

**Narrative Proposal: Environmental Protection Agency
Brownfields Community Wide Combined Assessment Grant
Application from the City of Knoxville, Tennessee
South Waterfront Redevelopment Area**

The following is the narrative proposal for the City of Knoxville, Tennessee's South Waterfront Community Wide Combined Assessment Grant Application requesting \$200,000 for hazardous substances and \$200,000 for petroleum sites, combined to address the same target community, for a total not to exceed amount of \$400,000.

Threshold Criteria for Assessment Grants:

1. Applicant Eligibility

The City of Knoxville, as a municipality, is eligible to apply for this grant by meeting the following criteria:

General Purpose Unit of Local Government defined by the Environmental Protection Agency as: a county, municipality, city, town, township, local and public authority (including an public and Indian housing agency under the United States Housing Act of 1937 school district, special district, intrastate district, council of governments (whether or not incorporated as a nonprofit corporation under State law), any other regional or interstate government entity, or any agency or instrumentality of a local government.

2. Letter from the State or Tribal Environmental Authority

A letter of support from Andy Shivas, Brownfields Coordinator, Division of Remediation, Tennessee Department of Environment and Conservation is included as an attachment to this narrative proposal.

3. Petroleum Site Eligibility Determination

As this is a community wide assessment, we have not yet identified all potential petroleum sites. Eligibility determinations will be done when we affirmatively identify the sites in the area. However, due to the amount of historical and present gasoline operations in the waterfront and from Phase I assessments already conducted in the area, we are aware of at least 10 sites within the waterfront that have the potential for hydrocarbon contamination. This information leads us to request \$200,000 for petroleum sites as part of this application.

Ranking Criteria for Assessment Grants:

1. Community Need

The following section is a description of the health, welfare, environmental, and financial needs of South Knoxville as it is affected by the presence of brownfields. Sources of information are cited in the text.

a. Health, Welfare, and Environment

i) The effect brownfields currently have on South Knoxville based on the number / size of brownfields and their health, welfare, and environmental impacts:

South Knoxville is located in east Tennessee in the City of Knoxville. Downtown Knoxville is situated on the northern bank of the head of the Tennessee River; South

Knoxville is situated on the southern riverbank directly across from downtown. It is delineated for this project as a 3 mile long, 3 mile deep stretch along the south bank of the Tennessee River, starting on the southwestern side of the CSX rail road bridge as it crosses south over the Tennessee River and traveling in an easterly direction to terminate on the southeastern side of James White Parkway Bridge for a total distance of 3 miles. From these points, the redevelopment area encompasses a total of 3 square miles back from the River, including industrial, commercial, and residential uses, as well as an abandoned quarry and natural areas of historical significance to the Civil War.

South Knoxville houses active and extinct industry such as petroleum and asphalt operations (active examples: Holston Gases, CEMEX, Rinker Materials; inactive examples: TransMontaigne Petroleum, Dixie Barrel & Drum Co.), furnishing and automotive refinishers, drycleaners, junk yards, boat construction companies, gas stations, textile mills, mothballed gas and rail lines, and quarry operations, many of which at one point depended on barge for materials transport. Based on the Environmental Protection Agency definition of a brownfield and a driving inventory of the area, there is an estimated 20 abandoned, idle, and underused industrial and commercial sites ranging from a buildable lot size to several acres in size, 10 with potential for hazardous substances (asbestos, perchloroethylene, arsenic, lead), and 10 with the potential for petroleum contamination (drums and underground tanks, soil contamination) within the project area. Over the years, small working class neighborhoods built in around rail lines. Much of the industry has since moved out, leaving an assortment of abandoned warehouses, overgrown lots, and dilapidated neighborhoods (neighborhoods are not targeted in this proposal). A new development code made industry a grandfathered use when this became a redevelopment area.

Knoxville is ranked 1 in the U.S. for child allergy and asthma sufferers (American Allergies and Asthma Foundation of America, 2008). South Knoxville's population, like much of east TN, also suffers from high incidence of diabetes and obesity (American Diabetes Association, 2008) and while healthcare facilities are located in the waterfront area, many of the residents are uninsured or on state health insurance, and have difficulty receiving medical care. Drug related crime has gone up in the last 5 years (Knoxville Police Department, 2008), and population proximity to lands with old industrial uses and potential environmental contaminants are high, as shown on area Sanborn Maps from the 1920's through the present.

South Knoxville inhabitants range from low middle income to poverty and are predominately white. Demographics are fairly consistent with the rest of the Knoxville community, which had a year 2000 population of 173,890 and an estimated growth of 183,546 projected for 2007 (U.S. Census Bureau, 2008). In 2006, Knoxville's total population was 175,027 (American Community Survey, 2006). Of the 175,027, 166,644 are thought to be native to the area. Eighty three percent of people 25 years and over had graduated from high school, and 27% had a bachelor's degree or higher. Seventeen percent had not graduated from high school (Knoxville Metropolitan Planning Commission, 2008). This is consistent with the National Average. Population within the redevelopment boundary is estimated at 20,000 (South Waterfront Return on Investment Study, 2006).

Knoxville is not as racially diverse as many other cities in the nation. For people reporting one race alone, 82% were White, 16% were Black, less than 0.5% were American Indian, 1% were Asian; less than 0.5 percent were Native Hawaiian, and 1% were identified as “other race”. Two percent reported two or more races, and 3% were Hispanic (American Community Survey, 2006).

ii) The health and welfare of sensitive South Knoxville populations, and how residents are disproportionately impacted by environmental problems:

Though not heavily populated with racial minorities, South Knoxville is home to many elderly, children, and women of reproductive age. An estimated 2,000 elderly care for children in the area (Knoxville Metropolitan Planning Commission, 2008). Figure 1 shows area women of child bearing age:

Knoxville, TN and United States Averages Comparison: Women of Child Bearing Age		
Women Surveyed	Knoxville Average	National Average
Number of women 15 to 50 years old who gave birth in the past 12 months	2,744	4,182,942
Unmarried women (widowed, divorced, and never married)	1,187	1,370,877
Per 1,000 unmarried women	41	35
Per 1,000 women 15 to 50 years old	57	55
Per 1,000 women 15 to 19 years old	58	26
Per 1,000 women 20 to 34 years old	91	104
Per 1,000 women 35 to 50 years old	17	23

Figure 1. Knoxville, TN Fertility (American Community Survey Estimates, 2006)

Women of child bearing age have been under threat lately in South Knoxville due to a recent influx of meth houses, prostitution, and a rise of petty theft and rape. Much of this is due to low income and transient renters, and some of this stems from a lack of respect many landlords feel about the area and its run-down condition. Brownfields demoralize the community and it’s reflected in the circumstances of the South Knoxville population. Figure 2 shows a breakdown of area children, who have unrestricted access to area sites:

Knoxville, TN and United States Averages Comparison: Children Demographics		
Minors Surveyed	Knoxville Average	National Average
Under 5 years	10,469.00	20,385,773
5 to 9 years	10,338.00	19,748,765
10 to 14 years	6,838.00	20,678,265
15 to 19 years	15,123.00	21,697,322

Figure 2. Knoxville, TN Children (American Community Survey Estimates, 2006)

Of Knoxville residents at least five years old in 2006, 22% reported disability. The likelihood of having a disability varied by age: from 10% of people 5-15 years old, to 18% of people 16-64 years old, and to 48% of those 65 and up. This is slightly higher than the national average. South Knoxville houses many disabled elderly on oxygen tanks and in wheelchairs, whose reduced mobility puts them at the mercy of their location. Addressing existing brownfields in this area is a huge start to increasing quality of life for these people.

b. Financial Need

i) The economic impacts of brownfields, including levels of poverty, household income, and unemployment rates demonstrating the economic needs of South Knoxville:

Knoxville poverty levels are consistently higher than the national average. In 2006, 24% of people in Knoxville City limits were in poverty, compared to 13% nationally. About 8.3% are currently unemployed, compared to the national average of 6.5% (Bureau of Labor Statistics, 2008). The following Figure 3 is a poverty breakdown, which occurs in concentration around brownfield sites:

Percentage of Knoxville, TN and United States Families and People Whose Income is Below Poverty		
Families and People Surveyed	Knoxville Average	National Average
All families	16.70%	9.80%
With related children under 18 years	26.70%	15.00%
With related children under 5 years only	36.00%	15.90%
Married couple families	7.90%	4.70%
With related children under 18 years	12.80%	6.50%
With related children under 5 years only	22.00%	6.10%
Families with female householder, no husband present	43.20%	28.60%
With related children under 18 years	51.10%	36.90%
With related children under 5 years only	60.80%	45.20%
All people	24.00%	13.30%
Under 18 years	31.10%	18.30%
Related children under 18 years	30.40%	17.90%
Related children under 5 years	41.80%	21.00%
Related children 5 to 17 years	24.80%	16.70%
18 years and over	22.20%	11.60%
18 to 64 years	23.90%	12.00%
65 years and over	14.40%	9.90%
People in families	18.00%	10.80%
Unrelated individuals 15 years and over	36.70%	24.40%

Figure 3. Knoxville, TN Poverty (American Community Survey Estimates, 2006)

The median income of households in Knoxville in 2006 was \$30,239, compared to \$48,451 nationally. Seventy-six percent of the households received earnings and 16% received retirement income other than Social Security. Twenty-seven percent of the households received Social Security. The average income from Social Security was \$13,575 (Knoxville Metropolitan Planning Commission, 2008).

ii) Factors, including fiscal condition and population size, limiting our ability to draw on other sources of funding for assessment of brownfield sites:

South Knoxville is not heavily populated, and its residential areas are squeezed around assorted functioning and defunct industry. As evidenced in the preceding data, the population is not financially influential and a significant portion in South Knoxville residents are underemployed, unemployed, disabled, or on some form of government assistance. The area has been consistently overlooked by grant funding, capitol project budgets, and local assistance efforts. Many are aware of the presence of environmental contaminants in their lives but accept it as part of living in the area.

In spite of proximity to water, property values in South Knoxville are low and often require expensive remediation upon purchase, making them costly investments for developers. Due to the amount of underutilized land, the tax base is also quite low (Knox County Trustee's Office, 2008), making the redevelopment of this area crucial to its economy. A return on investment study for the first South Knoxville brownfield site (over 5 acres, enrolled in the Voluntary Cleanup, Oversight, and Assistance Program with Tennessee Department of Environment and Conservation) currently under remediation and development show a before-development tax base of \$10,551 and an after-development tax base of \$756,000 with residential use.

The City of Knoxville is preparing to invest heavily in South Knoxville infrastructure and public amenities to spur private development, and subsequently seeks funds for required Phase I and II assessments from sources other than the allocated capitol budget, which is being used to cover the costly design and construction budgets planned for this area.

2. Project Description and Feasibility of Success

The following describes the project to be funded under this grant, specifically: reasonable approach, sufficient resources, and capability to complete in a timely manner. This proposal budgets grant funds mainly for conducting Phase I and II site assessments, though some inventory and planning activities will come out of the requested amount.

a. Project Description

i) Description of the proposed project to be funded under this grant:

To provide background for the project to be funded under this grant, in 2005 Knoxville began planning South Knoxville revitalization. The Public was involved throughout the open visioning process and participated in over 50 meetings and workshops in 2 years, resulting in a high level of community support. Revitalization efforts are grounded on a 20-year Vision and Action Plan, as well as a redevelopment and Tax Increment Financing district, and a form based code. The South Waterfront revitalization will redevelop a historically industrial and blighted area through public-private partnerships. Built on the planning process described above, this grant proposes the following:

1.) Inventory Process: There has been no formal brownfield inventory. Knoxville Community Development Corporation conducted an inventory of blighted properties that met specific criteria set by the Advisory Board, and should this grant be awarded will continue to act as a property inventory resource to the City, providing the City of Knoxville with an accurate description of number and types of brownfields that meet Environmental Protection Agency criteria within the redevelopment area.

2.) Site Selection Process: After the inventory is conducted by Knoxville Community Development Corporation, a Brownfield Technical Committee will be formed, comprised of members of the community as represented in Section 3, members of applicable local organizations that were on the South Waterfront's Schematic Design Technical Committee, and City staff consistently involved in South Knoxville public improvement projects. Sites will be selected for Phase I and II Assessments based on their proximity to areas planned for public improvements and community need. Any land the City must acquire for public right of way and park and green space will be used as a starting point

for selection. The South Waterfront Vision Plan incorporates at least 7 park areas as well as a riverwalk along the waterfront, and these sites will be considered first. From a combination of community input and the Vision Plan, eligible sites will be prioritized based on the following: a willing and able developer, cooperative property owners and willing sellers, availability of project specific capitol funds from the City for partnership, economic impact based on return on investment analysis including tax base increase potential, community prioritization and potential health and quality of life impacts, potential protection for natural and historical resources, and an end product that fits with the intent of the South Waterfront Vision Plan. This targeted corridor was selected based on its redevelopment and economic potential and its underutilized lands. As we move into vision plan implementation, we see a need for Phase I and II assessment funds.

3.) Approximate Number of Phase I & II planned: There are approximately 20 brownfield sites in the waterfront, at least 10 that have potential hazardous substances, and 10 with petroleum issues. Based on prior land use and a low legal tolerance for risk, we have yet to do a Phase I that has not required a Phase II. It is anticipated that both will be needed per site, and understood that Phase II assessments are subject to meeting site specific eligibility requirement and approval from the Environmental Protection Agency.

Access is a vital component to successfully conducting environmental assessments. Very little of the land in the South Knoxville redevelopment area is publically owned. Such land belongs either to the Tennessee Valley Authority or the City of Knoxville, and conducting assessments on these lands is a matter of notification. Most of the assessments requested under this grant will be conducted on private property.

In our initial Phase I and II assessments, we have found that access becomes unreliable on private property and have developed an access request form through the City Legal Department. In the event that an owner decides not to sign the form, Knoxville Community Development Corporation will approach them on the City's behalf to discuss the reasons for the request and to highlight the benefits of the program, of the assessments, and Tennessee Department of Environment and Conservation incentives for brownfield redevelopment, such as oversight and cleanup guidance. We will work closely with Tennessee Department of Environment and Conservation to insure all Phase II assessments are compliant with Phase II standards as outlined in ASTM E1903-97.

b. Budget for Environmental Protection Agency Funding and Leveraging Other Resources

i) Figure 4 identifies specific tasks for which Environmental Protection Agency funding will be used, including costs by budget category associated with each task. Each task is described in detail, including basis for estimated cost and projected outputs where possible.

Obtaining brownfield assessment funds is a first step to the redevelopment of the area. The Brownfield Technical Committee will comply with the Environmental Protection Agency's grant terms and conditions, and the grant will comply with all procurement procedures as outlined in grant administration guidelines 40 CFR 31.36. In kind services are not shown in the budget, but include execution of programmatic activities and area redevelopment, a return on investment that will well exceed initial Environmental

Protection Agency environmental assessment investment. The following budget requests a total of \$400,000 under the combined hazardous substance and petroleum request to be spent in 3 years: \$350,000 of the funding is for environmental site assessments, \$24,000 for remedial planning, \$18,000 for Program Development, \$5,000 for site inventory, and \$3,000 for community outreach, which includes travel expenses for Environmental Protection Agency Region 4 Brownfields grantee workshops and 2 National Brownfields Conferences. The \$1,000 budgeted for supplies will cover informational mailings, advertising expenses, and meeting facility rental.

Budget Categories	Project Tasks				
	Community Outreach	Program Development	Regional Inventory	Phase I & II Assessments	Preliminary Remedial Planning
Personnel					
Fringe Benefits					
Travel (1)		\$6,000			\$4,000
Equipment (2)					
Supplies	\$1,000				
Contractual (3)		\$7,000	\$5,000	\$350,000	\$20,000
Other (marketing)	\$2,000	\$5,000			
Total	\$3,000	\$18,000	\$5,000	\$350,000	\$24,000
Total grant request	\$400,000				

Figure 4. City of Knoxville TN 2009 Assessment Grant Request Budget Proposal

Community Outreach: This task includes meetings, publicity, and distribution of information to the public as the project progresses. At a minimum, 1 public meeting will be held to introduce the work to the community, and they will be updated through the newsletter and project specific openhouses as the work progresses.

Program Development: This task includes grant set up and research of other programs in the region who have successfully managed Environmental Protection Agency assessment funding, documentation of guiding procedures and principals, establishing committees and priority criteria for inventory ranking, media distribution, education, and training.

Project Area Inventory: This task is the survey of hazardous substance and petroleum brownfields sites in South Knoxville, and includes property ranking according to the criteria established in Section 2 a i). Estimated at \$5,000, it includes Knoxville's Community Development Corporation efforts.

Phase 1 & II Environmental Site Assessments: This task includes regulatory review, historical records review, site visits to subject sites and surrounding properties, and interviews with property owners and relevant others. It is anticipated that a Phase I assessment will be conducted on a minimum of 20 sites at an average cost of \$2,500 per site. It is also anticipated that 20 Phase II assessments will be conducted pending Environmental Protection Agency approval at an average cost of \$15,000 per site. This budget item includes preparation of a Quality Assurance Plan and detailed investigation

plans for sites of interest developed based on Phase I findings. To the extent practical with available funds, sampling and testing may include waste characterization of materials stored on site for disposal purposes, ground water sampling of existing monitoring wells, and soil gas surveys utilized for preliminary screening purposes. Phase II assessments will also include survey of buildings to identify asbestos containing building materials or lead based paint. Phase II assessments will meet site-specific eligibility and Environmental Protection Agency approval.

Preliminary Remedial Planning: This task includes an evaluation of soil, groundwater, and sediment analytical results to characterize the impacted media, type of contaminants, and the extent of contamination so that the preliminary remedial planning can be accomplished, and data gaps identified. Location, type, condition, and quantity of asbestos containing building materials and lead based paint will be defined to develop management and abatement plans as part of remedial planning. The \$24,000 budgeted estimates necessary contracted expenses.

ii) Leveraging

If assessments determine additional assessment or cleanup work may be required, the following describes the funding and resources we have and will seek to complete the additional work. Also described are other sources of funding that we have and are seeking to ensure the successful revitalization of brownfield sites assessed with this grant.

Knoxville's South Waterfront will benefit from the Environmental Protection Agency brownfield funding by allowing capitol funds already allocated to the area's redevelopment to be used for design and construction of public improvements as they dovetail with private redevelopment of brownfield sites. Being able to provide required assessments for both public and private redevelopment will provide added incentive for investment of private funds into the area. The primary strategy of the 20-year Action Plan is to support over \$800 million in private, market-driven redevelopment through construction of \$139 million in public improvements. Phase 1 plans for \$60,800,000 in investment. To date, four sources of funding are available to implement the Vision Plan:

- 1.) A \$2,800,000 project-specific Tax Increment Financing plan was created in 2006 for the Cityview condominium project. Tax Increment Financing funding is designated for land acquisition and construction of the first portion of the 3 mile riverwalk.
- 2.) A Tax Increment Financing district encompassing the entire South Waterfront approved by City Council in 2006 has an expected yield of \$44,000,000 over 20 years.
- 3.) A \$6,000,000 High Priority Projects award (Project #4983 – Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users) was approved in 2005 for the South Waterfront; matching capitol funds are being reserved through 2010.
- 4.) Since 2006, the City of Knoxville has allocated \$15,200,000 in capitol funds to the South Waterfront, which is serving as the partial design and construction budget for Phase I projects.

The City of Knoxville invested \$2,300,000 in consultant services for the preparation of the South Waterfront Vision Plan, Action Plan, and Phase I Schematic Design of the South Waterfront. To date, Knoxville has also secured 38% of the total public

improvements funding needed over the next 20 years (\$52,800,000 of \$139,000,000). In the 2007 shift from visioning to implementation, the South Waterfront Development Department was created, allowing this to be a well-attended effort. Public involvement continues into implementation, with distribution of monthly progress newsletters, open Advisory Board meetings, quarterly neighborhood meetings, project design workshops, and as-needed open houses.

Any Brownfield funding gaps that Environmental Protection Agency dollars will not address can be filled through capitol funds. As shown by investment, the City of Knoxville is highly committed to this project, presenting an extremely low level of incompleteness risk to agencies considering portions of it for grant funding. If this project is funded, it will be completed within the allotted 3 years.

c. Programmatic Capability

i) Currently or Has Ever Received an Environmental Protection Agency Brownfields Grant:

The City of Knoxville South Waterfront has never received an Environmental Protection Agency Brownfields grant of any kind.

ii) Has Not Received an Environmental Protection Agency Brownfields Grant but has received other federal or non-federal assistance agreements:

To date, the South Waterfront has received only 1 federally funded assistance agreement. This is the previously mentioned High Priority Projects award under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users. The South Waterfront award is Project #4983: TN Improvements to the Blount / Sevier Corridor in Knoxville, Tennessee, and supports the South Waterfront Redevelopment Project with \$6,000,000. A total of 5,091 projects were identified in 2005, each with a specified amount of funding by contract authority. Funding accumulates over 5 years and is available until expended, only for transportation improvements. The Federal share is up to 80%, reimbursable to the City. Matching capitol funds are being reserved through 2010 for the rework of an old railroad underpass and associated green space and public improvements. We will draft a contract with Tennessee Department of Transportation in 2009, but have been waiting for capitol funding to accumulate since 2005.

As the South Waterfront Department was established late 2007, we don't have yet have a departmental history of managing grants. However, one of our community-based organizational partners (Todd Napier with the Knox County Development Corporation) received and successfully managed a \$200,000 Environmental Protection Agency assessment grant in 2004, and will be a significant asset to the City of Knoxville should we receive this grant. Also, the systems we have in place to acquire the requisite expertise and resources required to perform the proposed project are healthy and significant. South Waterfront staff has managed grants during tenure with other organizations, and the City of Knoxville has an experienced Grants Coordinator housed in our financial department who oversees the accounting associated with all grant agreements the City is involved in. This position sets up accounts for awarded funds and provides financial oversight to all City Departments managing awarded grants.

Our ability to manage the brownfields grant we are applying for and our ability to successfully perform all phases of work under this grant hinges on this in-house financial and South Waterfront Departmental expertise, as well as the software the City employs to track grants. The City of Knoxville uses ORBIT, which has an entire subsystem designated to financially manage grants. Departmental representatives are given Grants User permissions, and an ORBIT invoicing system allows for tracking of individual expenditure draws. This enables both the City and the grantor organization to be as detailed as guidelines demand regarding expenditure of grant funding, based on approved and agreed upon budgets. The South Waterfront Department works closely with other City of Knoxville departments successfully managing federal and state grants, including Finance, Engineering, Community Development, and Policy and Planning, and will draw on that expertise in managing grants awarded to us in the future.

Our staff expertise and qualifications will be relied upon to manage the grant from award to completion. In addition to the experienced and qualified staff we rely on in other departments, the South Waterfront Department consists of 2 full time staff. Possessing a combination of 12 years of higher environmental education and over 30 years of applicable working experience insures that we are capable of executing all phases of the work to be performed under this grant. Dave Hill, South Waterfront Senior Director, has a B.S. in Environmental Science (Associates in Forestry Technology) and a Master of Science in Landscape Architecture. His career spans over 25 years in Planning, Development, and City management, and he has managed grants in several positions over the years, successfully navigating varying state and federal regulations and requirements.

Susanna Bass, South Waterfront Project Manager, has a B.S. in Environmental Studies (Forestry Minor) and a Master of Science in Biosystems Engineering Technology. To date, her career includes over 6 years of government experience in civil, state, and federal positions, with an emphasis on improving water quality in both Tennessee and Alabama. During her time with the Tennessee Valley Authority, Susanna managed watershed improvement projects funded with state and federal grants, and is experienced performing and managing these agreements, including meeting and complying with reporting requirements, submitting final acceptable technical reports, and reporting on progress made towards achieving the results under those agreements. She is also experienced with the ORBIT software, and is registered as an ORBIT Grants User. She will be responsible for managing this grant if awarded, and will work closely with the City's Grant Coordinator to insure this is done to both City and Environmental Protection Agency satisfaction. The City of Knoxville has not had any adverse audit findings and have not had to correct problems associated with such.

Environmental Consultants are currently under contract to provide professional environmental oversight and technical expertise for the conversion of over 5 acres of brownfield to a public park and road system associated with new residential development. The selection process complied with the City of Knoxville's procurement regulations and submitting firms were ranked on the previous experience of the Principals and team members, their percent of time designated to the project, their relationship with Tennessee Department of Environment and Conservation, and familiarity with the Voluntary Cleanup, Oversight, and Assistance Program and the project area. This same firm will not automatically be guaranteed work involved in this brownfield assessment

project, but will be subject by law to resubmit qualifications with other interested firms. The same process will be used to evaluate all candidates, which will ensure the winning candidate will be most qualified to do the work.

3. Community Engagement and Partnerships

a. The following is a discussion for our plan for involving the affected community (neighborhood organizations, citizens' groups, redevelopers, and other stakeholders) in site selection for assessments, cleanup decisions, or reuse planning, including activities that have already occurred. Also described is our plan for communicating the progress of our project to citizens.

The targeting community is already engaged in the Plan for the South Knoxville Waterfront Redevelopment, and channels for engaging them in the work covered in this grant are already firmly established. Due to the publicity of the vision over the past 3 years which included over 50 public meetings, workshops, and openhouses, the waterfront documentation at <http://www.cityofknoxville.org/southwaterfront>, and the monthly newsletter with over 700 mail and email recipients, community members understand and embrace the waterfront as sustainable redevelopment. Neighborhood organizations, citizens' groups, redevelopers, and stakeholders are treated with equality and privy to the same information, and are in the habit of calling with any questions.

Brownfields assessment will fit in well with the community's understanding of the intent of this project because sustainability is a key element in the vision for the South Waterfront. The form based code requires from the private developer a level of tree preservation, environmental and archaeological reports, pervious parking lots with vegetated medians, plant maximization, slope planting for erosion prevention, dark skies compliance, first flush detention, capability to obtain Leadership in Energy and Environmental Design certification, shade provision, and Energy Star compliant roofs. South Waterfront public spaces, many of which are currently brownfields, will be designed to work within the natural restraints and maximize the natural benefits of each site, resulting in environmentally sensitive areas that will educate the community on sustainable brownfield redevelopment.

The South Waterfront 5 acre park design and associated road redevelopment is the first public improvement within the project area to develop on brownfield sites. Comments received at a recent Road and Park Design workshops placed emphasis on the environment, showing that the community not only accepts this level of commitment to green infrastructure but holds the City to these standards in the waterfront. Both park and road design teams are planning public outreach opportunities and information kiosks throughout the project site. In addition to explaining the waterfront's green street design in physical locations throughout the project area, brownfield redevelopment will be explained as well, because the new roads and park will be located on old industrial sites. Brownfield work will also be communicated monthly in newsletters, on the website, in our quarterly community meetings, and piggy-backed onto project update openhouses.

English is the primary community language and will continue to be used for this communication. Brownfield updates will be shared in community quarterly meetings as well as 1 kickoff meeting at a minimum. Meetings will continue to be located in the

community in easily accessible public facilities (past locations have included accessible churches, schools, and community centers) and will continue to be held after working hours to accommodate community work schedules. As always, comment cards will be provided. Comments will be posted on the website and addressed individually.

Through our monthly newsletter staff activities section, the community is already aware of this grant application submission. If the grant is awarded, it will be announced in the newsletter with a time and place for a community meeting to introduce the grant budget and guidelines. Prior to having the community meeting, South Waterfront staff will pull together the Brownfield Technical Committee, which will meet to establish communication flow and organization roles. The direction of the Brownfield Technical Committee will be communicated at the community meeting, and monthly updates will be put into the newsletter as environmental site assessment progress occurs.

b. The following describes our efforts and plans to develop partnerships with our local and state environmental and health agencies, and other relevant governmental agencies to ensure our brownfields project is successful.

Tennessee Department of Environment and Conservation has already become involved in the redevelopment of South Knoxville, as the park and road project was enrolled in the Voluntary Cleanup, Oversight, and Assistance Program in August 2008; upon learning of this project, Tennessee Department of Environment and Conservation suggested that assessment grant funding should be sought from Environmental Protection Agency to support the South Knoxville redevelopment. We have encouraged our committed residential developer associated with the park and road project to enroll his land as well, and prepared a Voluntary Cleanup, Oversight, and Assistance Program application for him to submit. Our environmental consultants are working with Tennessee Department of Environment and Conservation to prepare a Remedial Action and Environmental Redevelopment Work Plan. The Remedial Action and Environmental Redevelopment Strategy will be presented to Tennessee Department of Environment and Conservation for approval; the presentation will provide an overview the existing environmental conditions and how these conditions could impact plans for development based on intended type. These discussions will form the basis for the risk assessment approach.

Depending on the results of the environmental sampling and risk assessment, a remediation strategy will also be presented that will evaluate up to two remedial approaches under consideration for the site. Site sampling data will be used to update understanding of the extent of contamination and to conduct the risk assessment. These will form the basis for the final remediation design. Recommended remediation design will be presented at a meeting held with the design teams to insure clear understanding of the approach. The final remediation approach and supporting technical justification will be incorporated into the Remedial Action and Environmental Redevelopment Work Plan submitted to Tennessee Department of Environment and Conservation for approval. The approved plan will become a part of the bid documents prepared to guide construction of the development and the integrated remediation.

Meetings with other relevant government agencies will be requested as the need arises. Our local health department will be contacted upon the award of this grant to ascertain how they would like to be involved. We will rely on continual communication with

consultants and with Tennessee Department of Environment and Conservation to inform us of state regulations pre and post cleanup, for cleanup completion certifications, and for technical assistance.

c. The following are descriptions and roles of the key community-based organizations involved in this project. Attached letters from the community-based organizations mentioned below describe their roles and affirm referenced commitments.

Over the past 5 years, the South Knoxville Waterfront redevelopment plan has matured only with the cooperation of the community and through local partnerships. At some point most community organizations in Knoxville have been involved with this project. Though many more have been active, the ones profiled in the following section have been some of our closest and most consistent partners. Community-based organizations will be given the opportunity to review this grant's proposed work plan if awarded.

The Development Corporation of Knox County:

Since Knoxville South Waterfront inception, staff from the Development Corporation of Knox County has sat on both the South Waterfront Technical Committee and the Oversight Committee, and have been involved in the return on investment study details. They have provided local data to hired consultants for the Visioning and Action Plan process, and sat on the South Waterfront Schematic Design Review Committee. They will comment on our Environmental Protection Agency work plan and sit on our Brownfield Technical Committee if we are awarded this grant. Their primary role has been and will continue to be provision of technical assistance and quality assurance to the South Waterfront Department. They will be an especially beneficial partner in Brownfields coordination, as Todd Napier of the Development Corporation was awarded and successfully administered a \$200,000 assessment grant for Knox County in 2004.

Knoxville's Community Development Corporation:

Knoxville's Community Development Corporation acts as the arm of the City in all redevelopment areas and is by law Knoxville's exclusive redevelopment and urban renewal authority. Knoxville's Community Development Corporation assists in administering redevelopment powers in this area, including but not limited to acquiring real property to remove, prevent or reduce blight, blighting factors, or the causes of blight. To this end, Knoxville's Community Development Corporation administers the South Waterfront Advisory Board, whose sole purpose is to review properties in the inventory for elements of dilapidation and blight and make recommendations to Knoxville's Community Development Corporation on appropriate actions to take.

In addition, Knoxville's Community Development Corporation acquires real property where the condition of title, the diverse ownership of the real property to be assembled, the street or lot layouts, or other conditions prevent proper development. Knoxville's Community Development Corporation also acquires real property for the City of Knoxville where acquisition of the area is necessary to carry out the redevelopment plan. In addition to these services, Knoxville's Community Development Corporation meets with South Waterfront staff monthly to go over any issues, and is currently holding the public improvement land and managing the project specific Tax Increment Financing

mentioned in Section 2 b iii). They will be on the Brownfield Technical Committee and will be primary conductor of the brownfield site inventory if the grant is awarded.

Knoxville Rowing Association:

The South Waterfront Department has been working with Knoxville Rowing Association to insure the preservation of the rowing lanes used for their Regattas. In the process, Knoxville Rowing Association has provided valuable insight into community and special user group interests, and has been represented on consultant selection committees for various design projects. Knoxville Rowing Association has been a stakeholder consistently in favor of the redevelopment of the waterfront, and mainly serves in capacity of community representation and volunteer time.

Old Sevier Community Group:

The Old Sevier Community Group has been actively involved in the planning process for the Knoxville South Waterfront redevelopment. They are partially located on the Tennessee River within the redevelopment boundary, and have an interest in insuring responsible and quality development. They have hosted South Waterfront staff at their own meetings to allow us to provide redevelopment updates, and have been represented in attendance at each of the community meetings. The Old Sevier Community Group has provided feedback on communication and design issues, and continues to be a sounding board for redevelopment strategies.

4. Project Benefits

The following explains the extent to which the project’s anticipated outcomes promote general welfare through the improvement of the public health and safety, economy, and environment of the targeted community, and how these outcomes will contribute to our overall community vision for the revitalization of brownfield sites.

a. Welfare and/or Public Health

Environmental, social, and public health benefits anticipated from the redevelopment of sites assessed under this grant, and how nearby and sensitive populations in our targeted community will be protected from contaminants during assessment work conducted on brownfield sites under this grant:

Of the estimated 20 abandoned, idle, and underused industrial and commercial sites ranging from a buildable lot size to several acres in size, 10 have potential for hazardous substances (asbestos, perchloroethylene, arsenic, lead), and 10 have potential for petroleum contamination (drums and underground tanks, hydrocarbon soil contamination) within the project area. Site characterization through Phase I & II assessments funded by this grant will be used to determine possible health risks and to take affirmative action recommended by Tennessee Department of Environment and Conservation and contracted Environmental Consultants to reduce those risks in South Knoxville. A significant portion of anticipated benefits of redevelopment include reduction of community risk of exposure to these brownfield sites, including: securing them so they can no longer pose an attractive nuisance to the children of the area, containing contaminants onsite, and checking the stormwater routes to ensure water is not moving uncontrolled off site. Inventory and site selection will identify high risk brownfields, which will be addressed first. Assessment of individual brownfields will

provide more comprehensive knowledge of the specific contaminants we are dealing with, and allow us to plan for and address remediation of them in safe and effective ways.

Redevelopment of brownfields will be sustainable as mandated in South Knoxville's Form Based Code, which emphasizes low impact development and requires builders to be able to obtain Leadership in Energy and Environmental Design certification for new structures. The code also mandates use of pervious pavement, and vegetative management strategies for stormwater and first flush requirements. It concentrates density and focuses on public access to the water, allowing for maximization of green spaces throughout the redevelopment area. On our first brownfield redevelopment site, the private developer is considering using the Tennessee River to geothermally heat and cool his townhomes and condos. He is also installing Energy Star appliances and concentrating storm water runoff through a wetland within the park area, allowing it to filter brownfield contaminants from runoff prior to river entry. Environmental and energy conservation ideas such as this fit with Knoxville's South Waterfront's vision.

Redevelopment of our brownfield sites will consider all environmental effects of remedial implementation, and incorporate options to maximize net environmental benefits to clean up actions associated with each site. This mindset extends to the remediation process as well, as we will seek to be as surgical in the handling of necessary remediation methods and tasks. Nonhazardous materials created from the demolition of buildings will be recycled to the fullest extent possible, including any uncontaminated brick, untreated wood, metal, gypsum wall board, concrete, asphalt paving, roofing material, and architectural salvage materials. Demolition contractors will be under the supervision of environmental professionals reporting directly to the City, to insure contaminated materials stay on site or are disposed of in a manner that complies with the remedial plan and Tennessee Department of Environment and Conservation recommendations. Contractors selected for the work will be chosen partially on the capacity and maintenance levels of their equipment, and instructed to be conservative in equipment operation for cleanup and construction tasks.

One Phase II assessment has been completed to date within the South Knoxville redevelopment area, and has pointed to the presence carcinogenic substances, specifically arsenic and lead in soil analytical results. Groundwater samples in this area exhibited trace amounts of each, which were attributed to sedimentation, and soil samples exhibited a faint petroleum odor pointing to the presence of possible underground storage tanks. This site is of significant size and has housed many and varied industrial uses over the past century. It is anticipated that similar conditions will be found throughout the redevelopment area, possibly to a much worse extent.

South Knoxville is surrounded by water, in the form of quarries, streams, and the dam controlled Tennessee River (Ft. Loudoun Reservoir). The South Waterfront Redevelopment area stretches between Goose and Baker Creeks, both category 5 streams and chronic Tennessee State 303d List occupants. Goose Creek has 4.9 miles impacted by pathogens, siltation, and habitat alteration due to collection system failure and municipal separate storm sewer system area discharges, and polychlorinated biphenyls due to presence of a Superfund Site in proximity to this project area. Baker Creek has 3.3 miles impacted by pathogens, nitrates, and habitat alterations due to collection system

failure and municipal separate storm sewer system area discharges. Both discharge into Ft. Loudoun Reservoir, which is also 303d listed (Category 5, 14,600 acres) for contaminated sediment and has fishing advisories due to polychlorinated biphenyls. Both groundwater and runoff has the potential to be significantly improved after remediation of brownfield sites, which will not only be a positive contribution to the immediate community, but will contribute to the communities downstream. The Tennessee River system flows through 8 states, 6 of which are downstream of Knoxville. Regionally, efforts towards improving water quality made by individual communities matter, and remediating our riverbank brownfields will positively affect the southeast region.

As stated in the Community Needs section of this grant, brownfield assessment and, ultimately, revitalization needs to mitigate our community health and crime issues as much as possible. Though brownfields revitalization cannot singlehandedly wipe out diabetes, asthma, and crime in South Knoxville, it can work to reduce them by providing green spaces for exercise as planned in the vision for the area, vegetation in place of pavement to improve air quality, a sense of renewed pride in the area, and a reduction of places attractive to vandals. Improving the economics of the area by improving the environment will directly result in greater mental and physical health opportunities for the community.

b. Economic Benefits and/or Greenspace

i) The following describes how this grant will produce economic benefits, such as increased employment and expanded tax base, through the redevelopment of sites assessed under this grant:

Quantitative estimates of economic benefits through increased employment opportunities and an expanded tax base are very positive. Currently the South Knoxville revitalization effort has \$82,000,000 in known Funding Sources: \$34,600,000 from the South Waterfront TIF District, \$7,400,000 from the Federal Transportation Grant and the City's 20% match, and \$40,000,000 (\$2,000,000 annually over 20 years) from City of Knoxville capitol funds. This leaves a current funding gap is \$57,000,000. Potential Sources to make up this difference over the 20 year plan include private donations, State & Federal Grants, and potential user fees. The return on investment for the City is that each \$1.00 of public improvement funding leverages \$5.82 of private investment. The South Waterfront Redevelopment Plan estimates an economic impact of \$157,200,000 as shown in Figure 5:

Knoxville South Waterfront Redevelopment Return on Investment Study, 2006		
City Tax Return on Investment		
	Real Property Tax	\$42,000,000
	Personal Property Tax	\$1,000,000
	Bond Retirement Fund	\$15,200,000
	Parking Revenues	\$7,400,000
	Special Assessment	\$4,700,000
	Sales Tax	\$2,000,000
	Hotel Tax	\$1,400,000
County Tax Return on Investment		
	Real Property Tax	\$55,400,000
	Personal Property Tax	\$1,300,000
School District Return on Investment		
	Sales Tax	\$5,000,000
State Return on Investment		
	Sales Tax	\$21,800,000
Total Return on Investment		\$157,200,000

Figure 5. South Knoxville Redevelopment Return on Investment Study (2006)

ii) The following describes other non-economic benefits associated with sites to be reused for greenspace and other not-for-profit activities:

Areas redeveloped for uses such as parks, recreation areas, greenways, or environmental buffers afford previously mentioned mental and physical health benefits to community and regional users, as well as a place to watch events and participate in the natural heritage of the area. Greenspace development reduces pressure to develop greenfields, or previously undeveloped lands, and reduces the amount of urban sprawl facilitated by development. The South Knoxville vision maximizes brownfield redevelopment into greenspace and outdoor amenities. Major public improvement elements include 1,900 new parking spaces, 2.2 miles of new street construction, 2.1 miles of existing street reconstruction, 51.3 acres of new parks, open space and trails, a new river-spanning pedestrian bridge, 2,200 Residential Units, 60,000 square feet of retail space, 400,000 square feet of office space, a 100-room hotel, 30,000 square feet of restaurant and entertainment space, 225 marina slips, and 135,000 square feet of cultural institution space, all located on previously developed lands.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

Anticipated environmental benefits, beyond the assessment and remediation of contaminants, associated with the sustainable redevelopment of sites assessed under this grant include the following:

There are numerous economic, environmental and social benefits that Knoxville expects from the assessment and cleanup of brownfields sites. Economic benefits include an increase in local tax base and new job growth as shown in Figure 5. There are numerous tax incentives from both state and local governments available for brownfields projects which we plan on tapping once the sites have been assessed and marketed successfully.

Environmental and social benefits in the South Knoxville Vision Plan include reuse of existing infrastructure such as utilities and public transit, reduction of development pressure on surrounding greenfields, prevention of sprawl, improved air quality, and reduction of natural habitat destruction. Many brownfield assessments conducted reveal that no clean up is necessary and that the site is ready for development. Should this be true in our case, it will be beneficial for the tax revenue to the City of Knoxville and reduce the economic strain felt by developers. Overall, brownfield redevelopment will improve the health of the local community, who have been living with toxins and blight.

d. Plan for Tracking and Measuring Progress

Targeted outcomes include at least 20 sites assessed with Phase I and Phase II, for hazardous substances and petroleum in 3 years, with at least 20 acres of clean up. We are requesting \$400,000 in assessment grant funding to ultimately leverage \$814,000,000 in private cleanup and redevelopment investment dollars over the next 20 years within the redevelopment area. The standard Property Profile Reporting guidelines will be followed and the Standard Brownfields Property Reporting Form completed for each property, and will be used for each site to supplement Environmental Protection Agency mandated progress reports.

Several pieces of information in the Property Profile Form refer to leveraged activities. Typically, these are natural outcomes of the Environmental Protection Agency-funded activities such as cleanup jobs and funding at a property assessed with Environmental Protection Agency brownfields assessment grant funding. A demonstrable link or connection between the Environmental Protection Agency-funded activities and leveraged activities will be clearly stated and activities, funding, or accomplishments that occur prior to award of the Environmental Protection Agency grant will not be reported as leveraged, since the activity predates the award. In addition, the leveraged activity, funding, or accomplishment will only be reported when actually manifested. Projected numbers and other data, including expected jobs or uncommitted funding, will not be reported. Additionally, we will report milestone outcomes such as groundbreakings, funding acquired from currently unknown sources, public relations and outreach events and community meetings.

If awarded this grant, Property Profile Forms will be submitted when a property is identified for use of Environmental Protection Agency grant funds for assessment or planning activities. Property Profile Forms will be updated as activities such as assessment, cleanup, and redevelopment occur, and as accomplishments such as cleanup completed, redevelopment underway, and significant leveraged funding committed occur, and then submitted online or with the next required Progress Report. Our Property Profile Forms will be updated upon completion of a Phase II assessment, receipt of a no cleanup action document or determination, completion of cleanup activity, and initiation or completion of specific redevelopment projects. In addition, Property Profile Forms will be updated as the property background information changes. We will revise and submit updated Property Profile Forms for all targeted properties when the grant is being closed out.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Remediation
401 Church Street
4th Floor, L&C Annex
Nashville, TN 37243-1538

October 27, 2008

Environmental Protection Agency
Attn: Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: Brownfields Application for the City of Knoxville, Tennessee South Waterfront
Redevelopment Area

Dear Mr. West:

The City of Knoxville, Tennessee has created a South Waterfront redevelopment district of the south side of the Tennessee River as it flows through the heart of downtown Knoxville. This is a 3 mile long, 3 mile deep stretch of primarily abandoned industrial lands and blighted neighborhoods. The 20-year plan to redevelop Knoxville's South Waterfront has been well planned: based on extensive return on investment studies, Knoxville City Council has adopted a Vision and Action Plan, a Form Based Code, established a Tax Increment Financing District, and contracted for Schematic Design of the South Waterfront as a whole. When completed, the South Waterfront will provide major new recreational and economic opportunities for the area.

The Tennessee Department of Environment and Conservation (TDEC) has been working with the City of Knoxville South Waterfront Department under our Voluntary Cleanup Oversight and Assistance Program (VOAP) to create a brownfield agreement for the first South Waterfront public improvement, a Park and Road project. In addition to this site specific agreement, the South Waterfront Department has communicated to TDEC their intent to pursue EPA Assessment Grant funding for hazardous substances and petroleum for the South Waterfront redevelopment area as a whole as well as to fund any TDEC required assessments for public improvement sites. We support this application as an excellent use of designated brownfields funds for future recreational opportunities, which will be available to all citizens and visitors of the City.

Sincerely,

A handwritten signature in cursive script that reads "Andrew P. Shivas".

Andrew P. Shivas
Brownfields Coordinator
Division of Remediation
Tennessee Department of Environment and Conservation

The
**DEVELOPMENT
CORPORATION**
of Knox County

October 29, 2008

Environmental Protection Agency
Attn: Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: Brownfields Application for the City of Knoxville
Tennessee South Waterfront Redevelopment Area

Dear Mr. West:

The City of Knoxville, Tennessee has created a South Waterfront redevelopment district of the south side of the Tennessee River as it flows through the heart of downtown Knoxville. This is a 3 mile long, 3 mile deep stretch of primarily abandoned industrial lands and blighted neighborhoods. The 20-year plan to redevelop Knoxville's South Waterfront has been well planned: based on extensive return on investment studies, Knoxville City Council has adopted a Vision and Action Plan, a Form Based Code, established a Tax Increment Financing District, and contracted for Schematic Design of the South Waterfront as a whole. When completed, the South Waterfront will provide major new recreational and economic opportunities for the area, benefiting a diverse component of Tennessee's population in much the same way Chattanooga's 21st Century Waterfront already does.

The South Waterfront Department has communicated to us their intent to pursue EPA Assessment Grant funding (for hazardous substances and petroleum) for the South Waterfront redevelopment area as a whole, to fund TDEC required Phase I assessments for public improvement sites. As a nonprofit economic development organization working on behalf of the City of Knoxville and Knox County, we agree that this is an excellent use of designated brownfields funds for future economic development opportunities for all citizens of the City, County, and State. As our staff has been involved with various aspects of this project, we were requested to provide this letter in support the City of Knoxville's grant application.

Sincerely,



Todd A. Napier
Executive Vice President



P.O. Box 3550 • Knoxville, TN 37927-3550
(865) 403-1100 • Fax (865) 403-1117
(800) 848-0298 (Tennessee Relay Center)

November 4, 2008

Alvin J. Nance, Executive Director/CEO

Environmental Protection Agency
Attn: Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

RE: Brownfields Application for the City of Knoxville, Tennessee South Waterfront
Redevelopment Area

Dear Mr. West:

The City of Knoxville, Tennessee has created a South Waterfront redevelopment district of the south side of the Tennessee River as it flows through the heart of downtown Knoxville. This is a 3 mile long, 3 mile deep stretch of primarily abandoned industrial lands and blighted neighborhoods. The 20-year plan to redevelop Knoxville's South Waterfront has been well planned: based on extensive return on investment studies, Knoxville City Council has adopted a Vision and Action Plan, a Form Based Code, established a Tax Increment Financing District, and contracted for Schematic Design of the South Waterfront as a whole. When completed, the South Waterfront will provide major new recreational and economic opportunities for the area, benefiting a diverse component of Tennessee's population in much the same way Chattanooga's 21st Century Waterfront already does.

KCDC is the City of Knoxville's exclusive Redevelopment and Urban Renewal Authority. Knoxville's South Waterfront has been designated as a redevelopment area. KCDC assists the City of Knoxville in administering redevelopment powers in this area, including, but not limited to, acquiring real property to remove, prevent or reduce blight, blighting factors or the causes of blight. In addition, KCDC acquires real property where the condition of the title, the diverse ownership of the real property to be assembled, the street or lot layouts or other conditions prevent proper development and where the acquisition of the area is necessary to carry out a redevelopment plan.

The South Waterfront Department has communicated to TDEC and to us their intent to pursue EPA Assessment Grant funding (for hazardous substances and petroleum) for the South Waterfront redevelopment area as a whole, to fund TDEC required Phase I

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Environmental Protection Agency

Attn: Don West

November 4, 2008

Page 2

assessments for public improvement sites. Through our involvement with this project, we were requested to provide this letter in support the City of Knoxville's grant application. We agree that this is an excellent use of designated brownfields funds for future recreational opportunities, which will be available to all citizens of the City, County, and State, as well as our visitors.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alvin Nance', with a long horizontal flourish extending to the right.

Alvin Nance
Executive Director/CEO



November 13, 2007

Environmental Protection Agency
Attn: Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: Brownfields Application for the City of Knoxville, Tennessee South Waterfront
Redevelopment Area

Dear Mr. West:

I am writing on behalf of the Knoxville Rowing Association. KRA is a non-profit organization that teaches the sport of crew and individual rowing to people of all ages, from high school students to adults in their 70s. For the past 35 years, KRA has used Knoxville's downtown waterfront on the Tennessee River. We are pleased to see the revitalization of this area, most recently along the river's south shore.

The 20-year plan to redevelop Knoxville's South Waterfront has involved many groups and is based on community needs. Knoxville City Council has adopted a Vision and Action Plan, a Form Based Code, established a Tax Increment Financing District, and contracted for Schematic Design of the South Waterfront as a whole. When completed, the South Waterfront will provide major new recreational and economic opportunities for the area, benefiting a diverse component of Tennessee's population.

As a community group involved with this project, we were requested to provide this letter in support the City of Knoxville's grant application. We agree that this is an excellent use of designated brownfields funds for future recreational opportunities, which will be available to all citizens of the City, County, and State, as well as our visitors.

Sincerely,

Mary English
Chair, Community Relations
Knoxville Rowing Association

OLD SEVIER COMMUNITY GROUP
P.O. BOX 20062
KNOXVILLE, TN 37940

October 28, 2008

Environmental Protection Agency
Attn: Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: Brownfields Application for the City of Knoxville, Tennessee South Waterfront
Redevelopment Area

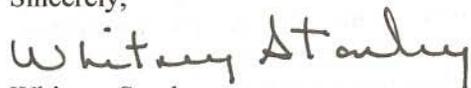
Dear Mr. West:

The City of Knoxville, Tennessee has created a South Waterfront redevelopment district of the south side of the Tennessee River as it flows through the heart of downtown Knoxville. This is a 3 mile long, 3 mile deep stretch of primarily abandoned industrial lands and blighted neighborhoods. The 20-year plan to redevelop Knoxville's South Waterfront has been well planned: based on extensive return on investment studies, Knoxville City Council has adopted a Vision and Action Plan, a Form Based Code, established a Tax Increment Financing District, and contracted for Schematic Design of the South Waterfront as a whole. When completed, the South Waterfront will provide major new recreational and economic opportunities for the area, benefiting a diverse component of Tennessee's population in much the same way Chattanooga's 21st Century Waterfront already does.

The South Waterfront Department has communicated to TDEC and to us their intent to pursue EPA Assessment Grant funding (for hazardous substances and petroleum) for the South Waterfront redevelopment area as a whole, to fund TDEC required Phase I assessments for public improvement sites. As a community group involved with this project, we were requested to provide this letter in support the City of Knoxville's grant application. We agree that this is an excellent use of designated brownfields funds for future recreational opportunities, which will be available to all citizens of the City, County, and State, as well as our visitors.

Our neighborhood group, Old Sevier Community Group, has been actively involved in the planning process concerning the south waterfront. A portion of our neighborhood is on the Tennessee River and our residents have a vested interest in striving for quality and responsible development. The City of Knoxville has worked tirelessly to ensure that Old Sevier has been a part of every stage in the process. Our neighborhood has confidence in a continued positive relationship with the City of Knoxville.

Sincerely,



Whitney Stanley
Member of the Steering Committee
Old Sevier Community Group