

## THRESHOLD CRITERIA FOR ASSESSMENT GRANT

### A. Applicant Eligibility

The City of Florence (Florence) is a duly chartered Class 5 municipality of the State of Alabama.

### B. Letter from the State or Tribal Authority

The letter of support and acknowledgement from the Alabama Department of Environmental Management (ADEM) is attached to this proposal as Attachment A.

## RANKING CRITERIA FOR ASSESSMENT GRANT

### A. Assessment Grant Proposed Budget (Community-Wide Assessment)

Florence intends to use this grant to conduct inventory, Phase I & II Environmental Site Assessments (ESAs) to characterize and assess brownfield sites, and cleanup and redevelopment planning, with an emphasis on the Sweetwater Arts and Entertainment District (SAED). If grant money remains after the SAED is addressed, sites in other areas of the community would be assessed. Anticipated budgets in specific cost categories are identified in the following table:

<b>Budget Categories</b>	<b>Brownfields Inventory &amp; Outreach</b>	<b>Phase I ESAs</b>	<b>Phase II ESAs</b>	<b>Cleanup &amp; Redevelopment Planning</b>	<b>Total</b>
Personnel	\$12,000			\$9,500	\$21,500
Travel	\$1,750				\$1,750
Supplies	\$1,500			\$1,250	\$2,750
Contractual	\$4,000	\$44,000	\$120,000	\$6,000	\$174,000
Total	\$19,250	\$44,000	\$120,000	\$16,750	\$200,000

**Brownfield Inventory and Outreach:** The SAED area contains several known and perceived brownfield sites that will be inventoried with site information included in a database. This task will be conducted by Florence’s Planning Department staff with assistance from interns from the University of North Alabama (UNA) Geography Department. Community outreach and education will be regularly conducted by Florence staff and technical consultants to inform stakeholders of the findings, solicit input from property owners and citizens, and to work with private investment entities (i.e., developers, realtors, banks, non-traditional lenders, etc.) and citizens on an integrated community goal and vision for an achievable plan for redevelopment. \$1,500 is included for supplies necessary for subtasks such as mapping, copying, publishing, mailing, etc., \$1,750 is budgeted, if needed, for a Brownfield conference or workshop travel (i.e. such as the National Brownfield Conference in Detroit, MI May 5-7, 2008) that would directly improve the quality of the inventory and outreach.

**Phase I ESAs:** This task includes conducting approximately 20 Phase I ESAs at an approximate cost of \$2,200 each of inventoried sites in the SAED in general accordance with (1) the EPA’s Standards and Practices for All Appropriate Inquiries (AAI) [40 CFR Part 312] and (2)

guidelines established by the American Society for Testing and Materials (ASTM) for Phase I ESAs (ASTM Standard Practice E 1527-05). This information will be used in preparation of an electronic brownfield database that leverages historical property information to support strategic planning and master planning initiatives, to evaluate the potential level of effort necessary to investigate selected sites, to allow web-based searches of sites that meet a potential development teams risk tolerances, property needs and infrastructure needs.

**Phase II ESAs:** This task includes conducting approximately ten (10) Phase II ESAs at an approximate cost of \$12,000 each based upon the results of the Phase I ESAs. These are subject to meeting site specific eligibility requirements and approval from the EPA and the ADEM Voluntary Cleanup Program (VCP). Sites with the highest redevelopment potential will be prioritized to aid completion of cleanup and redevelopment plans. Information from the Phase II ESAs will be included in the database described above.

**Cleanup & Redevelopment Planning:** This task will involve the development of a plan to cleanup and redevelop sites within the SAED and to develop implementation strategies and resources. This task will be conducted by the Florence Planning Department staff and technical consultants. The information obtained from community outreach and the Phase I and II ESAs will be used to evaluate the potential level of effort necessary to cleanup selected sites for budget preparation and/or contractor selection. \$1,250 is included for supplies necessary for subtasks such as mapping, copying, publishing, mailing, etc.

## **B. Community Need**

1. Florence is the county seat and principal city of the Florence–Muscle Shoals metropolitan area and is considered the primary economic hub of northwestern Alabama. The city was founded in the early 1800s along the Tennessee River and was one of the first textile centers in this part of the country. The 97-acre SAED area is part of a 500-acre area originally known as the Sweetwater Community that later was referred to as East Florence, which was once home to various iron works/foundries, the largest wagon works factory in the southern US, wood/lumber yards, fertilizer plants, textile mills, and various other manufacturers. For nearly a century, the area was the industrial center for Florence that bustled with industrial jobs, local businesses, and residential neighborhoods. A railroad depot with several rail lines leading to various industries existed. Throughout the 20<sup>th</sup> century, new manufacturing methods and the changing economy brought the deterioration of the major industries in Florence and the SAED areas. Many decaying buildings in the SAED area were left contaminated or perceived to be contaminated. This industrial area was historically located on the edge of town and was not frequently accessed. The primary access into downtown Florence was further west over the O’Neal Bridge. However, within the last three years State Highway 133 was extended north with a new bridge across the Tennessee River and an off ramp from the highway at Veterans Drive, which is the southern border of the SAED. The SAED is now the primary gateway into Florence. A diagram showing the SAED area is included in Attachment B for review and reference.

Many of these industrial sites are now closed and/or abandoned with the long time use of hazardous substances resulting in them being brownfields. The brownfield status of these sites has decreased their taxable value and the sites remain undeveloped, which has led to lost and no

new job creation. Data obtained from the United States Census Bureau (1999 and 2000) and The University of Alabama Center for Business and Economic Research for both the Florence and SAED areas indicate: 1) the median family income in the SAED is \$13,488 versus \$40,577 for the rest of Florence, 2) the percent of family households in the SAED is 23.9 percent versus 60.4 for the rest of Florence, and 3) the percent of married households in the SAED is 27.9 percent versus 43.6 percent for the rest of Florence. The population in the SAED area is not necessarily decreasing but rather becoming older, as families and younger people move out to find jobs and the housing market has become more rental than home ownership. The combined effects of the socio-economic status of the community and the continual trend of industrial out-sourcing have challenged the stability of the community, which can only be reversed with significant private investment and redevelopment in a comprehensive and planned manner.

**2.** The EPA grant will allow Florence to assess the brownfield sites in the SAED to identify and quantify the actual and perceived risks to human health and the environment and to prepare redevelopment plans designed to eliminate, minimize, or mitigate against these risks, while returning the sites to a beneficial use. The SAED area is a mix of residential, commercial and industrial properties. Several schools, a neighborhood recreation center and a daycare center are located in the area. In fact the St. Joseph and Brandon schools border the SAED to the east and west resulting in children walking through the area on a regular basis. At least two (2) documented brownfield sites and several potential ones exist in the SAED including an abandoned former metal plating company and a former foundry that is partially dismantled. The Sweetwater Creek crosses the SAED along the east boundary and along the foundry. An unnamed stream tributary leading to the creek is an open channel adjacent to the abandoned plater. Refer to Attachment B for a diagram. Children and other citizens could be exposed to potential contaminants in surface waters and surficial soils at or near these sites.

Brownfield assessment will greatly compliment the strategic elements of the Comprehensive Plan that was implemented by Florence in April 2007 after seven (7) months of public meetings and a year of drafting. Land uses that are located, planned and designed to be compatible with this system of critical environmental resources will be supported and encouraged to provide opportunities for creativity, efficiency, stability, image, and diversity. The vision for the SAED includes a mixed use with residents of all ages and lifestyles and provides more diverse green spaces with public parks, residential neighborhoods and apartments, recreation centers, nearby schools and commercial mix of offices, restaurants with outside dining and entertainment, and art and antique shops. Refer to Attachment C for a flyer of the SAED area that has been developed and provided to the public and developers to represent Florence's vision for the SAED area. At this point, few developers have been willing to invest in the SAED area. The grant will help leverage investment in brownfield sites resulting in new opportunities for commercial, residential, and recreational development on sites cleared of environmental issues/hazards, which will enable continued growth and redevelopment. Without this grant, the revitalization will likely stall due to the stigma of brownfield sites.

**3.** The impact of vacant, abandoned, and underutilized sites due to environmental problems is substantial. The legacy of the brownfield sites are a blight on the community both aesthetically and from an environmental perspective due to the presence or perceived presence of contamination. The contamination from the former plater and foundry, and from numerous other

suspected brownfield sites scattered throughout the SAED, including other former industrial sites, dry cleaners, leaking underground storage tank (UST) sites, potential unlicensed landfill/dump sites, an abandoned rail depot and former rail lines, and sites throughout the community has hindered the redevelopment or expansion on these and adjoining properties. Contaminated sites pose negative health consequences through exposure to soil, groundwater and surface water contamination via potential direct contact, ingestion, and inhalation. As a community that relies on groundwater and surface water (i.e., Tennessee River, Cypress Creek, and Sweetwater Basin) for its water supply, brownfields are an immediate threat to local residents.

In the SAED area, the impact of actual and perceived environmental contamination is profound resulting in the implementation of the vision described in Section B2 being hindered. Because actual and perceived environmental pollution has led to lower property values, disinvestments, and abandoned property; the social and economic fabric of the community is suffering where fewer families live and people have significantly lower incomes. This grant will empower Florence to begin the process of addressing those brownfield sites that are hindering redevelopment and progress within Florence, while keeping with its theme of redeveloping from the core.

### **C. Site Selection Process**

1. Florence's Planning Department staff, interns from UNA and technical consultants will inventory brownfield sites that have near term redevelopment or reuse feasibility and opportunities. To meet that definition, the inventory will consider land use and zoning history, particularly heavy industrial/commercial and manufacturing uses, information from local, state, and federal environmental and health agencies on sites and contaminants in the area, and input from the community, including information and perceptions about specific sites. Sites will be categorized into general classifications that range from low to high risk and the higher the risk, the higher the priority. The ranking is intended as a way to prioritize sites that pose the greatest threats to human health and the environment and that takes into consideration sites with the highest redevelopment potential based upon community need, developer interest, location, etc. Site eligibility will be evaluated in accordance with EPA guidelines. Useful nominal categories will also be applied (i.e., RCRA permitted, state and federal CERCLA sites, state dry cleaner sites, leaking UST sites, sites previously assessed through other sources, etc.).

2. There have been no previous community-wide brownfield inventory or prioritization activities to date although much information is available to do so. Based upon planning and ongoing implementation of the Florence Comprehensive Plan, knowledge of the history of land uses by Florence staff, and on research conducted by Florence's technical consultant, it is anticipated that greater than twenty sites exist in the SAED area and that numerous others exist throughout the city. In the SAED area, several potential sites have already been identified including the abandoned plater, former foundry, abandoned railroad depot, former dry cleaners and other former industrial sites. Florence has an option to purchase agreement on the abandoned plater site.

3. In order to obtain access to privately owned sites, community outreach efforts will take place to educate and inform the owners of the benefits of assessing the sites and completing the required cleanup to allow for successful redevelopment, which will increase investment in the area, result in fewer underutilized sites, and increase property values. They will be informed of ADEM's VCP and limitations on liability associated with the VCP. They will be provided with a written access agreement for review and comment. If after all reasonable efforts are exhausted to gain access an owner refuses to allow access, the next highest priority site within the same categorical preference will replace the inaccessible site.

#### **D. Sustainable Reuse of Brownfields**

1. Florence is preventing pollution and reducing resource consumption through various planned land use and development patterns and themes. Planned overall development patterns for Florence are composed of several major components, all supported by and coordinated with plans for the city's transportation system and other infrastructure. Activity centers are nodes or concentrations of people that should affect urban form, environmental quality and the transportation network in a positive way. Residential neighborhoods will be planned, designed, constructed and maintained to do so in ways that balance development and conservation. The overall, community-wide balance of population and consumption of land will be structured by and compatible with the city's green infrastructure of environmental resources. All existing infrastructure and landscape will remain or maintained as much as possible during redevelopment activities with fill reuse encouraged on all public projects. The city has developed extensive storm water management guidelines and regulations and will continue to strictly enforce these during redevelopment activities.

Florence has strategically focused population concentrations upon commercial and employment centers, supported by residential neighborhoods and interspersed with and structured by green corridors, all interconnected by a variety of accessibility options that will require less automobile travel, provide better opportunities for future transit, and decrease adverse environmental effects. The SAED area is included in The Comprehensive Plan within the "specialty mixed use centers" section. These are relatively small, mixed use areas. Each should respond to its surroundings, support pedestrian activity and allow for maximum pedestrian access. These areas typically have a strong edge and a historical focus. The city intends that development should be planned, sited and designed to be compatible with the city's green infrastructure. Florence's Utilities Department and the Tennessee Valley Authority (TVA) are partnering on programs which encourage green energy sources that sometimes provide incentives. The Green Power Switch program encourages residents to buy 'green power' in 150-kilowatt-hour blocks which is electrical energy generated from cleaner renewable resources such as wind, solar, and methane gas.

2. Projects that would be assisted under this grant would result in the development of more intensive economic uses than currently exists. These new uses would provide Florence with an increased tax base and redevelopment of contaminated sites would also provide new jobs, on both a temporary basis during redevelopment and on a permanent basis through the businesses that locate or expand on the redeveloped sites. In addition, the creation and/or expansion of green spaces will increase property values which in turn will increase the tax base.

Numerous actual and perceived brownfields present barriers to the ongoing revitalization projects of Florence. Those projects include ongoing and proposed housing redevelopment and infill, new commercial development, and greenway and open space parks. These projects address the following visions of the Florence Comprehensive Plan: 1) increase business and job opportunities for residents of Florence, 2) attract investments and create value through coordinated public/private initiatives, 3) provide incentives for business startup and expansion, 4) develop partnerships between industry and residents for addressing employment needs, 5) develop public facilities that serve as centerpieces of community activities, 6) develop streetscape to provide common theme, link activities and beautify the area, and 7) develop the city's street system to enable the efficient movement of vehicular traffic.

Another benefit to Florence is the ability to leverage direct private investment. The Cleanup and Redevelopment Planning part of the proposed budget is intended to inform and encourage developers to pursue the redevelopment of potential brownfield sites. The ESA activities will lower upfront risk and provide the ability to utilize various financial tools such as tax increment financing (TIF) and federal brownfield income tax incentives. The resulting redevelopment projects will increase the value of property and generate additional tax revenue. The alternative is leaving brownfield sites in their current condition and not recognizing any economic or environmental benefit.

**3.** Smart growth principles are being and will be applied in all areas of Florence, including the SAED area. The Florence Comprehensive Plan calls for traditional neighborhood developments which are walkable, link to existing and proposed greenways and park areas, and include affordable housing. Ongoing and planned projects that are affected by brownfield issues will be conducted in accordance with the Florence Comprehensive Plan and promote meeting the following goals:

- Increase the number of quality, diverse and affordable homes through rehabilitation, infill, and new construction.
- Increase the linkages between the residential areas and neighborhood activity centers for pedestrians, bikes, automobiles, and mass transit.
- Initiate infill program to construct housing and stabilize the community.
- Extend greenway and walking trails along and between activity centers, parks, recreation, and protected areas.
- Encourage land use planning that supports the neighborhood character and improve the appearance through a systematic zoning ordinance and code enforcement process.
- Create homeownership opportunities within existing housing stock.
- Enlarge the holdings of greenways and citywide, community, and neighborhood parks.
- Establish gateways or entry features at strategic locations throughout the community.

#### **E. Creation and Preservation of Green Space/Open Space and Nonprofit Purposes**

Florence and its surrounding area enjoy a wealth of natural resources critical to human well-being, whether the particular resource affects the economy, overall quality of life or the health and safety of residents. Natural resources have limits, and development decisions typically affect far more than the property owner and the immediate neighborhood. The city has created redevelopment and planning guidelines, and tailored site selection criteria based on the fundamental principle of preserving natural resources and green space in a manner that connects the entire city. As a part of the planning process Florence has reviewed carefully the mutual impacts of development and natural resources on one another, for purposes of protection, production, health and safety, and parks and recreation. They have also considered how these natural resource opportunities together form a logical green infrastructure of open space and natural resource areas that may provide a framework or structuring system within which to organize, locate and interconnect urban development, including community and recreation centers.

Florence's green infrastructure is not and will not be simply the land and water areas left over when all the development and building is done. Redevelopment of brownfield sites will result in preservation of greenspace. What is required is guided, sensitive balancing of conservation and development. These are the environmental conditions associated with surface water, slopes, and public and semi-public parks and open space. Florence's open spaces, many of which may appear to be simply the city's "undeveloped" lands, include many resources that are important to the community's character and well-being. Others may appropriately be set aside for reasons of health and safety, managed production of farm and forest, parks and recreation, and protection or preservation.

Florence's River Heritage Riverwalk is a multi-million dollar phased project which began in the late 90's. Phase I included the central anchor, the Patton Island Overlook, located at the eastern boundary of the SAED. Phase II, priced at \$6.2 million, is currently under construction with a completion date of December 2007. This phase connects the eastern boundary of the Veteran's Drive corridor with the Patton Island Overlook. From the Patton Island Overlook, the Riverwalk will enter the SAED as an urban walk. The Alabama Department of Transportation has provided funding to design and implement a greenscape connection from the Patton Island Overlook to the SAED. The streetscape design for SAED includes pedestrian facilities as well as increased greenspace.

Florence's Urban Forestry and Parks and Recreation Departments and individual developers will provide long-term management and care of the greenspaces/open spaces which are a quality of life improvement that ultimately strengthens the tax base that supports it.

#### **F. Pre-Award Community Notification**

1. In 2006, the Florence City Council approved the preparation and submittal of this Community-Wide Hazardous Substances Assessment grant proposal. Should the grant be awarded to Florence, the following process will be taken to notify the community. This process has previously been used and was very successful in obtaining community involvement and feedback on Florence's Comprehensive Plan.

First, a press release will be distributed within the first week of receiving the grant award to both daily and weekly newspapers in the city. These papers, especially the Times Daily, are widely distributed and read. Secondly, a legal notice will be placed within the Times Daily announcing the grant award and stating the public can review the grant proposal at the City of Florence's offices or review and download on the city's website. Thirdly, a stakeholders group including city departmental officials, citizens of the community, community business leaders, real estate agents, developers, builders, lending institutions, etc. will be sent emails and/or postcards by USPS mail announcing the grant award and how they can review and comment on it. And fourth, the agendas of City Council meetings are presented on the local cable access channel and the grant proposal will be part of the next scheduled City Council meeting. The meetings themselves are broadcast on the local cable access channel which will allow people to watch the discussion without attending the meeting and provide comment later. A month and a half comment period is proposed to allow everyone time to provide their comments of the grant proposal. It should be noted that an article already has been published in the Times Daily paper describing the SAED area and that a grant proposal is currently being written (refer to Attachment D for a copy of the article). In addition, an initial stake-holders meeting was held on September 5, 2007, where Florence officials and their technical consultant presented Florence's vision for the SAED area and to notify everyone that this grant proposal would be submitted to the EPA during current submittal period. The meeting also allowed the participants to provide feedback. Please refer to Attachment E for a copy of the postcard announcement of the September 5, 2007, stake-holders meeting. The press release, legal notice, postcards, and City Council meeting will provide information on where to review the grant proposal and where and how (i.e., email, telephone, written correspondence) to provide comments.

Community involvement will bring better outputs and outcomes. Broad participation by the community and stakeholders in the success of the community will ensure a more complete and thorough brownfield inventory, will set priorities and target sites by community consensus, and will enable specific cleanup and redevelopment resource commitments to be made in concert with the targeting of sites..

**2.** These notification methods are the most appropriate ways to reach Florence's target community because specific sites for assessment under this grant have yet to be selected. A broad approach to contacting citizens and stakeholders on a city-wide basis, which will likely have an interest in brownfields and which may be able to suggest sites for assessment, will give many individuals and groups input in the city's plans. Notification of specific stakeholders in the SAED area or in any other community will be notified by a face-to-face contact in the form of a survey conducted by Florence Planning Department interns from UNA Geography Department. This will be followed up with a postcard invite to a community meeting to be held in the evening for daytime workers assuming they have at least a 30 minute commute, to discuss how to best utilize the grant within the area.

**3.** The comment period will begin within the first week of Florence receiving notice of the grant award and will end when the grant cooperative agreement is due to the EPA which is estimated at a month and a half. As noted above, public comment will be encouraged through press releases, a legal notice, face-to-face surveys, postcards, community meeting(s), and a City

Council meeting. Comments can be received in person, by email, telephone, and/or written correspondence.

4. Once comments have been received and complied, Florence will consider and respond in writing to comments on the approach to conducting brownfield inventory, ESAs, and Cleanup and Redevelopment Planning; however, it will be noted that the plan to accomplish these tasks is a working plan due to a multitude of possible results of the brownfield inventory and ESAs. In addition, Florence will take suggestions for specific sites to be assessed and review their eligibility relative to EPA guidelines. Sites will then be prioritized relative to other identified sites.

#### **G. Ongoing Community Involvement**

1. Florence's overall strategy for how the city intends to shape itself over time was officially formalized by the development of the Florence Comprehensive Plan which is a guide to making decisions regarding land use, development and redevelopment, conservation, zoning, and capital improvements. The planning process for the Florence Comprehensive Plan began in earnest with a Town Meeting in mid-January 2006. The near-capacity crowd was provided a brief overview of the city and its resources using maps of existing physical features, including critical infrastructure as well as land use, zoning and traffic. The participants were asked a series of questions designed to elicit comments and suggestions that would help the Planning Commission and City Council as they considered the future of their city. The questions focused on assets of Florence, issues, outside forces, why people choose to live/work/invest in Florence, and visions for Florence. From there the City Council and Planning Commission coordinated a series of community meetings over a seven (7) month period that cumulated in the Florence Comprehensive Plan that was adopted in April 2007. The approach to community involvement with brownfields will be similar.

To get and keep the community involved with Florence's brownfield redevelopment, it is proposed that a series of four (4) community workshops will be announced and scheduled with the community invited to discuss and give feedback on the progress of the grant (i.e., brownfield inventory, information obtained from a potential trip to the the National Brownfield conference, ESAs, and Cleanup and Redevelopment Planning). Each will begin with a progress update followed by the meeting agendas. The meetings will be extensively publicized through newspaper, city website newsletters, postcard announcements, and flyers distributed through the city.

The open community workshops will include the following topics or information: 1) review of site inventory criteria, receive input and gather information on possible brownfield sites, and set community objectives affecting how brownfields are categorized. 2) a) identification of opportunities to leverage near term public, nonprofit, and private investments in site cleanup, redevelopment, or reuse and b) set priorities for ESAs, addressing potential critical threats to the public health and rating opportunities against the vision, goals, and objectives of the Comprehensive Plan. 3) a) reach a consensus on the sites to target for Cleanup and Redevelopment Planning, including remediation of critical threats to the public health, b) secure specific commitments of public, nonprofit, and private resources for near term cleanup,

redevelopment, or reuse, and c) receive input and formulate specific redevelopment options. 4) rate redevelopment options and finalize plans for cleanup, redevelopment, and reuse.

2. Florence has established relationships and/or partnerships with the following stakeholders to ensure appropriate and sustainable cleanup and redevelopment of brownfields within the City of Florence as well as in the other stakeholder’s areas: Northwest Alabama Council of Local Governments, Shoals Chamber of Commerce, Shoals Economic Development Authority, National Heritage Area – Shoals Committee, Music Preservation Society, TVA, ADEM, and the University of North Alabama. A unique component of the partnership with the UNA is the involvement of student interns, who Florence recently hired to help conduct face-to-face surveys and compile census data for the Florence Comprehensive Plan. The city has met with the business owners of the SAED and will continue to coordinate with the group to establish goals, maintain the integrity of the district, and eventually initiate tax incentives through the Alabama Historical Commission for building preservation and renovation.

3. Communication of progress will be conducted in a variety of ways including progress updates at community workshops, press releases to the Times Daily and other daily and weekly newspapers in the city, City Of Florence website updates, project profile posters in businesses, updates at City Council meetings, District 3 meetings, and Planning Commission meetings. There are few, if any, languages other than English that are a primary means of communication for Florence residents; therefore, all communication will be in English.

4. A table with names and contact information for community-based organizations supportive of this Community-Wide Hazardous Substances Assessment grant proposal is provided below. Organizations involved in specific future ESAs and/or Cleanup and Redevelopment Planning projects will be added to the list as sites are selected.

<b>Organization</b>	<b>Contact Person</b>	<b>Phone Number</b>	<b>Activities/Representation</b>
Sweetwater Brownfield Redevelopment Task Force	Mr. John Rusevlyan	256-712-1795	Task Force comprise of investors; bankers; community leaders; higher education; media
University of North Alabama	Dr. Lisa Keys-Mathews	256-765-4640	Department of Geography
Alabama Department of Environmental Management	Mr. Larry Norris	334-279-3053	State of Alabama Brownfield Regulatory Agency
Northwest Alabama Council of Local Governments (NACOLG)	Community Planning Director	256-389-0515	NACOLG is the regional planning and intergovernmental coordination agency created by the local governments pursuant to Alabama State Legislation. NACOLG provides assistance to member governments in the development and implementation of planning projects.

Department of Urban Forestry	Mr. Paul Graham	256-760-6314	The Urban Forestry Department of the City of Florence oversees the City's landscaping needs, tree planting programs, and renewal of the older urban trees.
Lauderdale County Tourism	Ms. Debbie Wilson	256-740-4141	Promotes tourism in the area including the City of Florence.
Shoals Economic Development Authority	Ms. Susie Heird	256-764-0351	Serves as the area's lead organization to develop and implement economic development strategies that create new business and employment opportunities essential for sustainable community growth.

**H. Reduction of Threats to Human Health and the Environment**

1. As discussed in the Community Needs Section B1, the SAED area was originally referred to as “Sweetwater” but later referred to as East Florence. The industrial revolution for this area of Florence began in the 1880s and continued through the 1920s until the great depression. During this time period a canal was constructed along with an extensive railroad system to transport raw materials and finished products from the factories to the boats. The abandoned railroad depot building is located in the SAED. A local reference from the Florence library titled “History of the Shoals” details some of the industrial companies that operated in this area. Additional research by Florence’s technical consultant has identified Sanborn fire insurance maps from the late 1890s to 1920s that document numerous industrial uses. Some of these industrial sites remain today in the SAED area either as operating or abandoned sites that have known or perceived contamination. Copies of relevant maps are included in Attachment F.

Some of these sites are located along the Sweetwater Creek that crosses through the SAED (refer to diagram of SAED in Attachment B). The former foundry site referenced throughout this grant was originally developed in the late 1880s and operated until poor economic times resulted in its closure during the last five years. Other industry from this time period included cotton mills that operated until the mid-1940s and a wood wagon works company that was at the time the second largest in the nation operated until approximately 1941. A large fertilizer manufacturing company has operated in the area since the late 1890s. As also mentioned earlier, a plating company and other industrial companies related to metal products operated in the area; however, most are closed now.

The SAED area includes a large amount of residential homes many dating back to the late 1800s. Several schools, a neighborhood recreation center and a daycare are located in the area. In fact the St. Joseph and Brandon schools border the SAED area to the east and west resulting in children and other citizens walking through the area and having exposure to the contamination on a regular basis by ingestion, dermal contact, and/or inhalation. The Sweetwater Creek crosses the SAED area along the east boundary and along the foundry. An unnamed stream tributary leading to the creek is an open channel adjacent to the abandoned plating company. Exposure to contaminants is not reliably restricted since abandoned industrial buildings are not fenced off,

surficial soils are not paved, and the streams and creek are open channel. Shallow groundwater has been documented at approximately 10.0 to 13.0 feet below ground surface (bgs) with a southerly groundwater flow direction towards the Tennessee River by previous site investigations at the former plating company and foundry. Shallow soil and groundwater contamination are documented to exist on the former plating company property. Specifically, arsenic, lead, nickel, and total and hexavalent chromium exceed the EPA Region 4 Preliminary Remediation Goals (PRGs) and ADEM requirements in soil. Arsenic, lead, nickel, zinc, and total and hexavalent chromium in the groundwater exceed the EPA Region 4 PRGs and the EPA Drinking Water Standards and ADEM requirements. It is possible that shallow groundwater vents to the Sweetwater Creek and/or unnamed stream.

Although the area is currently supplied potable water by municipal sources, historic water wells likely exist that could still be used by residents as potable water sources, to water lawns, wash cars, fill swimming pools, etc. resulting in potential exposure to hazardous substances. Even the municipal sources of potable water may be at risk due to the area groundwater aquifer being the Tuscumbia-Fort Payne aquifer contained within the Tuscumbia Limestone formation. The bedrock aquifer has documented solution features that may be hydraulically connected to shallow groundwater in the area and allow potential conduits for contaminants to impact the Tuscumbia-Fort Payne aquifer.

The legacy of over a century of various industrial operations in the SAED area has resulted in documented contamination from the former plating company and perceived and very likely contamination at the foundry and at numerous other former industrial sites. Prior to the passage of major environmental laws it was common for industrial wastes to be dumped onto the ground, into surface waters, pits, ponds, wells, etc. resulting in contaminated soil, groundwater, surface water and other media. The documented industrial operations in the area used various hazardous substances including but not limited to heavy metals (e.g., arsenic, hexavalent chromium, lead, mercury, etc.), solvents (i.e., volatile organic compounds (VOCs)), semi-VOCs, acids, polychlorinated biphenyls (PCBs), petroleum products, and etc. that have well documented toxicological effects on the human body such as carcinogenic and neurotoxic.

This grant would allow Florence to develop its first ever formal inventory of brownfield sites. This inventory alone is seen as a valuable tool in measuring the extent of past contamination by quantifying the number of sites that require action, and allowing the city to track the progress of cleanup and redevelopment. With the exception of sites where there has been state or federal action, Florence currently relies solely upon as needed ESAs and cleanup. In other words, sites are addressed as development happens. This grant would serve as a basis for developing a systematic, catalytic, and proactive approach. Florence would then be able to develop a strategic plan for prioritizing and addressing each site over time. Phase I ESAs will be conducted at eligible sites to thoroughly document their history to determine whether Recognized Environmental Conditions (RECS) exist that require further investigation and types of hazardous substances that may have been utilized on a specific property. At eligible sites that require additional investigation, comprehensive workplans to conduct Phase II ESAs will be prepared and after approval by the EPA and ADEM's VCP, implemented to characterize the contamination, the type of media impacted, exposure pathways, and the risk to human health and the environment. This information will be invaluable to identifying the worst environmental

problems and prioritizing sites for cleanup that will provide the most impact on mitigating contaminants that are currently impacting human health and the environment. The information will be shared with ADEM.

By developing a comprehensive and strategic approach to brownfield cleanup, potential impacts to natural resources and health risks to the community will be greatly reduced or eliminated. Once the nature and extent of contamination is determined, redevelopment goals described in the vision for the SAED area in Section B2 can be shaped with careful evaluation of the future use. The contamination could dictate the type of development at a particular brownfield site such as having a mixed use with commercial on the ground floor to minimize residential exposures through direct contact or inhalation, parking areas with pavement as an engineering control, etc.

2. ADEM is the primary entity for oversight of brownfield cleanup activities in the State of Alabama and has an active brownfield program and VCP since 2001. A flyer describing ADEM's brownfield program is included in Attachment G. As mentioned in the Ongoing Community Involvement Section, ADEM has reviewed the grant application and provided their comments.

As part of the community outreach and education, property owners and prospective developers will be informed about ADEM's brownfield program and VCP that provides both financial and liability limitation incentives to redevelop brownfield sites. The VCP has a review procedure and fee for both assessment and cleanup workplan review by ADEM. If ADEM revolving loan fund loans or grants are likely for a particular site, it is crucial to enroll in the VCP and follow the various procedures. This money is only available to municipalities; therefore, Florence would be the recipient of the loan or grant and work with the developer to conduct cleanup activities. Florence will work with ADEM to help ensure the maximum leveraging of various funds and incentives to achieve the desired goal of redeveloping brownfield sites and to ensure that the cleanup actions taken meet the appropriate ADEM remedial standards to eliminate or reduce risk to human health and the environment as described in Section B3. This could include elimination of direct contact, ingestion, and inhalation exposures to unacceptable concentrations of various contaminants and damage to the natural resources of Florence through exposure to various media such as contaminated soil, groundwater, surface water, etc.

ADEM has made it a priority to work with municipalities and developers on brownfield sites. The VCP provides a conditional liability waiver for sites to developers that are cleaned to the agency's satisfaction, which protects future buyers from penalties and from third-party lawsuits. This is a big incentive for developers that are considering buying and redeveloping a brownfield site. An example of this is the Birmingham Alabama area where ADEM has cleared five (5) sites and have been successfully redeveloped. One (1) of the five (5) sites is a 12-acre parcel that was contaminated by chlorinated solvents and was redeveloped into a Publix grocery store. The Birmingham area received one (1) of the 15 EPA brownfield pilots launched nationwide in 1995.

## **I. Leveraging of Additional Resources**

1. The vision for the SAED area includes major redevelopment that will not only include cleanup of brownfield sites, but also improvements to infrastructure such as sanitary and storm sewers, water lines, natural gas and other utilities, sidewalks and street scaping along the major traffic arteries and possibly at other sites. The EPA grant will jump start the redevelopment; however, it will not be enough to completely fund it. Therefore, Florence is evaluating the likely funding gaps that exist and determining what other funding resources can be leveraged that may currently exist or can be developed.

Florence will contribute substantial in-kind staff resources and supplies necessary for this project. In-kind activities will include but not limited to the following: setting up a brownfield redevelopment authority, establishing a TIF authority, publicizing community meetings, providing engineering support, economic and financial analysis in leveraging other resources, public utilities and facilities planning assistance. Florence has established a program called the One Stop Shop which gives businesses one point of contact for information about obtaining the spectrum of city services to assist during their development process.

For the resources not funded under this grant, Florence will utilize general revenues as a source of funding needed for this project, which most likely will be through the City of Florence One Cent Capital Improvement fund. The State of Alabama Department of Revenue has various brownfield tax incentives including the capture of property and sales and use taxes through a TIF authority. Florence will leverage these additional resources.

Alabama received an EPA Revolving Loan Fund (RLF) grant. As described in Section H2, the RLF can be used to provide low interest loans and sub-grants for cleanup of brownfield sites. Additionally, Alabama has established Dry cleaning Environmental Response and Alabama Tank Trust Funds to cover some of the costs of assessment and cleanup of environmental contamination by dry cleaning and petroleum contaminants. Florence will leverage these additional resources.

Redevelopment will spur substantial private investment. Developers will be informed of the VCP and liability protections, TIF and RLF resources, and trust funds. Additionally, they will be informed of the Federal Income tax incentives where eligible expenses can be deducted as expenses instead of being treated as a capital cost that has to be depreciated over a number of years. Florence will leverage these additional resources.

2. The Florence Comprehensive Plan presents a long-range view of city development that will be carried out in accord with the city's Strategic Development Concept. This concept for the long-term development of the city deals with the use and development of land and for public sector investments to support such development patterns over time. The city's plans are to be implemented through a combination of direct public and private investment, and through public decisions by the City Council, Planning Commission and other boards and commissions. Plan recommendations will be translated into action through revision and continued administration and enforcement of the Zoning Ordinance and Subdivision Regulations, through budgeting and capital improvement programming, through empowerment of community and neighborhood organizations and volunteers, and through public and private decisions regarding annexation.

As described in Section II, Florence will use assessment funds to leverage additional funding for cleanup and redevelopment throughout the duration of this grant. These include public and private in-kind services, bond initiatives, ADEM RLF loans and/or grants, TIF of property and sales and use tax, state trust funds for eligible sites, potential federal Housing and Urban Development (HUD) or state equivalent affordable housing loans and/or grants, and private investment.

In summary, a combination of public, private, and nonprofit resources is planned on being invested in Florence and the SAED redevelopment area. Most of these investments, however, are complicated by the presence or perceived presence of brownfield sites in the path of progress and without the grant it will be more difficult to leverage the resources discussed in this section.

## **J. Programmatic Capability**

1. Florence will manage this assessment grant through its Purchasing and Grants Management Department and the Planning Department which will also conduct the brownfield inventory as well as Cleanup and Redevelopment Planning for sites targeted based on the findings of the ESAs. The Purchasing Director who has 30 years experience will monitor the performance of the grant and the Planning Director, with assistance from the Land Development Planner, will manage the day-to-day assessment activities. Other City departments are to evaluate the work to ensure it meets the highest accounting, planning, and engineering standards. Florence has a long, successful history of receiving and managing local, state, and federal funds. Most recent history includes over \$8.0 million in Transportation Enhancement funds through the Federal Highway Administration (FHWA) and Alabama Department of Transportation (ALDOT). Independent audits have been performed with no negative findings before, during, and after the projects.

A staff of over 10 professionals, ranging in experience from four (4) years to senior staff with 30 years experience, has extensive experience with grant proposals, implementation, reporting requirements, and close-out processes. The staff is trained in grants administration and will attend any necessary training specific to the implementation of this assessment grant. Additionally, the City expects to retain a qualified professional services firm to assist with the ESA investigations that is knowledgeable of EPA Grant requirements, and that provides administrative and technical deliverables consistent with EPA guidelines.

2. The City of Florence has a strong track record of receiving and managing federal funds, for a wide range of projects in compliance with federal accounting and reporting requirements including no adverse audit findings by local, state, or federal agencies. Florence has handled a variety of federal funds including, but not limited to:

- Appalachian Regional Commission
- Economic Development Administration (EDA) Funds
- Community Development Block Grant (CDBG) Funds
- Federal Emergency Management Agency (FEMA) Funds
- Water Conservation Act Funds
- Alabama Department of Transportation Funds

- Federal Highway Administration Funds
- Alabama Historical Commission Funds

Florence is not, nor has it previously been, required to comply with special “high risk” terms and conditions under any agency regulations implementing OMB Circular A-102.

3. Florence has not been a previous recipient of an EPA Brownfields cooperative agreement or other EPA Federal assistance agreements.

4. Florence’s plans for tracking and measuring progress towards achieving outputs and outcomes will be to provide quarterly and final reports to the EPA, as appropriate. The quarterly reports will include information on the outputs and outcomes. Outputs expected from this grant will include the Phase I and II ESAs and technical assistance to developers. Outcomes expected of this grant include acres/parcels assessed, new business start-ups, jobs and other funding leveraged, acres of greenspace/open space created, units of housing created and other public benefits, as generated. In addition, as ESAs and Cleanup and Redevelopment Planning are completed and cleanups move forward, changes in environmental conditions will be measured, including the types and levels of contamination identified as a result of ESAs. A final report will present a summary of the brownfield inventory, ESAs, Cleanup and Redevelopment Planning, and any cleanups, including a summary of outputs and outcomes and any lessons learned.

### **ATTACHMENTS**

- Attachment A: ADEM letter of support and acknowledgement for the Community-Wide Hazardous Substances Assessment grant proposal.
- Attachment B: Diagrams of the SAED Area
- Attachment C: Flyer of the SAED Area
- Attachment D: Times Daily Article
- Attachment E: Postcard Announcement of the September 5, 2007, Stake-Holders Meeting
- Attachment F: Sanborn Maps of the SAED Area
- Attachment G: Flyer of ADEM’s Brownfield Program