



Northwest
Tennessee
Development
District

Regional Planning

P.O. Box 963
124 Weldon Dr.
Martin, TN 38237-0963
731.587.4213
Fax: 731.587.4587

B. Application Information Sheet

R04-26-A-074

1. Applicant Identification:
Northwest Tennessee Development District (NWTDD)
124 Weldon Drive
Martin, TN 38237
2. Website URL:
 - a. NWTDD – <https://nwtd.org/>
 - b. City of Dresden – <https://www.cityofdresden.net/>
 - c. Dyer County – <https://www.dyercounty.com/>
3. Funding Requested:
 4. Assessment Grant Type: Brownfields Coalition Assessment Grant
 5. Federal Funds Requested: \$1,500,000
6. Location:
 - a. Dyer County
 - b. Dyer County
 - c. Tennessee

 - a. City of Dresden
 - b. Weakley County
 - c. Tennessee

NWTDD will utilize funding from this FY26 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 9-county service area (Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion and Weakley counties)

7. Coalition Members Target areas and Priority Site Information:
 - Dresden TN Target Area (DDTA) – the northern border of this area is the south side of Maple St. from US Hwy 54 on the west to Cedar St. on the east in Dresden, TN. The southern border is Locust St. and includes the 4-block corridor of US Hwy 54 entering Dresden from the SW. The target area encompasses 0.07 mi² in Census tract (CT) 47183968400. The focus site is the south side of the 100-200 blocks of W. Main St. This area once included a gas station, an auto repair shop and various turn-of-the-century commercial structures.

Progress Through Planning

Serving Benton • Carroll • Crockett • Dyer • Gibson • Henry • Lake • Obion • Weakley

- Dyer County TN Target Area (DCTA) - the northern border of this area is the south side of East Cedar St. from US Hwy 51 on the west to Compress St. on the east in Dyersburg, TN. The southern border is the rail line and the North Fork Forked Deer River. The target area encompasses an area of 0.07 mi² in CT 47045964402 and 47045964401. There are two focus sites: a corner gas station and surrounding lots and a former cotton processing warehouse. Both sites have environmental concerns, a high potential for redevelopment, are in severely economically impoverished areas and are near (the cotton warehouse) or in (gas station and surrounding lots) the floodplain of the North Fork Forked Deer River.
- NWTDD Target Area (NWTAA) –the northern border of this area is the south side of US Hwy 22 and encompasses a 1.8-mile corridor that includes both US Hwy 45 (Lindell St.) and the West Tennessee Railroad in Martin, TN. It is bordered roughly on the west by Neal St. and on the east by McCombs St. The target area encompasses 0.40 mi² in CT 47183968203. There are two focus sites: a former rail transloads site and a former elementary school. Both sites have environmental concerns, a high potential for redevelopment, and are in economically impoverished areas.
- Priority Sites:
 - Former Gas Station/Commercial lots 100 & 200 Block W. Main St. Dresden, TN 38225
 - Rail Transload Site 755 N. Lindell St. Martin TN 38237
 - Former School 520 N. McCombs St. Martin TN 38237
 - Former Gas Station/Corner Lots 304 S. Main St, 119 E Cedar St, Dyersburg, TN 38024
 - Former Cotton Warehouse 1009 E Court St, Dyersburg TN 38024

1. Contacts:

a. Project Director:

Faith Allen

NWTDD Community Development Administrator

731-587-4213 ext. 238

faith.allen@nwtd.org

124 Weldon Drive

Martin, TN 38237

b. Chief Executive:

Lori Kelley-Burdine

NWTDD Executive Director

731-587-4213 ext. 210

lori.burdine@nwtd.org

124 Weldon Drive

Martin, TN 38237

6. Population:

City of Dresden, TN – Population 2,974

Dyer County, TN – Population 36,818

NWTDD, TN – Population 254,605

(2023 ACS 5-YR Estimates)

7. Other Factors:

Other Factors	Page#
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
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).	Page 1
The priority site(s) is in a federally designated flood plain.	Page 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 4
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority site(s) within the target area(s).	
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.	

8. Letter from the Tennessee Department of Environment and Conservation, Division of Remediation (attached).

9. Releasing Copies of Applications: Not Applicable



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
DAVY CROCKETT TOWER, 7TH FLOOR
500 JAMES ROBERTSON PARKWAY
NASHVILLE, TENNESSEE 37243

January 20, 2026

Faith Allen, Community Development Administrator
Northwest Tennessee Development District
124 Weldon Drive
Martin, TN 38237

Re: State Letter of Acknowledgement for the Coalition Assessment Grant
Application

Ms. Allen,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$1,500,000 US Environmental Protection Agency (EPA) Brownfields Coalition Assessment Grant.

Since many brownfields are abandoned, underutilized, and/or contaminated, TDEC is expressly interested in seeing initiatives to return these sites to productive uses. This effort is consistent with our mission to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for your grant.

We greatly appreciate your efforts to address brownfields in Dyer County, the City of Dresden, Benton, Carroll, Crockett, Gibson, Henry, Lake, Obion, and Weakley counties in Tennessee.

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program

1. Project Area Description & Plans for Revitalization – Coalition Members, Target Area & Brownfields, a. Coalition Members:

The Northwest Tennessee Development District (NWTDD) is a legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. The NWTDD (Coalition Lead -- pop. 254,605) (2023 American Community Survey (2023 ACS)) is an association of 48 municipal and 9 contiguous county governments (in Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion, Weakley counties) centered in rural Northwestern Tennessee (the Region). The Region has long been serviced by Interstates 40 and 155, and U.S. Highways 155, 45, 51 and 79. Our mission is to advance our communities by enhancing well-being through a people centered approach focused on forging successful partnerships with local governments benefiting individuals, families and businesses.

With our non-lead members, City of Dresden (pop. 2974) and Dyer County (pop.36,818) (2023 ACS), both local units of government, we comprise the NWTDD Coalition (Coalition). Dresden and Dyer County are non-lead members of the Coalition because they, like other communities in NWTDD, have need but they do not have the capacity to apply for and manage brownfields grants, partly due to their size and their lack of access to brownfield resources to address their brownfields on their own.

1.b. Overview of Brownfield Challenges and Description of Target Areas:

The geographic boundaries for which we propose to conduct assessment activities encompass the 9-county Region noted in 1.a above, with the western part historically dependent on farming and related agri-business; the central part being more densely populated, attracting significant manufacturing and automotive industries including food and beverage processing, textiles, plastics and chemicals, metalwork and fabrication; and the northeastern part remaining mostly agrarian, healthcare and education focused with some areas of industrialization. Although communities in the NWTDD are not traditional “rust belt” communities, we have historically depended greatly on industry to provide quality employment for our residents. Industry and commerce grew in our downtowns alongside neighborhoods, allowing residents to work near their homes. Unfortunately, after our industry peaked in the 1960’s, many of our communities have experienced a steady decline in prosperity due to business closures, transfer of manufacturing jobs overseas, and increased automation. Industry reductions, floods and other natural disasters in NWTDD communities have resulted in over 1,300 jobs lost in the Region over the last 15 years (TN Dept. of Workforce Dev. (TN DWD)). This has adversely affected many NWTDD communities that have not fully recovered from deindustrialization that started in the 1980s and escalated after the 2008 global financial crash and recent economic downturns. **Thus, hundreds of brownfields were left behind throughout our Region, totaling nearly 960 acres of blighted or underutilized land, much of it within or adjoining disproportionately impacted populations, both in urban and rural areas.**

If awarded, NWTDD will utilize funding from this FY26 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 9-county Region. We have chosen three (3) target areas as our focus where EPA Brownfields Assessment Grant funding will have the greatest initial impact and move these sites towards realization of their redevelopment potential.

Dresden TN Target Area (DDTA) – the northern border of this area is the south side of Maple St. from US Hwy 54 on the west to Cedar St. on the east in Dresden, TN. The southern border is Locust St. and includes the 4-block corridor of US Hwy 54 entering Dresden from the SW. The target area encompasses 0.07 mi² in Census tract (CT) 47183968400. The focus site is the south side of the 100-200 blocks of W. Main St. This area once included **a gas station, an auto repair shop and various turn-of-the-century commercial structures**. This site has environmental concerns, a high potential for redevelopment, and it consists largely of slab or brick and block foundations due to all structures there being destroyed by tornadoes in 2021.

Dyer County TN Target Area (DCTA) - the northern border of this area is the south side of East Cedar St. from US Hwy 51 on the west to Compress St. on the east in Dyersburg, TN. The southern border is the rail line and the North Fork Forked Deer River. The target area encompasses an area of 0.07 mi² in CT 47045964402 and 47045964401. There are two focus sites: **a corner gas station and surrounding lots and a former cotton processing warehouse**. Both sites

have environmental concerns, a high potential for redevelopment, are in severely economically impoverished areas and are near (the cotton warehouse) or in (gas station and surrounding lots) the floodplain of the North Fork Forked Deer River.

NWTDD Target Area (NWTAA) –the northern border of this area is the south side of US Hwy 22 and encompasses a 1.8-mile corridor that includes both US Hwy 45 (Lindell St.) and the West Tennessee Railroad in Martin, TN. It is bordered roughly on the west by Neal St. and on the east by McCombs St. The target area encompasses 0.40 mi² in CT 47183968203. There are two focus sites: **a former rail transloads site and a former elementary school**. Both sites have environmental concerns, a high potential for redevelopment, and are in economically impoverished areas.

Residents living among brownfields in the DDTA, DCTA, and NWTAA experience **low income** (Median Household Income (MHI) that is 37% to 67% less than the US and 27% to 67% less than TN). The DDTA, DCTA & NWTAA experience **high poverty** (74%, 188% & 150% higher than TN and 55%, 159% & 125% higher than the US) and high child poverty (93%, 72% & 196% higher than TN and 121%, 97% & 240% higher than the US). The DCTA target area census tract has a **high minority**, (21% higher than the US and 82% higher than in TN), and the DCTA and NWTAA have a **very high African American populations** (245% and 78% higher than the US and 161% & 35% higher than TN). (see 2.b.) (2023 ACS).

The financial challenges experienced by our target area residents have perpetuated a cycle of low-quality jobs, inadequate affordable housing, unhealthy nutritional options, food deserts, insufficient park/recreational space and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. We recognize the great redevelopment potential of the DDTA, DCTA and NWTAA and are making a focused effort to address priority brownfields (see 1.c) and leverage additional funding for these hardest hit parts of our communities where redevelopment investment has the greatest opportunity for success.

1.c. Description of the Priority Brownfield Sites):

There are more than 200 brownfield sites in the DDTA, DCTA and NWTAA alone combined, ranging in size from less than half an acre to over 75 acres in size. Table 1 presents our priority sites, those that offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical/current uses, likely environmental issues, and planned reuses are listed below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse	Suspected Contaminants*
100 and 200 Blocks, south side of W Main St. Dresden (DDTA) , – 2.6 acres, adjoins low-income neighborhood and downtown commercial center	Gas station and older commercial structures including an auto garage destroyed by a 2021 tornado/only building foundations remain/new fuel center and commercial structures envisioned	VOCs, PAHs, metals, PCBs, petroleum, PFAS.
Railyard, 755 N Lindell St, Martin (NWTAA) -- 25 acres in commercial area; adjoins Cane Creek and disproportionately impacted populations	Container and timber and rail transload site / 5-acre concrete pad on 25 rail served acres/ new industrial & job development planned	VOCs, PAHs, metals, PCBs, petroleum, PFAS
Unity Christian School, 520 N McCombs St Martin (NWTAA) – 7.7 acres in residential, economically impoverished neighborhood	Former K-9 school / Vacant buildings remain / Community Center	VOCs, PAHs, metals, PCBs, petroleum, PFAS, asbestos, lead paint
Corner Lots, Main Ave & E Cedar St (DCTA) - 1.81 acres in commercial area borders low-income area and is in Forked Deer River flood plain	Gas station and commercial sites / Vacant lots with concrete pads / Recycling and vocational center envisioned	VOCs, PAHs, metals, PCBs, petroleum, PFAS
Cotton warehouse sites (DCTA) , 10 acres, adjoins low-income neighborhoods & Forked Deer River	Cotton Warehouses / Concrete Slabs / light industrial or logistics redevelopment	VOCs, PAHs, metals, PCBs, petroleum, PFAS

*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include damage to skin, liver, kidneys, heart, spleen; nervous, respiratory, hormonal, blood, & immune systems; may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).

These sites are our highest priorities because they will meet immediate needs in our target areas, align with our revitalization plans, and redevelopment is imminent due to resources already committed: Dyersburg's zoning code explicitly mentions being developed from a comprehensive plan to promote public welfare, health and safety which aligns with elimination of Brownfields. Past initiatives such as "Vision XXI" show a history of community-driven strategic planning. Community leaders specify revitalization of the DDTA, DCTA, NWTAs, target areas as a key initiative. The City of Dyersburg, Dyer County and Dyer County Chamber have invested nearly **\$6M in infrastructure improvements** adjacent to our target area. These investments include a park, a walking trail, farmers market and food business incubation projects and include leveraging local funds with grant funds from the TN Depts of Agriculture, Tourism, Economic and Community Development and Transportation as well as the Delta Regional Authority. These amenities are within yards of DCTA brownfield priority sites. Dyer County partners also intend to invest additional resources in partnership with TN Wildlife Federation, West TN River Basin Authority and Tennessee Department of Environment & Conservation (TDEC) to address flood zone issues that adversely affect the DCTA. In January 2025, Dresden received a \$357,500 infrastructure planning grant from Tennessee Department of Economic & Community Development (TDECD) for revitalization of a portion of the DDTA which plans critical infrastructure and aligns with the region's goals of attracting new business and investment. We believe that strategic investment of EPA assessment funds will continue to leverage investment in our target areas, making our communities more attractive to new businesses, developers, visitors, and residents. The investment to redevelop former industrial sites, historic structures, commercial assets, and greenspace amenities on priority brownfield properties in our target areas and throughout NWTDD will serve as examples of success, triggering further investment. For example, the former gas station site and former cotton warehouse site in the DCTA potentially impacts the adjoining low-income neighborhood and North Fork Forked Deer River with petroleum, solvent and other industrial chemical releases. **Along the Deer Fork River in Dyersburg, trail users can view discarded barrels and other industrial wastes just yards from the DCTA.** Partners in Dyer County have plans to repurpose these sites, removing the environmental and health threats and transforming one into a community recycle and vocational center and the other into a new industrial site that will adhere to environmentally aware construction and operational practices while providing much needed community services and new high-paying jobs respectively to this part of the community (as specified in our Revitalization Plans (1.d).

1.d. Identifying Additional Sites:

Our focus at the outset of this grant will be the DDTA, DCTA and NWTAs target areas. As we pursue assessment of priority sites, additional sites (such as the Deer Fork River site mentioned above) will be identified using the brownfield inventory and community input and will meet the demographic and other conditions used to define our disadvantaged DDTA, DCTA, NWTAs areas, which means they will be in an underserved community and/or a disadvantaged census tract. Beyond our priority sites, we are woefully aware of multiple additional brownfield sites in each of our target communities including most that are in economically impoverished areas that have disproportionately impacted populations.

Revitalization of the Target Area, I.e. Reuse Strategy & Alignment with Revitalization Plans:

The NWTDD 2022 Comprehensive Economic Development Strategy (Revitalization Plans) specify revitalization of the DDTA, DCTA, and NWTAs target areas and outline critical infrastructure and renovations to enhance our role as a regional economic hub. This mix of brownfields to industrial and mixed-use commercial and residential redevelopment and increased walkability and connectivity in the DDTA, DCTA, and NWTAs will allow target area residents to live, work, shop, and recreate within their neighborhoods and throughout target area communities.

The key to revitalization of our target areas and other portions of the Region is brownfields reuse, for which this EPA brownfields grant is vital. These funds will help us reach redevelopment goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the DDTA, DCTA and NWTAs, triggering further environmental and redevelopment funding. Following severe tornadoes and a federally declared disaster in 2022, Dresden (DDTA) has made advances in recovery but is just now putting plans in place to restore

multiple structures that were destroyed. In Martin (NWTA), a 5-acre concrete slab on 25 acres of a former rail transload site that adjoins Cane Creek has had limited interest from developers due to a lack of knowledge of existing environmental conditions. The former elementary school in Martin adds to existing blight in an economically impoverished neighborhood but would be an attractive site for the community's plan for redevelopment as a community activity center. Both target sites in Dyersburg (DCTA) have the community's attention for redevelopment for specific intended purposes. Due to a lack of history and knowledge of possible contamination at these sites, efforts to redevelop have been stalled. The EPA assessment grant is vital to establish a baseline of existing conditions. With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits outlined below.

1.f. Outcomes & Benefits of Reuse Strategy:

Reuse/redevelopment of all Table 1 properties will create an estimated 1225 temporary construction jobs and estimated 758 permanent jobs and will generate more than \$8.1M in annual tax revenue, according to projections. Additionally, since our priority sites are in or will be in future designated Tax Increment Financing (TIF) districts, incremental increases in property taxes retained for redevelopment purposes by our communities could **generate up to \$2M in annual property tax revenue which will be reinvested in the DCTA, DDTA and NWTA**

Assessment and reuse of priority sites such as the former railyard site and blighted former elementary school in Martin will remove environmental threats, eliminate blight, reduce crime, and stimulate investment in surrounding properties. This in turn will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in our target areas, where many of our low-income, minority, and other economically impoverished or disproportionately impacted populations reside. Reuse of brownfields will also generate higher tax revenue for our communities, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise.

During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficient measures such as energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. Addressing priority sites in the DCTA, DDTA, and NWTA will create affordable and sustainable housing areas, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of low-income residents. **EPA's investment in brownfields in our target areas will help economically impoverished and disproportionately impacted populations by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our parks network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economy. In Dyersburg, TN (DCTA), EPA's investment could very well catalyze local efforts to restore 1100 acres of compromised flood zone that is adjacent to the DCTA.**

Strategy for Leveraging Resources, 1.g. Resources Needed for Site Reuse:

Our target communities have a history of leveraging investment in projects. Northwest Tennessee Development District has led the state in securing grants in numerous sectors. According to the 2022 NWTDD Comprehensive Economic Development Strategy (CEDS), the planning staff has secured grants totaling more than \$45 million. These include 11 Community development Block Grants, 10 TDEC American Rescue Plan grants, 5 Delta Regional Authority grants, 3 Site Development Grants, and 4 Industrial Planning Grants among others. Another 20 applications are currently up for review. Dyersburg (DCTA), Martin (NWTA) & Dresden (DDTA) are committed to rehabilitation of their target sites for the betterment of their communities and intend to pursue TIF districts as well as some of the following available resources:

- *Private/Public Funding* – see above
- *EPA* - Additional EPA Assessment, Cleanup, Multipurpose, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of our communities (\$500K-\$5M)

- *EPA – Targeted Brownfield Assessment Program* – provides Phase I & Phase II assessments, and cleanup planning for eligible brownfields properties (\$50K-\$100K)
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Tennessee Department of Environment and Conservation (TDEC) Brownfield Area Redevelopment Fund* – Will provide grants, targeted for investigation and remediation/mitigation at brownfield sites, to local governments for local investments in brownfield sites (up to \$500K per year)
- *Northwest Tennessee Development /USDA Rural Small Business Loan Fund* - provides loans for development projects in rural areas within most of the NWTDD service area (\$250K)
- *Northwest Tennessee Development/EDA Revolving Loan Fund (RLF) Program* - RLF funds are intended to provide bridge or gap financing for projects in rural or urban areas that would not otherwise be able to be completed (\$250K)
- *Tennessee Brownfields Redevelopment Tax Credits* - Tax Increment Financing (TIF) and Franchise/Excise Tax Credit for qualifying development projects enrolled in the TDEC Voluntary Oversight and Assistance Program (\$ variable)
- *Community Development Block Grant* – available to non-entitlement communities for projects that eliminate blight, benefit low-moderate income citizens, and/or address imminent health & safety problems (\$400K-\$600K)
- *TN Main Street Program* - revitalize community traditional downtowns (up to \$600K)
- *TN Department of Economic Development/Community & Rural Development Program Petroleum Underground Storage Tank Fund* - State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)

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

1.h. Use of Existing Infrastructure:

Land use goals in our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill development in our community's core neighborhoods in our target areas before additional land is considered for development. All priority sites have full utilities already present including 3-Phase electricity, natural gas, city water and sewer, telephone, and fiber optic service. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, on- and off-street parking and commerce. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in our target areas. With revitalization ranging from mixed-use commercial/residential to industrial, existing infrastructure will allow for easy access for commercial and industrial development, enabling residents to work and live in the same neighborhood, and creating a walkable community.

2. Community Need and Community Engagement -- Community Need, 2.a. The Community's Need for Funding:

NWTDD needs EPA's financial assistance because we do not have the necessary funds for environmental assessments in our general budget (\$1.1 M FY24) to address brownfields anywhere in our service area, let alone in our target area. Indicators of need in the NWTDD are evident in numerous key economic-demographic factors: Residents living among brownfields in the DCTA, DDTA, and NWTAA experience **low income (Median Household Income (MHI) is 37% to 67% less than the US and 27% to 62% less than TN), high poverty (74%, 188% & 150% higher than the US and 55%, 159% & 125% higher than TN), and high child poverty (92.5%, 72% & 196% higher than TN and 121%, 97% & 240% higher than the US). Our DCTA.02 target area census tract also has a high minority population, (36% higher than the US and 87% higher than in TN), and the DCTA.01 and DCTA.02 have high African American populations (198% and 245% higher than the US and 125% & 161% higher than TN).** (see 2.b.) (2023 ACS).

The large number of vacant buildings on target area brownfields has resulted in increases in

crime, vagrancy, illegal dumping and vandalism within the DCTA, DDTA & NWTa when compared to other parts of their respective communities (according to community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfield sites. The NWTDD’s priority brownfield sites further add to the financial burden of target area residents by suppressing property values and straining municipal budgets through a reduced tax base.

Nearly the entire DDTA was impacted by tornadoes and severe weather as indicated by the February 3, 2022 FEMA-4637-TN disaster declaration. The damage caused by this disaster event in conjunction with the disastrous effects on the Region because of COVID-19, slowed economic recovery in many areas of Northwestern Tennessee. We were disproportionately impacted by the coronavirus due to the reduction of tourism and retail industries. Repairing damaged buildings and delayed re-openings slowed the economic rebound for many small businesses in NWTDD’s communities. **The tornado in Dresden and the lack of investment in DCTA and NWTa due to environmental unknowns** has added substantially to the economic challenges facing our communities diminishing local income and property tax revenues and increasing poverty. Because of our communities’ small populations, and with budgets barely able to provide essential services and needed infrastructure maintenance, our target area communities lack the discretionary funds necessary to complete the proactive assessment or remediation, and reuse planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow NWTDD to fulfill the revitalization needs for our target areas and beyond, creating unique, healthy, safe, and walkable neighborhoods.

2.b. Health or Welfare of Sensitive Populations:

Table 2 ¹	US	TN	DDTA	DCTA CT 9644.02	DCTA CT 9644.01	NWTa
Median Household Income	\$78,538	\$67,097	\$49,839	\$25,313	\$42,017	\$38,790
Percent Minority	36.6%	26.5%	—	49.8	45.2	30.2
Percent African American	12.4%	16.4%	—	42.9	37.0	22.1
Individuals Living in Poverty ²	12.4%	13.8%	21.5	35.8	27.4	31
Children Living in Poverty ²	16.3%	18.7%	36.0	32.1	34.0	55.5
Elderly Living in Poverty ²	10.4%	10.8%	—	32.8	—	—

¹ Stats from 2023 ACS ² Last 12 months

Our most sensitive populations (low-income residents and individuals living in poverty, especially children, the elderly and minorities (Table 2), live in and around our DCTA, DDTA and NWTa brownfield sites that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, soil and groundwater contamination, as well as unsafe structures. Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, PFAS, lead paint, and asbestos are potentially causing harm to our sensitive populations. **Between 56% and 66% of all homes (compared to 40.5% in US and 41.8% in TN) in our target census tracts were constructed before 1980, making them much more likely to contain asbestos and lead-based paint, a significant threat to young children and pregnant women.** Our target sites all are in or adjoin low-income neighborhoods and are potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, lead paint and other contaminants that are known to cause various cancers, heart diseases, and respiratory diseases, **which are experienced by DCTA, DDTA & NWTa residents at higher rates than TN and the US** (2.c). The proximity of brownfields to low-income neighborhoods in our target areas drive down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a disadvantage for target area residents with no relief in sight.

Assistance through funding from this EPA grant will provide much needed capital for the assessment of blighted properties, clearing the way for remediation and revitalization of the NWTDD to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system and constant investment in infrastructure. The resulting resurgence of commerce

will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit NWTDD’s economically impoverished and disproportionately impacted populations, including removal of blight, reducing exposure to environmental contamination, providing safer neighborhoods, and better access to public services, ultimately improving the health of our communities.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions:

Contaminants from target area brownfields are affecting the health of our residents. Many of the priority sites are believed to be impacted by PCBs, VOCs, PAHs, petroleum, metals, asbestos, lead paint, and/or other chemicals. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancers, chronic respiratory disease, asthma and heart disease among other ailments. As Table 3 below shows, **our target area residents have high incidences of cancer, asthma, heart disease and chronic respiratory disease, all potentially linked to impacts from nearby brownfields.** Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable people living in them.

Table 3 – Health Indicators

Disease/Health Condition	US Rate	TN Rate	Weakly Co. (DDTA & NWTA)	Dyer Co. (DCTA)	Target Counties vs US
Lung Cancer ¹	51.2	63.1	78.8	86.1	54-68% higher
Kidney Cancer ¹	16.3	17.2	20.6	22.3	26-32% higher
Asthma ²	7.7%	9.4%	9.8%	10.5%	27-36% higher
Heart Disease Deaths ³	162.1	266.0	260.1	275.1	60-70% higher
Chronic Resp. Disease Deaths ³	36.4	47.0	49.1	53.9	35-48% higher

¹ 2018-2022 NIH ² Per 100K Res. ³ Per 10K Res.

There are over 100 Coalition properties with environmental records on the TDEC Division of Remediation sites website. The cumulative effects of these sites likely contribute to the adverse health conditions impacting our residents. **Removal of sources of environmental contaminants present at brownfields in our target areas will reduce exposure of our underserved populations to these materials and in turn, reduce disproportionate incidences of disease and other poor health outcomes that these residents currently experience.**

2.d. Economically Impoverished/Disproportionately Impacted Populations:

The public health impact from DDTA, DCTA and NWTA brownfields and commercial and industrial operations, and their proximity to our underserved populations, including low-income and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. In one case (DCTA), industrial waste and barrels of unknown origin line the community trail and the river that borders the TA. Use of this grant will enable coalition communities to assess and appropriately address contaminants that have produced these negative effects on our impoverished and disproportionately impacted populations.

Community Engagement, 2.e. Project Involvement & 2.f. Project Roles:

Several community organizations have pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups is well suited to engage the community and public at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project. For example, Dyer County Chamber, NWTEDC and Weakley County Economic Development Board and NWTHRA will help connect workers to job opportunities created by this grant, including temporary jobs created during the redevelopment of brownfield sites, as well as permanent jobs for new businesses on redeveloped brownfield properties.

Table 4 – Project Partners and Roles

Partner Name	Entity's Mission	Point of Contact	Description and Project Roles
Dyer County Chamber of Commerce	Promote improvement of the Dyer County community, schools, economy and quality of life	Slater Barr President/CEO sbarr@dychamber.com	Local economic & workforce development organization, site selection & prioritization; identify potential buyers; disseminate information about the grant
Dyer County Industrial Development Board	Work with partners on economic growth and securing investments	David Hayes IDB Chair 731-286-7800	Site selection & prioritization; identify potential buyers; disseminate information about the grant
NW Tennessee Economic Develop. Council (NWTEDC)	Helping people through education, partnership and delivery of quality services in NW Tennessee	Cheryl Oglesby-Townes, Executive Director coglesby@nwtncap.org	Inform property owners and other stakeholders of the importance of revitalizing our brownfield properties
Weakley County Economic Development Board	Work with local partners on economic growth by securing grant funding and developing industrial sites	Justin Crice, CEO Executive Director direcctor@wcedb.com	Local economic & workforce development organization, site selection & prioritization; identify potential buyers; disseminate information about the grant
NW Tennessee Human Resources Agency (NWTTHRA)	NFP organization dedicated to enhancing quality of life for all residents in the NWTDD region	Emily Payne, Director of Human Resources & Special Projects	Advocacy of services while considering the total social economic and environmental well-being of the community

2.g. Incorporating Community Input:

NWTDD has a culture of community involvement that we will maintain throughout this grant. **A total of 8-12 public meetings will be held during the 4-year grant period** in various Region communities to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The Region will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on NWTDD and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. NWTDD has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging Region residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and schedule future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the community Planning & Zoning Departments, Plan Commissions, and Chambers of Commerce to bring awareness of the redevelopment opportunities priority sites offer. Developers will be identified and invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate

it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress – Description of Tasks/Activities & Outputs: NWTDD will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA Project Officer. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, NWTDD and its QEP will complete the following tasks:

Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization:

a. Project Implementation: NWTDD staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the NWTDD and QEP and EPA to manage the grant's Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries. We will carefully track contractor costs, comparing to budget, expenditures, and project progress, to ensure that grant funds will be utilized within the prescribed 4-year project period. NWTDD, with QEP support, will update its existing brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no order: 1) reuse potential, 2) potential for environmental or human health impact and 3) community input. Additional sites will be identified by the community leaders, local governments, redevelopment investors, and through community outreach. Priority will be granted to sites within areas identified as economically impoverished/disproportionately impacted populations near residential areas that pose health risks to an underserved community. Priority will also be considered for sites that have a higher chance of redevelopment and a greater economic impact potential within our target areas.

b. Schedule: QEP selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (but typically much more frequently) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at quarterly throughout the grant period

c. Task/activity Leads: NWTDD & QEP

d. Output(s): Travel - NWTDD staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 16 Quarterly Reports, ACRES entries, 4 MBE/WBE reports, 4 annual reports, etc.; calls, 8-12 public meetings to update communities on the brownfield program, and correspondence between NWTDD, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

Task/Activity 2: Environmental Investigation:

a. Project Implementation: Prior to applying for site eligibility, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESAs activities on sites selected by NWTDD. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (E1527-21) and the All-Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1. The QEP will prepare a Quality Assurance Project Plan (QAPP) as well as Sampling & Analysis Plans/Health & Safety Plans (SAPs/HASPs) for EPA approval. Once approved, the QEP, directed by NWTDD, will complete Phase II ESAs based on environmental conditions identified in the Phase I ESAs.

b. Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 15th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

c. Task/activity Lead(s): NWTDD & QEP

d. Outputs: 36 Phase I ESAs; QAPP, SAPs/HASPs, estimated 32 Phase II ESAs.

Task/Activity 3: Clean-up & Reuse Planning:

a. Project Implementation: QEP, directed by NWTDD, will prepare site specific clean-up

plans/documents including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up/reuse funding development (1.c.i).

b. *Schedule*: Prepared after Phase I and II ESAs are complete, contamination is present, and if cleanup is necessary. Task 3 activities will continue throughout the grant period.

c. *Task/activity Lead(s)*: NWTDD & QEP

d. *Output(s)*: estimated 12 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

a. *Project Implementation*: 8-12 public meetings will be held at various venues throughout NWTDD’s service area during the grant period to update ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. NWTDD will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning and provide marketing resources for future development. Additional sites can be identified during public community outreach meetings. These meetings will be focused on public engagement including what sites the community views as a priority for redevelopment. Priority will be granted to sites identified by underserved communities, especially when those sites are within areas identified as economically impoverished/disproportionately impacted populations.

b. *Schedule*: 2-3 public meetings per year; the 1st planned for the 2nd Quarter of the grant period.

c. *Task/activity Lead(s)*: NWTDD & QEP

d. *Output(s)*: 8-12 public meetings to update communities on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to ensure startup activities are completed per the schedule above. NWTDD will allocate all grant funds to project properties before the final quarter of the grant period to ensure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites in 1.c, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

3.e. Cost Estimates:

The NWTDD Coalition is requesting \$1,500,000 in grant funding, which is essential to complete environmental assessments of target area priority brownfields. The costs outlined in Table 5 were developed by anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. NWTDD will allocate \$1,288,550 (86% of total grant funds) to Phase I and II ESAs.

Table 5 Budget	Budget Categories ¹	1. Program Mgmt. Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Personnel	\$24,600			\$12,000	\$36,600
	Supplies				\$490	\$490
	Travel	\$8,260				\$8,260
	Contractual ²	\$54,900	\$1,288,550	\$95,000	\$16,200	\$1,454,650
TOTAL BUDGET		\$87,760	\$1,288,550	\$95,000	\$28,690	\$1,500,000

¹Table 5 only includes budget categories with costs. ²In accordance with Federal, state, and local procurement regulations.

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

1. Program Management & Training Support, Inventory/Prioritization: \$87,760 – ***Personnel:*** Direct admin. Cost includes 410 hrs. \$60/hr. = \$24,600; ***Travel:*** Attend 2 National Brownfield Conferences (2 people each): airfare x 4 @ \$2,500, 2 rooms, 3 nights lodging for 2 confs. @ \$3,300, meals @ \$1,020, ground transportation @ \$400, conf. registration for 2 people x 2 events @ \$1,040 = \$8,260; ***Contractual:*** total \$54,900, includes approximately 160 hrs. \$90/hr. = \$14,400 for inventory, & approximately 450 hours \$90/hr. = \$40,500 for program management.

2. Env. Investigation: \$1,288,550 – ***Contractual:*** 29 Phase I ESAs at an average cost of \$3,700 each = \$107,300, & 31-32 Phase II ESAs at an estimated cost of \$37,500 (depending on site complexity/environmental conditions) = \$1,181,250 (@ \$37,500 average cost). Though our budget will support 29 Phase I's and 31 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in inventories as priority sites listed in 1.c.

3. Clean-up & Re-use Planning: \$95,000 – ***Contractual:*** 13 ABCAs/Clean-up plans or Re-use plans/Design Charettes expected to cost \$5,000-\$15,000 each = \$95,000.

4. Community Outreach & Involvement: \$28,690 – ***Personnel:*** Direct admin. Cost includes 200 hrs. \$60/hr. = \$12,000; ***Supplies:*** printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$490; ***Contractual:*** approx. 180 hours at an estimated \$90/hr. = \$16,200.

3.f. Plan to Measure & Evaluate Environmental Progress & Results:

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

4. Programmatic Capability & Past Performance – Programmatic Capability 4.a. Organizational Capacity, 4.b. Organizational Structure & 4.c Description of Key Staff:

NWTDD staff will manage this grant. NWTDD has the technical, financial, and administrative capacity to implement the EPA Brownfield Assessment Grant successfully. Faith Allen, Community Development Administrator, is a graduate of San Joaquin Valley College in Business Administration and attended Lambuth University's Visual Arts and Communications program and has worked in graphics and media for over fifteen years. Ms. Allen joined NWTDD as a Grant Administrator in 2022 and has a passion for serving others. She has experience in writing and administering Community Development Block Grants (CDBG), Site Development and Infrastructure Planning Grants, and other types of federal and state funded programs. She can assist with grant applications, public notice and community involvement, proper bidding procedures, labor compliance, project management, reporting, and closeout and will be the point person for identifying sites and use of the funds for NWTDD. Mrs. Katelyn Edwards, NWTDD Director of Finance, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. With a degree in Business Administration, Mrs. Edwards has served as Director of Finance for NWTDD since 2021 and has performed similar administration and financial management including the tracking and reporting of federal and state grants that the NWTDD receives. The NWTDD team will aggressively use their brownfields and small business growth experience to seek redevelopment opportunities for brownfield properties throughout Randolph County.

In the unlikely event that a member of the team leaves their job prior to the completion of grant

tasks, the depth of the NWTDD team, with over 30 dedicated economic development and planning professionals, will allow for a quick and seamless transition to other experienced grant management handlers.

4.d. Acquiring Additional Resources:

NWTDD and our QEP will make every effort to contract with disadvantaged business enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. NWTDD staff have a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. Through a competitive bidding and procurement process, consistent with 2 CFR Part 200, NWTDD will select a QEP with experience administering EPA Brownfields Grants and working with the Tennessee Department of Environmental Conservation (TDEC) and the Tennessee Brownfields Redevelopment Program (TBRP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 4-year project period. This team will be supported by other NWTDD departments including community and economic development, rural planning, infrastructure, finance, and housing. We will work with the Small Business Administration (SBA) to identify small businesses in the area with strong labor practices who have been vetted by the SBA as qualified to perform remediation activities and other contracted services. We will invite vetted contractors through the competitive bidding process noted above. We will also work with Dyer County Chamber of Commerce, Dyer County Industrial Development Board, NWTEDC, Weakley County Economic Development board and other community partners (see 2.e) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

Past Performance & Accomplishments

4.f. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreement, (1) Purpose and Accomplishments:

While NWTDD has not previously received a US EPA Brownfield Assessment grant, at the time of their 2022 Comprehensive Economic Development Strategy (CEDS), NWTDD had secured grants totaling more than \$45 million. These include 11 Community Development Block Grants, 10 TDEC American Rescue Plan grants, 5 Delta Regional Authority grants, 3 Site Development Grants, and 4 Industrial Planning Grants among others. In addition over the course of fiscal years 2023-24 and 2024-25, NWTDD successfully secured more than \$43 million dollars in grant funds for its' communities including 6 Site Development grants, 3 Three Star grants, 1 Asset Enhancement grant, 1 Tourism Enhancement grant, 1 BUILD grant, 1 Historic Development grant, 1 DRA grant, 1 FIDP grant, 8 Broadband Ready and 2 Connected Communities Facilities grants, 6 Community Development Block grants, 6 Infrastructure Planning grants and 3 Local Parks and Recreation grants. NWTDD will assure compliance with all EPA grant requirements as is their usual practice and as stated herein.

4.f.(2) Compliance with Grant Requirements: All funding assistance agreement terms and conditions have been and are being met for the above projects. **All grant goals and outputs/outcomes have been achieved to date**, all reports were completed in a timely manner, and no corrective measures have been needed. NWTDD is fully compliant with the terms and conditions of these grant programs which are ongoing.

2.B. Threshold Criteria for Coalition Grants

2.B.(1) Applicant Eligibility

- a. Northwest Tennessee Development District (NWTDD) (applicant and Coalition Lead) is a legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. (documentation attached). The applicant is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

NWTDD (Coalition Lead) has two (2) coalition non-lead members for this application:

- Dyer County is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.
 - City of Dresden is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.
- b. Neither the lead applicant (NWTDD) nor the non-lead member organizations are exempt from Federal taxation under section 501(c)(4) of the IRC.

2.B.(2) Target Areas

Target areas for the coalition lead and non-lead members are presented in the Application Information Sheet. One target area is located in each of the lead and non-lead coalition members. The target areas do not overlap and are in three distinct jurisdictions.

2.B.(3) Non-lead Member(s) that Never Received an EPA MARC Grant

Neither non-lead coalition members, Dyer County nor City of Dresden have ever been awarded an EPA Brownfields MARC Grant.

2.B.(4) Legal Authority to Expend Grant Funds on Behalf of Non-Lead Coalition Members

- a. NWTDD (applicant and Coalition Lead) has the legal authority to expend grant funds on behalf of the non-lead members to conduct the proposed grant activities.
- b. NWTDD's geographic boundary encompasses the geographic boundaries of both non-lead members.

2.B.(5) Coalition Agreement

Non-lead coalition members, Dyer County and City of Dresden, have submitted signed letters of commitment to NWTDD agreeing to participate in the Coalition (documentation attached).

2.B.(6) Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions, and solutions. 8-12 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Sections 2.g. of the Narrative/Ranking Criteria for further information.

2.B.(7) Expenditure of Existing Grant Funds

NWTDD affirms that none of the coalition members have an open cooperative agreement for MARC Grant funding.

2.B.(8) Contractors and Named Subrecipients

N/A – NWTDD has not procured/named any contractors or subrecipients.