

**Paul Avenue Brownfields Revolving Loan Fund (BRLF)**  
**Community Involvement Plan**  
**April 2020**

**U.S. Environmental Protection Agency Cooperative Agreement #BF-95445109<sup>1</sup>**

**The City of Atlanta Brownfields Program**

A brownfield is a real property whose expansion, redevelopment, or reuse may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Examples include former industrial sites, gas stations, dry cleaning establishments, and manufacturing plants. In Atlanta, encouraging the reuse of brownfields through planning and economic incentives is critical to promoting smart and sustainable growth. Brownfield impacts are felt in many ways, including:

- Financially – the full tax value of properties that are brownfields is not collected;
- Socially – the presence of brownfields may act as a barrier between communities;
- Community health – brownfields may contribute to actual or perceived health risks; and
- Environmentally – brownfields may negatively impact adjoining properties by contributing to off-site migration of environmental contamination.

The City of Atlanta’s involvement in cleaning up brownfields started in 1996 when it received funding from the United States Environmental Protection Agency (U.S. EPA) to conduct a pilot brownfields project. Since then, the City has successfully received and managed several U.S. EPA brownfield grants; including EPA Brownfields Petroleum and Hazardous Substances Assessment Grants (in 2005, 2010, 2013, and 2017); an EPA Brownfields Cleanup Revolving Loan Fund grant (2009) and an EPA Brownfields Area Wide Planning pilot grant (2010).

**City of Atlanta Brownfields Program Goals**

Brownfield parcels in Atlanta are often abandoned or underutilized because they have actual or perceived environmental contamination. The presence of contamination along with the risks and costs associated with addressing contamination can be a significant barrier to redevelopment. The City of Atlanta Brownfields Program seeks to revitalize these areas and improve the quality of life for impacted neighborhoods. The goals of the City’s Brownfields Program are to improve the quality of life, revitalize neighborhoods and increase the City’s tax base by:

- Encouraging sustainable redevelopment of brownfields;
- Protecting human health and the environment;
- Retaining and attracting jobs;
- Maximizing the effectiveness of the Brownfields Program through collaborative efforts; and
- Educating and engaging the community about the Brownfields Program.

<sup>1</sup>Note: Though this project has been funded, wholly or in part, by U.S. EPA, the contents of this document do not necessarily reflect the views and policies of the U.S. EPA.



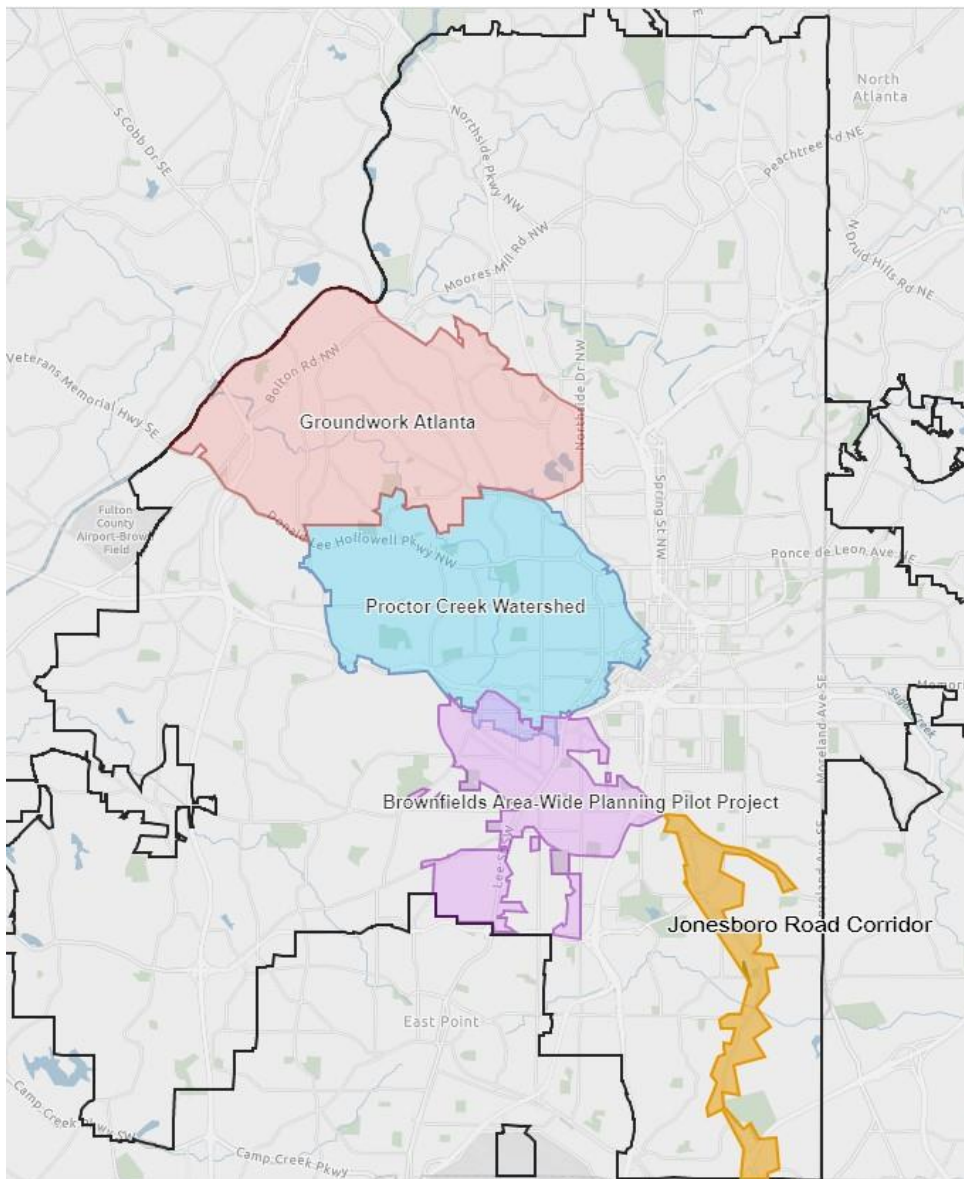
The City's Brownfields Program is implemented through its planning, assessment and cleanup initiatives. The purpose of the Brownfields Revolving Loan Fund (BRLF) is making loans and subgrants for remediating brownfields. Using BCRLF cleanup funds, the City supports new economic, public health, cultural and recreational opportunities. Anticipated outcomes from investments in brownfield redevelopment are more jobs, businesses and greenspace, cleaner water and soil, and less blight, crime and health problems.

**City of Atlanta - Invest Atlanta Brownfields Revolving Loan Fund Program- BF-95445109-4**

The U.S. EPA awarded the City of Atlanta a \$1,000,000 BRLF grant in 2009. The BRLF initiative is jointly administered by the Atlanta Department of City Planning Office of Zoning and Development and Invest Atlanta (the City of Atlanta's economic development agency). The purpose of the BRLF is to support redevelopment of brownfields by financing remediation through loans and subgrants. The City targets cleanup funds in neighborhoods impacted by brownfields including in Atlanta's Brownfields Area Wide

Planning area, Proctor Creek watershed, Groundworks Atlanta focus area, and the Jonesboro Road corridor (see Map 1).

Funds are available to qualified private sector and non-profit owners or purchasers of "shovel-ready" brownfields. A 20% match by the loan/subgrant recipient is required. The Invest Atlanta Board approves the loan/subgrant, sets the loan terms, and services loans. The funds revolve by collecting principal and interest payments and re-lending payments to future borrowers and subgrantees.



*Map 1. Atlanta Brownfield Target Areas*



## Community Involvement in BCRLF Cleanup Activities

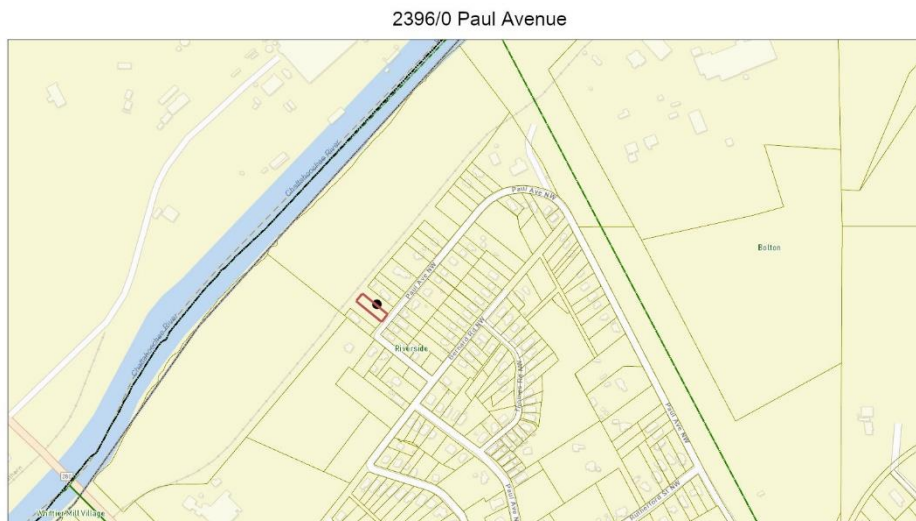
Community involvement is an essential component to Atlanta's Brownfield Program. All loans and subgrant awards require a site-specific community relations plan that includes providing reasonable notice, and the opportunity for public involvement and comment on the proposed cleanup options. Community involvement activities must be initiated prior to the cleanup of a site. The Community input will be considered for 30 days.

*Administrative Record:* Each application for a BRLF loan or subgrant has an administrative record containing relevant site information and documents. An important aspect of community involvement is allowing the public to comment on the administrative record. The community involvement process activities include:

- Providing public notice of the availability of the administrative record. The notice may be placed in a major local newspaper of general circulation, on the Internet, or similar measure to inform the general community and target area of the availability of the administrative record for public review;
- Providing the opportunity for written and oral comments on the administrative record. Upon timely request, extend the public comment period as needed, and
- Holding a meeting during the public comment period to discuss the proposed cleanup and solicit comments from interested parties.

### **0 Paul Avenue- aka 2396 Paul Avenue and parcel ID17 025300100717**

The Conservation Fund will be submitting a BRLF application to the City of Atlanta and Invest Atlanta for the remediation of 0 Paul Avenue, Atlanta, GA 30318 (aka 2396 Paul Avenue and parcel ID17 025300100717). This 0.2 acre parcel is located in the Riverside Neighborhood of NPU D and in Council District 9. This parcel along with other adjoining parcels on Paul Avenue will become a 10 acre park owned and managed by the City of Atlanta Parks and Recreation Department. This new greenspace will provide access to the Chattahoochee River multi-use trail along the Chattahoochee River.



Map 2. 0 Paul Avenue location

*Environmental Site Assessment:* Prior to the purchase of the site, The Conservation Fund’s environmental consultant conducted a Phase II Environmental Site Assessment. Based on review of maps and photographs, the site appears to have been undeveloped since the 1930s. Residential units were built in surrounding parcels in the 1940s.

At some point, fill material which originated from the former Bernath Barrel & Drum facility was deposited on the subject property and two adjoining two tracts of land owned by Georgia Power (- Paul Avenue, NW and 2386 Paul Avenue, NW). In October 1995, the Georgia Environmental Protection Division (EPD) collected soil samples from suspected fill materials at the 2386 Paul Avenue property in response to a complaint. Metals including Arsenic, Barium, Lead and Silver were found in the fill material above notification concentrations. In July 2006, Georgia Power completed soil removal activities under the direction of the Georgia EPD. After completing the soil removal activities, Georgia Power certified that the soils on their property, 2386 Paul Avenue and the subject property met Type 2 (Residential) Risk Reduction Standards. On August 28, 2006, a Compliance Status Report (CSR) was prepared for Georgia Power.

As part of The Conservation Fund Phase II, soil samples were collected and found to contain Lead at concentrations above EPD’s Risk Reduction standards. Additional soil investigations were completed to define the depth and extent of Lead contamination on the property.



*Proposed Remediation/Corrective Action:* A Prospective Purchaser Corrective Action Plan (PPCAP) was approved by Georgia Environmental Protection Division (EPD) on October 2, 2019. The proposed remediation is to excavate and remove approximately 630 tons contaminated soils. The excavation, handling, transportation and disposal of the Lead contaminated soils will be performed in a manner to prevent contamination of the surrounding, un-impacted areas and in accordance with applicable federal, State and local laws. The property will be cleaned to EPD’s residential standards. The

estimated cost to remediate the contaminated soil and other EPD requirements is \$100,000. A subgrant of up to \$80,000 will pay 80% of the remediation costs and The Conservation Fund will pay 20% of the costs.

## **Community Involvement Activities**

### Administrative Record (Information Repository)

The City of Atlanta will establish an *Administrative Record* for the Paul Avenue BRLF Application. The administrative record will include documents demonstrating the basis for the cleanup and its progress—e.g., previous ESA reports; the GA EPD approved PPCAP; U.S. EPA required site-specific documents including a Work Plan, Analysis of Brownfield Cleanup Alternatives (ABCA), and Quality Assurance Project Plan (QAPP); responses to public comments and verification that shows that the cleanup is complete. The public comment period for information in the administrative record will be at least 30 days (April 27, 2020 to May 26, 2020 is the initial 30-day public comment period). The administrative record will be available for review in the Department of City Planning Office of Zoning and Development website at [www.atlantaga.gov/brownfields](http://www.atlantaga.gov/brownfields) and once City Hall is open at the OZD Office at 55 Trinity Avenue, Suite 3350, Atlanta, GA 30303.

### Public Notices and Meetings

*Community Meetings:* Information about the Paul Avenue BRLF subgrant will be presented at the virtual Neighborhood Planning Unit D meeting on Tuesday April 28, 2020 at 7:30 pm. In addition, a virtual community meeting will be held on May 12<sup>th</sup>, 2020 from 6:30 at 7:30 pm (Join Zoom Meeting <https://zoom.us/j/4447189894>). At this meeting, the public will have a chance to learn and ask questions about the loan process as well as the cleanup and redevelopment schedule. Atlanta's environmental consultant will discuss brownfield remediation at Paul Avenue. Meeting notices will be shared with Dustin Hillis, District 9 Council member, the Riverside Neighborhood, NPU D, The Conservation Fund and Groundwork Atlanta. A presentation about this subgrant will be made at the next Groundwork Atlanta Board meeting. Information will also be available at the 2020 Atlanta Eats.

*Invest Atlanta Board of Directors Meeting:* Approval of the BRLF subgrant to The Conservation Fund will be on the June or July 2020 Invest Atlanta Board of Directors meeting agenda. These meetings are open to public and are advertised on Invest Atlanta's website at <https://www.investatlanta.com>.

*Website:* Information about this project will be posted on the City of Atlanta's Brownfields Program website at <http://www.atlantaga.gov/brownfields> and on the City Planning Department social media sites.

### Point of Contact

To obtain information, to schedule an appointment to review documents, to submit comments or questions about this project, please email [jlavandier@atlantaga.gov](mailto:jlavandier@atlantaga.gov) or contact Jessica Lavandier at 404-865-8522. The official 30-day public comment period is from April 27 to May 26, 2020.