organizational structure, project approach, and successes with Brownfields Revitalization. Lead staff led a session at the NADO National Training Conference in September 2017 to share their model of regional success in rural and impoverished communities. Specific outcomes and outputs from previous grant efforts include work on 35 sites, 33 Phase I ESAs (some multi-parcel), 12 Phase II ESAs, 2 cleanup plans for the NC Brownfields Program, and 71 cleanup and redevelopment jobs. Our efforts have resulted in over \$69M+ in leveraged site redevelopment funding occurring on 13 sites totaling 28.35 acres, \$800,000+ in committed funds for the redevelopment of the Patterson Mill site in Roanoke Rapids; CBDG catalyst award that turned 2 vacant warehouses in Littleton into a new public library; over \$200,000 for UST removals, asbestos removal, and building demolition from the City of Rocky Mount; over \$34,000,000 in property purchase/redevelopment funding, and an estimated \$4,800,000 in new market tax credits for development of the downtown Rocky Mount Event Center located in an distressed neighborhood. Under the grant that ended 9/2023, the WestPoint Stevens industrial site in Roanoke Rapids signed a BFA and underwent an ownership change that will result in \$125M of foreign investment in the site, bringing 110 jobs. This investment is directly tied to our use of grant funds to thoroughly investigate this site. We have conducted 51 outreach meetings involving community residents, developers, lenders, realtors, public officials and/or Brownfields partnership members, held 16 formal presentations at events, 12 e-blast mailings of the UCPCOG brownfields program newsletter to over 500 recipients, and have had 8 write-ups in media/publications/reports.

(2) Compliance with Grant Requirements: UCPCOG successfully executed the 2011, 2014 and 2020 Community-Wide Assessment grant awards in substantial compliance with our work plans, schedules, and terms and conditions. There were NO remaining funds when the grants were closed on schedule. For each grant, our progress, including deliverables, MBE/WBE submittals, quarterly and annual reporting were timely and accurately achieved and reported in ACRES.

UPPER COASTAL PLAIN COUNCIL OF GOVERNMENTS

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www.ucpcog.org

January 2, 2026

Aditi Chakravarty
EPA Region 4
Atlanta Federal Center
61 Forsyth Street, S.W. 10th FL
Atlanta, GA 30303-8960

RE: Threshold Criteria Responses for 2026 EPA BF Coalition Assessment Grant

Dear Aditi Chakravarty & Threshold Criteria Reviewers:

To ensure clarity and compliance with Threshold Criteria for this EPA Coalition Assessment Grant Application:

2.B.(1). Enclosed with this Attachment of documents is the NC Council of Governments Statutory Authority demonstrating our eligibility to apply for these grant funds. We are a unit of local government. It also provides clarity on the UCPCOG status regarding not being exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code. Our non-lead members include the Town of Weldon, NC and City of Roanoke Rapids, NC. Each are units of local government and are hereby affirmed as both being eligible for funding. Neither of the non-lead members are exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2.B.(2). As detailed on the Narrative and Narrative Information Sheet, the target areas include the Town of Scotland Neck, NC, (UCPCOG – Lead Member) the Historic Downtown District of Roanoke Rapids, NC, (non-Lead Member), and the Town of Weldon (non-Lead member).

2.B.(3.). Neither non-lead member that has never been awarded an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant.

2.B.(4). We hereby attest that, as the Council of Governments of the non-lead members, and as the lead member in this application, UCPCOG has legal authority to expend grant funds on behalf of the nonlead members to conduct the proposed grant activities.

2.B.(5). See Attached Coalition Letters from each non-lead Member

2.B.(6). Outreach to the target communities will be led by the UCPCOG Project Manager in partnership with our community engagement specialists detailed in the grant narrative and coordinated through Steering Committee members, all of whom are committed to educating their constituencies on brownfields risks, project activities, and outcomes. UCPCOG will modify and utilize a proven Community Involvement Plan (CIP) developed under previous EPA BF Assessment grants. Modifications will include a very targeted focus on residents and others that have traditionally been economically distressed and have suffered from environmental injustices.

Input for our program will continue to be solicited, considered and responded to at Steering Committee meetings, targeted meetings/events in each community, and via follow up processes, as appropriate. Our targeted events will be held at strategic times and places for maximum engagement, especially prior to Phase II activities. All meetings will have virtual components for those who cannot participate in person. Spanish translators are available at meetings as needed. We will also develop a project website and continue posting updates on the UCPCOG Facebook and LinkedIn pages. We will extend materials and information through town halls and community centers. We also communicate progress and responses through an email list of over 560 constituents, local newspapers, newsletters, and reports to the region. See Narrative for budgetary and other details.

2.B.(7) Neither UCPCOG or the non-lead members have an open EPA Brownfields Assessment or Multipurpose Grant.

2.B.(8). Not Applicable

The above statements are true and attested by my signature this day January 2, 2026.

Please do not hesitate to contact me regarding any needed clarifications,

Ron Townley



Project Manager

Upper Coastal Plain Council of Governments

