

GRANT APPLICATION SUMMARY SHEET

Grant Name: Brownfields Community-Wide Assessment 23-28
Department: PLANNING COMMISSION
Grantor: ENVIRONMENTAL PROTECTION AGENCY
Pass-Through Grantor (If applicable):
Total Applied For \$500,000.00
Metro Cash Match: \$0.00
Department Contact: Greg Claxton
 862-7162
Status: NEW

Program Description:

Metro Nashville Planning Department is seeking a grant from the U.S. Environmental Protection Agency to evaluate presence of environmental contaminants within properties along the East Bank that have a history of industrial uses. The grant intends to focus evaluation efforts on properties that are unstudied and that will likely be disturbed as parking lots are transformed into green space. Understanding potential contamination presence prior to any redevelopment activities is critical. The Planning department does not have a current budget for this work, hence Planning is seeking a grant.

Plan for continuation of services upon grant expiration:

The grant application proposes to fully fund the scope of work proposed. Any remediation efforts will be executed via separate financial resources.

APPROVED AS TO AVAILABILITY OF FUNDS:

APPROVED AS TO FORM AND LEGALITY:

DocuSigned by:

Kelly Plannery

11/22/2022

Director of Finance

DS
TE

Date

DocuSigned by:

Courtney Mohan

11/22/2022

Metropolitan Attorney

Date

APPROVED AS TO RISK AND INSURANCE:

DocuSigned by:

Lora Fox

11/22/2022

Director of Risk Management Services

Date

DocuSigned by:

John Cooper

11/22/2022

Metropolitan Mayor

Date

(This application is contingent upon approval of the application by the Metropolitan Council.)

Grants Tracking Form

Part One

Pre-Application ☐		Application ☒		Award Acceptance ☐		Contract Amendment ☐	
Department	Dept. No.	Contact	Phone	Fax			
PLANNING COMMISSION	007	Greg Claxton	862-7162				
Grant Name:		Brownfields Community-Wide Assessment 23-28					
Grantor:		ENVIRONMENTAL PROTECTION AGENCY		Other:			
Grant Period From:		04/01/23	(applications only) Anticipated Application Date:				
Grant Period To:		04/01/28	(applications only) Application Deadline:				
Funding Type:	FED DIRECT	Multi-Department Grant		☐ If yes, list below.			
Pass-Thru:	Select Pass-Thru --- >	Outside Consultant Project:		☐			
Award Type:	COMPETITIVE	Total Award:		\$500,000.00			
Status:	NEW	Metro Cash Match:		\$0.00			
Metro Category:	New Initiative	Metro In-Kind Match:					
CFDA #	66.818	Is Council approval required?		☒			
Project Description:		Applic. Submitted Electronically? ☒					

Metro Nashville Planning Department is seeking a grant from the U.S. Environmental Protection Agency to evaluate presence of environmental contaminants within properties along the East Bank that have a history of industrial uses. The grant intends to focus evaluation efforts on properties that are unstudied and that will likely be disturbed as parking lots are transformed into green space. Understanding potential contamination presence prior to any redevelopment activities is critical. The Planning department does not have a current budget for this work, hence Planning is seeking a grant.

Plan for continuation of service after expiration of grant/Budgetary Impact:

The grant application proposes to fully fund the scope of work proposed. Any remediation efforts will be executed via separate financial resources.

How is Match Determined?

Fixed Amount of \$ or 0.0% % of Grant Other: ☐

Explanation for "Other" means of determining match:

No match required.

For this Metro FY, how much of the required local Metro cash match:

Is already in department budget? n/a Fund Business Unit

Is not budgeted? Proposed Source of Match:

(Indicate Match Amount & Source for Remaining Grant Years in Budget Below)

Other:			
Number of FTEs the grant will fund:	0.00	Actual number of positions added:	0.00
Departmental Indirect Cost Rate	52.44%	Indirect Cost of Grant to Metro:	\$262,200.00
*Indirect Costs allowed? ☐ Yes ☒ No % Allow.	0.00%	Ind. Cost Requested from Grantor:	\$0.00 in budget
*(If "No", please attach documentation from the grantor that indirect costs are not allowable. See Instructions)			

Draw down allowable? ☐

Metro or Community-based Partners:

Planning, Metro Sports Authority, Maxwell Heights Neighborhood Association, Friends of Shelby Park, Cayce Place Residents Association, Cumberland River Compact, Civic Design Center, Greenways for Nashville, Urban League of Middle Tennessee, Urban Land Institute (none to receive any financial resources from grant with exception of Planning)

Part Two

Grant Budget

Budget Year	Metro Fiscal Year	Federal Grantor	State Grantor	Other Grantor	Local Match Cash	Match Source (Fund, BU)	Local Match In-Kind	Total Grant Each Year	Indirect Cost to Metro	Ind. Cost Neg. from Grantor
Yr 1	FY23	\$101,000.00						\$101,000.00	\$52,964.40	\$0.00
Yr 2	FY24	\$317,000.00						\$317,000.00	\$166,234.80	\$0.00
Yr 3	FY25	\$75,000.00						\$75,000.00	\$39,330.00	\$0.00
Yr 4	FY26	\$7,000.00						\$7,000.00	\$3,670.80	\$0.00
Yr 5	FY27	\$0.00						\$0.00	\$0.00	\$0.00
Total		\$500,000.00						\$500,000.00	\$262,200.00	\$0.00
Date Awarded:		Tot. Awarded:		Contract#:						
(or) Date Denied:		Reason:								
(or) Date Withdrawn:		Reason:								

Contact: juanita.paulsen@nashville.gov
vaughn.wilson@nashville.gov

GCP Rec'd
11/21/22

GCP Approved
11/22/22

VW

1. Applicant Identification

Metropolitan Government of Nashville and Davidson County Planning Department
P.O. Box 196300
Nashville, TN 37212

2. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested
 - 1.1. \$500,000
 - 1.2. Waiver not applicable

3. Location

City of Nashville, Davidson County, Tennessee

4. Target Area and Priority Site/Property Information

- Target Area: Downtown Nashville, Tennessee, East Bank of Cumberland River bordered by Interstate-24 (338 acres). This area is currently characterized by post-industrial under-use, with 70% of the area consisting of pavement. Though the East Bank itself currently contains no housing units, the census tract in which it sits is largely impoverished (over 61% under the poverty line), minority (65%), and young (29.8 median age). The tract has a high incidence of asthma due to the proximity of I-24, along with other health disparities as detailed herein.
 - Target Area Census Tract: Davidson County, TN Census Tract 193
- Priority Sites: Metro-owned properties located in the 113-acre central portion of the East Bank area. Of these, five sites (5) are identified as priorities for the full scope of work and an additional six (6) are slated for at minimum a Phase I assessment, as detailed herein. Priority sites are as follows:
 - 4 Main Street (Parcel 09302006700); Owner: MDHA
 - 6 Main Street (Parcel 09302006800); Owner: Metro Sports Authority
 - 116 South 1st Street (Parcel 093020087000; Owner: Metro Sports Authority
 - 20 Victory Avenue (Parcel 09303011500); Owner: Metro Sports Authority
 - 600 South 1st Street (Parcel 09307004600); Owner: Metro Sports Authority

5. Contacts

a. Project Director

Greg Claxton, Manager, Advanced Planning & Research
Metro Nashville Planning Department
615-862-7150
gregory.claxton@nashville.gov

b. Chief Executive/Highest Ranking Elected Official

John Cooper, Mayor
Mayor@nashville.gov
615-862-6000

6. Population: Davidson County - 715,884 ([Census.gov Population Estimates base, April 1, 2020](#))

7. Other Factors:

	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site 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.)	3
The priority site(s) is in a federally designated flood plain.	3-4
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	7
30% or more of the overall project will be spent on eligible reuse/area-wide planning activities, as described in Section 1.A., for priority site(s) within the target area.	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	N/A

8. Letter from State

See attached letter.

9. Releasing copies of Applications

The applicant understands that the information included within will be treated in accordance with 40 CFR Section 2.203.



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION

DIVISION OF REMEDIATION
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TENNESSEE 37243

November 21, 2022

Mayor John Cooper
Metro Nashville
1 Public Square, #100
Nashville, TN 37201

Re: State Letter of Acknowledgement for the Community-Wide Assessment Grant
Application

Mayor Cooper,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$500,000 US Environmental Protection Agency (EPA) Brownfields Community-Wide 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 Metro Nashville, TN.

Sincerely,

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Nashville (hereinafter “Metro”), the seat of Davidson County and state capitol of Tennessee, is one of the fastest growing cities in the U.S. Spanning 526 square miles and home to over 715,000 residents, the area is known for its technology, healthcare, music, and tourism industries. It is also home to several institutions of higher education, including four HBCUs. Rapid, recent growth of the city has resulted in many opportunities for some but has also amplified gentrification, housing unaffordability, and environmental injustice, adding pressure to marginalized communities in the urban core.

The target area for this application is the East Bank Study Area, the swath of land south of Jefferson Street, east of the Cumberland River and west of I-24 in Nashville’s urban core. The target area is the subject of the *Imagine EastBank Vision Plan* (approved October 2022 and hereinafter referred to as “*Imagine EastBank*”), the result of a 21-month community planning process for 338 acres comprising 95 parcels of underutilized, post-industrial land on the east bank of the Cumberland River. The plan outlines a vision for complete, mixed-use urban neighborhoods centered on 1.8 miles of publicly accessible, riverfront green spaces. Key objectives include remediating harmful effects of urban renewal that isolated the area geographically, socially, and economically; bolstering resiliency with a riparian framework for flood mitigation; and recentering the river as a vital community resource. One of the early implementation objectives for this vision is remediating a number of brownfields in the area.

The identity of Nashville is intrinsically tied to the Cumberland River. The city was founded on its western banks at French Lick; situated high on a bluff, it was a natural point to establish a commercial and residential settlement, and in the ensuing years, this western bank became the front door to the city’s bustling downtown. On the opposite, east bank, industry requiring direct access to the river developed in the sandy flood plain. By the turn of the twentieth century, significant land holders on the riverfront included lumber yards, brickyards, coal and ice distributors, and bridge and barge manufacturers. Immediately adjacent, the residential neighborhoods in Edgefield grew as streetcar suburbs, supporting these businesses and those immediately across the river, in downtown.

Between 1910-1930, a series of natural disasters—a devastating fire, tornado, and several floods—ravaged the East Bank. Instead of rebuilding, middle and upper-class white families moved away, initiating a period of disinvestment, hollowing out, and racial segregation of the urban core. In the twentieth century, two waves of urban renewal completed the severance of the East Bank from the city’s geographic and social fabric. As part of the *1958 East Bank Urban Renewal Plan*, residential neighborhoods were cleared to make way for the construction of I-65 (now I-24) and Ellington Parkway. Remaining property between the river and the interstate was zoned industrial. Subsidized housing projects, like Cayce Homes, were constructed along the interstate to act as a buffer between urban and industrial parts of the city and wealthier residential neighborhoods, creating swaths of concentrated poverty adjacent to noxious land uses and air pollutants.

Today the East Bank is dominated by auto-centric and former industrial uses with significant impervious surface coverage. Nearly 70% (230 of the 338 acres) of the target area consists of pavement, exacerbating local urban heat island effects. Another 21 acres are currently occupied by an athletic stadium. Several industrial uses remain, such as the SA metal recycling plant (48 acres), TA truck stop and travel center (17 acres), Alley-Cassidy Brick (13 acres), and two petroleum storage and

distribution facilities (11 acres). Other uses include Crosspoint church, Metro’s juvenile justice center, a gas station, a storage facility, and several hotels adjacent to the interstate. The area lacks basic infrastructure like road connectivity and sidewalks, and is often perceived as unsafe. The Cumberland River is inaccessible and experienced as a barrier to downtown Nashville rather than a resource. Its banks are steep from erosion, littered with trash, and overgrown with scrubby, invasive plants.

Due to this historical land use and its situation in the 500- or 100-year floodplain, the area is characterized by high climate hazards due to flooding. On May 1-2, 2010, Nashville experienced 13.5 inches of rain in 36 hours (an approximate 500-year storm), causing a devastating flood on the East Bank and Downtown Nashville that resulted in 11 deaths, displacement of 10,000 residents, and over \$2 billion in property damage, disproportionately affecting minority and poverty-stricken communities. Another significant storm in August of 2021 caused severe flash flooding, resulting in four deaths.

No housing units currently exist on the East Bank, even though over 12,000 people live within a half mile. According to EJScreen, neighbors (residents within the same Census Tract) are primarily people of color (83%). Seventy-seven percent (77%) are considered low-income, and 23% have less than a high school education. Many live in Cayce Homes, Metro’s largest subsidized housing complex. Public health outcomes for this census tract reflect decades of concentrated poverty and daily interaction with pollutants. Nearly one-half (48.4%) of adults are obese. The rate of diabetes is 19.2%. These residents have the highest rates of asthma in Metro—16.7% (99th percentile nationally)—due to nearby sources of air pollution and proximity to Interstate-24.

Within the East Bank target area, this grant is focused on a 113-acre area of publicly-owned, post-industrial land—bounded by Main Street (north) and Korean Veterans Boulevard (south)—at the East Bank’s center. While former land use indicates a high potential for contamination in this area, it has never been studied. *Imagine EastBank* recommends the transformation of this inaccessible, underutilized riverfront into a vibrant public amenity for underserved residents.

ii. Description of the Priority Brownfield Sites

The priority sites included in this application for full assessment are five publicly-owned parcels comprising approximately twenty-one acres. The land was purchased between 1972 and 1996 before brownfield assessment was required. At the time, rather than redevelop the land, it was paved to serve as parking for the adjacent stadium and remains in that condition to this day, chronically underutilized. Minimal infrastructure, such as fencing, basic street lighting, and rarely used rail tracks can be found.

The following priority sites have hosted a variety of industrial and manufacturing activities since the early 1800s and are highly representative of sites throughout the target area. Former uses point to the potential presence of volatile organic compounds (VOCs), polyaromatic Hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), lead and other metals, and asbestos. A railroad spur has run through these sites since the 1870s and continues operation today. Commonly reported contaminants along rail corridors include arsenic, metals, petroleum products, creosote, coal ash, and PAHs.

4 Main St (Parcel 09302006700): This 1.1-acre parcel sits partially within the 100-year flood plain. It was historically occupied by lumber yards and planing mills, including Wm. Sutherland and Co., later Standard Lumber, and was purchased by Metro in 1972. Potential contaminants include petroleum, wood-treatment chemicals, creosote, dioxins, and lead. <i>Imagine EastBank</i> points to it as a site for a riverfront park and greenway.

6 Main St (Parcel 09302006800): This 5.8-acre parcel sits within the 500-year flood plain. It was historically occupied by lumber yards, sawmills, a broom factory, and a tin shop near the riverfront. Later, primary uses include an auto-repair facility and junk yard, as well as pipe storage and plumbing facility. It was purchased by Metro in 1972. Potential contaminants include petroleum, PAHs, leads, asbestos, creosote, and wood treatment chemicals. <i>Imagine EastBank</i> proposes a mixed-use, public performing arts and cultural center on this site.
116 South 1st Street (Parcel 093020087000): This 6.5-acre parcel was part of the 28-acre sawmill and woodenware factory along the riverfront owned by Prewitt-Spurr Manufacturing Company. Other industrial uses through the years included Nashville Laundry, Steam, and Drycleaning Co., and Davidson Hicks and Green Sash Door and Blinds Mfg. It was purchased by Metro in 1972. Potential contaminants include creosote, wood treatment chemicals, petroleum, PAHs, leads, asbestos, VOCs, and solvents such as tetrachloroethylene (PCE). <i>Imagine EastBank</i> proposed developing this site with mixed-income housing and commercial uses, and riverfront parks and greenways.
20 Victory Avenue (Parcel 09303011500): This 5.8-acre parcel was part of the 28-acre sawmill and woodenware factory along the riverfront owned by Prewitt-Spurr Manufacturing Company. Later, it was purchased by the Nashville Bridge Company to produce bridges and barges. Other industrial uses have included cement production and an automobile junk yard. In 1996, it was purchased by Metro Development and Housing Agency (MDHA) as part of <i>The East Bank Redevelopment Plan</i>. Potential contaminants include petroleum, wood-treatment chemicals, creosote, dioxins, lead, PAHs, PCBs, and VOCs. At the time, MDHA deemed the physical condition of the entire East Bank as blighted and categorized over 60% of the properties substandard. <i>Imagine EastBank</i> proposes developing this site with mixed-income housing and commercial uses, and riverfront parks and greenways.
600 South 1st Street (Parcel 09303011500): This 3.4-acre parcel sits within the 500-year flood plain. Historic industrial uses include sawmills and lumber and brick yards. In the 1910s, it was occupied by W.T. Hardison & Co. Lime, Sand, Cement, Tile, and Roofing Co. By the mid-20th century, it housed oil and gasoline storage tanks. In 1996, it was purchased by MDHA as part of <i>The East Bank Redevelopment Plan</i>. Potential contaminants include petroleum, wood-treatment chemicals, creosote, dioxins, and lead. <i>Imagine EastBank</i> proposed developing this site with mixed-income housing and commercial uses, and riverfront parks and greenways.

An additional six sites of similar nature are targeted to include Phase I assessments and to the extent feasible from a budgetary perspective, Phase II assessments and ABCAs. These parcels include:

Address	Size	Historical Use
130 North 1 st Street (Parcel 08214005900); Owner: Metro Water and Sewer	4.28	Lumber activities
3 Main Street (Parcel 09302006603); Owner: Metro Government NE Board	0.17	Utilities; rail adjacent
1 Titans Way (Parcel 09303006600); Owner: Metro Sports Authority	29.01	Stadium
115 Woodland Steet (Parcel 08215003000); Owner: Metro Sports Authority	2.55	Parking
100 Woodland Street (Parcel 09303000300); Owner: Metro Juvenile Court	2.9	Refining, Court & Justice Center –

0 Victory Avenue (Parcel 09303017100); Owner: Metro Sports Authority	1.3	Bridge & barge building, stadium
501 South 1 st Street (Parcel 09307005100); Owner: Metro Sports Authority	1.9	Parking

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

[*Imagine East Bank*](#) fully describes revitalization plans for the area and is aligned with multiple existing planning efforts, including but not limited to the [2015 Nashville Next Plan](#), the [2020 Metro Nashville's Transportation Plan](#), the 2021 [Affordable Housing Task Force Report](#), and the 2022 [Connect Downtown Study](#). *Imagine East Bank* proposes marrying resiliency with improved quality of life through a riparian framework for flood mitigation that involves laying back the riverbank—creating intentional spaces for the river to flood—and repurposing publically-owned parcels as park space with green infrastructure that will serve as a flood and stormwater management strategy. In parallel to the brownfields assessments of subject under the current grant application, Metro intends to apply for BRIC financing to conduct modelling and feasibility design work to establish a flood and stormwater management framework for the East Bank. This strategy would involve disturbing land with a history of industrial uses that has never been studied. *Imagine East Bank* sets forth a vision for redevelopment of the 338 acres of the East Bank and will inform creation of an implementation strategy that effectuates the vision, including performative green spaces, greenways, a mobility hub, a new pedestrian bridge, equitable and affordable housing, activation of the riverfront, authentic spaces, and a new stadium. The implementation strategy will also include establishing the process for zoning considerations and design review and approval for the East Bank.

ii. Outcomes and Benefits of Reuse Strategy

Assessment, remediation, and redevelopment of these currently underutilized **priority properties** will unlock the potential of the East Bank to meet the dual need of (1) access to parks and green space for a nearby underserved and disproportionately burdened population and (2) performative landscape capable of managing flooding events and mitigating potential damage from the nearby Cumberland River. Redevelopment of the **entire target area** will create mixed-income spaces with access to equitable housing, opportunities for small and local businesses, and activation of active and passive uses of the river, such as parks, dog parks, boating, event space, and recreational fields. As there are currently no residences in the priority area, displacement is not a concern; in fact, revitalizing this area will add connectivity to the neighboring Cayce Homes subsidized housing development (the Cayce Homes development is home to a population which bears significantly higher asthma rates compared to the broader Nashville community) and McFerrin Park neighborhood (McFerrin Park neighborhood is home to a population that is low-income and minority). The expansion of green space, greenways, and other communal spaces will further environmental justice. Access to parks and greenways is integral to exercise, lower levels of stress, increased social interaction, and creation of safe places. Collectively, these benefits deliver considerable positive health outcomes for surrounding low-income, minority, sensitive and at-risk populations, and all Nashvillians, more broadly.

As Nashville continues through planning and implementation of the future East Bank, strategies proven to build sustainable communities will be incorporated, such as waste minimization, high performance and energy efficient buildings, renewable energy, EV ready buildings, green space, district-level stormwater management, trees, bikeways, greenways, and complete streets. The City's [Climate Action Plan details several examples of policies](#) that are being deployed to achieve these

outcomes. Metro owned properties in the target area are required by local ordinance to pursue LEED Gold certification. For non-Metro properties in the target area, the City will encourage and incentivize use of robust and resilient buildings standards and techniques above and beyond what is required in Nashville code.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Redevelopment of the East Bank as envisioned will require significant resources from a variety of parties. Understanding site contamination within the target area is a first yet highly important step in initiating redevelopment, as it will allow Metro to quantify the scale and scope of potential cleanup activities necessary for successful transformation of the East Bank. Metro can then begin building these resources into its budget and/or seek partner resources to leverage for execution of projects. Examples of potential opportunities/resources identified for this project include but are not limited to FEMA BRIC Planning Grants for modelling alternatives and studying impacts of laying back the river through grading and filling (estimated \$500,000), USDOT Grants for development of a multimodal transit spine along the East Bank to increase connectivity of currently disconnected areas (estimated \$9,000,000), USDOT Grants for development of greenways, federal agency technical assistance offerings (current recipient of HUD Climate Connected Communities TA), affordable housing property tax incentives, local funding mechanisms, and private sector and non-profit partnerships.

ii. Use of Existing Infrastructure

Redevelopment plans for the priority sites seek to create park space for the public to enjoy where parking lots and asphalt currently stand. Existing infrastructure, including electricity, gas, water, sewer, telecommunications, internet, and minimal roadways, will be leveraged where feasible and necessary. Some movement of gas infrastructure is anticipated as necessary. Because the redevelopment plans emphasize use of green space, greenways, and nature-based solutions to transform these properties into amenities that can be enjoyed by all, existing infrastructure will in many cases be sufficient. Connectivity and multimodality are key components of redesign of the East Bank.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Metro does not have funds for site assessment of the East Bank in its budget. Nashville has several significant challenges it is working to address—including homelessness, high home and rent prices, education and workforce development, escalating cost of living, and recovering from the COVID-19 pandemic—and limited resources at its disposal to do so. As noted in following sections, the community within a 1-mile radius of the target area includes low-income and other sensitive populations, who likewise, as community partners in redevelopment activities, have lesser access to resources to support financial requirements associated with assessment. Absent this grant from EPA, Nashville would be required to divert resources from other critical needs to execute this work.

ii. Threats to Sensitive Populations

Properties within a 1-mile radius of the target area include significant sensitive populations, including minority groups, low-income persons, children, and elderly, which stand to bear a disproportionate environmental burden from a health perspective associated with any environmental risks posed by a Brownfield site. The region within a 1-mile radius of the target area can be characterized as follows, according to EPA's EJScreen tool: 56% are persons of color, 51% are low income, there is a 6%

unemployment rate, 12% have less than high school education, 6% are under the age of 5, and 6% are over the age of 64. The target area also coincides with neighborhoods that experienced redlining during the mid-20th Century and currently appear in USDA's Food Access Research Access as being low-income census tracts where a significant share of residents is more than ½ mile from the nearest supermarket. Within a 1-mile radius of the target area there are two hazardous waste treatment, storage, and disposal facilities.

The region within a 1-mile radius of the target area also registers high percentiles (90th or higher) in the state for diesel particular matter (99th percentile), air toxics cancer risk (92nd percentile), air toxics respiratory HI (97th percentile), traffic proximity (98th percentile), RMP facility proximity (97th percentile), hazardous waste proximity (97th percentile), and underground storage tanks (92nd percentile). This means that residents in the area experience environmental risk exposure that is greater than all but 10 percent or less of the population in the state (reference attached EJ Screen Report). Not surprisingly, the area registers in the 90th percentile or higher for incidence of heart disease, asthma, and low life expectancy. Given these demographics, the population within a 1-mile radius of the target area stands to significantly benefit from identification and remediation of any determined contamination and subsequent property redevelopment as green space.

Understanding potential site contamination in a region with adjacent sensitive and overburdened populations will further environmental justice. The surrounding community is one which has experienced historic redlining, resulting in higher-than-average exposure to industrial activities, traffic and air pollution from nearby interstates, noise pollution, and urban heat island effects. Reimagining the East Bank as green and multi-use space available to the public will take small steps to remedy these historic injustices borne by surrounding communities.

b. Community Engagement

i. Project Involvement and ii. Project Roles

Metro Nashville engages in robust community engagement regarding all its programs and services. As it relates to East Bank redevelopment in particular, the Metro Planning Department spearheaded robust engagement with residents, businesses, and other stakeholders over 21+ months to gather input on redevelopment plans; this effort formed the basis of *Imagine East Bank*. *Imagine East Bank* included a dynamic and extensive outreach process, intended to continue through the implementation phase. This included virtual and in person public and technical meetings, polling events, email newsletters, research, workshops, and online surveys. This engagement produced five engagement summary documents published for community review and feedback.

In addition to collaboration with individual community members and property owners, three committees have lent and continue to lend their expertise and resources and provide feedback through the process, as follows and detailed in the table below:

- Key Stakeholders—leading local non-profit and advocacy groups;
- Neighborhood Advisory Committee—Neighborhood Associations and neighborhood-centric nonprofits and churches;
- Technical Advisory Committee—State, Federal, and Local Agencies with technical knowledge and capacity to leverage resources.

Partner	Point of Contact	Role in Project
---------	------------------	-----------------

Maxwell Heights Neighborhood Assoc.	Leslie Boone boonelr@gmail.com	neighborhood outreach
Friends of Shelby Park	Rebecca Ratz rebecca@friendsofshelby.org	neighborhood outreach
Cayce Place Residents Assoc.	Marilyn Greer marilyngreer2@gmail.com	neighborhood outreach
Cumberland River Compact	Mekayle Houghton mekayle.houghton@cumberlandrivercompact.org	Outreach to environmental constituencies; technical analysis
Civic Design Center	Eric Hoke Eric@civicdesigncenter.org	Plan & host engagement events; interactive engagement, analysis & design solutions
Greenways for Nashville	Amy Crownover amy@greenwaysfornashville.org	Provide venues for engagement events
Urban League of Middle TN	Clifton Harris charris@ulmt.org	Outreach & advocacy
Urban Land Institute	Jennifer Carlat Jennifer.Carlat@uli.org	Outreach support to development community

iii. Incorporating Community Input

Nashville has already demonstrated its commitment to community engagement in the target area as noted above, and will continue to extend this engagement effort if awarded this grant. In total, to date, community outreach for this project has included over 50 public meetings with 1,200+ attendees, 1,100+ email subscribers, and 1,700+ online survey responses. The city will build upon these relationships to ensure the community is aware of the Brownfields grant, assessment process, and can provide input. The East Bank Program Management Team will develop a structured plan for engaging with the public throughout the assessment process utilizing the methods above that have been shown to be engaging and effective. Under this grant the city proposes to hold a minimum of 3 community meetings and/or engagement opportunities to gather feedback from the public and inform future actions.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Activity 1: Program Administration
i. Project Implementation: Oversight of all EPA-funded activities for Brownfields sites, including but not limited to budget management, oversight of consultants and subcontractors, coordination of Metro staff committed to project, and hosting of regular project meetings. Includes costs for bi-annual stakeholder meetings (internal and external) and travel to regional and national brownfields workshops as detailed below. Late phases of work include coordinating within Metro and with external government stakeholder to plan and identify financing for remediation and reuse works.
ii. Anticipated Project Schedule: Months 1-48
iii. Task/Activity Lead: Project Director and Manager with support from East Bank Program Management Team and Manager of Advanced Planning and Research
iv. Outputs: Quarterly reports, all required EPA grant reports, QAPPs, team meeting agendas and notes, presentations.

Activity 2: Community Engagement
i. Project Implementation: Coordination and execution of education, outreach, and public comment with stakeholders, leveraging existing engagement on <i>Imagine East Bank</i> Planning study. Education of stakeholders on concepts relating to Brownfields. Coordination with subcontractors working on community engagement activities.
ii. Anticipated Project Schedule: Months 1-22
iii. Task/Activity Lead: Senior Planner for the <i>Imagine East Bank</i> Planning Study with support from East Bank Program Management Team and subcontractors
iv. Outputs: Community engagement plan, community meeting agendas and notes, community comments and response to comments relating to Brownfields work and reuse plans, outreach materials, mixed media.
Activity 3: Environmental Assessments
i. Project Implementation: Phase I and Phase II environmental site assessments to be completed for priority sites and 2-4 other sites identified as feasible within the target area in the East Bank.
ii. Anticipated Project Schedule: Months 4-36
iii. Task/Activity Lead: Qualified environmental professional (QEP, subcontractor) with oversight by Project Manager
iv. Outputs: Phase I reports (11 sites identified above) and Phase II reports (5 priority sites as well as 2-4 additional sites identified above), QAPPs (generic and site specific).
Activity 4: Prepare Analysis of Brownfield Cleanup Alternatives (ABCAs)
i. Project Implementation: Identification of site-specific cleanup actions (planning) and alignment with reuse plans for priority sites and target area.
ii. Anticipated Project Schedule: Months 24-42
iii. Task/Activity Lead: QEP with oversight by Project Director and Manager
iv. Outputs: Analysis of Brownfield Clean Up Alternatives (ABCAs) for priority sites (5) and other sites within the target area for which Phase II reports are completed; incorporation into <i>Imagine East Bank</i> Planning Study

b. Cost Estimates

Task	Cost Description
1. Program Administration	In-Kind: Includes Metro staff oversight, management, consultant selection, and reporting associated with the project.
	EPA Fund: Includes costs for convening roundtable discussions with internal and external stakeholders, no less than twice annually (\$16,000). Includes line item for travel (conference registration as required, airfare, hotel and per diem) specifically for attending one annual Regional Brownfields New Grantees Workshop (3 persons) and two National Brownfields Conferences (2-3 persons), equal to an estimate of \$14,500.
2. Community Engagement	In-Kind: Metro staff oversight/participation in public outreach activities including training as needed.
	EPA Fund: Procure consultant identified as a trusted entity within the target community, to create outreach materials, and organize and facilitate public outreach (\$12,000). Includes line items for materials (\$5,000), to include hand-outs, posters, media promotion (e.g. radio), etc.
3. Environmental Assessments	In-Kind: Metro staff oversight and consultation with external stakeholders associated with parallel development plans (e.g. Titans Stadium).

a. Phase I ESAs	EPA Fund: Conduct Phase I ESAs in accordance with ASTM 1527-13 and the EPA's All Appropriate Inquiries (AAI) Rule (70FR66070). Includes obtaining access agreements from private property owners, other required site assessment activities, and preparation of a Generic Quality Assurance Project Plan (QAPP) (lump \$15,000). Phase I ESA cost is based on complexity of site history and use, as well as the size of the property, estimated as follows: 10 x \$4,000 average/Phase I = \$40,000 for 10 smaller parcels, \$10,000 for Titans stadium parcel (29 acres).
b. Phase II ESAs	EPA Fund: Conduct Phase II ESAs in accordance with ASTM 1903-11 to address recognized environmental concerns identified in the Phase I ESA effort. Prepare Site-Specific QAPPs (SSQAPP) and Health & Safety Plans (HASPs) prior to the start of Phase II ESA activity. Based on current prioritization of parcels, the following costs were developed: 4 Main Street: \$11,700; 6 Main Street: \$61,400; 116 South 1st Street: \$68,900; 20 Victory Avenue: \$61,600; 600 South 1st Street: \$36,400. Based on outcome of Site Selection and Phase I work, the budget also includes \$80,000 for 2-4 additional sites for Phase II work.
4. Prepare ABCAs	EPA Fund: Prepare ABCAs to be utilized for property revitalization planning and negotiation of a Brownfield Voluntary Cleanup Agreement with the state regulators. Cost estimates are as follows: 5 sites x \$7,500 = \$37,500. Based on outcome of Phase II work, budget includes \$30,000 for up to 4 additional sites.

	1. Program Administration	2. Community Engagement	3. Environmental Assessments	4. Prepare ABCAs	Total
Personnel					
Fringe Benefits					
Travel	14,500				14,500
Equipment					
Supplies		5,000			5,000
Contractual	16,000	12,000	385,000	67,500	480,500
Total Direct Costs	30,500	17,000	385,000	67,500	500,000
Total Budget	30,500	17,000	385,000	67,500	500,000

c. Measuring Environmental Results

The Project Manager in partnership with the East Bank Program Management Team and the QEP will document, track, and analyze outputs and outcomes associated with the project through recurring project meetings, quarterly reports, and regularly scheduled meetings with the EPA Brownfields Program Officer. Measures of success will be tracked by the project manager through a spreadsheet and report formats specified by EPA. **Specific outputs** include 5 priority sites fully assessed (Phase I and II), all 11 sites assessed at the Phase I level, and up to 4 (or more, as budget allows) assessed to the Phase II level, resulting in 7 to 9 ABCAs. In addition, outputs will include a minimum of 3 community meetings or engagement opportunities, an outreach campaign, incorporation of Brownfields assessment findings into an updated *Imagine East Bank* Planning Study, and an increased number of stakeholders engaged in the effort through education and outreach.

Specific outcomes include acres of land identified for redevelopment as green space, number of residents provided access to green space within a 10-minute walk, and private investment and other non-Metro funding leveraged.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

The East Bank Program Management Team—a diverse team of engineers, planners, landscape architects, and GIS specialists within the Metro Planning Department—will lead the Brownfield Assessment and Remediation Program under the leadership of **Greg Claxton, AICP**, Manager of Advanced Planning and Research. Mr. Claxton has over 15 years' experience managing complex planning projects with diverse teams and constituencies, including the 2015 *NashvilleNext* comprehensive plan and the 2021 Metro Redistricting process. **Harriett Brooks, PLA**, a licensed landscape architect and urban planner with over 8 years' experience coordinating complex, grant funded projects, will serve as the Project Manager and coordinator. **Anna Grider**, Senior Planner for the *Imagine East Bank* Planning Study, will spearhead stakeholder engagement and collaboration. **Kendra Abkowitz, PhD**, Metro's Chief Sustainability and Resiliency Officer within the Mayor's Office, will assist in leveraging the work of this project with related initiatives and opportunities. The core team will be supported administratively by the **Financial and Administrative Office** within the Planning Department. Metro Planning has robust capacity and organizational experience to manage the implementation of this project—including administrative tasks, fiscal management, and compliance with award conditions during the performance period. The department has mechanisms in place to account for unforeseen staff turnover and obtain additional contractors if needed—including contracts with several IDIQ (indefinite delivery, indefinite quantity) consultants with various fields of expertise from public relations to environmental engineering.

b. Past Performance and Accomplishments

The Metropolitan Government of Nashville and Davidson County has received an EPA Brownfields Grant over 7 years ago. Metro Government does not have any current EPA Brownfields Grants.

1. Accomplishments

Metropolitan Development and Housing Agency received multiple Brownfields grants in 2002 and 2004 from EPA for its Rolling Mill Hill project, which successfully transformed the site of the former Nashville General Hospital into apartments (with a workforce housing component), artists' lofts, and office and non-profit spaces. Several of the spaces are LEED certified and historic components were maintained and have been placed on the National Register of Historic Places. This project is considered a brownfields success story by the EPA.

2. Compliance with Grant Requirements

Metro Nashville, as a government, routinely receives multiple federal and non-federal assistance agreements and is well equipped to comply with all applicable requirements. Metro has fully complied with all past federal and state audits of Metro grant performance, and engages in regular, internal audit of its grant performance, with satisfactory result.



EJScreen Report (Version 2.1)



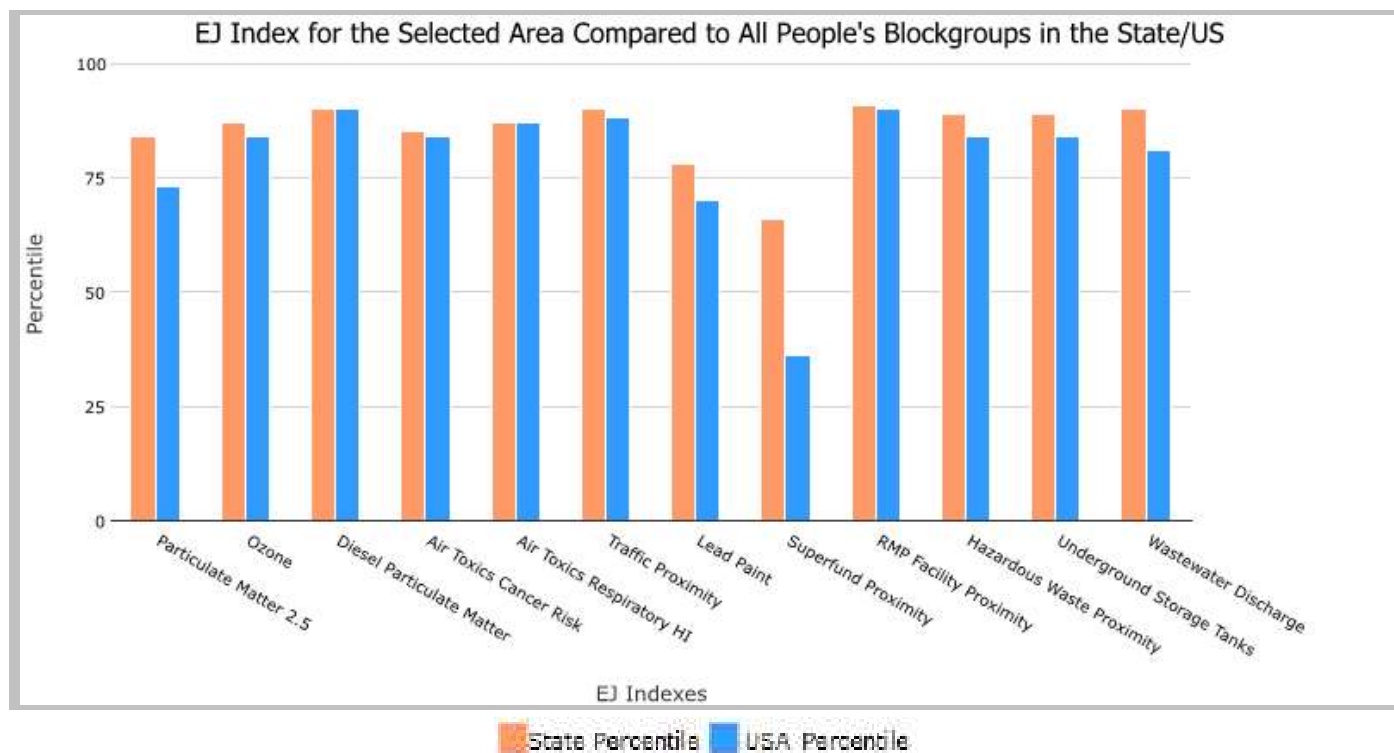
1 mile Ring around the Area, TENNESSEE, EPA Region 4

Approximate Population: 19,825

Input Area (sq. miles): 4.79

EB Redevelopment Area

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	84	73
EJ Index for Ozone	87	84
EJ Index for Diesel Particulate Matter*	90	90
EJ Index for Air Toxics Cancer Risk*	85	84
EJ Index for Air Toxics Respiratory HI*	87	87
EJ Index for Traffic Proximity	90	88
EJ Index for Lead Paint	78	70
EJ Index for Superfund Proximity	66	36
EJ Index for RMP Facility Proximity	91	90
EJ Index for Hazardous Waste Proximity	89	84
EJ Index for Underground Storage Tanks	89	84
EJ Index for Wastewater Discharge	90	81



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



EJScreen Report (Version 2.1)

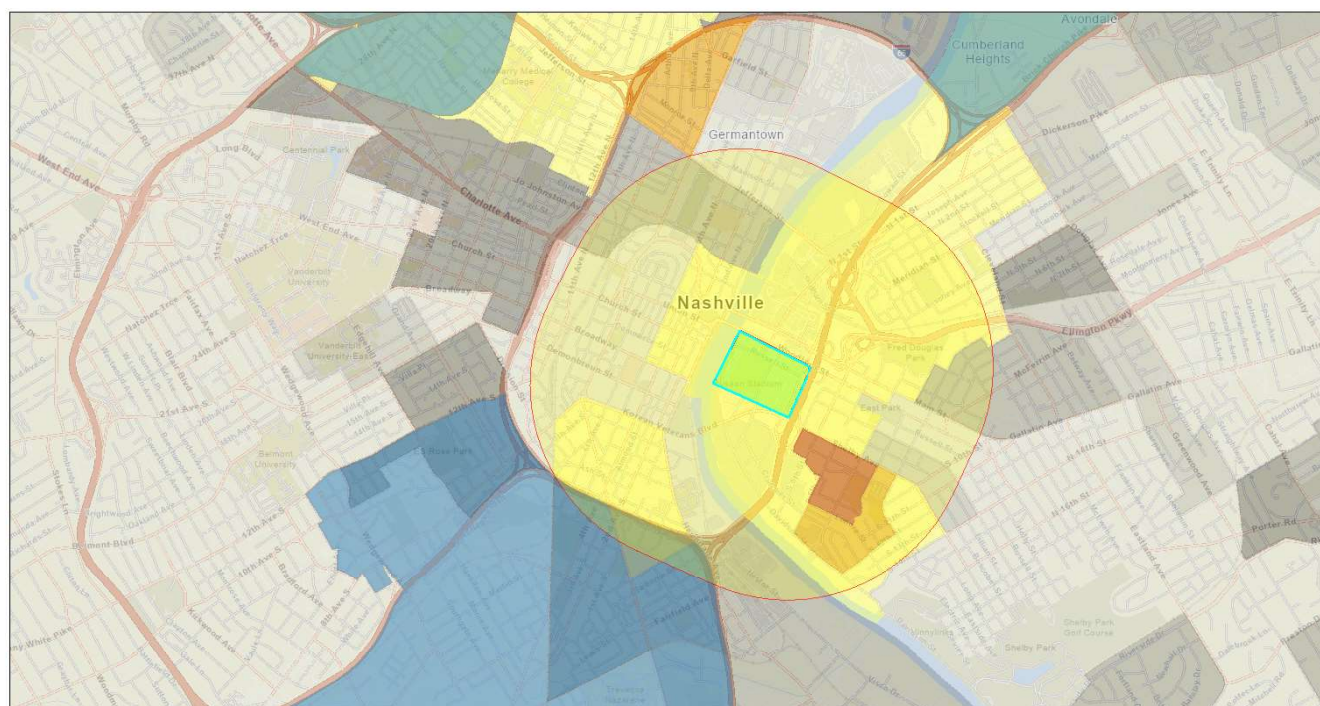


1 mile Ring around the Area, TENNESSEE, EPA Region 4

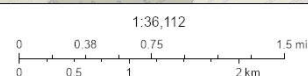
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EB Redevelopment Area



October 25, 2022



Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2



EJScreen Report (Version 2.1)



1 mile Ring around the Area, TENNESSEE, EPA Region 4

Approximate Population: 19,825

Input Area (sq. miles): 4.79

EB Redevelopment Area

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.56	8.21	68	8.67	49
Ozone (ppb)	43.7	42.6	79	42.5	65
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.707	0.233	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	38	33	92	28	95-100th
Air Toxics Respiratory HI*	0.55	0.41	97	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	3300	360	98	760	95
Lead Paint (% Pre-1960 Housing)	0.24	0.19	68	0.27	52
Superfund Proximity (site count/km distance)	0.017	0.078	29	0.13	13
RMP Facility Proximity (facility count/km distance)	3.3	0.59	97	0.77	96
Hazardous Waste Proximity (facility count/km distance)	3.2	0.64	97	2.2	80
Underground Storage Tanks (count/km ²)	4.5	1.3	92	3.9	75
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0042	0.037	81	12	62
Socioeconomic Indicators					
Demographic Index	53%	32%	83	35%	77
People of Color	56%	27%	82	40%	70
Low Income	51%	34%	76	30%	80
Unemployment Rate	6%	5%	62	5%	63
Limited English Speaking Households	2%	1%	81	5%	63
Less Than High School Education	12%	12%	51	12%	61
Under Age 5	6%	6%	57	6%	57
Over Age 64	6%	16%	10	16%	12

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

APPLICATION FOR FY2023 EPA Brownfield Community-Wide Assessment Grant

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

Lucy Alden Kempf

Director
Department of Planning

__11/21/22__
Date