



Narrative Information Sheet

1. Applicant Identification:
Upper Cumberland Development District (UCDD)
1104 England Drive
Cookeville, TN 38501
2. Website URLs:
 - a. UCDD – <https://ucdd.org/>
 - b. Warren County -- <https://www.warrencountyttn.gov/>
 - c. City of Cookeville – <https://www.cookeville-tn.gov/>
3. Funding Requested:
 - a. Assessment Grant Type: Brownfields Coalition Assessment Grant
 - b. Federal Funds Requested: \$1,500,000
4. Location (non-lead members):
 - a. Warren County
 - b. Warren County
 - c. Tennessee

 - a. City of Cookeville
 - b. Putnam County
 - c. Tennessee

UCDD will utilize funding from this FY26 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 14-county service area (Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, and White counties)

5. Target area:
 - Cookeville Target Area (CTA) – consists of a consists of a 0.5-mile-wide corridor that runs from the southwest city border to the southeast (US70W to Cedar Ave.) in the southern portion of Cookeville. The CTA covers an area of 0.1 mi² in census tract (CT) 47141000800. The CTA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods. We are focusing on two large brownfields sites in this target area, one a former auto salvage yard and a large vacant downtown lot.

Upper Cumberland Development District

1104 England Drive | Cookeville, TN 38501

P: (931) 432-4111 F: (931) 432-6010

www.ucdd.org

- Warren County Target Area (WTA) – is in the southern portion of McMinnville, and is bound by E. Colville St. to the north, Highway 55 to the west, and Bridge St. to the south. The WCTA covers an area of 0.2 mi² in CT 47177930600. The WCTA contains several closed former industrial and commercial brownfield properties adjoining low-income neighborhoods. We are focusing on two large brownfields sites, McMinnville Manufacturing, a hardwood flooring manufacturer, and a former railroad tie manufacturing facility.
- Upper Cumberland Target Area (UTA) – is in the southern portion of Gainesboro, Jackson County, and is bound by Main St. to the north, SR56 to the west, and Oak St. to the south. The UCTA covers an area of 0.1 mi² in CT 47087960300. The UCTA contains several closed institutional brownfield properties including a former middle school and associated sites in a low-income neighborhood. We are initially focusing on the former Fox Middle School property in this target area.
- Priority Sites:
 Fox Middle School, 707-711 School Drive, Gainesboro, Jackson County, TN 38562
 McMinnville Manufacturing, 205-273 Bridge Street, McMinnville, Warren Co., TN 37110
 Railroad Tie Manufacturer, 301-315 Depot Street, McMinnville, Warren Co., TN 37110
 Former Auto Salvage Yard, 663-669 W. Broad Street, Cookeville, Putnam Co., TN 38501
 Vacant Lot, 9 S. Cedar Avenue, Cookeville, Putnam Co., TN 38501

6. Contacts:

- a. Project Director:
 Ms. Megan Regan
 Community Development Planner
 Upper Cumberland Development District
 1104 England Drive
 Cookeville, TN 38501
 931-432-4111
mregan@ucdd.org
- b. Chief Executive:
 Mr. Mark Farley
 Executive Director
 Upper Cumberland Development District
 1105 England Drive
 Cookeville, TN 38501
 931-476-4169
mfarley@ucdd.org

7. Population:

City of McMinnville, Warren County, TN – population 14,032
 City of Cookeville, Putnam County, TN – population 37,102
 Town of Gainesboro, Jackson County, TN – population 1,086
 (2025 ACS 5-YR Estimates)

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less.	Page 1
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 2
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.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 1.e., for priority sites within the target areas.	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. Letter from the Tennessee Department of Environmental & Conservation, Division of Remediation (attached).

10. 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

Megan Reagan, Community Development Planner
Upper Cumberland Development District
1104 England Drive
Cookeville, TN 38501

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

Ms. Reagan,

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 Warren County, the City of Cookeville, Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, and White 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 Upper Cumberland Development District (UCDD) 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 UCDD (Coalition Lead, pop. 370,060 (2023 American Community Survey (2023 ACS))) is an association of 31 municipal and 14 contiguous county governments (in Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, and White counties) located in the Upper Cumberland Region of Tennessee, approximately 80 miles from Nashville between Interstate 24 and 40 (the Region). Our mission is to advocate and promote economic and community development within the Region particularly in rural, low-income, and underserved communities.

With our non-lead members, Warren County (pop. 43,619) and City of Cookeville (pop. 37,102), both local units of government, we comprise the UCDD Coalition (Coalition). Warren County and Cookeville are non-lead members of the Coalition because they don't 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 our Region noted in 1.a. The Region consists of many small to medium-size communities that historically grew as agricultural centers, but after World War II shifted more to numerous industries including manufacturing, healthcare and social assistance, leisure and hospitality (tourism), transportation, warehousing, utilities, construction, scientific, professional, and technical services. We have historically depended greatly on industry and manufacturing to provide quality employment for our residents. Industry and commerce grew in our downtowns alongside neighborhoods, allowing residents to work near their homes. Unfortunately, as surrounding industry waned since its peak in the 1950's, our communities have experienced a steady decline in prosperity due to the closure of businesses, the transfer of manufacturing jobs overseas, and increased automation. Closures and manufacturing/service industry reductions at local facilities in UCDD communities (Club Wyndham Resort, Perdue Farms, Crossville Hardwoods, Nyrstar Tennessee Mines, Manchester Tank & Equipment, ABM Industry Groups, Community Development Institute Head Start, OS Restaurant Services, Omega Apparel, Cumberland River Hospital, Nestle Waters, LM Farms, Endura Products Tennessee, etc.) have resulted in over 4,700 jobs lost in the Region in the last 8 years (TN Dept. of Workforce Dev. (TN DWD)), devastating many of our communities that still have not fully recovered from deindustrialization that started in the 1980s and escalated after the 2008 global financial crash. **This has left behind hundreds of brownfields throughout our Region, totaling more than an estimated 750 acres of blighted or underutilized land, much of it within or adjoining poor neighborhoods and our downtowns, both in urban and rural areas.**

If awarded, UCDD will utilize funding from this FY26 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 14-county service area. We have chosen three target areas as our focus where EPA Brownfields Assessment Grant funding will have the greatest initial impact and move these sites towards redevelopment:

Cookeville Target Area (CTA) – consists of a roughly 0.25-mile-wide corridor that runs from the intersection of Walnut Ave. & W. Spring St. to the northwest where Steakley Dr. intersects W. Spring St. The CTA covers an area of 0.26 mi² entirely within the southern portion of census tract (CT) #47141000800 in the City of Cookeville, Putnam County. The CTA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods. We are focusing on two brownfields sites, a former auto salvage yard and a vacant downtown lot.

Warren County Target Area (WTA) – consists of an approximately 1.1 mi long by 0.3 mi wide rectangular area, bound by West End Ave. to the northwest and Rivercliff Rd. to the southeast in the southern portion of McMinnville, Warren County. The WTA covers an area of 0.2

mi² predominantly in CT #47177930600. The WTA contains several closed former industrial and commercial brownfield properties adjoining low-income neighborhoods. We are focusing on two brownfields sites, a former wood flooring manufacturing site and a former railroad tie manufacturing site.

UCDD Target Area (UTA) – consists of an approximately 0.7 mi long by 0.3 mi wide area, bound by E. Cox St. to the north and Warren Dr. to the south in the southern portion of Gainesboro, Jackson County (population 920). The UTA covers an area of 0.26 mi² in CT #47087960300. The UTA contains several closed institutional brownfield properties including a former school and associated sites in a low-income neighborhood. We are initially focusing on the former school site in this target area.

Residents living among brownfields in the CTA, WTA, & UTA experience low income (Median Household Income (MHI) is 28% to 44% less than that in the US, and 17% to 34% less than in TN) and high poverty (15% to 270% higher than in the US, and 15% to 203% 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; insufficient park/recreational space; and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. In addition, none of our target area communities have a Tax Incremental Financing (TIF) district, which has turned away numerous potential investors. We recognize the great redevelopment potential of the CTA, WTA, and UTA and are making a focused effort to address priority brownfields (1.b.) and leverage additional funding for these hardest hit parts of our communities where redevelopment investment has the greatest opportunity for success. **We are already working hard to repurpose and reshape the businesses and commerce of the CTA, WTA, and UTA including: the \$21M expansion of Aphenia Pharma’s Solid Dose Division in Cookeville-Putnam County and over \$5M investment in drinking water infrastructure in McMinnville.** We believe that strategic investment of EPA assessment funds will revitalize our target areas, making our communities more attractive to new businesses, developers, visitors, and residents.

1.c. Description of the Priority Brownfield Sites: There are more than 50 brownfield sites in the CTA, WTA, and UTA combined, ranging from less than an acre to 32 acres in size. Table 1 presents our priority sites that offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical and current uses, likely environmental issues, potential health effects from exposure to these sites, 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*
Fox School, 707-711 School Drive, Gainesboro (in UTA) – 6.6 acres; adjoins low-income neighborhood; adjoins Doe Creek, portions in FEMA floodway	Former Fox Middle School / Vacant school in deteriorating condition / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
Wood Flooring Manufacturer, 301-315 Depot St, McMinnville (in WTA) – 6 acres in industrial area, near low-income neighborhood	Former wood flooring manufacturer / Vacant buildings in good condition / Advanced, high-tech manufacturing	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
Railroad Tie Manufacturer, 205-273 Bridge St, McMinnville (in WTA) – 32 acres in industrial area; adjoins Barren Fork River, portions in FEMA floodway	Former railroad tie manufacturer / Vacant buildings in fair condition / multi-family residential & greenspace	PCBs, metals, petroleum, VOCs, PAHs, PFAS, asbestos, lead paint
Auto Salvage Yard, 663-669 Broad Street (in CTA) – 13.7 acres, in industrial area; adjoins low-income neighborhood	Former Auto Salvage Yard / Salvage yard with deteriorating structures / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
Vacant Lot, 9 S. Cedar Avenue, Cookeville (in CTA) – 5.3 acres in commercial area; adjoins low-income neighborhood	Unknown historic use / Vacant-underutilized lot / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, 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 funding already committed (**City of McMinnville for \$300,000 Downtown Improvement Grant, and a TDEC Drinking Water State Revolving Fund Loan of \$5.7M for construction of water improvement infrastructure**). The investment to redevelop historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in our target areas and throughout the UCDD (we have an initial inventory of over 100 brownfield properties) will serve as examples of success, triggering further investment. For example, the **Wood Flooring Manufacturer site potentially impacts the adjoining neighborhood with historical solvents or other industrial chemical releases, and the Railroad Tie Manufacture site is potentially impacting the adjoining Barren Fork River**. The City of McMinnville has plans to repurpose these sites, removing the environmental and health threats and transforming them into a much-needed mixed-use commercial/residential and multi-tenant residential development respectively, bringing desperately needed high-paying employment and housing to this part of our community (as specified in our Revitalization Plans (1.e)).

1.d. Identifying Additional Sites: Our focus at the outset of this grant will be the CTA, WTA, and UTA target areas. As we complete assessment of priority sites, additional sites will be identified using our updated brownfield inventory and community input. Additional sites will exhibit similar criteria (demographics, sensitive populations, environmental threats, health challenges, redevelopment potential, etc.) used to define our disadvantaged CTA, WTA, and UTA areas, which means they will be in an economically impoverished or disproportionately impacted community or census tract.

Revitalization of the Target Area -- 1.e. Reuse Strategy & Alignment with Revitalization Plans:

Our Coalition's 2020 UCDD Comprehensive Economic Development Strategy, 2024-2027 Upper Cumberland Local Plan, Cookeville Capital Improvement Plans 2023-2026, McMinnville 2023-2026 Strategic Plan, Town of Gainesboro Community Mobility Plan, (Revitalization Plans) specify revitalization of the CTA, WTA, and UTA target areas as a key initiative 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/residential redevelopment and increased walkability/connectivity in the CTA, WTA, and UTA 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 CTA, WTA, and UTA, triggering further environmental and redevelopment funding (1.g.). Increasing our stock of mixed-use commercial/residential properties and accessible owner-occupied, moderate-income housing near our commercial centers will alleviate our housing shortage and align with our goals to increase the walkability/connection of our downtowns to area neighborhoods. Revitalizing former industrial sites to become multi-use retail, commercial, residential, and/or green space development, will bring much needed jobs to the CTA, WTA, and UTA. Plans are underway to **revitalize the Auto Salvage Yard into a mixed-use commercial/residential development**, further benefiting the residents of the UTA. **Assessment and redevelopment of the Railroad Tie Manufacturer in the WTA would remove the threat of potential environmental contaminants to the adjoining Barren Fork River** and attract new multi-family residential and greenspace development, providing needed housing for WTA residents. **Reuse of the Wood Flooring Manufacturer into a high-tech advanced manufacturing facility will add high paying jobs** and revitalize a deteriorating area of the WTA. The revitalization efforts for our priority sites will create needed jobs, affordable housing, and walkable green space within our target areas, improving our residents' quality of life and meeting the visions outlined in our Revitalization Plans. **Significant resources have already been pledged**

for reuse of CTA, WTA, and UTA properties, including infrastructure improvements along Main Street in McMinnville, Rail-Trail in Cookeville, and along Roaring River Park in Gainesboro in the heart of the UTA (see 1.g.). 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: Assessment and reuse of priority sites such as the **Fox School and Vacant Lot** will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector 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 sensitive populations reside. Reuse of brownfields will also generate higher tax revenue for our communities, and through increased investment, jobs will be created, new residential units will be constructed, and property values will rise. **Redevelopment of all Table 1 properties will create an estimated 850 construction jobs and over 425 permanent jobs and will generate nearly \$5M in annual property tax revenue combined for target area communities, according to projections.**

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 CTA, WTA, and UTA will create affordable and sustainable housing, workforce development (jobs), and remediate/reduce legacy pollution in areas with high concentrations of economically impoverished residents. EPA's investment in brownfields in our target areas will help by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our parks network, encouraging green transportation, and turning brownfields into new hubs for the growth of our economy.

Transforming priority sites such as the **Salvage Yard & Vacant Lot in Cookeville, and the Fox School site in Gainesboro into multi-use redevelopments, will create a more walkable community.** This in turn will help mitigate community vulnerability to climate change by reducing carbon emissions and encouraging green transportation (walking, biking, etc.), ultimately providing better health to our economically impoverished residents (due to low-income and poverty) who have experienced a disproportionate exposure to environmental impacts from brownfields).

Strategy for Leveraging Resources, 1.g. Resources Needed for Site Reuse: Our target communities have a history of leveraging investment in projects. For example, McMinnville has **leveraged over \$5M in grant funding for construction to improve their water delivery infrastructure to help revitalize the community and Cookeville's 39 Depot Street project with >\$6M invested already.** More investment is planned, focusing on the CTA, WTA, and UTA as outlined below:

- *Private/Public Funding* – see above
- *EPA* - Additional EPA Assessment, Cleanup, Multipurpose, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the city (\$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* - Provides grants, targeted for investigation and remediation/mitigation at brownfield sites, to local governments for local investments in brownfield sites (up to \$500K per year)

- *Upper Cumberland Development District Business Loan Program* – RLF funds are intended to provide bridge or gap financing to help support job creation and regional and economic prosperity in the Upper Cumberland. (\$250K)
- *Upper Cumberland Development District Industrial Development Grant Program* – grant program designed to incentivize industrial development in the Upper Cumberland Region (\$ variable)
- *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 (I-40 US 70, SR 111, & SR 63), and McMinnville/Warren County's and Gainesboro's greenway trail systems to attract new investment in area brownfields, reducing redevelopment costs of these sites. 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. Revitalization ranging from mixed use commercial/residential to light industrial existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood.

2. Community Need and Community Engagement -- *Community Need, 2.a. The Community's Need for Funding:* UCDD needs EPA's financial assistance because we do not have the necessary funds for environmental assessments in our general budget (\$10.3M FY25) to address brownfields anywhere in our service area, let alone in our target areas. Indicators of need in the CTA, WTA, and UTA are evident in key economic-demographic factors: **MHI for the CTA, WTA, and UTA is 38%, 31%, and 42% less than the US, and is 27%, 18%, and 32% less than TN, respectively). Poverty in the CTA and WTA is 59% and 44% higher than the US, and is 25% and 13% higher than TN, respectively. Children living in poverty in the CTA and WTA are 40% and 17% higher than the US, and 41% and 17% higher than TN, respectively. Elderly living in poverty in the CTA and WTA are 73% and 12% higher than the US, and 67% and 8% higher than TN (see 2.b). (2023 ACS).**

The large number of vacant buildings on target area brownfields has resulted in an estimated twofold increase in crime within the CTA, WTA, and UTA 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 UCDD's priority brownfield sites further add to the financial burden of target area residents by suppressing residential property values and straining municipal budgets through a reduced tax base.

Clay, Fentress, Jackson, and Overton counties were negatively impacted by severe storms, tornadoes and flooding as indicated by the May 8th, 2021, Presidential Disaster Declaration - FEMA DR-4637-TN. The damage caused by this disaster event in conjunction with the disastrous effects on the Region as a result of COVID-19, slowed economic recovery in many areas of the Upper Cumberland area of 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 Upper Cumberland Tennessee. **The loss of over 4,700 quality jobs by large employers in the Region since 2017** (1.c.), has added substantially to the economic challenges facing our communities, diminishing local income and property tax revenues, and increasing poverty in our communities. The OS Restaurant Services closure, in multiple counties in Tennessee, was devastating, and we still have not fully recovered from the loss of such a large employer. 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/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 UCDD 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: Our most sensitive populations (low-income residents and individuals living in poverty (especially children & the elderly)(Table 2), live in and around our CTA, WTA, and UTA brownfield sites that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, soil and groundwater contamination, and unsafe structures. Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, PFAS, lead paint, and asbestos are potentially causing harm to our sensitive populations. **71% of houses in the UTA were constructed before 1980, making them much**

Table 2	US ¹	TN ¹	CTA ¹	WTA ¹	UTA ¹
Median Household Income	\$78,538	\$67,097	\$48,501	\$54,088	\$45,313
Individuals Living in Poverty	12.4%	13.8%	21.9%	15.3%	27.8%
Children Living in Poverty	16.3%	18.7%	22.9%	19.1%	28.7%
Elderly Living in Poverty	10.4%	10.8%	18.0%	11.6%	---
¹ Stats from 2023 ACS					

more likely to contain lead-based paint, a significant threat to young children and pregnant women. The Auto Salvage Yard, adjoining a low-income neighborhood, is potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, and other

contaminants that are known to cause various cancers, heart diseases, and respiratory diseases, **which are experienced by CTA, WTA, and UTA residents at higher rates than TN and the US** (2.c). The proximity of brownfields to low-income neighborhoods in our CTA, WTA, and UTA drives down housing values, suppresses commercial investment, and limits target area residents' access to adequate employment, resulting in a disadvantage for them 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 UCDD 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 UCDD's underserved and sensitive populations, including removal of blight, reducing exposure to toxic chemicals, lowering crime, 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 have 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 counties have high incidences of cancer, asthma, heart disease and chronic respiratory disease**, and all are very 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. There are 1,811 UCDD properties with environmental records on EPA’s Envirofacts Mapper. 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 CTA, WTA, and UTA brownfields and commercial and industrial operations, and their proximity to our disproportionately impacted populations, including low-income residents, has exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on priority sites. New jobs in our target areas will create gainful employment for residents, reducing poverty, minimizing displacement, and improving the state of our housing by encouraging the redevelopment of residential properties in the target areas. **Repurposing the former Railroad Tie Manufacturer in the WTA will provide needed high-paying jobs in their community and encourage the redevelopment of other properties, including residential, in the area.** Grant funds will assess lead-based paint, spurring other federal programs (e.g. CDBG) to help fund lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhoods, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. Health indicators such as **high rates of death from lung cancer, bladder, colon & rectum, and lung cancers, high rates of premature births and low birth weights, and asthma related emergencies** (2.c) will no longer be influenced by environmental impacts that are related to our target area brownfield sites. This reduction in environmental exposure will be accomplished where our disproportionately impacted and impoverished populations are concentrated.

Table 3 – Health Indicators

Health Condition	WTA Rate ³	CTA Rate ³	UTA Rate ³	TN Rate ³	US Rate ³
Bladder Cancer ²	24.2	22.6	—	19.1	18.8
Colorectal Cancer ²	45.6	40.2	40.6	38.7	36.4
Chronic Respiratory Disease ¹	66.8	61.5	77.1	45.7	43.4
Death by Heart Disease ¹	414.4	284.5	336.6	210.2	162

¹ National Institute of Health, 2023 Data ²Center for Disease Control, 2021 Data, ³Rate per 100,000

the state of our housing by encouraging the redevelopment of residential properties in the target areas. **Repurposing the former Railroad Tie Manufacturer in the WTA will provide needed high-paying jobs in their community and encourage the redevelopment of other properties, including residential, in the area.** Grant funds will assess lead-based paint, spurring other federal programs (e.g. CDBG) to help fund lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhoods, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. Health indicators such as **high rates of death from lung cancer, bladder, colon & rectum, and lung cancers, high rates of premature births and low birth weights, and asthma related emergencies** (2.c) will no longer be influenced by environmental impacts that are related to our target area brownfield sites. This reduction in environmental exposure will be accomplished where our disproportionately impacted and impoverished populations are concentrated.

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, the Biz Foundry will help connect brownfield investors with lenders, facilitating and encouraging creative development and brownfield reuse financing deals to maximize project success

Table 4 – Project Partners and Roles

Partner Name	Entity’s Mission	Point of Contact	Description and Project Roles
Cookeville	Partnership between public &	Amy New, President & CEO	Local non-profit focused on reuse/historic

CityScape	private sectors dedicated to revitalizing Downtown Cookeville	931-526-9591 anew@cookevillechamber.com	preservation of downtown Cookeville properties – site selection & prioritization; identify potential investors of downtown Cookeville properties
McMinnville-Warren Co Chamber of Commerce	Creating a positive climate for business growth in Warren County	Lakelinn Simmons 931-473-6611 lsimmons@warrentn.com	Local business advocacy organization – promote brownfield sites to prospective businesses; disseminate information about brownfield sites & redevelopment; provide meeting space
The Biz Foundry	Building the entrepreneurial ecosystem in the UC Region	Tiffany Anton 931-210-5105 tiffany@thebizfoundry.org	Non-profit business advocacy group – provide mentoring to new brownfield development groups, provide meeting space, connect brownfield investors with lenders
Highlands Economic Partnership	Strengthening the region by cultivating a vibrant economy & enhancing quality of life	Amy New, President & CEO 931-526-9591 anew@cookevillechamber.com	4-county public-private economic & community development initiative based in Cook
Small Business Development Center	Providing high-quality consulting and training solutions to start, grow, and sustain a business	Kelly Sullivan, Director 931-520-6081 ksullivan@ucdd.org	Network and statewide system that provides no-cost confidential advising and training to entrepreneurs and small business owners.
Upper Cumberland Habitat for Humanity	Eliminate poverty housing & homelessness by building/renovating houses for people in need	Stacy Nash, Coordinator of Repair Services 931-528-1711 ext. 7	Non-profit serving low income residents – grass-roots community outreach and engagement assistance, low-income housing development assistance, & site selection

2.g. Incorporating Community Input: UCDD 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 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. In the event 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.).

The Region will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on UCDD 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. UCDD 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 a schedule for 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. When developers are identified, they will be 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, a. Description of Tasks/Activities & Outputs

UCDD will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by EPA's PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, UCDD and its QEP will complete the following tasks:

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

a. Project Implementation: UCDD staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between UCDD, QEP, EPA, etc. 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. UCDD, 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 environmental justice, 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 and to sites near residential areas that pose health risks to a disproportionately impacted 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 (more frequently as specific project activities require) 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 least quarterly throughout the grant period

c. Task/activity Leads: UCDD & QEP

d. Output(s): Travel - UCDD 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 UCDD, 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 UCDD. 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 UCDD, will complete Phase II ESAs based on environmental conditions identified in 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): UCDD & QEP

d. Outputs: 29 Phase I ESAs; QAPP, SAPs/HASPs, estimated 32 Phase II ESAs.

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

a. Project Implementation: QEP, directed by UCDD, 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.f).

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): UCDD & QEP

d. Output(s): estimated 13 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

a. Project Implementation: 8-12 public meetings will be held at various venues throughout UCDD’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. UCDD 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 that are near residents identified as economically impoverished and/or disproportionately impacted by brownfields.

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

c. Task/activity Lead(s): UCDD & 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. UCDD 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 UCDD 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. UCDD 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
	Travel	\$8,260				\$8,260
	Supplies				\$490	\$490
	Personnel	\$24,600			\$12,000	\$36,600
	Fringe Benefits					

	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 – **Travel:** Attend 2 National Brownfield Conferences (2 people each): airfare x 4 @ \$2,400, 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 mgmt. **Personnel:** Direct admin. Cost includes 410 hrs. \$60/hr. = \$24,600.

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 – **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. **Personnel:** Direct admin. Cost includes 200 hrs. \$60/hr. = \$12,000.

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, UCDD 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 UCDD’s best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Output and outcomes following the close 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: UCDD’s Planning and Community Development Department (PCDD) will manage this grant. The PCDD has previously managed many other economic development resources valued at over \$50M over the past 10 years. The PCDD staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Mrs. Megan Regan is Community Development Planner with the Upper Cumberland Development District, and she will be the financial manager of the brownfields grant. She has three years of experience with ARC, EDA, CDBG, and other federally funded projects and will be responsible for fiscal oversight, drawdowns, financial reporting, compliance with 2 CFR Part 200, and coordination with project partners to ensure proper use of funds throughout the grant period. She will be assisted by Mr. Tommy Lee, UCDD’s Deputy Director. Mr. Lee has decades of experience working with governmental agencies in planning and

community development, including grant administration, grant writing, and planning for 14 counties. He has extensive knowledge of the Upper Cumberland Region and State of Tennessee guidelines, coordinates and conducts numerous public meetings, and is in regular communication with State of Tennessee representatives and local officials. Mr. Lee will supervise this grant program. The PCDD staff will aggressively use their regional planning, grant administration, brownfields redevelopment, and small business growth experience to seek redevelopment opportunities for brownfield properties in the UCDD target areas and throughout the Region and have the technical, financial, and administrative ability in place to implement this grant project successfully. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of UCDD's team, with over 60 dedicated economic development and planning professionals, will allow for a seamless transition to other experienced members.

4.d. *Acquiring Additional Resources:* UCDD 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. UCDD 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, UCDD 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 UCDD 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 Warren County/McMinnville Partnership (see 2.e.) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

4.e. *Past Performance & Accomplishments -- Currently Has or Previously Received an EPA Brownfields Grant:* UCDD previously received two FY13 EPA Brownfields Assessment Grants for Hazardous Substances and Petroleum. Skillful execution of the Work Plan resulted in full expenditure of grant funds by the end date, resulting in the development of a brownfield inventory and the completion of 8 Phase I ESAs, 6 Phase II ESAs, and 2 ABCAs.

UCDD also received a FY09 EPA Brownfields Assessment Grant where 6 Phase I ESAs and 3 Phase II ESAs were completed, and the grant was expended within the Cooperative Agreement period. At the time of this submission, all outputs and outcomes related to the grants (completed brownfield inventory, community engagement, Phase I ESAs, QAPP, Phase II ESAs, ABCAs, remedial planning, reporting, and ACRES entries) have been met and are accurately reflected in the ACRES system.

4.b.(2) *Compliance with Grant Requirements:* All Work Plan goals, outputs, and outcomes of the previous EPA Brownfields Grant were achieved, and all reports including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc. were completed in a timely manner, and no corrective measures were needed. The city was fully compliant with the terms and conditions of their previous Cooperative Agreement. As with our previous grant, UCDD has a clear plan to aggressively address targeted brownfields in the community, and firm leveraging commitments to redevelop sites into viable assets. Due to budget constraints, lower tax revenues, and pressures to complete projects necessary to maintain our infrastructure, EPA grant funding is the only way we will successfully redevelop brownfields.

2.B. Threshold Criteria for Assessment Grants

2.B.(1) Applicant Eligibility

Upper Cumberland Development District (UCDD) (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.

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

- Warren 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 Cookeville 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.

2.B.(2) Target Areas

Target areas for the coalition lead and non-lead members are presented in the Application Information Sheet.

2.B.(3) Existing Brownfields Grants to Non-lead Members

Non-lead coalition member, Warren County, has never been awarded an EPA Brownfields MARC Grant. Additionally, UCDD affirms that each non-lead coalition member is not the recipient of an open cooperative agreement for MARC Grant funding.

2.B.(4) Legal Authority to Expend Grant Funds

Upper Cumberland Development District (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.

2.B.(5) Coalition Agreement

Non-lead coalition members, Warren County and City of Cookeville, have submitted signed letters of commitment to UCDD 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.e and 2f. of the Narrative/Ranking Criteria for further information.

2.B.7 Expenditure of Existing Grant Funds

UCDD does not have an open EPA Brownfields Assessment Grant or EPA Brownfields Multipurpose Grant.

2.B.8 Contractors and Named Subrecipients

N/A -- UCDD has not procured/named any contractors or subrecipients.