

**The City of Atlanta Brownfields Revolving Loan Fund (BRLF)  
U.S. Environmental Protection Agency Cooperative Agreement #-02D34622**

**National Church Residences Trinity Towers 611 Springdale Road SW  
Subgrant Community Involvement Plan**

**The City of Atlanta-Invest Atlanta Brownfields Revolving Loan Fund Program**

US Environmental Protection (EPA) Agency awarded the City of Atlanta a FY 2022 Bipartisan Infrastructure Law (BIL) Brownfield Revolving Loan Fund (BRLF) grant (Cooperative Agreement #-02D34622) to capitalize its Brownfields Revolving Loan Fund program. The BRLF Program is administered by the Office of Zoning and Development (OZD) in the Department of City Planning (DCP) and Invest Atlanta. EPA defines a brownfield as a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

With this grant funding, the City of Atlanta and Invest Atlanta provide financing for brownfield remediation of eligible projects within the Atlanta city limits. The BRLF program provides loans to private property owners and subgrants to non-profits to support remediation required for site cleanup of a brownfield site within the city of Atlanta. The Invest Atlanta Board approves BRLF loans and subwards at its monthly meetings and also serves as the Fund Manager.

Community involvement is the foundation of planning activities undertaken by the City of Atlanta Department of City Planning, Office of Zoning and Development (OZD) and it is integral to the success of the City of Atlanta's Brownfields Program. The goal of the Community Involvement Plan (CIP), an administrative requirement of the EPA BRLF grant, is to establish a program that will keep stakeholders informed and involved so that they are aware of the program and specific funded cleanup projects, to answer questions, to provide timely project specific information, and to provide the opportunity to comment on either general program of specific project elements. This site specific CIP describes how community members, community-based organizations and key stakeholders will be informed and have the opportunity for meaningful involvement throughout the site remediation funded with the BRLF.

**The City of Atlanta Brownfield Program Goals**

The goals of the City of Atlanta's Brownfields Program are to improve the quality of life, revitalize neighborhoods, and increase the City's tax base by:

- Encouraging redevelopment of brownfield sites;
- Protecting human health, natural resources, and the environment;
- Supporting the retention and attraction of jobs and services;
- Maximizing the effectiveness of the Brownfield Program through collaborative efforts;
- Educating and engaging with the community about the Brownfields Program; and

- Investing EPA Brownfields grant funds in Target Communities.

### **Site Specific Community Involvement Plans**

A Site Specific Community Involvement Plan (SSCIP) is required for each subgrant and loan. Providing reasonable notice and the opportunity for public involvement and comment on the proposed cleanup options is part of every CIP. Each SSCIP Plan includes:

- Creating a project webpage that is part of [www.atlantaga.gov/brownfields](http://www.atlantaga.gov/brownfields) and that includes a project fact sheet, meeting notice, required project documents (ABCA and QAPP), and presentations;
- Public Comment Period: written and oral comments on any items related to a proposed cleanup can be made during a 30 day public comment period. Comments and responses will be part of the project Administrative Record.
- Posting meeting notices on the City Planning Department's existing social media accounts (such as Twitter & Facebook) and sending the meeting notice to the Neighborhood Planning Unit and the neighborhood association where the loan/grant recipient is located.
- Presenting project information at a neighborhood and/or Neighborhood Planning Unit meeting where the project to be funded by the proposed loan/subgrant is located.
- Holding a community meeting to discuss the proposed cleanup, the Analysis of Brownfield Cleanup Alternatives (ABCA) and solicit comments from interested parties.
- Incorporating Community Input: During the 30 day public comment period and during the community meetings, any stakeholder can ask questions, provide comments, and have comments considered in the proposed remediation.

### **National Church Residences**

National Church Residences (NCR), a non-profit organization based in Ohio and with an office in Atlanta, provides affordable housing for seniors. NCR owns and/or operates 340 senior housing communities in 25 states. NCR has owned Trinity Towers since 1999.

### **Trinity Towers- 611 Springdale Road SW**

Trinity Towers, built in 1975, is 11-story building with 240-unit senior affordable housing development and on a 3.32 acre parcel. It is located at 611 Springdale Road SW in Land Lot 101 of the 14th District of Fulton County, Georgia. It is in the Perkerson Neighborhood of Neighborhood Planning Unit X and in Council District 12.

The building was renovated in 2005 utilizing Low Income Housing Tax Credits. Trinity Towers was selected for a 2022 4% Housing Tax Credit by the Georgia Department of Community Affairs. The proposed \$54 M renovation will take 20 months and is estimated be completed in 2025. This renovation will include all common areas and residential units. The Scope of Work will require

accessible units to be reconfigured to meet code compliance, while all other standard units will be upgraded.

### **611 Springdale Road SW Remediation Plan**

A Phase I Environmental Site Assessment was conducted in February 2023. In addition, an Asbestos Inspections Report, dated February 22, 2023, collected samples of exterior window accent panels, referred to as woodrock and analyzed them in accordance with EPA's protocols. Laboratory analysis identified asbestos in the exterior panels. Approximately 7, 200 square feet of woodrock panels are located in the building's exterior. According to NCR, the woodrock panels don't pose a threat to the residents and visitors of Trinity Towers, they are deteriorating and are being removed as part of the building renovation. National Church Residence estimates that the cost of removing the woodrock panels from the exterior is \$1.5M. The remediation of the woodrock panels will last approximately 4 ½ months.

### **Subgrant Award**

National Church Residences submitted an application to the City of Atlanta/Invest Atlanta Brownfields Revolving Loan Fund Program for a subgrant award to remediate the exterior woodrock panels. The Invest Atlanta Board approved the subgrant at its November 16, 2023 Board meeting. This subgrant award will allow national Church Residences to continue to offer deep affordability in a safe space for senior housing in South Atlanta

### **Administrative Record**

The City of Atlanta will establish an Administrative Record for Trinity Towers. The Administrative Record will include documents demonstrating the basis for the cleanup and its progress—such as a 2022 Phase I Environmental Site Assessment, Asbestos Inspection Report; U.S. EPA required site-specific documents including the 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 at the Department of City Planning Office of Zoning and Development (OZD) at the Atlanta City Hall located at 55 Trinity Avenue, Suite 3350, Atlanta, GA 30303. Some of the documents will be posted on the City of Atlanta Brownfields website at [www.atlantaga.gov/brownfields](http://www.atlantaga.gov/brownfields).

### **Community Involvement Activities**

Community engagement is the foundation of planning activities undertaken by the City of Atlanta Office of Zoning and Development. It is also required by the EPA Brownfield Revolving Loan Fund grant program. The community involvement for the BRLF subgrant to National Church Residences includes notifying the community about the subgrant, providing 30 days for public comment and having a community meeting. The following Community Involvement activities will be implemented.

**Community Notification:** Information about the subgrant to National Church Residences will be available in several ways.

- **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. A brownfield website page for Trinity Towers will have information about the project including a fact sheet, the community meeting notice and the Analysis of Brownfield Cleanup Alternatives (ABCA) and other information as needed.
- **Community Meeting Notice:** a community meeting notice will be created and distributed by the Department of City Planning. It will be posted on the Department of City Planning social media and project website and provided to National Church Residence for distribution to its stakeholders.
- Information about the community meeting will be presented at the Perkerson Civic Association January 2, 2024 meeting and the Neighborhood Planning Unit X Monday January 8, 2024 starting at 7 pm.

**Community meeting:** A community meeting will be held in person on Thursday January 11 at from 1:00-2:00 pm and from 2:30 – 3:30 pm in the Trinity Towers Community Room at 611 Springdale Road SW. At this meeting, the public will have a chance to learn and ask questions about the City of Atlanta Brownfield Revolving Loan Fund Program and the subgrant process. Atlanta’s BRLF Qualified Environmental Professional (QEP) will present information about the proposed brownfield remediation and the Analysis of Brownfields Cleanup Alternatives (ABCA).

**Community Comment Period:** The 30 day public comment period will be from January 8 to February 7, 2024.

**Point of Contact:** To obtain information, to schedule an appointment to review documents, to submit comments or questions about this project, please contact Jessica Lavandier at [jlavandier@atlantaga.gov](mailto:jlavandier@atlantaga.gov) and at 404-450-6442 in the Department of City Planning, Office of Zoning and Development.

**Previous Community Engagement:** NCR had meetings with the resident about the renovations on March 30, 2022 and August 29 & 30, 2022. In additional NCR engaged with NPU-X at their September 2022 meeting to discuss the project renovation.