

**Trees Atlanta – 825 Warner Street Subgrant
Brownfields Revolving Loan Fund (BRLF) Community Involvement Plan**

**U.S. Environmental Protection Agency Cooperative Agreement #BF-954451091
The City of Atlanta Brownfields Program
October 2020**

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, 2017 and 2020); an EPA Brownfields Cleanup Revolving Loan Fund grant (2009) and an EPA Brownfields Area Wide Planning pilot grant (2010)¹.

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;

¹ 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.

- Maximizing the effectiveness of the Brownfields Program through collaborative efforts; and
- Educating and engaging the community about the Brownfields Program.

The City's Brownfields Program is implemented through its planning, assessment and cleanup initiatives. The purpose of the Brownfields Revolving Loan Fund (BRLF) is to make 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.

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.

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 involvement 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.

825 Warner Street SW

825 Warner Street SW is located in the Murphy Crossing area and in the Atlanta Area Wide Planning area. It is adjacent to the former State Farmer's Market and just south of the Atlanta BeltLine Westside trail. It is in the Oakland City neighborhood of Neighborhood Planning Unit S and in Atlanta Council District 12. The parcel, #17 010600090070, is approximately 2.9 acres.

Historic use of the site

The property is currently developed with a one-story 23,000 square foot warehouse building. Historical records show the subject property being developed with several structures in 1932 and occupied by F.E. Golian Company which worked in structural and ornamental steel. By 1950, buildings on the site were used for "Cold Storage" and "Wholesale Produce". A 1978 Sanborn map labeled the use of the building as "Wholesale Meat". City directories dating back to 1952 indicate that the property was occupied by C.L. Fain Company which operated a wholesale produce company in the 1950's. In the early 1960's to sometime in the 1970's, Armour & Company operated a wholesale meat company on the property. Moms Bakery operated a commercial bakery on the property from 1994 to 2010s. The artists' studio known as "the Bakery" operated on the site for the past several years. Trees Atlanta, Inc. purchased the property in July, 2019.

Trees Atlanta Headquarters

Trees Atlanta, a nonprofit community group that protects and improves Atlanta's urban forest by planting, conserving, and educating has nearly tripled its staff size over the past decade. To have its growing staff in one location, Trees Atlanta will be building its headquarters on this site.

The new Trees Atlanta state of the art 20,000 square-foot headquarters building will allow it to reach new, diverse audiences, expand youth and adult education, its green job training initiative - Youth Tree Team, and community volunteer programming. The site will be reforested with an educational meadow, walking trails spurring from the BeltLine, and multiple outdoor education and gathering spaces. Indoor amenities include offices for Trees Atlanta staff, multiple classrooms, a rentable event space, operations and storage facilities, and a tenant space to be leased to an environmental nonprofit. Trees Atlanta submitted a BRLF subgrant application to the City of Atlanta and Invest Atlanta for the remediation of 825 Warner Street prior to the redevelopment of the site.

Environmental Site Assessments

As part of the due diligence prior to purchasing 825 Warner St. SW, a Phase I Environmental Site Assessment (ESA) was completed in April 2019 by Oneida Total Integrated Enterprises for the U.S. Environmental Protection Agency – Region 4 and Trees Atlanta as part of a Targeted Brownfields Assessment program. The Phase I ESA identified Recognized Environmental Conditions on the site and surrounding parcels. Subsequently, a Phase II Environmental Site Assessment (ESA) was conducted by ETRI on May 2017. Soil samples were collected via soil borings at depths varying from 2-10 ft. and were analyzed for Resource Conservation and Recovery Act (RCRA) Metals, volatile organic compounds (VOCs) and polyaromatic hydrocarbons (PAHs).

Working with ETRI, Trees Atlanta submitted a Prospective Purchaser Corrective Action Plan (PPCAP) in June 2019 to the Georgia Environmental Protection Division (EPD) Brownfield Group. Additional soil investigations were conducted in June 21, 2019 to define the extent of contamination identified in the Phase II ESA. Temporary monitoring wells in the area of highest lead in soils were installed to determine if groundwater has been impacted. Ten additional soil borings were installed to a depth of 25ft. The surface samples were analyzed for RCRA Metals. Deeper samples were analyzed for total Lead. Five of the samples had lead levels above Risk Reduction Standards (RRS). No detectable concentrations of lead were detected in the groundwater sample.

Remediation Plan

Based on the ESA investigations and the Corrective Action Plan, a cleanup action has been developed to include delineation of lead impacted soils, soil removal, site restoration, development of compliance report and project close-up. The site remediation is estimated to take about 2 months. According to estimates, approximately 563 cubic yards (CY) or 810 tons soil will be removed. A waste profile will be developed for possible disposal of the impact soil in a Subtitle D Landfill. Upon delineation, impacted soil will be excavated horizontally and vertically with the site boundaries to where no impacts are detected above the approved Georgia EPD Type 4 RRS. If additional impacts are encountered, then additional soil excavation may be required to achieve unconditional closure status.

The estimated cost to remediate the contaminated soil and other EPD requirements is \$200,000. A subgrant of up to \$150,000 will pay 80% of the remediation costs and Trees Atlanta will pay 20% of the costs.

Community Involvement Activities Administrative Record (Information Repository)

The City of Atlanta will establish an Administrative Record for 825 Warner Avenue SW. 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 administrative record will be available for review in the Department of City Planning Office of Zoning and Development (OZD) website at 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 Warner Ave SE BRLF subgrant will be presented at the virtual Neighborhood Planning Unit S October meeting on Thursday October 15th, 2020 at 7:30 pm. In addition, a virtual community meeting will be held on October 26th 2020 from 6:00 at 7:00 pm (via Zoom at <https://zoom.us/j/5138774717>- Meeting ID: 513 877 4717 or via phone at +1646-558-8656 Meeting ID: 5138774717#). At this meeting, the public will have a chance to learn and ask questions about the loan process as well as information about the proposed redevelopment of the site, cleanup and schedule. Atlanta's environmental consultant will discuss brownfield remediation at 825 Warner Avenue.

Community Meeting notices will be shared with Joyce Sheperd, District 12 Councilmember, the Oakland City Neighborhood, NPUs S, V and X, and Trees Atlanta. The 30 day public comment period will be from October 15th, 2020 to November 16th, 2020.

Invest Atlanta Board of Directors Meeting: The Invest Atlanta Board approved this subgrant at its September 17th meeting.

In addition to the City of Atlanta Brownfield staff community engagement, Trees Atlanta has conducted early Community Input Meetings in advance of this 30-day Community Input period. They have connected with surrounding neighborhood groups by email, social media, and/or virtual meetings. A virtual community meeting hosted was on August 6, 2020 co-hosted by Councilmember Sheperd and Trees Atlanta. Thirty-one residents were in attendance. A printed flyer regarding the meeting and topic were distributed to households in the area door-to-door with options to receive more information by phone or mail. In addition, a community survey was created to gather input from the community. To date, presentations have been made to the following groups related to Trees Atlanta's intentions to develop 825 Warner Street.

- 7/16/20 NPU S
- 7/23/20 Sylvan Hills Neighborhood Association
- 7/28/20 Oakland City Neighborhood Association
- 8/4/20 Adair Park Neighborhood Association
- 8/4/20 West End Neighborhood Association
- 8/6/20 Community Meeting announcing Trees Atlanta's new HQ
- 8/15/20 Capitol View
- 9/14/20 Westview Community Organization
- 10/3/20 Pittsburgh Neighborhood Association Meeting

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 or contact Jessica Lavandier at 404-865-8522.