

# 1. Project Area Description and Revitalization Plan

## a. Coalition Members

Foothills Regional Commission proposes a partnership with the four County governments, Cleveland, Polk, Rutherford, and McDowell Counties, which constitute its service area. FRC will serve as the applicant and lead coalition member, with the County governments contributing as non-lead members. The Counties lack sufficient staff dedicated to grant development and management to prepare or management a Brownfield Assessment Grant individually, and as FRC already serves as the conduit for other regional coordination efforts and as a source of grant writing and management services for its member governments.

## b. Challenges and Target Areas

The proposed project boundaries consist of the entire jurisdictions of Cleveland, Polk, Rutherford, and McDowell Counties. The foothills of western North Carolina were historically dominated by the textile and furniture manufacture industries, but as companies increasingly shifted their supply lines and production overseas at the turn of the millennium, many of the factories which were once the beating hearts of local economies shuttered their doors permanently. As a result, communities across the region contain sites previously dedicated to industrial use, for which the presence of hazardous materials and contaminants left over from the manufacturing process, or improperly disposed of in the past, poses a significant impediment to the redevelopment of these sites towards new, economically productive, uses.

## c. Description of Priority Brownfield Sites

As FRC is a council of government which serves all units of local government within the region and does not have an area of jurisdiction for which it is responsible as a general-purpose governmental unit, we have not identified a target identity for ourselves as the lead agency.

Cleveland County's target area is the site of a currently operational concrete plant in downtown Shelby, North Carolina, as well as the surrounding residential and

commercial district. The concrete plant is slated for relocation to a new location near the edge of the municipality, and potential environmental concerns include heavy metal contamination from the concrete manufacturing process. Assessment efforts will support the future redevelopment of the site for future residential or commercial use.

Polk County's target area is the former Southland Textiles Mill, located in a rural area of the county along the North Pacolet River. Possible environmental contaminants include possible seepage of hazardous materials into the surrounding soil or the nearby river. Future redevelopment options for the site include residential, commercial, or recreational uses.

Rutherford County's target area is the site of the now-demolished Stonecutter Mill, in Spindale, NC, and the surrounding residential and commercial district. The mill ceased operations in 1999 and was demolished between 2009-2013, according to the North Carolina Department of Historic and Cultural Resources' HPOWEB mapping tool. Potential environmental concerns include soil contamination from improperly stored or disposed petroleum products or other hazardous materials. Assessment efforts will support the future redevelopment of the site for future residential or commercial use.

McDowell County's target area for the assessment is the site of the former Clinchfield Mill complex, as well as the surrounding residential neighborhood. The Clinchfield Mill site was originally home to two manufacturing plants, the first built in 1915, and subsequently destroyed in a 2019 fire, a second extant mill built in 1917, and separate boiler and turbine houses. The nearby residential development includes mill houses constructed to serve as homes for the mill workers, as well as more recent construction. The remaining mill structure, most recently used as a warehouse for Western North Carolina recovery efforts, is slated for redevelopment into a seniors' apartment complex by Givens Estate, a local nonprofit developer, through a Department of Housing and Urban Development grant. Assessment efforts will assist with addressing potential environmental concerns with this redevelopment as well as future redevelopment of the rest of the site.

#### **d. Identifying Additional Sites**

Additional sites for assessment will be determined by consultation of the lead entity with coalition members and reviewed by a selection committee composed of

representatives from each coalition member. Additional sites will be prioritized based on the severity of the sites' expected environmental concerns, their suitability for redevelopment, and the number of other selected sites within the coalition member's geographic area.

**e. Reuse Strategy and Alignment with Revitalization Plans**

None of the participating jurisdictions have adopted a dedicated revitalization plan; however, redevelopment efforts are identified as priorities in two of the Counties' future land use plans. Cleveland County's Comprehensive Land Use Plan, adopted 2021, identifies redevelopment of industrial sites in Recommendation 21: "Develop plans for the remediation and reuse of former industrial sites for economic development purposes." Polk County's 20/20 Vision Plan, amended 2017, identifies brownfield redevelopment in Implementation Action I.53 "Work with economic development agencies to promote reuse of abandoned commercial and industrial sites, and to explore funding opportunities for brownfield site cleanup and redevelopment."

**f. Outcomes and Benefits of Reuse Strategy**

For all the identified target areas, site assessments are important first steps towards identifying and resolving barriers to redevelopment, freeing up funds from the local jurisdiction, other grants, and private developers that can be instead allocated towards completing the redevelopment project. Each target area, if development for commercial or residential use is later pursued, will improve resiliency to the impacts of natural disasters or extreme weather, as a larger supply of residential units and places of employment will soften the impact of homes and jobs lost due such an event, and will also improve the tax base of the local jurisdiction, allowing for greater investment in the maintenance and improvement of public infrastructure, emergency services, and disaster preparedness, all which serve to limit the effects and improve the outcomes experienced during a disaster event.

**g. Resources Needed for Site Reuse**

If the need for site remediation is discovered during the assessment process, inclusion in future an EPA Cleanup grant application will be considered. With assistance from the lead entity, the non-lead entities anticipate future applications to other grant opportunities, including but not limited to Appalachian Regional Commission grants, Economic Development Administration grants, the North Carolina Department of Commerce Building Reuse Program, Community

Development Block Grant Neighborhood Revitalization and Disaster Recovery, and other applicable federal, state, or nonprofit grants.

**h. Use of Existing Infrastructure**

Cleveland, Rutherford, and McDowell County's target areas are all currently served by municipal water and sewer access. Polk County's target area does not currently have water and sewer access, which may need to be provided depending on eventual redevelopment plans, in which case funding may be pursued as described above, either along with an application covered the full redevelopment project, or separately as a standalone application.

## 2. Community Need and Engagement

**a. Community's Need for Funding**

According to the Foothills Regional Commission Comprehensive Economic Development Strategy 2023, the Foothills Region, composed of Cleveland, McDowell, Polk, and Rutherford counties, had a population of 227,869 in 2020 and an estimated population of 230,072 in 2022. The regional poverty rate for all ages was 19.4% from 2008-2012, 19.7% from 2012-2016, and 16.7% from 2017-2021.

All the counties in the Foothills Region have been heavily impacted by the loss of manufacturing jobs from 1995 to 2010. This period saw the closure of many textile facilities that used to occupy valuable centrally located properties and has led to the continued vacancy of downtown properties in many of the region's towns.

Still affected by these job losses, Cleveland, McDowell, and Rutherford Counties are classified by the state of North Carolina as Tier 1 economically distressed communities, and Polk County is classified as Tier 2. This means that three of the counties in the Foothills region are among the 40 most economically distressed counties in the state of North Carolina.

**b. Health or Welfare of Sensitive Populations**

Poverty is one of the major negative determinants of health outcomes, and the Foothills Region still suffers from the effects of systemic poverty caused by the loss of manufacturing jobs. If the elimination of hazardous substances could activate

the properties to be used as employment zones, regional poverty could be greatly reduced.

**c. Greater than Normal Incidence of Disease and Adverse Health Conditions**

The region has a higher than average rate of upper respiratory diseases at 52.6%. This could be due to the exposure to lingering hazardous substances at the sites of the old manufacturing facilities. This grant will address these sites to hopefully improve health outcomes in the region.

**d. Economically Impoverished/Disproportionately Impacted Populations**

The Brownfield sites that this project addresses are centrally located in the municipalities of the Foothills Region. These locations contain the most housing density relative to the rest of the region. Therefore, any hazardous substances that are still present could have a significant impact on a high percentage of the regional population.

**e. Project Involvement/Roles**

Name of Organization/Entity/Group	Entity's Mission	Point of contact (name & email)	Specific involvement in the project or assistance provided
Foothills Regional Commission	To be a regional brokerage of assets and talent development that improves individual, household and business prosperity and strengthens local communities.	Alan Toney; <a href="mailto:atoney@frcnc.gov">atoney@frcnc.gov</a>	Applicant & Grant Administrator
Cleveland County	To provide for the Health, Safety, and	Chris Martin; <a href="mailto:chris.martin@clevelandcountync.gov">chris.martin@clevelandcountync.gov</a>	Community Liaison

	Welfare for all our citizens.		
Cleveland County	To provide for the Health, Safety, and Welfare for all our citizens.	Emily Sisk; <a href="mailto:emily.sisk@clevelandcountync.gov">emily.sisk@clevelandcountync.gov</a>	Community Liaison
McDowell County	The Mission of McDowell County government is to provide coordinated programs and professional services which protect the health, safety, and welfare of its citizens, as well as to preserve the county's natural environment and heritage as its primary asset.	Ashley Wooten; <a href="mailto:awooten@mcdowellgov.com">awooten@mcdowellgov.com</a>	Community Liaison
Polk County	The Polk County Board of Commissioner's Mission is to responsibly manage local property tax rates, adopt a balanced county budget, and establish effective policies through the passage of ordinances, resolutions, and orders.	Marche Pittman; <a href="mailto:mpittman@polknc.gov">mpittman@polknc.gov</a>	Community Liaison
Rutherford County	Policy making body which sets the budget for county operations.	Steve Garrison; <a href="mailto:steve.garrison@rutherfordcountync.gov">steve.garrison@rutherfordcountync.gov</a>	Community Liaison

**f. Incorporating Community Input**

Each of the Counties in the Foothills Region will act as a community liaison between Foothills Regional Commission and the public. This will ensure that Foothills Regional Commission addresses all the needs of each county and covers the most

important Brownfield sites to each community. Each County representative will be contacted for consultation on important sites on a monthly basis.

### 3. Task Descriptions, Cost Estimates, and Measuring Progress

Cost	Task
\$257,500.00	This fee is for the personnel cost as Foothills Regional Commission will be hiring a full-time program manager to oversee implementation of this project over the next four years and will also be responsible for the implementation of the recommendations from the assessment coalition and the planning work performed.
\$110,725.00	This is the approved 43% fringe benefit rate for the Foothills Regional Commission.
\$10,000.00	This funding is for travel throughout the region for implementation of the project.
\$975,000	These are funds for contracted services for with a licensed environmental engineering firm for assistance in performing phase 1 & phase 2 environmental assessments, perform economic development analysis to determine the highest and best use for the redevelopment of these sites, and to begin the initial assistance in securing funding for

	cleanup and partners for redevelopment.
\$146,775.00	This is a 57% HUD approved indirect rate for Foothills Regional Commission.

**a. Project Implementation**

The first step of this project is Foothills will hire the initial project manager in the first 90 days. Foothills already have a job description written and prepared to be posted once the grant award notice is received. In this same 90-day period, the new project manager and CED Director will undergo qualification-based procurement in line with both Federal and NC requirements. This firm will be selected based upon a transparent and clear scoring system, and the most qualified firm will be selected. In this same 90-day period, the project manager will begin initial meetings and scoping with the Coalition Council representatives to ensure that the communities are working together and moving in the same direction as the selected consultant.

Following this period, the project manager, consultant, and council will begin regular meetings and analysis of each site identified here in the application and as many other sites as possible identified by the council. These sites will be identified and analyzed by the council and consultant throughout the remaining 3.75-year period with regular updates and meetings.

**b. Anticipated Project Schedule**

First 30 days – Hire project manager

First 60 days – Implement regular council meetings

First 90 days – Select a consultant to partner with

First 180 days – All sites for assessment are identified and visited

First 365 days – Review and inventory of all sites and initial economic development analysis and environmental assessments are started.

Year 2-3 – Site and environmental assessments completed, and redevelopment plans and strategies for each site are identified, and the regional documentation is created.

Year 4 – Implementation strategies are created for each site, and funding sources are identified and development partners for each site.

**c. Task/Activity Lead**

Regional Commission will be the project lead, and the consultant will be the activity lead for the environmental assessments

**d. Outputs**

Foothills Regional Commission will create a long-range plan with sites assessed with all site assessment information included with strategies to clean up and redevelop each site with identified funding sources and partners with implementation strategies included. The implementation strategies will include funding, responsible partners, and key information pertaining to each site to ensure each one can be fully redeveloped.

**e. Cost Estimates**

\$515,000 is budgeted for salary, fringe, and indirect costs for the project manager to work and oversee the project implementation. This position is key as the local governments part of this program do not have the necessary capacity or expertise to implement this project.

\$10,000 is budgeted for travel to ensure travel throughout the region and any travel associated with the implementation of the program.

\$975,000 is budgeted for contractual services. This is for the selected firm to perform environmental assessments, site analysis, and implementation strategies. A complete Phase 1 and Phase 2 costs from \$45,000 to \$65,000 per site and mainly depends on found pollutants and condition of the site. The economic analysis and implementation strategies cost \$10,000 to \$20,000 per site. The goal of Foothills Regional Commission is to be a responsible steward of taxpayer funds and ensure that these limited dollars are used as effectively as possible, and as many sites as possible are identified and assessed as part of this grant. The firm selected will be required to comply with all federal, state, and local provisions, and we will oversee this to ensure compliance and to ensure the best possible deal for the region.

## 4. Programmatic Capability and Past Performance

### a. Organizational Capacity

Foothills Regional Commission is already responsible for managing several federal and state programs at a regional level, as well as providing grant management support for its local government members. Existing FRC programs include the Rural Transportation Organization covering Polk, Rutherford and McDowell Counties, EDA and ARC development districts, the region's HUD HOME Consortium, American Rescue Plan technical assistance, and broadband expansion planning efforts. FRC staff also provide grants administration for its member governments' ARC, CDBG-NR, and EDA grant awards.

### b. Organizational Structure

Foothills Regional Commission will carry out the requisite fiscal management and administrative requirements (grant reporting, procurement, compliance with applicable federal regulations) and provide technical expertise to assist coalition selected suitable sites for assessment.

Each non-lead coalition member's County Manager or their designees will serve as their jurisdiction's representative on the selection committee, to which FRC staff will present all sites identified and recommended by the member jurisdictions as well as regular progress reports and other updates as become relevant.

### c. Description of Key Staff

Alan Toney, Community and Economic Development Director, will oversee and direct the staff tasked with the completion of the project. Alan is an experienced grants administrator with extensive experience managing federal grant projects, including projects funded through ARC, EDA, EPA/NCDEQ water and sewer funds, and HUD's CDBG program.

Benjamin Bordeaux, Program Manager, will assist with grant reporting and regulatory compliance as needed. Benjamin is responsible for the administration and environmental review for several CDBG projects, as well as the region's ARPA technical assistance program.

Jack Elliott, Program Manager, will assist with completion of project goals and grant reporting as needed. Jack is responsible for the grant administration of several grants with ARC, EDA, and CDBG.

FRC also plans to hire a Brownfield Program Coordinator, to conduct the programmatic operations of the assessment coalition, including serving as the main point of contact for the program, meeting with non-lead entities and other stakeholders, grant reporting, presentation of site proposals to the selection committee, and all other duties required for successful completion of the project.

**d. Acquiring Additional Resources**

We anticipate that the primary additional resources required to complete this project will take the form of a contracted environmental engineering firm who will conduct ASTM Phase I Environmental Site Assessments and depending on any findings identified during the Phase I site assessment, Phase II Environmental Site Assessments, for each identified brownfield site. This firm will be selected in accordance with the Uniform Guidance found at 2 CFR Part 200, North Carolina Procurement Law, and FRC's procurement policy. FRC will issue and advertise a request for qualifications for environmental engineering services and select a firm through a qualification-based selection process.

**e. Past Performance and Accomplishments**

**1. Accomplishments**

Foothills Regional Commission has acted as the lead entity for previous EPA Brownfield Assessment Grants for the region, with a period of performance running from 2008 to 2011. A total of 22 site assessments were completed under this award, 16 Phase I ESAs and 6 Phase II ESAs.

**2. Compliance with Grant Requirements**

None of the staff responsible for the management of the previous award are still with the organization; however, to the best of our current knowledge the previous grant was correctly entered into ACRES and successfully closed out.