November 23, 2011

Environmental Management Support, Inc.
Attention: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Subject: Community-Wide Hazardous Substance Assessment Grant Proposal
Cumberland Valley Area Development District, Kentucky

Dear Mr. West,

The Cumberland Valley Area Development District is applying for a $200,000 community-wide hazardous substance assessment grant. The Cumberland Valley Area Development District is comprised of eight (8) counties located in Southeastern Kentucky with a total population of 238,270 and consisting of 3,241.63 square miles. We intend to continue the efforts we initiated with our 2008 community wide assessment grant to identify and assess brownfield sites in our region that most likely contain hazardous materials. In collaboration with the Cumberland Valley Regional Brownfield Committee (comprised of county/city personnel, community organizations, and interested members of the public), we identified more than 50 potential brownfield sites in our region. Our funding allowed us to perform assessments of approximately 10 properties, but far more work remains to identify and assess area brownfields.

Our region is poverty-stricken (32% live below the poverty level) and funding is limited, so most of our counties do not have the ability to independently undertake brownfield projects. This grant will assist our low income population in revitalizing our region by assessing currently vacant, underutilized contaminated sites for future cleanup and reuse.

GRANT SPECIFICS

a. Applicant Identification: Cumberland Valley Area Development District

b. DUNS number: 070815790

c. Funding Requested:
   i.) Grant Type: Community-wide Assessment
   ii.) Federal Funds Requested: $200,000
   iii.) Contamination: Hazardous Substances
d. Location: London, Kentucky

e. Property Name and Address: N/A

f. Contacts:

   i) Project Director: Whitney Chesnut
      Public Administration Specialist
      Cumberland Valley Area Development District
      P.O. Box 1740
      London, KY 40743-1740
      Phone: (606) 864.7391 Fax: (606) 878-7361
      wchestnut@cvadd.org

   ii) Chief Executive: Mr. Mike Patrick
        Executive Director
        Cumberland Valley Area Development District
        P.O. Box 1740
        London, KY 40743-1740
        Phone: (606) 864.7391 Fax: (606) 878.7361
        mpatrick@cvadd.org

g. Date Submitted: November 23, 2011

h. Project Period: August 2012 – August 2015

i. Population: 238,270

j. Special Considerations Checklist: Find attached in Appendix A.

We thank you for considering our application for brownfields assessment funding and look forward to working with EPA in the future.

Sincerely,

Whitney Chesnut
Cumberland Valley Area Development District

Attachments
cc: Phillip Vorsatz, EPA Region 4 Brownfields Coordinator
1. **Community Need**

1. a. **Health, Welfare, and Environment**
The Cumberland Valley region is located in southeast Kentucky bordering Tennessee and Virginia, also known as the Eastern Coal Field Region and historically economically tied to mining. The Cumberland Valley Area's topography is hilly to mountainous and is nestled in the heart of the Daniel Boone National Forest. The Cumberland Valley Area Development District (CVADD) is comprised of eight counties (Bell, Clay, Harlan, Jackson, Knox, Laurel, Rockcastle, and Whitley) and 18 cities (Pineville, Middlesboro, Manchester, Wallins, Loyall, Benham, Evarts, Harlan, Cumberland, Lynch, McKee, Barbourville, London, Mt. Vernon, Brodhead, Livingston, Corbin, and Williamsburg), many of which are isolated in mountainous rural areas.

The region has had a significant negative impact from brownfields, ranging from mine-scarred lands to abandoned industrial and commercial facilities. In 2008, the CVADD was awarded a $200,000 Environmental Protection Agency (EPA) brownfields hazardous substances community assessment grant. Using these funds, we identified an initial 50 potential brownfields sites. Many more are thought to exist. The Kentucky Department of Environmental Protection (KDEP) also reports that 240 state superfund sites and 164 leaking underground storage tanks are located in the CVADD area. Former methamphetamine labs are also a major problem, with the National Clandestine Laboratory Register listing 85 sites in the area. Citizens in the Cumberland Valley area are therefore forced to work and/or reside near a large number of brownfields and environmentally blighted properties, often unaware of the potential hazards due to exposure. In addition, the coal industry has dominated the region economically, leaving behind mine-scarred land throughout the district. Health issues such as black lung disease have been linked to coal mining and mine sites.

The CVADD has begun the process of assessing area brownfields. However, despite careful application of our funds, we have barely scratched the surface of the problem in this region. Our funding has allowed us to complete ten assessments, but more than 50 sites were identified in collaboration with the Cumberland Valley Regional Brownfield Committee (comprised of county/city personnel and interested members of the public). Due to our limited funds, we rated and ranked brownfields sites in order to select only the most “shovel-ready” sites for Phase I/Phase II assessment, trying to address at least one site per county. Far more work remains.

The targeted communities for the proposed project have several environmental justice factors to be considered to support community need. As indicated in the table below, all eight counties have a poverty rate above 20%, and the rate for Knox and Clay Counties is approximately 40%, indicating a sensitive population that will benefit from the proposed project. All have a disability status for individuals over five years of age above 25.6%, which is higher than the national average, recorded at 19.3%. The population of Cumberland Valley also shows particular sensitivity to health issues, with total mortality rates and prevalence of less than good health up to 30% higher than the Kentucky average. Cancer deaths, particularly from lung and bronchial cancer, and asthma rates are well higher than the Kentucky average in most counties. The exact reasons for these anomalies are unknown, but exposure to contaminants at brownfield sites, including coal related operations, may be an important contributor.
<table>
<thead>
<tr>
<th></th>
<th>Bell</th>
<th>Clay</th>
<th>Harlan</th>
<th>Jackson</th>
<th>Knox</th>
<th>Laurel</th>
<th>Rockcastle</th>
<th>Whitley</th>
<th>Kentucky</th>
<th>U.S.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>28,691</td>
<td>21,730</td>
<td>29,278</td>
<td>13,394</td>
<td>31,883</td>
<td>58,849</td>
<td>17,056</td>
<td>35,637</td>
<td>4,339,367</td>
<td>308,745,538</td>
</tr>
<tr>
<td>Poverty Rate</td>
<td>36%</td>
<td>43.3%</td>
<td>33.4%</td>
<td>30.7%</td>
<td>38.6%</td>
<td>21.5%</td>
<td>25%</td>
<td>33.3%</td>
<td>18.4%</td>
<td>14.3%</td>
</tr>
<tr>
<td>Disabled</td>
<td>33.30%</td>
<td>30.42%</td>
<td>34.70%</td>
<td>30.24%</td>
<td>31.73%</td>
<td>25.60%</td>
<td>26.23%</td>
<td>28.17%</td>
<td>11.00%</td>
<td>19.30%</td>
</tr>
<tr>
<td>Total Mortality</td>
<td>1074.1</td>
<td>1027.0</td>
<td>1205.4</td>
<td>1078.1</td>
<td>1047.6</td>
<td>956.1</td>
<td>978.9</td>
<td>984.6</td>
<td>906.8</td>
<td>--</td>
</tr>
<tr>
<td>Less than good health</td>
<td>39%</td>
<td>44%</td>
<td>36%</td>
<td>36%</td>
<td>33%</td>
<td>31%</td>
<td>34%</td>
<td>38%</td>
<td>23%</td>
<td>--</td>
</tr>
<tr>
<td>Prevalence of asthma</td>
<td>14%</td>
<td>19%</td>
<td>21%</td>
<td>14%</td>
<td>16%</td>
<td>15%</td>
<td>8%</td>
<td>15%</td>
<td>13%</td>
<td>--</td>
</tr>
<tr>
<td>(% adults)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cancer (all)</td>
<td>214</td>
<td>240</td>
<td>275</td>
<td>182</td>
<td>246</td>
<td>228</td>
<td>217</td>
<td>201</td>
<td>212</td>
<td>--</td>
</tr>
<tr>
<td>Lung Cancer</td>
<td>77</td>
<td>92</td>
<td>106</td>
<td>89</td>
<td>89</td>
<td>80</td>
<td>84</td>
<td>90</td>
<td>75</td>
<td>--</td>
</tr>
</tbody>
</table>

1Data is from the 2010 U.S. Census data and is available at www.census.gov. 2Data is from the www.kentuckyhealthfacts.gov. 3Data indicates deaths per 100,000 adults.

Within the region, the presence of brownfields is adversely affecting the growth of tourism and commercial and residential revitalization. By redeveloping brownfields as greenspace, the region would benefit from increased tourism and increased interest from potential purchasers and developers for commercial/residential properties. The availability of rehabilitated former brownfield properties would facilitate the entry of these businesses. The Regional Brownfield Committee intends to look at each potential brownfield site and promote the rehabilitation of these sites, for possible commercial ventures, but also residential uses, and greenspace development. This will promote a healthier environment for residents currently residing near a brownfield.

1.b. Financial Need

The entire Cumberland Valley area suffers from the economic loss associated with brownfield sites. Through the loss of commercial businesses and individuals moving to other locations, the area has been left with a high concentration of low-income citizens. Funding assistance from the US EPA will allow us to identify and quantify potential risk to human health and the environment, and create redevelopment plans to eliminate, minimize, or mitigate against these risks, while returning the properties to a beneficial use. Assessment funds will help the region to: 1) increase the local tax base, 2) facilitate job creation, 3) utilize existing infrastructure, 4) encourage the reuse of built land versus the development of underdeveloped, open land and greenspace, 5) identify potential risk to human health and the environment, and 6) take measures to protect human health and the environment.

Our region is poverty-stricken and funding is limited, so most of our counties do not have the ability to independently undertake brownfield projects. According to the Appalachian Regional
Commission, seven of the eight counties are considered to be distressed, meaning high rates of unemployment and poverty, and low per capita income. In 2010, the Cumberland Valley Area’s unemployment rate was 11.9% compared to Kentucky’s rate of 9.7% and the U.S. rate of 9.6% during this same period. According to the 2010 Census, the per capita income for the Cumberland Valley is $14,869, compared to Kentucky’s rate of $22,284 and U.S. rate of $27,041. The poverty rate for the area is 32.7%, compared to Kentucky’s rate of 18.4% and the U.S. rate of 14.3%, thus demonstrating a higher incident of poverty within the region.

Small individual communities within the region make for highly disproportionate impacts resulting from industrial withdrawal. Many commercial and industrial businesses have closed throughout the region. Therm-O-Disc, located in London, closed their facility, as did Ayrshire Electronics in Williamsburg, leaving several hundred persons unemployed. In 2007, Jackson County’s largest employer, Mid-South Electronic, was destroyed by arson and was not rebuilt, leaving 700 people unemployed. Furthermore, these facilities and several similar facilities remain empty today. The Cumberland Work Force Investment Agency provided counseling and training for the unemployed individuals, but the closing of these businesses has diminished the number of employment opportunities in the area. Throughout the region, coal mining has also shrunk as an employment opportunity as technology has replaced miners and coal seams have become more difficult to operate. In Harlan County, for instance, mining still accounts for 20 to 25% of jobs, but mining employment has shrunk from 13,619 workers in 1950, to 1,780 people in 2009, an 87% decline over 60 years, according to the Lexington Herald Leader.

The summary statistics below indicate how strongly our area is in need. A staggering 32.7% of people live in poverty, more than double the national level. Unemployment is elevated and income is low compared to state and national averages, with per capita income $12,000 lower than the national level. Brownfields rehabilitation would encourage new economic activity and help improve these environmental justice factors.

<table>
<thead>
<tr>
<th></th>
<th>CVADD area</th>
<th>Kentucky</th>
<th>United States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population(^1)</td>
<td>236,618</td>
<td>4,339,367</td>
<td>308,745,538</td>
</tr>
<tr>
<td>Unemployment</td>
<td>11.9%</td>
<td>9.7%</td>
<td>9.6%(^2)</td>
</tr>
<tr>
<td>Persons below poverty level(^1)</td>
<td>32.7%</td>
<td>18.4%</td>
<td>14.3%</td>
</tr>
<tr>
<td>Percent Minority(^1)</td>
<td>12.9%</td>
<td>12.2%</td>
<td>27.6%</td>
</tr>
<tr>
<td>Per Capita Income(^1)</td>
<td>$14,869</td>
<td>$22,284</td>
<td>$27,041</td>
</tr>
</tbody>
</table>

\(^1\)Data is from the 2010 U.S. Census data and is available at www.census.gov/
\(^2\)Data is from the Bureau of Labor Statistics and is available at www.bls.gov

The successful redevelopment of a brownfield can preserve greenspace, reduce urban sprawl, and assist in maintaining the region’s proud and desirable rural atmosphere. Residents will also directly benefit from environment and health risk identification. Through outreach efforts including planned continuation of the Regional Brownfield Committee and local work groups, CVADD will continue to work to bridge economic gaps that impact the tax burden of residents from underutilized commercial or industrial properties. These efforts will also further the cause
of preserving the regions natural features and open space by allowing development in established communities.

2. **Project Description and Feasibility of Success**

2.a. **Project Description**
Funding received from a Brownfield Assessment grant will allow us to build on the work begun with our 2008 grant, continuing our assessment of abandoned factories, commercial properties, medical buildings, and other facilities with the potential for reutilization. Due to the potential risks of possible contaminants, investors have avoided rehabilitating these facilities. Funds will also be utilized to assess asbestos- and lead-contaminated properties, abandoned dry cleaners, landfills, salvage yards and other industries where hazardous substances have been utilized. The CVADD has created the Comprehensive Economic Development Strategy (CEDS), a master plan for economic development that is updated on a yearly basis. This strategy is the result of a regional planning process designed to guide strategic development within each area of the CVADD. One major area of concern is the issue of brownfields and reclamation of these properties in order to create a healthier environment for our communities. Using brownfield funds, we will conduct activities including public outreach, additional site selection, Phase I and II assessments, and cleanup planning. We will hire an environmental contractor following procurement procedures contained in 40 CFR 30.

**Public Outreach:** Work will be coordinated with multiple stakeholders to ensure that the public is engaged, sufficient data is collected to make cleanup decisions, and all EPA grant requirements are met. On sites posing considerable risk to the community, education concerning the environmental risks will be provided by our selected environmental contractor. The public, and in particular businesses and community-based organizations, will provide expert knowledge and help make the District's Brownfields Program a success. We will make sure the public is involved by holding public meetings, producing and distributing a program brochure, and distributing fact sheets as progress is made. We will educate the communities about human health risks, brownfields redevelopment, and other brownfields related issues.

**Site Selection:** The Regional Brownfields Committee has developed a formal site ranking and scoring process for site selection. The Committee is comprised of at least one representative from each county government, as well as representatives from cities, community groups, nonprofit organizations, interested members of the public, and CVADD representatives. For each potential site, a site sponsor makes a formal presentation to the Committee, the site is scored, and a formal vote is made by the Committee to obligate funds. Sites are selected based on the following criteria: 1) sites must be eligible for assessment based on US EPA requirements; 2) property location must cohere with existing planning efforts such as Comprehensive Land Use Plans and the comprehensive economic development strategy; 3) owners must be willing to partner with CVADD on environmental studies and provide access; 4) site must be marketable; 5) have a perception of contamination hindering development; 6) have potential impact on human health and environmental health; and 7) have a positive impact on the surrounding community when reused. If selected, we will use a portion of the funds to expand our inventory of known brownfield sites. We envision a limited additional effort to identify unknown sites, relying on Kentucky Department of Environmental Protection (DEP) lists of petroleum and state sites, supplemented with sites identified during public outreach.
During the 2008 ranking process, more sites were identified than could be assessed with the current grant funds. Several brownfields and potential brownfields locations received a high ranking, but have not yet been addressed and are among the sites that will be considered for additional assessment. These are shown in the following table.

<table>
<thead>
<tr>
<th>Town/County</th>
<th>Site</th>
<th>Status</th>
<th>Impact/Problem</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barbourville,</td>
<td>Former Carriage</td>
<td>Phase I complete. Phase II needed</td>
<td>• Suspected Asbestos, Lead Paint, PCB-containing lamp ballast.</td>
</tr>
<tr>
<td>Knox County</td>
<td>House</td>
<td>for rehabilitation to continue</td>
<td>Located in downtown Barbourville, near the Court House and Visitor Center.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rehabilitation would remove a vacant eyesore and revitalize downtown.</td>
</tr>
<tr>
<td>Barbourville,</td>
<td>Former Blackstone</td>
<td>Phase I complete. Phase II needed</td>
<td>• Suspected Asbestos, Lead Paint, PCB-containing lamp ballast.</td>
</tr>
<tr>
<td>Knox County</td>
<td>Hotel</td>
<td>for rehabilitation to continue</td>
<td>Located in downtown Barbourville, near the Court House and Visitor Center.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rehabilitation would remove a vacant eyesore and revitalize downtown.</td>
</tr>
<tr>
<td>Lynch, Harlan</td>
<td>Former Medical Clinic</td>
<td>Phase I complete. Phase II needed</td>
<td>• Suspected Asbestos, Lead Paint, PCB-containing lamp ballast, Mold, Old</td>
</tr>
<tr>
<td>County</td>
<td></td>
<td>for rehabilitation to continue</td>
<td>medical equipment: Building in poor shape.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Located on Main Street in downtown Lynch. Rehabilitation would remove a</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>vacant eyesore and revitalize downtown. Potential for greenspace development.</td>
</tr>
<tr>
<td>McKee, Jackson</td>
<td>Former School</td>
<td>Phase I complete. Phase II needed</td>
<td>• Suspected Asbestos, Lead Paint, PCB-containing lamp ballast. Roof and</td>
</tr>
<tr>
<td>County</td>
<td></td>
<td>for rehabilitation to continue</td>
<td>interior of building in bad condition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Located in downtown McKee. Rehabilitation would remove a vacant eyesore and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>revitalize downtown.</td>
</tr>
<tr>
<td>Manchester,</td>
<td>Former Commercial</td>
<td>Phase I initiated but not completed.</td>
<td>• Suspected Asbestos, Lead Paint, PCB-containing lamp ballast. Possible</td>
</tr>
<tr>
<td>Clay County</td>
<td>Bldg. (Creech</td>
<td></td>
<td>additional impacts not yet assessed.</td>
</tr>
<tr>
<td></td>
<td>Bldg.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corbin, Whitley</td>
<td>Old Don Peace</td>
<td>Site identified. Phase I needed.</td>
<td>• Unknown</td>
</tr>
<tr>
<td>County</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Middlesboro, Bell</td>
<td>Old Hospital Building</td>
<td>Site identified. Phase I needed.</td>
<td>• Unknown</td>
</tr>
<tr>
<td>County</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Additional sites are expected to be identified for assessment by the Committee during upcoming site scoring, ranking and selection rounds. For any new property selections, CVADD, with an environmental consultant, will conduct a search of local and federal databases to ensure the selected properties are eligible for inclusion, not listed on the National Priorities List (NPL), have no unilateral administrative orders or court orders, nor subject to jurisdiction, custody, or control of the US government. CVADD and its consultant will also involve the US EPA project manager in property eligibility determinations. Site access agreements will be required for all privately owned properties. In general, when a party becomes aware of how a site assessment can increase the marketability and value of their property, CVADD is confident the necessary
access will be granted. CVADD will work closely with Region 4 EPA and the Kentucky DEP to address potential liability and eligibility issues regarding properties considered for assessment.

**Phase I/II Assessments:** Our overall goal will be to complete up to eight Phase I assessments and up to five Phase II assessments, and we will complete more assessments if the budget allows. We plan to conduct the first Phase I assessment within six months of grant award. We plan to conduct at least one Phase I or Phase II assessment in each county. Phase I assessments will be completed following ASTM All Appropriate Inquiry standards adopted in 2006. Phase II assessments would be completed in accordance with KDEP and/or EPA applicable rules and regulations, cognizant of local health department concerns and issues.

**Cleanup Planning:** Following Phase II assessment, we will prepare redevelopment plans for sites identified as top priority for cleanup. Cleanup planning will include up to four Analysis of Brownfield Cleanup Alternative (ABCA) documents to evaluate prospective remedial actions for the property, including a recommended cleanup alternative and cost estimate. As with our previous EPA grant, we will submit the ABCA documents to the KDEP and EPA for review and comment.

2.b. **Budget for EPA Funding and Leveraging Other Resources**

i) **Budget Table**

CVADD has a strong background in project oversight. Current staff has the experience and background to undertake the assessment program. Environmental Assessment will be completed through a contract with a qualified environmental consulting firm. The proposed $200,000 budget for this Community-Wide Assessment Grant focuses on the assessment of properties potentially contaminated with hazardous substances. No grant funds will be used for administrative purposes.

| **PROJECT BUDGET** |
|-------------------|-----------------|-----------------|-----------------|-----------------|
| **Budget Categories** | **Task 1 – Inventory of Sites/ Quality Assurance Project Plan** | **Task 2 – Phase I/Phase II Environmental Assessment** | **Task 3 – Remedial Planning and Design** | **Task 4 – Community Outreach and Travel** |
| Personnel | | | | |
| Travel | | | | |
| Supplies | | | | |
| Contractual | $7,000 | $154,500 | $18,000 | $1,500 |
| Total | $7,000 | $154,500 | $18,000 | $20,500 |

1. Travel to Brownfields-related training conferences is an acceptable use of these grant funds.

2. The Applicant will comply with the procurement procedures contained in 40 CFR 30.

**Task 1 – Inventory of Sites ($7,000):** This task includes completing additional site eligibility profiles, updating the Quality Assurance Project Plans (QAPP), and updating the inventory of possible brownfields. Under the "Contractual" category, we anticipate the average cost for the QAPP, site eligibility profiles and site inventory/prioritization will cost approximately $7,000.
Task 2 – Phase I/Phase II Environmental Assessment ($47,000): This task allows for Phase I Environmental Site assessments (ESAs) of approximately 5 to 8 brownfield sites with a qualified environmental consultant, at a cost of $3,000 each (estimated averaged total of $19,500). It also allows the development of Site-Specific QAPP Addendums and Phase II ESAs of 4 to 5 sites with a qualified environmental consultant at a cost of $30,000 each (estimated averaged total of $135,000). The intention of local government is the revitalization of these brownfield sites to allow for commercial, greenspace and residential development. In order to gain bona fide prospective purchaser status for a potential buyer, all Phase Is will be prepared in conformance with ASTM E1527-05. All Phase IIs will be conducted in accordance with ASTM E1903-97.

Task 3- Remedial and Planning Design ($18,000): This task addresses preparation of up to four Analysis of Brownfield Cleanup Alternative (ABCA) documents and redevelopment plans for each grant, at a cost of $4,000 to $5,000 each, depending on the size of the properties involved, the nature and extent of contamination, and the number of cleanup alternatives evaluated. As with the previous EPA brownfield grant, we will submit the ABCA documents to the KDEP and EPA for review and comment.

Task 4- Outreach, Programmatic Expenses, & Travel ($20,500): For identified sites this would cover only eligible programmatic activities such as:

- Completion of community outreach and education plan.
- Preparation of meeting materials and project updates newsletters.
- Set-up and notice of public meetings
- Presentation of the grant and brownfield program to the public, potential developers, lending institutions, neighborhood representatives, and other affected parties. CVADD sends a representative to every county to meet with county representatives and the public to encourage participation and identify sites. This requires significant travel funds.
- Prepare updates, brochures, and other printed materials to encourage community involvement and private investment.
- Attend national meetings, such as the National Brownfield Conference and Sustainable Redevelopment Conference, as well as local industry, council, neighborhood and planning meetings where there are connections for the brownfield initiative.

The CVADD is a quasi-governmental entity formed by state statute. The Areas Development District receives funding from many sources including federal, state and/or local governments. CVADD proposes to utilize approximately $10,500 received through local government funding. These local funds will be utilized to cover staff expenses during administrative activities, application preparation, meeting reporting requirements and proper financial management.

ii) Tracking and Measuring Outputs and Outcomes
Ms. Whitney Chesnut, Public Administration Specialist, will be responsible for tracking and measuring grant progress and prepare quarterly reports to the U.S. EPA. Ms. Judith Smith, Director of Finance, will be responsible for financial management. Both possess expertise in the tracking and measuring federal grants. Significant program support will also come from the Cumberland Valley Regional Brownfield Committee. Mr. Timothy Schwendeman, Assistant Director for Economic Development, will also assist in tracking the assessment grant. In order to measure progress, we plan to track our project outputs and outcomes as we move through
assessment, cleanup, and redevelopment. The table below identifies the proposed outputs and outcomes, recognizing that outputs and outcomes for this grant, as indicated in the grant application guidelines, will be defined in our EPA work plan. We will report outputs and outcomes in quarterly reports to EPA, comparing our actual accomplishments to the agreed-upon outputs and outcomes in our EPA work plan. We will also report progress in EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES) tracking system. Recognizing that some of our outcomes will not be completed during the three-year grant cycle, we will report intermediate outcomes that we achieve during the grant cycle, including the amount of funds leveraged for the revitalization project, the number of jobs created, and the degree to which exposure to contamination is minimized. By tracking our brownfields goals and the project outputs and outcomes, we will keep the community better informed of progress and provide EPA the data necessary to demonstrate that funds are being used as intended. If there is a lack of progress toward completing outputs and outcomes, actions will be taken to correct and steer the course of the project.

### PROPOSED OUTPUTS AND OUTCOMES

<table>
<thead>
<tr>
<th>Main Task Area</th>
<th>Outcomes</th>
<th>Outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Outreach</td>
<td>Number of people engaged in Project</td>
<td>• Completion of Community Outreach and Education Plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of meetings held</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of visioning sessions held</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of newsletters and fact sheets mailed/mailed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of people attending meetings and open houses</td>
</tr>
<tr>
<td>Site Assessment and Cleanup Planning</td>
<td>Number of people protected from contamination; number of acres assessed; number of sites with approved cleanup plans</td>
<td>• Number of Phase I and II assessments</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Completed quality assurance project plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of health and safety plans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of site-specific QAPP Addendums</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of analyses of ABCAs</td>
</tr>
<tr>
<td>Site Redevelopment</td>
<td>Total increase in tax revenue; amount of leveraged funds; acres of created greenspace</td>
<td>• Number of meetings with developers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of meetings with landowners</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of state and federal assistance agreements realized</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Number of new businesses</td>
</tr>
</tbody>
</table>

### iii) Leveraging

In addition to brownfields funding and CVADD funding, applications will be prepared by staff to pursue other funding opportunities based upon written recommendations for identified sites. Other pursuable sources of funding are:

- Appalachian Regional Commission Grants. The ARC, a partnership of local, state and federal government, each year provides funding for several hundred projects in the Appalachian Region, in areas such as business development, education and job training, telecommunications, infrastructure, community development, housing, and transportation.

- KDEP Site-Specific Assessments. The KDEP’s brownfields program provides site assessments for Phase I, Phase II, and cleanup planning work, using funds from its annual
Section 128(a) grant from EPA. The amount of funding available depends on the amount of funding KDEP received from EPA each year. KDEP has conducted numerous site assessment activities throughout the state including in our region.

- EPA Targeted Brownfields Assessments. We will work with the EPA Region 4 team to apply for targeted brownfields assessments, as available and necessary. EPA can fund up to $200,000 per site for petroleum and hazardous substance contamination.
- EPA Competitive Assessment Grant Funding. We will evaluate applying for additional EPA competitive grant funding for assessment which is available for up to $200,000 per site for petroleum and hazardous substance contamination.
- Economic Development Partners. We will collaborate with other economic development partners to determine if Economic Development Administration, HUD Community Development Block Grant, National Park Service Land and Water Conservation Fund, and/or U.S. Department of Agriculture funds can be obtained for assessment and cleanup.

Approximately 200 CVADD staff hours will be used for activities to perform programmatic duties. In-kind services provided by CVADD are detailed in an attached letter (Attachment C). All Regional Brownfields Committee hours for reviewing, ranking, and prioritizing projects will be in-kind. These services include significant travel costs for Committee members to attend monthly brownfields meetings, varying from 2 miles to as much as 200 miles round-trip. A letter of support from John Dodd, Mayor of Benham, is included (Attachment D), listing examples of in-kind cost donated by Committee members. Services provided by Emergency Management, Health Department Personnel, and Fire/Police Department Personnel would also be in-kind.

2.c. Programmatic Capability and Past Performance

i) Programmatic Capability
CVADD is one of 15 Area Development Districts located in the Commonwealth of Kentucky. The CVADD acts as a liaison between state and local governments, whose main initiative is to help the state government distribute funding to local and regional governments. The CVADD employs a professional staff providing a diverse base of experience and expertise. The CVADD services include, but are not limited to, grant writing and administration of grants.

In regard to the proposed project, Ms. Whitney Chesnut, Public Administration Specialist, will act as the Project Director. Ms. Chesnut has over six years of experience with developing proposals and project management. Mr. Timothy Schwendeman, Assistant Director of Economic Development, will assist with grant management and reporting. Mr. Schwendeman has over 25 years of grant management experience. In addition, the Regional Brownfield Committee, with CVADD, will oversee all phases of work, including issuing a request for qualifications and selecting of an environmental consulting company. The CVADD will be responsible for all quarterly and annual reports and submission of invoices to US EPA as required under the cooperative agreement. In the event of staff turnover, we are prepared to hire someone equally qualified. In the meantime, other CVADD staff members have also had extensive experience with managing federal funds. Lesli Gill, Economic Development Specialist, has been with the CVADD for five years. Ms. Gill would be able to step in and manage the brownfields grant while we are in the hiring process. We also anticipate retaining the services of a qualified, experienced environmental consultant and will comply with procedures outlined in 40 CFR 30 in the selection processes.
ii) Adverse Audits
The CVADD has an extensive history of managing federal and state funds and has never received any adverse audit findings relating to the management of those funds. CVADD is not aware of any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by the federal, state, tribal, or local government inspector general or similar organization, or audits conducted by the US General Accounting Office. CVADD has not, nor has previously been, required to comply with special “high risk” terms and conditions under agency regulations OMB Circular A-102.

iii) Past Performance
The CVADD currently has an EPA Brownfields hazardous substances assessment grant, BF-95440909, for $200,000. Performance has been as follows.
- Funds Expenditure: $174,319 of the $200,000 funds have been expended. CVADD expects funds will be totally expended approximately 7 months ahead of schedule.
- Accomplishments: A site inventory has been completed and sites identified for further assessment under the current grant. A generic QAPP and four site-specific QAPP Addendums were completed, reviewed, and approved by the EPA. As shown in the table below, ten Phase I ESAs were completed. Four Phase II ESAs were completed. Three ABCAs were developed for sites in Williamsburg, Benham, and Annville. Sites assessed have been added to ACRES. EPA Brownfields Cleanup grant applications are being prepared for two of the sites (Benham and Annville).

<table>
<thead>
<tr>
<th>Site</th>
<th>Location</th>
<th>Work Completed</th>
<th>Results/Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Former School</td>
<td>529 Master St., Corbin</td>
<td>Phase I ESA, Phase II ESA</td>
<td>Property owner, Greater Corbin House, Inc. will redevelop site for housing</td>
</tr>
<tr>
<td>Former Post Office</td>
<td>210 E. Sycamore St., Williamsburg</td>
<td>Phase I ESA, Phase II ESA</td>
<td>Whitley County Fiscal Court is seeking funding sources for site redevelopment.</td>
</tr>
<tr>
<td>Former Lincoln Hall School</td>
<td>190 Campus Drive, Annville</td>
<td>Phase I ESA, Phase II ESA</td>
<td>Cleanup Grant Application in preparation to renovate as a community center</td>
</tr>
<tr>
<td>Medical Clinic</td>
<td>500 McKnight St., Benham</td>
<td>Phase I ESA, Phase II ESA</td>
<td>Cleanup Grant Application in preparation to expand the clinic to serve veterans &amp; community</td>
</tr>
<tr>
<td>Former Carriage House</td>
<td>117 High Street, Barbourville</td>
<td>Phase I ESA</td>
<td>Phase II needed.</td>
</tr>
<tr>
<td>Former Medical Clinic</td>
<td>200 Church St, Lynch</td>
<td>Phase I ESA</td>
<td>Phase II needed.</td>
</tr>
<tr>
<td>Former School</td>
<td>120 Old School Rd., McKee</td>
<td>Phase I ESA</td>
<td>Phase II needed.</td>
</tr>
<tr>
<td>Former Blackstone Hotel</td>
<td>Court Square &amp; Knox St., Barbourville</td>
<td>Phase I ESA</td>
<td>Phase II needed.</td>
</tr>
<tr>
<td>Former Commercial Bldg.</td>
<td>121 Anderson St., Manchester</td>
<td>Phase I ESA initiated.</td>
<td>Phase I needed.</td>
</tr>
<tr>
<td>Commercial Buildings</td>
<td>246 Daniel Boone Drive, Barbourville</td>
<td>Phase I ESA</td>
<td>RECs identified, but site is within state cleanup program</td>
</tr>
</tbody>
</table>

- Compliance with grant requirements: The EPA-approved Work Plan emphasized a robust public involvement process. The CVADD notified the public through local newspapers, a website, public meetings, and interaction with citizens, realtors, developers, and political leaders. A fact sheet and summary of progress was made available to the community. An
opportunity for comment was made at each public meeting, providing a question and answer session. The EPA and state regulatory agencies were invited to participate in meetings as often as possible. Public meetings were conducted at centralized locations and at convenient times where the short- and long-term plans were discussed and feedback was obtained. Two visioning sessions were held for two sites approved for further work.

- Outreach to identify sites was accomplished by the Regional Brownfield Committee with members from each county of the CVADD. A formal site ranking and scoring process was developed. For each potential site, a site sponsor made a formal presentation to the Committee, then each site was scored and a formal vote was made by the Committee to obligate funds. Sites were approved on a “rolling application” basis until funds were expended. Sites were chosen that had the greatest potential to be eligible for cleanup grant applications. More sites than could be assessed by current grant funds were identified and will form the basis for site selection if a new grant is awarded.

- The schedule followed during execution of the grant was similar or accelerated relative to that in the Work Plan. As discussed under “Accomplishments”, all site work approved by the Brownfields Regional Committee has been completed. A MBE/WBE firm conducted approximately 11% of the grant total. All other terms and conditions were complied with. Quarterly reports have been submitted and ACRES is current.

3. Community Engagement and Partnerships

3.a. Plan for Involving the Affected Community

As performed under CVADD’s 2008 Community Assessment Grant, the Committee intends to conduct public meetings at the major milestones in the project: 1) a kickoff meeting for the inception of the project; 2) the completion of Phase I activities; 3) the completion of Phase II activities; and 4) during reuse planning and the development of remedial action plans. The public will be notified of meetings and the availability of information primarily through local newspapers, radio stations, and websites. Prior to each public meeting a fact sheet and summary of progress will be created and circulated within the community. An opportunity for comments and questions will be part of each public meeting. Our population does not warrant providing alternative language information, but if the need arises a translator will be hired. Illiteracy is the main area of concern, which will be addressed by using radio announcements. The Committee plans to make every effort to connect with citizens within the region. Twelve newspapers and eight radio stations have been identified in the region. The CVADD’s website (www.cvadd.org) will also be used for public outreach.

3.b. Partnerships with Environmental, Health and other Governmental Agencies

Effective partnerships have been developed with multiple government agencies that will be key to successful implementation of the grant. During implementation of our 2008 brownfields grant, we developed a close working relationship with EPA project manager Olice Carter, and worked regularly with Herb Petitjean and Amanda LeFevre at the KDEP, all of whom have attended a number of public meetings and site walk-throughs during site selection and assessment efforts.

Currently, the CVADD has a close partnership with the Regional Brownfields Committee. This Committee, developed in part to implement the 2008 grant, consists of local elected officials, judge executives and mayors, representatives from each of the county’s Health Departments, Area 11 Emergency Manager, and Chamber of Commerce and citizen members. Letters of
support from committee members are included (Attachment E) and listed below. Close relationships have been developed between Committee members to improve public health during the brownfields redevelopment process. For instance, Jackson County Ministries is partnering with Cumberland Valley District Health during the proposed Lincoln Hall Rehabilitation Project, a site identified and assessed through our 2008 brownfields grant. For the project, a cleanup grant has been submitted to EPA to revitalize a vacant asbestos- and lead-contaminated building in central Annville to create a community and cultural arts center.

No environmental job training programs are located in or near the District. We will make all possible efforts to link community members in the District to potential employment opportunities associated with our brownfield projects. We will work with the Cumberland Work Force Investment Agency to determine if any job seekers have the appropriate qualifications to conduct assessment work. Because we expect to conduct asbestos and lead-based paint assessments, we may be able to locate former employees from the construction industry with the appropriate certifications. We will also look for any local residents that may have relevant certifications received through the National Institute of Environmental Health Sciences grant training program.

3.c. Community-Based Organizations
The commitments of our community partners are outlined in the table below. Copies of the letters of commitment can be found in Attachment E.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Description</th>
<th>Role and Commitment</th>
</tr>
</thead>
<tbody>
<tr>
<td>KY Division of Emergency Management</td>
<td>Emergency Services Organization including mitigation, preparedness, response and recovery to protect the lives environment and property of the people. Contact: Jerry L. Rains (606) 877-3149</td>
<td>Committee Member, Site Prioritization, Disburse Information</td>
</tr>
<tr>
<td>Laurel County Health Department</td>
<td>Public Health Agency for Laurel County Contact: Rebecca D. Patton (606) 864-5187</td>
<td>Committee Member, Site Prioritization, Disburse Information</td>
</tr>
<tr>
<td>Jackson County Ministries</td>
<td>Non-Profit Religious Based Organization Contact: Jake Moss (606) 364-5151</td>
<td>Committee Member, Site Prioritization, Community Outreach</td>
</tr>
<tr>
<td>Housing Authority of Corbin</td>
<td>Non-profit Organization Contact: Dora Mobley (606) 528-5104</td>
<td>Committee Member, Site Prioritization, Community Outreach</td>
</tr>
<tr>
<td>Laurel County Division of Public Safety</td>
<td>Emergency Services Organization Contact: Albert Hale (606) 862-7904</td>
<td>Committee Member, Site Prioritization, Disburse Information</td>
</tr>
<tr>
<td>Whitney County Health Department</td>
<td>Public Health Agency for Whitley County Contact: Debra McNaughton (606) 528-5613</td>
<td>Committee Member, Site Prioritization, Disburse Information</td>
</tr>
<tr>
<td>PRIDE (Personal Responsibility in a)</td>
<td>A nonprofit organization linking citizens with government agencies to</td>
<td>Committee Member, Site Prioritization, Community Outreach</td>
</tr>
</tbody>
</table>
4. Project Benefits

4.a. Welfare and/or Public Health

Additional regional assessment will identify additional contaminated sites and take the next steps to assess and revitalize properties already identified. Several of the properties we have identified are centrally located in city centers and are of high priority for downtown revitalization, which is expected to bring a more upbeat feel to these communities. By definition, all brownfields pose a possible threat to human health due to the possibility of toxic substances. As an example, one of our high-priority projects, cleanup of a former school located in McKee, Jackson County, has been the subject of substantial public interest during our meetings. This building, located in the McKee downtown core, is vacant and suspected of being contaminated with asbestos, lead paint, and PCB-containing lamp ballast due to the age of the building. A Phase II has not yet been conducted to confirm the extent of the contamination. This building is an eyesore to downtown and may be a public health threat. If the building is cleaned up, the community has discussed redeveloping it into a senior center, bringing health benefits by addressing needs of the elderly. The CVADD and Regional Brownfield Committee will work in close cooperation with the contractors who will be hired to monitor sites found to test positive for the presence of hazardous contaminants. All precautions will be taken to reduce the threat to human health. Appropriate steps will be taken to ensure cleanup is completed utilizing federal guidelines to minimize health threats during cleanup. The project will also use the expertise of the local Emergency Management Services, Health Departments, and Fire/Police Departments to minimize the risk of exposure during cleanup. Information will be disseminated as to possible health conditions that may be a result to identified site contaminants.

The CVADD will integrate equitable development principles into the reuse of sites assessed. Equitable development coordinates housing, transportation and environmental policy to support equitable, health, and prosperous communities. We are partnering with several community organizations focused on keeping the historic nature of downtown districts in our communities. We are also assessing and redeveloping brownfield sites which in remote, rural sites - where the beneficiaries are the current residents and businesses – is in itself is equitable development. With new services and usable space available for underserved communities, new opportunities will be brought to these communities through reinvestment.

4.b. Economic Benefits and/or Greenspace

i) Economic Benefits

CVADD’s ability to secure federal funding for brownfields inventory, assessment, remediation, and redevelopment is essential for enabling and sustaining the growth of local economies. The region relies heavily on alternative revenue sources, such as tourism taxes, grant funding, Appalachian Regional Commission (ARC) funding, and city and county taxes in order to operate. As the population of the region continues to grow, it is essential that business opportunities grow as well. Brownfield assessments are the first step in stimulating business by offering commercial, retail, greenspace, and residential opportunities that are conducive to new
economic endeavors. Local county governments will use assessment resources to leverage redevelopment at brownfield sites, removing uses that are tax drains and barriers to reinvestment.

Taxes generated by unused brownfield sites are often less than the cost of municipal services. Redevelopment with residential or retail uses would increase property tax revenue from the site and the surrounding neighborhood due to increased valuation. Increased property values will encourage needed investment in adjacent neighborhoods. Redevelopment with office or industrial uses would contribute new income tax revenue and new jobs for the region’s residents, in addition to improving property values.

Two sites identified and assessed during our brownfields assessments provide examples of the types of potential economic benefits expected from brownfields redevelopment in our region.

- **Lincoln Hall Rehabilitation Project**: A cleanup grant has been submitted to EPA to revitalize a vacant asbestos- and lead-contaminated building in central Annville to create a community and cultural arts center. Anticipated economic benefits include a boost to local artisan income and jobs for retail clerks, janitors, and staff at a planned coffee shop. An improved community feel is anticipated through the revitalization of a now boarded-up building, encouraging public and business investment and engagement with the downtown core.

- **Benham Clinic Project**: In rural Benham in Harlan County, a cleanup grant has been submitted to EPA to rehabilitate a former coal company-owned hospital into a local clinic providing outpatient and veteran services. Half of the building is currently vacant and contaminated with asbestos and lead. Economic benefits include savings to residents who now have to spend significant time and financial resources traveling to regional clinics and hospitals, and who may delay receiving health treatment until expensive emergency visits must be made. Job creation is also a major economic benefit. According to the NALGEP Brownfields Community Network Southern Appalachian Brownfields Workshop (2011), 10 of the 20 fastest growing occupations nationwide are healthcare related, and healthcare will generate 3.2 million new jobs between 2008 and 2018, more than any other industry.

Like these sites, other vacant sites located often in the center of our cities, such as in Barbourville and McKee, are anticipated to provide additional employment and improved tax-base opportunities following cleanup.

ii) **Non-Economic Benefits**
Greenspace is very important in the redevelopment of brownfields within the region. Greenspace provides the perfect setting for tourists and encourages residents to walk and/or browse, which leads to increased opportunities for business owners. In addition, obesity is a significant problem for our region, with high rates of associated problems like diabetes and heart disease. Attractive greenspace, including new parks and trails, will encourage residents to spend time outdoors, helping to promote a less sedentary lifestyle.

The purpose of this assessment grant is to evaluate all potential brownfield sites and to determine the most productive use of each site. Sites that are not conducive to economic or housing redevelopment will be recommended to be converted to parks or other greenspace or other uses
for non-profit purposes. Some communities in our region have discussed creating community gardens. In other locations, a greenspace may be needed in order to better control surface water drainage and runoff. By utilizing local governments or non-profits, the proposed site would then be eligible for other funding opportunities through various state and federal grant programs. If an area is recommended as greenspace or open space, a long-term management plan will be put into place to ensure the site is maintained and preserved.

4.c. **Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

The Region is committed to sustainable practices and pollution prevention and resource conservation. The Cumberland Valley Regional Brownfields Committee will use a portion of grant funds to help local governments formulate brownfields redevelopment guidelines that will be available to existing businesses and industries as well as developers of new projects. These guidelines will provide recommendations for: 1) innovative approaches to storm water management, such as the use of porous paving systems that provide aesthetic and habitat benefits on site as well as functional water quality benefits, 2) site design concepts that include the use of native Kentucky plants and options for preserving existing landscape elements such as wooded areas, 3) use of US EPA’s Energy Star Program and the usage of associated products, 4) promotion of energy efficient strategies such as geothermal heating and cooling, and automated lighting systems, and 5) orientation and design of buildings and landscaping to maximize heat gain in the winter while providing shade in the summer to lower cooling cost.

Brownfields redevelopment reuses and restores existing infrastructure to help create a cleaner and safer community. CVADD is committed to improving area infrastructure, as described in the CEDS. Several miles of water lines and sewer line extensions, as well as plant upgrades, were completed in the District in the past year, increasing opportunities for rural residents for better quality of life. These infrastructure improvements would be made use of to the greatest possible extent during brownfields redevelopment. Moreover, redevelopment of brownfields would promote the reuse and updating of central infrastructure in downtown cores, rather than requiring further extension of existing utilities to the outskirts of town.

The Brownfield Assessment Grant will help the region apply a key principle for Smart Growth by creating an infill of redevelopment opportunities and maximizing the utilization of existing infrastructure. By facilitating redevelopment, the project will provide redevelopment opportunities to introduce mixed land use development that satisfy neighborhood needs. Some of the brownfields sites will provide the opportunity for the development of low- to medium-income housing, retail, and recreational and/or greenspace usage. Redeveloping brownfields will likely increase housing choices and community services, thus attracting new residents to the neighborhoods and encouraging existing residents to remain and invest in their homes. It is the desire of the Cumberland Valley Regional Brownfield Committee to create livable communities where residents have community facilities and amenities that satisfy the needs of the region.
Appendix 3
Special Considerations Checklist

Please identify (with an X) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

☐ Community population is 10,000 or less

☐ Federally recognized Indian tribe

☐ United States territory

☐ Applicant assisting a Tribe or territory

☒ Targeted brownfield sites are impacted by mine-scarred land

☐ Targeted brownfield sites are contaminated with controlled substances

☐ Community is impacted by recent natural disaster(s)

☐ Project is primarily focusing on Phase II assessments

☐ Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation

☒ Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy

☐ Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant
THRESHOLD CRITERIA

1. **Applicant Eligibility:** Cumberland Valley Area Development District is an eligible grant applicant as Regional Council per US EPA guidelines.

2. **Letter from the State or Tribal Environmental Authority:** A letter of support from the Kentucky Department for Environmental Protection is included as Attachment B.

3. **Site Eligibility and Property Ownership Information (Site-Specific Proposals Only):** Not applicable. Applying for a community-wide hazardous substances assessment grant.
Mr. Mike Patrick, Executive Director  
Cumberland Valley Area Development District  
P.O. Box 1740  
London, KY 40743-1740

Re: Letter of Support for Brownfield Grant Application from Cumberland Valley Area Development District

Dear Mr. Patrick:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the Cumberland Valley Area Development District to identify and address brownfield sites in the community. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment. We have been very impressed with the work your staff has conducted to date on brownfields. We support CVADD's application for a Brownfield Assessment Grant and look forward to continuing our work with CVADD and the communities within the District on this important issue.

Sincerely,

Herbert Petitjean  
Brownfield Coordinator

HCP:hp

cc: Whitney Chesnut (CVADD)  
Amanda LeFevre (Brownfield Outreach Coordinator)  
Kenya Stump (Division of Compliance Assistance)  
Shawn Cecil (Superfund Branch)  
Bill Belcher (Division of Waste Management, London Regional Office)
November 23, 2011

Environmental Management Support, Inc.
Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: Letter of In-kind Commitment

Dear Mr. West:

Please accept this letter as an in-kind commitment for all programmatic duties above $10,000.

If you have any questions or require additional information, please contact me at 606.864.7391.

Sincerely,

Mike Patrick
Executive Director
November 23, 2011
Mayor John Dodd
Benham City Council
Benham, KY

Whitney Chesnut
Cumberland Valley Area Development District
P.O. Box 1740
London, KY 40743

Dear Ms. Chesnut:

I and the City Council of Benham strongly support your application to the EPA for a brownfields assessment grant for the cleanup of brownfields properties in Cumberland Valley. The City of Benham has been closely involved in brownfields site identification, ranking, and final selection during the utilization of CVADD’s 2008 EPA grant funds.

As a member of the Brownfields Regional Committee, I have provided many hours of in-kind services. These include hours of my time spent at monthly Committee meetings held in London, KY, and at public meetings in the City of Benham. Travel costs are an additional in-kind service. Benham is one of the farthest cities in the District from London, located 100 miles from Benham. Each round-trip to London amounts to approximately $102 (at a mileage rate of $0.51), an in-kind service I have provided over the last two years of approximately $2,500.

Through our involvement in the Brownfields Regional Committee, our city has undertaken the rehabilitation of a formerly coal-company owned hospital, the Benham Clinic. Having finished the Phase I/II Assessment process, we have submitted a cleanup grant to EPA. We envision creation of a facility to offer outpatient and veteran’s services. We are very enthusiastic about this project and the prospects for job creation and better public health in our area.

We represent the City’s residents who have been in enthusiastic support of brownfields cleanup. We pledge to ensure that residents are involved and fully represented in the brownfields process.

We look forward to providing our contribution!

Sincerely,

John T. Dodd
Mayor John Dodd
November 23, 2011

Mr. Mike Patrick, Executive Director
Cumberland Valley Area Development District
P.O. Box 1740
London, KY 40743-1740

Dear Mr. Patrick:

I would like to offer my support to the Cumberland Valley Area Development District (CVADD) in re-applying for the EPA Brownfield Assessment Grant. I feel our region has benefited from this grant by revitalizing property that may be currently contaminated and unusable. Noted progress has been made and needs to continue to better serve our citizens of the region and the Commonwealth.

My role as the Region 9 Manager with KY EM allows me to travel to counties in our region and deal with various contamination and hazardous materials incidents. I believe this experience has proven valuable while serving as a member of the CVADD Regional Brownfield Committee. I look forward to continuing the partnership between the CVADD and KY EM in the initiative to provide a cleaner and healthy environment for the citizens of the Commonwealth of Kentucky.

Sincerely,

Jerry L. Rains

Region 9 Manager
KY Division of Emergency Management
November 17, 2011

Mr. Mike Patrick, Executive Director
Cumberland Valley Area Development District
Post Office Box 1740
London, KY 40743-1740

Dear Mr. Patrick:

This letter is written in support of the Cumberland Valley Area Development District (CVADD) in the effort to assure continuity of work being accomplished through the Regional Brown Field Grant. I have been a regional committee member since the implementation of the Brownfield Grant and can see the benefit and value of assessing underutilized sites throughout the region for both safety issues, and development of business and industry. I have had the privilege of listening to several communities throughout the region present future projects to renovate and restore buildings that are serving no purpose and have become eyesores and buildings/properties that hold great community sentiment. All projects were presented with the goal of invigorating economy and restoring a building to a safe, functional level to provide a benefit or service to the community. I look forward to the continuation of the next phase of funding to assure the projects are completed.

Sincerely,

Rebecca Patton, Program Specialist
Laurel County Health Department
Jackson County Ministries
PO Box 340, 190 Campus Drive Suite #2
Annville, Kentucky 40402
606-364-5151

November 17, 2011

Mr. Mike Patrick, Executive Director
Cumberland Valley Area Development District
P.O. Box 1740
London, KY 40743-1740

Dear Mr. Patrick,

Please accept this letter of support in your efforts to receive a Brownfield assessment grant. Our organization has been a recipient of CVADD’s efforts to help local organizations and communities in navigating the process of trying to apply for a Brownfield cleanup grant.

It was through the CVADD that we first learned of the grant possibility. Your staff since that time has helped us through the various phases of the loan application by giving us timely advice and more importantly offering us encouragement to keep pursuing the opportunity. It is difficult for me to imagine going thru this process without the CVADD.

We applaud your efforts and it is our desire that more communities and organization will be helped in the future in their efforts to clean up contaminated sites. Hopefully we will be given the opportunity to encourage others as they work with the CVADD.

Sincerely,

Jacob L. Moss
Executive Director
November 17, 2011

Mr. Mike Patrick, Executive director
Cumberland Valley Area Development District
P.O. Box 1740
London, KY 40743-1740

Dear Mr. Patrick

I am writing this letter in support of your application for another Brownfield Assessment Grant for the Cumberland Valley Area Development District.

Your agency, especially Whitney Chestnut, helped us through the process of securing funding for both a Phase I and Phase II Assessment for a vacant school building that we own. It is our goal to develop the building into much-needed housing for families by restoring the older building into new, two-bedroom apartments.

I served on the Regional Brownfield Committee and several sites received Phase I and II Assessments; however, the Committee recognizes that there are numerous other sites within our district that have not yet been assessed and I support the ADD in it's effort to address this environmental issue.

Sincerely,

Dora Mobley

Dora Mobley
Executive Director
November 21, 2011

Mr. Mike Patrick
Executive Director
Cumberland Valley Area Development District
P.O. Box 1740
London, KY 40743-1740

Re: CVADD Regional Brownfield Assessment Grant Proposal

Dear Mr. Patrick:

I am pleased to support the Cumberland Valley Area Development District’s (CVADD) efforts to seek additional EPA funding for the Brownfield Assessments throughout the region. The CVADD has successfully implemented a project that involved the numerous other properties that are underutilized and may contain hazardous substances. We believe by continuing to assess Brownfield in the area, the health and well-being of our citizens and the economic life of our communities will be greatly improved.

Sincerely,

Albert Hale
Laurel County Division of Public Safety & Emergency Management

C: Whitney Chesnut, Cumberland Valley ADD
November 17, 2011

Mr. Mike Patrick, Executive Director
Cumberland Valley Area Development District
P.O. Box 1740
London, KY. 40743-1740

Dear Mike,

**Subject: Brownfields Letter Of Support**

The Whitley County Health Department fully supports all efforts of the Cumberland Valley Area Development District in your efforts to secure EPA Brownfields Assessment Grants. The region that you represent is in tremendous need for revitalization. This funding would make a significant impact on Whitley County and the needs that we have as a county that conducts mining operations. We have many projects that need reclamation. Without this type of planning and funding, our county would not be able to move forward in areas that would bring us in line with our counterparts throughout the state of Kentucky.

Whitley County would greatly benefit from this type of grant funding for future redevelopment, expansion and growth. We have many sites that have been abandoned and are not used because of real and perceived contamination or pollutants to the property. We have many meth labs and properties destroyed because of meth making and use in our county. We also have old schools, factories, mine stripped lands, old gas stations, etc. that would benefit tremendously from this type of funding to help our communities and our citizens in the process of cleaning up and reinvesting in our county. We believe that this type of funding would aid in job growth, increase our tax base while utilizing our current infrastructure, improve and protect our environment for all future generations.

I look forward to working with your agency in the future to help Whitley County and our regional partners protect and reclaim the area that we call home.

Best regards,

Debra Brown McNaughton

Debra Brown McNaughton, R.S.
November 21, 2011

Mr. Mike Patrick  
Executive Director  
Cumberland Valley Area Development District  
P.O. Box 1740  
London, KY 40743-1740

Re: CVADD Regional Brownfields Assessment Grant Proposal

Dear Mr. Patrick:

Please accept this letter as acknowledgment of my enthusiastic support for the Cumberland Valley Area Development District’s Regional EPA Brownfields Assessment Grant. I have worked closely with Whitney Chesnut as a member of the CVADD Regional Brownfields Committee and I look forward to continuing this endeavor.

Sincerely,

[Signature]

Tammie Wilson  
Vice President/CFO

Cc: Whitney Chesnut, Cumberland Valley ADD