Section A. Executive Summary
Community partners will restore resiliency in Thomasville's low-income historic neighborhoods through three community-driven projects: (1) a community resilience hub, (2) repair of critical water infrastructure causing sewage backup into the neighborhoods, and (3) home improvement grants focused on improving energy efficiency and indoor air quality. Projects will focus on improving health outcomes, specifically asthma and upper respiratory disease, for priority populations with multiple vulnerabilities to climate change.

Application Title: Restoring Resiliency in Thomasville's Traditional Neighborhoods

Lead Applicant: City of Thomasville, GA ("City")

Statutory Partner to the Lead Applicant: Thomasville Community Development Corporation ("TCDC")

Contact Information:
[redacted]

Eligibility:
This is a Partnership between the lead applicant the City of Thomasville ("City"), a local government, and its statutory partner the Thomasville Community Development Corporation ("TCDC"), a non-profit under Section 501(c)(3) of the Internal Revenue Code and also a Community-Based Organization (CBO) whose mission is "to improve the quality of life and wealth creation opportunities for residents of Thomasville's under-invested neighborhoods."

Climate Action Strategies:
- CA-3: Energy-Efficient, Healthy, and Resilient Housing and Buildings
- CA-4: Microgrid Installation for Community Energy Resilience
- CA-5: Community Resilience Hubs
- CA-8: Workforce Development Programs for Occupations that Reduce Greenhouse Gas Emissions and Air Pollutants

Pollution Reduction Strategies:
- PR-1: Indoor Air Quality and Community Health Improvements
- PR-2: Outdoor Air Quality and Community Health Improvements
- PR-3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience

Grant Award Period: January 1, 2025-December 31, 2028

Amount of EPA Funding Requested: $19,805,900

Target Investment Area: N/A

Disadvantaged Community to benefit from the projects:
The Disadvantaged Community to benefit from the projects are residents of these EPAs Inflation Reduction Act (IRA)-Defined Disadvantaged Block Groups: 132759607012, 132759607021, 132759607022, 132759607023, 132759608003, 132759608004, 132759607013.

Other Sources of Funding: Due to the relevance of this NOFO to the proposed projects and in order to avoid duplicate funding, other sources of funding are not being pursued at this time. Based on our understanding, the proposed projects do not fit within the Infrastructure Investments and Jobs Act but align to the goals outlined by the EPA for this NOFO. Some weatherization funding for proposed projects may be covered under IIJA and may be pursued for future funding. As a non-entitlement community and often too large to be considered rural, our community struggles to access funding for environmental justice housing improvements through federal programs due to the difficult regulations. For these reasons, the Community Change Grant is the ideal grant source for this comprehensive strategy to transform Thomasville's distressed communities.

Section B. Project Work Plan
Part 1. Community-Driven Investments for Change

1.1 Community Vision Description
A. COMMUNITY DESCRIPTION - Thomasville is the county seat of Thomas County, Georgia. The city is the second-largest city in southwest Georgia (after Albany) with a population of 18,539. The city often gets accolades for its vibrant downtown, beautifully preserved historic neighborhoods, and the natural beauty of the surrounding longleaf pine forests. These amenities led to Thomasville's recent third place award in USA Today's "Best Small Town in the South." But, like many places with great wealth and beauty, Thomasville is a tale of two cities. While the majority of households in the downtown and northern neighborhoods of the city reside in picturesque, walkable neighborhoods, the majority of households residing in the Southside and Westside historic neighborhoods (identified as disadvantaged block groups) have historically experienced a legacy of redlining resulting in decades of divestment.

The project area was drawn to include these divested neighborhoods, including Inflation Reduction Act ("IRA")-designated and "Justice40" disadvantaged block groups 132759607012, 132759607021, 132759607022, 132759607023, 132759608003, 132759608004, 132759607013. Residents of the project area have strong familial ties and active religious lives. Over 25 houses of worship can be found in this 5.3 square mile area and are often hubs of neighborhood activity. Located 35 miles northeast of Tallahassee, Florida, the city is surrounded by historic plantations. This Red Hills Region of Georgia is home to one of the largest privately owned forests in the world-- over 400,000 acres of long-leaf pine. Nearby Tall Timbers Research Station (an international hub for prescribed fire science) has led Thomas County to being a national leader in prescribed burning. While this encouraged burning practice has created rich and diverse ecosystems in the surrounding forests, the ambient air quality in the city has suffered.

For the project, the identified Disadvantaged Block Groups have been divided into three Sub Areas later defined in this section. Those Sub Areas are aligned with the three major grant-funded project activities as follows: (1) The community resilience hub will take place in Sub

Area One; (2) A critical water infrastructure project will take place in Sub Area Two; and (3) the Home Improvement Grant Program will take place in Sub Area Three. While disadvantaged communities in the project area will benefit, the housing, health and safety benefits of these projects will accrue more directly to low-income residents living within the .49 square miles of historic neighborhoods within these block groups. The prioritization of households within these historic neighborhoods ensures concentrated impact and maximize benefit to the disadvantaged community.

Sub Area One (Census Block Group 132759607013) - Grant programming will center around a Community Resilience Hub ("hub," Climate Action Strategy 5) in Sub Area One, the historic Dewey City Neighborhood. To ensure a concentrated impact of the hub's programming, we will measure the percentage of sub area households participating in any hub programming and have a goal of reaching up to 175 disadvantaged households in the subarea (50% of the total households). As of the last census, the 1.01 square-mile block group (15% of total project area) contained 351 households, 31% of which are owner-occupied, and 100% of whom are people of color. The per capita income is $17,385. The Dewey City neighborhood has been culturally significant since the conclusion of the Civil War when the area was made available exclusively for freed slaves to purchase and build homes. The first school for Black students in Thomasville was also opened on the Douglass School site in the early 1900s. The campus has served as a hub for learning, voting, and gathering ever since. "During the decades of segregation, Dewey City was notable for being fully self-sustaining. It had its own beauty salons, barber shops, grocery stores, convenience stores, childcare facilities, cafes, snack shops, auto garages and several churches," wrote syndicated columnist Arthur Jones III.[1] The neighborhood was nominated for the National Register of Historic Places in 2008, and it then included 110 contributing buildings, a structure, and a contributing site. It also included 100 non-contributing buildings and 35 non-contributing sites, and a non-contributing object.[2] Because of its history of active resident involvement, Dewey City has been a strategic neighborhood for neighborhood investments for both the City of Thomasville ("City") and the Thomasville Community Development Corporation ("TCDC"). Neighborhood groups like the Dewey City Neighborhood Watch and Douglass High School Alumni Association, along with the local churches and daycares have been driving investments and activities in the neighborhood. It is listed in the City's Comprehensive Plan ("Blueprint 2028") as a "Future Character Area" and "Impact Investment Area." The City recently completed nearly $3 million of Community Development Block Grant ("CDBG") improvements in the neighborhood's sewer, water, street, and drainage infrastructure. Phase II CDBG improvements are underway.

The hub will be housed at the gymnasium at Douglass School. Douglass High School Alumni Association acquired the Douglass School complex from the Thomasville City Schools in the early 2000s with a mission to "to maintain and preserve the historic Frederick Douglass High Complex as a facility that serves as a central location in the historic Dewey City district for extended educational learning, social services, spiritual and religious services, economic

[1] Jones, Arthur III. "Historically Significant, Thomasville-Times Enterprise, Nov. 15, 2014
[2] "Dewey City Historic District," *Wikipedia*, https://en.wikipedia.org/wiki/Dewey_City_Historic_District#cite_note-nrhpdoc-2 (accessed September 25, 2024).

development, academic youth services, and a community meeting space." Since then, the campus has served as a community center and gathering spot for over 15 non-profits. However, the impending move of a major tenant (The Jack Hadley Black History Museum) and the difficulty of managing an aging school led the alumni association to seek proposals for the adaptive reuse of the beloved campus. TCDC has worked closely with the alumni association to find sustainable solutions to preserve the beloved campus. Across from the hub, the former classroom buildings of Douglass School campus will soon be retrofitted into 52 units of affordable, independent senior housing. Douglass Senior Partners, LP (a partnership between TCDC and Tapestry Development Group) were recently awarded low-income housing and historic tax credits to create a model for sustainable, affordable living in a traditional rural neighborhood. Douglass Senior Partners, LP will close on the sale of the historic campus by December 31, 2024, and construction for the housing will begin in January 2025. The 52 households who will move into this complex by the end of 2027 will provide the ideal model resiliency community. While the Dewey City neighborhood, and specifically the Douglass School campus, will be "the hub" for grant-funded activities, the other sub areas were drawn to include neighborhoods with extreme environmental concerns, namely impaired waterways, and home-based indoor air pollution. Sub Area One is also included in Sub Area Three.

Sub Area Two Sub Area 2 Census Blocks 132759607012 and132759607012 (both "Justice40" and EPA IRA disadvantaged communities) incorporates the Oquina creek, an impaired stream. The Sewer Outfall lines whose adverse impacts flow into the low-income neighborhoods are within this subarea. This sub area will be the site of City-led infrastructure projects and will prevent sewer back up into homes, prevent sewer spills in the area, and increase capacity.

These block groups are in the 96th percentile for Particulate Matter 2.5 and RMP Facility Proximity. They are also in the 90th state percentile for hazardous waste proximity; 92nd national percentile for underground storage tanks; and 94th national percentile for lead paint. The creeks and waterways of this area have been a prized geographic feature for the community. Residents of these block groups are in the 93rd national percentile for asthma. A section of Oquina Creek flowing through Dewey City is locally considered sacred ground as churches have used the creek as baptismal waters for generations. However, these waterways are impaired and in danger of significant increases in hazardous material flows due to aging infrastructure. The Oquina Creek is listed as an impaired stream by the Georgia Environmental Protection Division (GAEPD). The city has made significant investments to address increased levels of fecal coliform through improvements to the wastewater system and wastewater treatment plant. Staff have been trained to perform Adopt-A-Stream monitoring and sites are located strategically to determine the outcomes of these improvements. Monitoring will continue throughout the implementation of this project and results will be shared with US EPA. The disadvantaged communities served by this project will benefit from improved sewer flow which will decrease the probability of blockage and prevent backflow into their homes. Sewer spills into this prized geographic feature will be prevented alleviating concerns for community health safety. The project will also increase capacity which will allow future economic development within the community: current system limitation prevents increased development at this time, to include new homes.

Sub Area Three (Census Block Groups 132759607022, 132759607013, 132759607023, 132759608003, and 132759608004)- This 2.49 square mile sub area (36% of total project area) is the priority area for the expansion of TCDC's Home Improvement Grant program and includes the locally designated historic districts of Fletcherville, Dewey City, and Stevens Street. It contains 1,496 households and has a per capita income of $14,849. The .06 square mile **Fletcherville Historic District** was listed on the National Register of Historic Places in 1985 and was named for its centerpiece: the Fletcher Institute, a Methodist-affiliated school for Black students. Harper School now sits on the former site and with its open area it remains "a significant landscape feature of the district."[3] The .27 square mile **Stevens Street Historic District** dates from the 1850s and abuts the historic downtown area to the east. A new survey of the district completed in August 2024 shows a significant decline in historic resources since it was listed on the national registry in 2001. According to officials, the not-yet published attrition study by WLA Studio indicates there are 182 Contributing Historic Resources (down from the original 344 in 2001) and 43 Noncontributing Historic Resources (down from 83). The neighborhood was noted to be an intact African-American neighborhood that developed following the end of the Civil War, a place where freed blacks could settle but undesirable for whites since it was in the floodplain of Oquina Creek and "suffered from lack of breezes and loud noises associated with the railroad."[4] The disadvantaged community's intention to preserve these historic neighborhoods led to the inception of TCDC's Home Improvement Grant Program in 2023. Since then, over 50 eligible applicants from this project area have applied for home improvements. In 2023, TCDC focused the grant programs on the Dewey City neighborhood; this year, grants are focused in the Fletcherville and Stevens Street neighborhoods. Concentrating CCG-funded home improvement projects within these neighborhoods will maximize benefits to these disadvantaged block groups. The historic neighborhoods contain many of the disadvantaged community's social, educational, and recreational centers, including the Marguerite Neel Williams Boys and Girls Club, the Weston YMCA, Harper Elementary School, Community Outreach and Training Center, Weston Park, Scott Senior Center, in addition to at least 19 houses of worship.

As a whole, the Project Area includes many strategic natural and cultural resources that will be leveraged by residents to restore resiliency. Recent resident-driven investments in Dewey City and the Douglass School complex, combined with project funding from this grant, provides a tremendous opportunity to reverse a history of disinvestment and restore community-based resilience to environmental injustice and the impacts of climate change.

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[3] "Fletcherville Historic District," *Wikipedia*, https://en.wikipedia.org/wiki/Fletcherville_Historic_District#cite_note-nrhpdoc-2 (accessed September 25, 2024).

[4] National Park Service, "National Register of Historic Places Registration Form: Stevens Street Historic District," *National Register of Historic Places*, May 16, 2001, https://npgallery.nps.gov/NRHP/GetAsset/NRHP/01000500_text (accessed September 25, 2024).

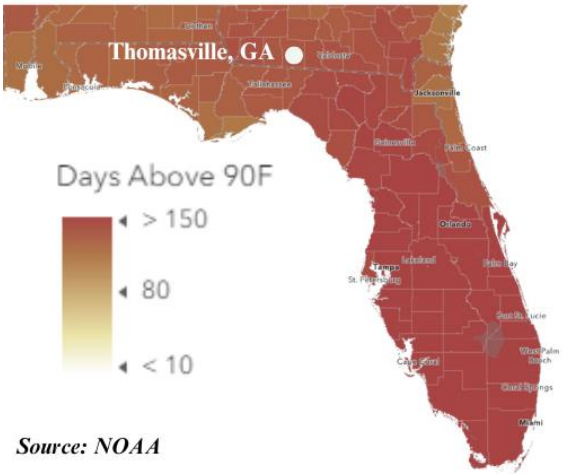
B. COMMUNITY CHALLENGES - The Project Area is low-income and disproportionately minority. The disadvantaged residents in the project area experience layered climate-related adversities given the aging housing stock, outdoor air pollution, increasing frequency of extreme weather events, and impaired and at-risk waterways. The compounding impact of the area's environmental challenges creates distinct health challenges in area residents, including asthma, chronic obstructive pulmonary disease (COPD), and other respiratory ailments. While extreme weather events and outdoor air quality issues impact the disadvantaged populations in the project area, specific challenges related to each sub area have driven our community's strategy selections.

The project area has critical levels (over 90th percentile by EPA's EJ Index) of Particulate Matter 2.5 and nitrogen dioxide. According to the Ambient Air Monitoring Program of the Georgia Environmental Protection Division, prescribed fires are the primary cause of PM 2.5 in our region of the state. The high levels of particulate matter are amplified by the common use of gasoline-powered lawn equipment-- in summer months, area residents report mowing lawns as often as twice a week. The relative inefficiency of gasoline-powered lawn equipment engines compared to cars creates a surprisingly oversized impact on concentrations of PM 2.5. "EPA data has found that gas-powered lawn mowers make up five percent of total air pollution in the United States"[5] According to the World Health Organization, PM 2.5 and nitrogen dioxide are among the pollutants with the "strongest evidence for public health concern."[6]

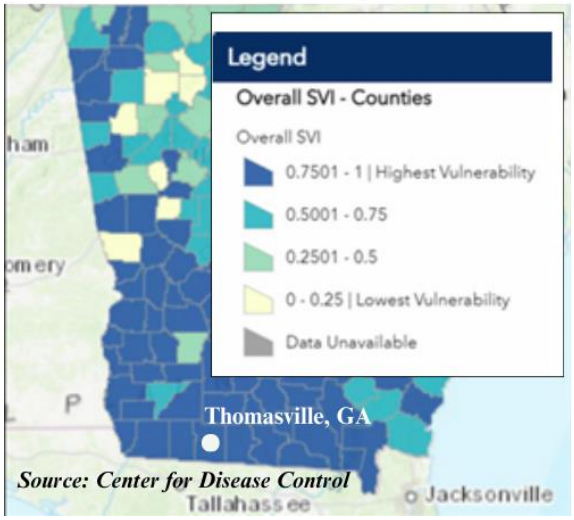
Impending climate change amplifies the project's outdoor air quality issues. Historically (1976-2005), Thomas County has experienced 85 days per year with temperatures over 90°F. Projections show that the number will rise to at least 138 days per year above 90 degrees by 2050. (See Figure 1) The area is already subject to an increasing frequency of flash floods and thunderstorms. The National Oceanic and Atmospheric Administration (NOAA) extreme weather database confirms residents' observations of worsening weather, showing that in the last five years (2019-2024) Thomas County has reported an annual average of 9.2 occurrences of Thunderstorms with Wind, compared to an average of 6.7 events per year in the 18 years preceding; and a four-fold increase in tornados to where we now average at least one tornado every year, compared to one every three years in the baseline period from 1996-2019.

[5] Jiahn Son, "Lawn Maintenance and Climate Change," Princeton University, May 12, 2020
[6] World Health Organization, "Health Impacts," accessed September 25, 2024, https://www.who.int/teams/environment-climate-change-and-health/air-quality-energy-and-health/health-impacts.

Projected Days with Temperatures >90°F by 2050



Social Vulnerability Index



Since we began work on this narrative two major hurricanes (Debby and Helene) have caused service outages and downed trees throughout the city. Our region of southern Georgia-- on the state line over the Florida Panhandle and just 30 minutes north of Tallahassee-- has always been hot and humid, and incidences of severe weather are increasing and projected to increase even more over the next 40+ years. The projected increases in heat compounded with the gulf coast high humidity create additional health risks associated with heat and high humidity, such as asthma and low life expectancy. Residents express concern that these extreme weather events will further devastate housing conditions and health outcomes. Indeed, the FEMA's National Risk Index shows "Very High" Social Vulnerability risk– the highest level in its ranking system -- for the census tracts included in the Project Area (See Figure 2).

Sub Area One Challenges - As the "hub" of project activities, Sub Area One is a microcosm of the project area with layered indoor and outdoor air quality issues adversely impacting health outcomes for area residents. EPA's EJ Screen confirms the following challenges identified by area residents:

1. Indoor Air Quality related to aging and unhealthy housing stock.
    a. Lead Paint (80^{th} percentile, EJ Index)
2. Outdoor Air Quality
    a. High concentrations of PM2.5 (80^{th} - 90^{th} percentile, EJ Index)
    b. High levels of Nitrogen Dioxide (80^{th} - 90^{th} percentile, EJ Index)
    c. RMP Facility Proximity (90^{th} - 95^{th} percentile, Supplemental Index)
3. Health Disparities
    a. Asthma (90^{th} -95^{th} percentile -Health Disparities)
    b. Low life expectancy (80^{th} - 90^{th} percentile, Health Disparities)
4. Socioeconomic Indicators
    a. People of Color (95^{th} - 100^{th} percentile, Socioeconomic Indicator)
    b. Children under age 5 (95^{th} - 100^{th} percentile, Socioeconomic Indicator)
    c. Energy Cost (95^{th} percentile, CEJ Screening tool)
    d. Low Income (86^{th} percentile, Socioeconomic Indicator)

Sub Area Two Challenges - The impaired water and aging sewer line challenges in sub area two impact the disadvantaged community in this sub area, as well as the other sub areas whose residents are adversely impacted by inflow and infiltration ("I&I"). Localized flooding issues create an additional challenge to the overburdened wastewater system. Many portions of the wastewater system that need to be addressed are in this sub area and directly impact the water quality in this and other sub areas. The headwaters of the Oquina Creek surround the area on three. According to the Georgia Association of Regional Commissions online ArcGIS Hub, sections of this "impaired" creek contains "fecal coliform and other contaminants" making the stream unsafe for subsistence and/or recreation. Further sewer spills into this prized geographic feature will pose a major health risk to disadvantaged communities in this and other project sub areas. The impervious surfaces of new developments in the area, including 87 residential homes and 44 townhomes, will contribute to more flooding and increased I&I. Previous engagement (noted in Attachment E) shows many residents' concerns about sewer backup in toilets and tubs or the smell of sewage in the neighborhood. In a 2023 interview, project area resident Carolyn Coachman described water issues she and her neighbors were experiencing: "People had dark water and all kinds of trash in it, and it looked like sewage stuff coming up in the sinks," said Coachman.[2] The following environmental justice issues noted on EPA's EJ Screen further compound the impaired water and aging infrastructure challenges:

1. Underground storage tanks (80^{th} – 90^{th} percentile, EJ Index)
2. RMP Facility Proximity (96^{th} percentile, EJ Index)
3. Underground Storage Tanks (92^{nd} percentile, EJ Index)
4. Hazardous waste proximity (90^{th} state percentile, EJ Index)

Sub Area Three Challenges - The aging and unhealthy housing in sub area three neighborhoods has created dangerous indoor air quality, high energy cost burdens, and poor health outcomes for residents. As noted in Attachment E, dilapidated housing is one of the top cited citizen concerns. According to the latest census data, more than 45 percent of Thomasville's housing units are 40 years or older. Residents living in these older homes and buildings face numerous environmental risks, including lead, asbestos, and radon exposure. The cost of critical home repairs makes the area's low-income residents vulnerable to displacement and the homes vulnerable to destruction. Utility costs are the most common complaint for residents in these neighborhoods in resident engagements and public meetings. Thomasville Utilities has comparatively low rates (11.80 cents per kilowatt hour compared to nationwide average of 15.74 cents); however, residents of the project area face higher than average utility burdens due to system inefficiencies, poor insulation, and energy leakages in their homes. These conditions paired with the area's low-income earnings create an energy burden for residents. Census Tract 13275960700 which contains many of the project area's block groups is in the 95^{th} percentile for energy cost burden. The following resident concerns are also substantiated by EPA's EJ Screen:

1. Indoor Air Quality related to aging housing stock
    a. Lead Paint (over 90^{th} percentile, EJ Index)
2. Outdoor Air Quality
    a. High levels of PM 2.5 (90^{th} –100^{th} percentile, EJ Index)
    b. High levels of Nitrogen Dioxide (90^{th} – 95^{th} percentile, EJ Index)

3. Health Disparities
    a. Asthma (80th – 90th percentile, EPA EJ Screen Health Disparities)
    b. Persons with Disabilities (80th – 90th percentile, Health Disparities)
    c. Low life expectancy (80th – 90th percentile, Health Disparities)
    d. Asthma (80th -90th percentile, Health Disparities)
4. Socioeconomic Indicators
    a. Low income (80th – 95th percentile – EPA EJ Screen/Socioeconomic Indicator
    b. High percentage of children under age 5

The overall impact of these historic environmental justice issues has led to adverse health outcomes for the disadvantaged community across the project area. Specifically, all project area block groups are in the 93rd percentile or above for asthma, which is correlated with indoor and outdoor air quality issues. Older houses, weather, and outdoor air pollution all trigger asthma symptoms. National Institute of Health research indicates these challenges underlie the area's elevated levels of asthma and respiratory illness. A recent study in the Journal of Exposure Science & Environmental Epidemiology highlights the importance of residential indoor air quality and environmental risk factors for asthma control, health-related quality of life, and emergency department visits for asthma.[7] According to the Georgia Department of Public Health, Non-Hispanic Black children, traditionally residing in federally identified disadvantaged communities, were three times more likely to report asthma-related Emergency Department visits than non-Hispanic white children (1,800 compared to 445). In Thomas County in 2022, the Emergency Department Visit Rate for asthma for Black residents of Thomas County was over four times that of white residents of Thomas County (738 compared to 164). Twelve percent of students at Harper Elementary (a Title One school serving the project area) have a reported asthma diagnosis, however, the school's Registered Nurse believes it may be much higher as she commonly sees "flare ups" in the clinic. Nationwide, asthma is linked to school absenteeism, a risk factor for poor student achievement and school dropout. Given the high particulate matter and aging housing supply of the project area, the uncommonly high rate of asthma in project area residents is both understandable and preventable.

C. COMMUNITY VISION – To restore resiliency, all citizen-driven projects proposed will **(1) take action to improve environmentally influenced health outcomes** (specifically asthma and COPD) and/or **(2) prevent future health and safety challenges through proactive pollution reduction strategies.** The priority population for grant-funded activities are project Area residents with multiple vulnerabilities, including (1) under the age of five or over 64 years of age or pregnant, (2) low-income, and (3) suffering from asthma, COPD, or other respiratory illnesses.

Community Vision- Sub Area One: *To become the hub for community information, resources, health, and safety at the center of a newly resilient community.* Dewey City was once a model neighborhood for self-sustaining resiliency. For this reason, it was chosen as "the hub" of grant programming which aims to restore that resiliency, not just in Dewey City, but in *all* of

[7] Kang et al., "Impacts of Residential Indoor Air Quality and Environmental Risk Factors on Adult Asthma-Related Outcomes in Chicago, IL," *Journal of Exposure Science and Environmental Epidemiology*, November 30, 2022.

Thomasville's Traditional Neighborhoods. A Community Resilience Hub will equip and empower residents to take action to improve indoor and outdoor air quality issues and related health outcomes.

Community Vision- Sub Area Two: *To repair and enhance vital water infrastructure to ensure the health and safety of disadvantaged community residents and protect significant waterways used for food and recreation.* The success of all proposed programs is predicated on having the necessary infrastructure to prevent future health and safety challenges. Critical water infrastructure repairs will improve current water quality issues in the area and prevent future challenges.

Community Vision- Sub Area Three: *To protect the longevity of historic disadvantaged communities and ensure the health of residents.* Quality of life starts at home; therefore, home improvements will be at the center of resiliency building efforts. An extension to TCDC's Home Improvement Grant Program will improve in-home air quality and energy efficiency for priority populations.

Regular resident engagements and quantitative data have underscored specific indoor and outdoor air quality challenges for the project area. For these reasons, the bulk of programming proposed aims to improve indoor and outdoor air quality for priority populations. To build community responsibility and enhance sustainability, a community-based Environmental and Community Justice Committee ("ECJC") will recommend and respond to grant-funded activities. This group of neighborhood residents and community partners (detailed in Attachment E) will ensure priority populations within the Project Area will receive the benefits of investments and have the opportunity to build on them for current and future generations. These projects fully align with the vision set forth by the City's Comprehensive Plan: "Thomasville residents expressed frustration over the distribution of resources in the city. While improvements to the downtown ideally serve everyone, there is an opportunity to target public space and street improvements in areas such as Dewey City…, where a significant amount of Thomasville's culture and history is located. Targeted enhancements in these neighborhoods not only help to create one unified Thomasville, but it also increases the city's overall attractiveness to visitors and future residents." Further, Policy 7.17.2 recommends the City "Ensure adequate wastewater infrastructure in designated growth areas... to enhance opportunities for neighborhood revitalization and economic growth." Project applicants and community partners expect successful implementation of these projects will galvanize the community to reduce respiratory illness and restore resiliency in Thomasville's Traditional Neighborhoods. In turn, interventions will improve overall health and safety of priority populations in the Project Area and empower the residents to rebuild their historically self-sustaining neighborhoods.

A. STRATEGY OVERVIEW - Climate Action and Pollution Reduction Strategies were selected for their potential to positively address the adverse health and safety outcomes experienced by Project Area residents. Investments in each of these strategies were designed around the community vision of improving environmentally influenced health outcomes and preventing future health and safety challenges.

SUMMARY OF SELECTED STRATEGIES AND ACTIVITIES		
CLIMATE ACTION STRATEGIES	**Cost**	**%**
Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings	**$984,200**	**5%**
Home improvement grants for energy cost savings (up to 45 single family at $40,000 each) *	$900,000	
Sub Strategy 8: Workforce Development Programs for Occupations that Reduce Greenhouse Gas Emissions and Air Pollutants		
Contractor workforce development training program in indoor air quality and energy efficiency assessments and improvements and green building consultants to train and consult with staff. Disadvantaged Business Entities (DBE) training and assistance.	$84,200	
Strategy 5: Community Resilience Hubs	**$8,636,344**	**44%**
Renovation/conversion of Douglass High School Gymnasium to include community spaces, federally qualified health center ("FQHC"), training areas, environmental justice offices, and emergency preparedness and response services.	$5,067,080	
Staffing, maintenance, and operations related to hub programming	$372,710	
Staffing and equipping of FQHC	$797,297	
Sub Strategy Climate Action 4: Microgrid Installation for Community Energy Resilience		
Installation of solar panels and battery back-up at hub and LIHTC apartments at Douglass School site	$1,546,821	
Sub Strategy Pollution Reduction 2: Outdoor Air Quality and Community Health Improvements		
Trade-in of gasoline-powered lawn care equipment, outdoor air quality monitoring and assessment	$55,140	
POLLUTION REDUCTION STRATEGIES		
Strategy 1: Indoor Air Quality and Community Health Improvements	**$923,940**	**5%**
Home improvement grants for indoor air quality (up to 45 single family homes at $40,000 each) *, plus air monitors and purifiers for project area residents	$923,940	
Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience	**$8,812,810**	**44%**
System Upgrades – Rebuilding of sewer outfall line (impacts a minimum of 3,460 disadvantaged households)	$8,812,810	
** The amount of home improvement grants spent on indoor air quality improvements (PR1) and energy efficiency updates (CA 3) will be flexible to maximize benefit to disadvantaged community. Applicants recognize that some improvements may address both strategies.*		

Forty-four percent ($8.8M) of grant funding will be spent on Pollution Reduction Strategy 3 since this aging infrastructure poses the greatest health and safety risk to project area residents. The negative impacts of the aging sewer lines in the project area directly impact the disadvantaged neighborhoods to the south. The cost for this project is based on engineering estimates of cost and recently accomplished projects similar in nature. The Community Resilience Hub and related programming make-up approximately 44% of the project budget ($8.6 M). Qualified contractors estimate hub renovations to be nearly $6.5 million and the solar microgrid and back-up battery storage to cost $1.6 million. The microgrid will provide affordable, resilient energy to the hub, as well as the low-income residents of the adjacent Douglass School Senior Apartment complex. As noted in Attachment F, Georgia Solar Pros estimate a $833,362 ($16,026 per resident) lifetime electric bill savings from the grid. Together, the housing and hub will be a model for connected, sustainable, and affordable living. The hub will also serve as the programming point for TCDC's Home Improvement Grant Program (Climate Action Strategy 3 and Pollution Reduction Strategy 1). Approximately $2.3 million (approximately 12% total) of project funds will be invested in the grant program for home improvements for the priority population. The pollution reduction and climate action strategies concentrated on the Douglass School campus in Sub Area One will empower disadvantaged residents throughout the project area to reverse environmental injustices and create long-term sustainability. However, the strategies in each project sub area are designed to complement each other to maximize health outcomes and resiliency for the priority population in all sub areas.

B. CLIMATE ACTION STRATEGIES

Climate Action Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings *(project also addresses Pollution Reduction Strategy 1)* - TCDC will take action to improve environmentally influenced health outcomes by extending the existing Home Improvement Grant Program to improve indoor air quality and/or energy efficiency for "priority populations" in Project Area Three. This may include air monitoring, filtration, and purification systems; replacement of problematic heating/cooling/cooking systems, insulation, window replacements, and other "critical home repairs." Current federal grant programs for weatherization often refuse to fund critical care improvements (i.e. roof or flooring repairs) homeowners need to make weatherization efforts impactful. Therefore, based on the existing application submissions for TCDC's Home Improvement Grant program, the flexibility of this grant program to allow for critical care improvements in addition to healthy home audits and air quality/weatherization improvements will be necessary. The Center for Disease Control shows "strong evidence of effectiveness" for the use of home-based multi-trigger, multicomponent interventions with an environmental focus for children and adolescents with asthma.[8] Specifically, reducing allergens and irritants in the home has been shown to improve asthma symptoms and reduce the number of school days missed due to asthma. Forty-five grants of up to $40,000 per home will be awarded over the three-year period of performance to households with one or more priority population residents. These funds will be split on an as-needed basis to also address indoor air quality improvements (see Pollution Reduction Strategy 1 below).

[8] Guide to Community Preventive Services. "Asthma: Home-Based, Multi-Trigger, Multicomponent Environmental Interventions for Children and Adolescents with Asthma." *The Community Guide*, 2022, https://www.thecommunityguide.org/findings/asthma-home-based-multi-trigger-multicomponent-environmental-interventions-children-adolescents-asthma.

To determine funding eligibility, TCDC will coordinate with City and ECJC to develop an application and process that ensures a fair and equitable process for accepting applications and entering into agreements for home improvements. TCDC will build on its current Home Improvement Grant process to meet the indoor air quality and energy efficiency goals for the priority population described herein. The City will review all compliance documentation prior to the release of funds. A rubric will be approved by the ECJC to prioritize funding based on the severity of health vulnerabilities, indoor air quality issues and energy inefficiencies. Energy and indoor air quality audits will be conducted on homes of all eligible applicants with CCG funding. The following eligibility and funding process will be recommended to the ECJC for approval:

Step 1: Pre-Application Submission through TCDC's current Home Improvement Application portal.

1. Application to be approved by ECJC to include personal and household information, description of home improvements requested, indoor air quality and energy efficiency issues.

Step 2: Initial Screening by TCDC Staff

1. Residency Verification
    - Applicants must provide proof of residency within Sub Area Three.
    - Acceptable documents: utility bill, lease agreement, property deed, or state ID.
2. Disadvantaged Status Evaluation/Priority Population Points
    - Standards to be set by the ECJC based on "priority population" indicators (i.e. includes a child or elderly adult with asthma or other respiratory challenge).
3. Ownership or Rental Status
    - Homeowners: Provide proof of ownership (e.g., property tax statement or mortgage documentation).
    - Renters: A process to ensure the funding accrues to the disadvantaged population will be recommended by an attorney and approved by the ECJC.
4. Property Assessment
    - Housing Type- Eligible properties include single-family homes, mobile homes, and multi-family units (up to four units).

Step 3: Pre-Assessment of property for Indoor Air Quality (IAQ), Energy Efficiency, and structural feasibility by preferred contractors.

1. IAQ: Baseline evaluation for issues such as mold, lead-based paint, asbestos, or poor ventilation.
2. Energy Efficiency: Initial energy audit assessing insulation, windows, HVAC systems, and appliances.
3. Structural Feasibility: The property must be structurally sound to accommodate improvements. Structural improvements, such as roofing, may be included in grant funding when it improves the impact of other renovations.

Step 4: Neighborhood Grant Committee (a subcommittee of the ECJC) reviews applications provided by TCDC staff and scores based on prioritization criteria, which may include the following:

1. Severity of severity of health vulnerability.
2. Severity of indoor air quality issues and energy inefficiencies.
3. Proximity to other grant-funded activities.

Step 5: Approval and Grant Agreement

1. Notification: Approved applicants receive a grant offer detailing the scope of improvements and funding limits.
2. Grant Agreement: Applicants sign an agreement to allow inspections, commit to maintenance, and acknowledge grant terms.

Step 6: Implementation and Post-Assessment

1. Improvements must be completed by certified contractors following EPA standards.
2. Post-assessment ensures:
   - IAQ improvements (e.g., proper ventilation, removal of contaminants).
   - Energy efficiency upgrades (e.g., meeting ENERGY STAR standards).
3. Final documentation provided to grantees.

Any conflicts of interest must be disclosed prior to the award of any funding. HUD CDBG Conflict of Interest Regulations, 24 CFR §570.489 Program administrative requirements will be followed by TCDC in connection with any expenditure of any Grant funds, whether to a subrecipient of a subaward or a contractor. Additionally, all reporting requirements and any additional compliance requirements will be based upon the executed grant award agreement.

Identified challenges: (1) poor indoor air quality due to aging housing stock; (2) the risk of displacement of area residents and erosion of neighborhood character due to development pressure; (3) asthma Rates in the 90th percentile; (4) high Particulate Matter; and (5) disproportionately high numbers of vulnerable populations in the project area, including children under 5, adults over 64, and disabled. The success of this program will be predicated on a training program to increase the number of qualified contractors to complete the home energy audits and renovations. Therefore, programming will include **Climate Action Strategy 8 (Workforce Development Programs for Occupations that Reduce GHG Emissions and Air Pollutants)** to build the capacity of contractors working in the project area. In addition to green building and auditing tools and techniques, training will help qualified businesses attain "Disadvantaged Business Enterprise" status**.** To monitor and report project outcomes, TCDC will hire an Environmental Justice Director and Home Improvement Grant Manager. The Manager will also act as a "navigator" to identify additional funding opportunities for building improvements, as needed. They will coordinate with the hub-based clinic to monitor short and long-term health impacts of grant recipients.

Climate Action Strategy 5: Community Resilience Hub- TCDC will lead the renovation of Douglass School gymnasium and ancillary buildings to meet the community vision goals of (1) improving environmentally influenced health outcomes and (2) preventing future health and safety challenges in Sub Area One. The grant-funded Environmental Justice Director and Resilience Hub Manager will ensure program fidelity and strategy implementation. These individuals will also work with Primary Care of Southwest Georgia, FQHC and Collaborating Entity, to monitor and report program outcomes. Upon funding, TCDC will work with relevant emergency response organizations to assess local risks and adequately equip hub for critical

needs, such as refrigeration for medicines, charging stations, and emergency supplies and develop an emergency response strategy. The Community Resilience Hub will be a daily "comfort center" and serve an average of 30 residents per day through program events, training, and other services. In accordance with the Thomas County Emergency Management Agency's Pre-Hazard Mitigation Plan, the hub will meet the goal of enhancing community awareness and preparedness for climate-related hazards. The Hub Manager will begin environmental justice programming while the hub is under construction and manage day-to-day operation of the center once opened. The creation of the hub was developed in response to the following challenges in the Project Area: (1) increased severity of heatwaves, storms and floods; (2) high Particulate Matter 2.5 Pollution in the project area; (3) climate-related health risk exposures in vulnerable populations, including asthma and respiratory flare-ups, heatstroke, injuries from accidents, and waterborne diseases; (4) inadequate community understanding of climate threats and prevention strategies.

To address these challenges, project applicants and community partners have proposed the following program components to be included at the hub.

- Climate-controlled space for regular social, educational, and recreational activities for priority populations.
- Critical resource and emergency service point during post-disaster response and recovery efforts (phone charging, medicine storage, food/water distribution).
- On-site FQHC monitor, prevent, and treat climate-related health challenges, along with other common health challenges in priority populations.
- Trade-in program for gasoline-powered lawn care equipment.
- Digital outdoor air quality monitoring and information kiosks in strategic locations to provide information about climate threats, including extreme heat, storms, and air quality issues.
- Commercial kitchen to address health and food safety issues related to resiliency.
- Training sessions for priority populations on environmental hazards and mitigations, as well as online messaging and marketing campaigns regarding environmental and climate-related hazards and precautions.

Other climate action and pollution reduction strategies addressed through the hub and its programming include the Home Improvement Grant Program (**Pollution Reduction Strategy 1 and Climate Action Strategy 3,** described below), Contractors Training Programs (**Climate Action Strategy 8**), and Outdoor Air Quality Monitoring and Gasoline-Powered Lawn Equipment Trade-In Program (**Pollution Reduction Strategy 2**). Outdoor air quality monitors will help the community understand the source of the high PM 2.5, particularly the impact of the nearby prescribed burning. This understanding will empower residents to take action to protect themselves. A marketing campaign will be created to raise awareness of the dangers of gas-powered blowers and mowers. The campaign and associated equipment trade-in program will help residents monitor and reduce their exposure to PM 2.5. The hub will be designed with sustainability at its core, incorporating energy efficient, zero-emission building innovations and water-saving landscape features. A solar micro-grid and energy storage unit will use zero-emission electricity generation and energy storage to provide reliable, affordable energy to the hub and the adjacent 52 affordable apartments on the Douglass campus (**Climate Action**

Strategy 4: Microgrid Installation for Community Energy Resilience). This strategy also addresses Climate Action Strategy 3 and the project area's most-cited challenge: high energy costs. The installation of approximately 459 kW of renewable energy and 767 kWh of battery storage will lead to Greenhouse Gas emission reduction, enhanced energy resilience during extreme weather events, and a decreased energy cost burden for grid users. The installation will lead to an estimated reduction of 272.3 tons of CO2 emissions per year, equivalent to 5750 long haul flights avoided.

C. POLLUTION REDUCTION STRATEGIES

Pollution Reduction 1: Indoor Air Quality and Community Health Improvements - *(This strategy is addressed above with Climate Action Strategy 3: Energy-Efficient, Healthy Resilient Housing and Buildings.)* In addition to the home improvement grants discussed above, a budget allocation was also made to provide indoor air quality monitors and purification devices to any members of the priority population in Sub Area Three. The FQHC will monitor asthma or respiratory symptoms of the recipients.

Pollution Reduction Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience. To address water quality this project will replace aged wastewater infrastructure in Sub Area Two that is contributing to I&I and the resulting overflow of the Wastewater Treatment Facility which flows directly into Oquina Creek (Census block 132759607001, Thomas County), then travels down the Ochlocknee River and into Lake Talquin. The cost for this project is based on engineering estimates of cost and recently accomplished projects similar in nature. This project upgrades the wastewater system to reduce water pollution in disadvantaged communities. The plan developed to address I&I in our community was developed using a multi-prong approach to determine the sources of water pollution to include smoke testing, flow meters within the system, system modeling, and water quality monitoring. Continued water sampling and monitoring will be conducted to monitor the outcomes of this project both locally and regionally.

2.1 Performance Management, Outputs/Outcomes: Given limited local capacity in environmental auditing and building, significant project resources have been allocated to project consultants and staffing to design, implement, and evaluate project outcomes. Evaluation tools will be created by environmental and public health consultants to include surveys, interviews, focus groups, and secondary data analysis of indicators such as CHG emissions, pollution levels, energy consumption, and public health outcomes. The evaluation will cover the entire program lifecycle, including planning, implementation, and outcomes. It will focus on both short-term and long-term impacts across multiple indicators, including energy consumption, air and water quality testing, and public health. Program outcomes will be shared with the EPA and local community through regular reporting to the ECJC, annual reports, and relevant forums and publications, as well as on TCDC's website and social media channels. Outputs and outcomes listed below are anticipated but will be subject to approval of Subject Matter Experts and the ECJC upon funding. All grant-funded program activities can be reasonably completed, and outputs/outcomes measured within the three-year period of performance. In addition to the outputs and outcomes listed below, other project programming related to climate change monitoring, awareness, trainings, and relevant evaluation methods will be recommended by the ECJC and implemented by grant-funded staff.

Anticipated Outputs and Outcomes of Activities	
CLIMATE ACTION STRATEGIES	
Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings	
Outputs	**Outcomes**
Up to 45 environmental justice home improvement grants made to single family homes with one or more "priority population" residents.	Reported decrease in incidents of asthma and other respiratory illnesses for participating residents by grant participants; 20% energy cost reduction for participating residents.
Up to 60 home energy audits and resident trainings performed to reduce energy use.	Participating residents reduce energy costs by 10% through recommended best practices.
Sub Strategy 8: Workforce Development Programs for Occupations that Reduce Greenhouse Gas Emissions and Air Pollutants	
Six+ training sessions for contractors on conducting energy audits and green building methods. Additional development training & assistance for DBEs.	Five local contractors become certified to do green building audits and renovations. Up to seven contractors paid for estimating services for bids on 40 home repairs.
Strategy 5: Community Resilience Hubs	
Outputs	**Outcomes**
Design and renovation of 12,000 square feet of indoor resiliency hub space and 5,000 sf of shaded indoor/outdoor space.	10,302 sf of safe indoor and 5000 sf of indoor/outdoor shelter to serve an average of 30+ residents daily.
Construction, staffing and equipping of 1682 sf for Federally Qualified Health Center.	2 "priority population" patients served per day and 520 per year. 1% decrease in asthma and COPD-related ED visits per year.
Sub Strategy Climate Action 4: Microgrid Installation for Community Energy Resilience	
450+ kW of Total Solar Power installed; 613217 kWh of clean energy generated.	272.3 tons of CO2 (GHG emission) reduction per year; $1200 annual energy cost reduction for 52 households.
Sub Strategy Pollution Reduction 2: Outdoor Air Quality and Community Health Improvements	
Replacement of 30 gas-powered lawn mowers/blowers with electric equivalents.	Reduction in PM 2.5 emitted by lawn care equipment (gasoline-powered mowers and blowers).
POLLLUTION REDUCTION STRATEGIES	
Strategy 1: Indoor Air Quality and Community Health Improvements	
(Addressed in Strategy 3 Above)	

Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience	
Outputs	**Outcomes**
26,312 feet of rehabilitated sewer truck and outfall lines. 88 manholes repaired or replaced.	Improved water quality within the adjacent Oquina Creek segments. A reduction in the number of residents concerned about sewer backup and/or smells.

2.2 Project Linkages to the EPA Strategic Plan

All projects directly relate to the EPA's Strategic Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights) and Objective 2.1 (Objective: Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels) as disadvantaged populations at the local level are the direct beneficiaries of all climate action and pollution reduction strategies proposed. TCDC, specifically, as a community-based organization whose staff and board represent the Project Area, can meaningfully involve priority populations in project planning, implementation, and reiterations. The Community Engagement and Collaborative Governance Plan (Attachment E) details how TCDC and the City's prior and ongoing engagement in disadvantaged neighborhoods will inform the projects in ways that are "community-driven, coordinated, and collaborative, support equitable and resilient community development, and provide for meaningful and fair treatment of communities with environmental justice concerns." (Objective 2.2, Performance Goal 3) Each proposed project also includes outcomes that "reduce disparities in environmental and public health conditions." (Objective 2.2, Performance Goal 1)

The community resilience hub at Douglass School will also address Objective 1.2 (Accelerate Resilience and Adaption to Climate Change Impacts), Performance Goal 3 to "Assist at least 450 communities...especially communities that are underserved and disproportionately at risk from climate change to take action to anticipate, prepare for, adapt to, or recover from the impacts of climate change." The resilience hub also incorporates environmental justice into annual emergency response and removal exercises. (Objective 6.3) The critical wastewater infrastructure improvements address Goal 5, Objective 5.2 (Protect and Restore Waterbodies and Watersheds). The Home Improvement Grant Program directly addresses Goal 3, Objective 4.1, Performance Goal 3 to "ensure all people with low socio-economic status live in areas where the air quality meets the current fine particle pollution National Ambient Air Quality Standards." In addition, this program also supports EPA's Children's Health strategy as children and elderly with asthma or other respiratory illness are priority populations for grant awards.

2.3 CBO Commitment and Experience

As a new community-based organization, TCDC is a Statutory Partner in this proposal and will rely on the City as Lead Applicant for its experience in managing large federal grants. Key staff have been engaged in local community development work for well-over 20 years, including real estate development, business and non-profit management, and community engagement. The formation of TCDC was recommended by the local Georgia Initiative for Community Housing ("GICH") alumni group to serve as a "community quarterback" for housing initiatives. Thus, the workplan and strategic neighborhood selections of the TCDC have been

guided by the GICH group, which is made of housing stakeholders, including representatives of Habitat for Humanity of Thomasville, Thomas County NAACP, Landmarks Historic Preservation, Community Outreach and Training Center, the Thomas County Housing Authority, as well as realtors, developers, and other interested parties. This GICH group continues to advise and collaborate with TCDC on the planning and implementation of the organization's work plan. The Board was formed to meet Community Housing Development Organization ("CHDO") requirements that at least one-third of the Board must be representatives of low-income communities (per Chapter 3 of U.S. Department of Housing and Urban Development HOME program regulations), which the TCDC Board further targeted to the low-income neighborhoods within the TN-URA. TCDC's operational success is underwritten by a 5-year seed grant from the Williams Family Foundation of Georgia.

Community engagement through door-to-door canvassing, active participation in neighborhood events, and regular neighborhood walks ensures a people-first, asset-based approach to neighborhood development. To accomplish its mission, the TCDC uses three program tools: (1) Neighborhood Impact Grants (including Home Improvement, matching Commercial Facade, and Neighborhood Activities grants) to ensure community-led neighborhood change; (2) InvestTVL, an emerging Community Development Financial Institution, to invest in historically under-invested entrepreneurs; and (3) Low-Income Housing Tax Credit Program to develop high-quality, affordable rental housing with local ownership. TCDC's recent project successes include a competitive 9% tax credit award to support the estimated $19 million low-income housing tax credit project a Douglass School (in partnership with Tapestry Development) and a $50,000 project implementation grant though the Partnership for Inclusive Innovation's Community Leadership program for the launch of InvestTVL. The fund expects to make up to $600,000 of lending investments in under-represented entrepreneurs and neighborhood developers by 2026.

2.4 Programmatic and Managerial Capability and Resources

As lead applicant, the City will be responsible for oversight of all compliance and project completion of all EPA Community Change Grant-funded projects. Financial and compliance oversight, as well as project management of the City's infrastructure work will be provided in kind by the City. The City's Grants Administrator Pam Schalk has successfully administered approximately forty-six (46) state, federal, and foundation grant awards in the amount of $27.7 million in her tenure from 2019. Schalk also has four years of experience as a Program Manager for the Florida Department of Environmental Protection under the Division of State Lands, Land and Recreation Grants Section. Managed programs included both state and federally funded grant programs. Successful training as a Florida Certified Contract Manager was a requirement of employment (Cert. # 2530-16041). The City's Financial Services is responsible for managing all city funds. The Financial Management System can segregate funds and track spending by category. A complete set of general ledgers and subsidiary accounts will be maintained for the fund. Accounting within this fund will be conducted on a double entry basis where Debit and Credit balances are maintained for each general ledger account and the sum of all debits equals the sum of all credits. The City has received the Government Finance Officers Association Certificate of Achievement for Excellence in Financial Reporting annually since 2008 for the Comprehensive Annual Financial Reports. Financial, Procurement, and Grant Policies and

Procedures have been adopted to ensure all financial transactions follow local, state, and federal requirements.

The City's Civil Engineering Department is certified as Local Administered Projects (LAP) by the Georgia Department of Transportation (GDOT) for full administration of federally funded projects from the Federal Highway Administration. This means that they have demonstrated our ability to successfully manage, administer, and execute Federal and State policies and procedures and also The Civil Engineering Department received this, and also re-certification, because one of their biggest strengths is their documentation and organization capabilities. They can effectively follow and demonstrate compliance with critical federal regulations such as 2 CFR 200, Title VI, Procurement of Engineering and Architectural Services, Disbarment, Wage Rates, and Equal Opportunity. The LAP certification and re-certification process is extensive. Therefore, the Civil Engineering Department has certainly demonstrated that they have the resources, capacity, capabilities, staff, expertise, and skills to perform and manage the award activities effectively for this grant. They have training and certification from GDOT in Right-of-Way Acquisition (ROW), Title VI Training, and Engineering and Design Procurement Training.

[redacted] and [redacted] will serve as the project leads for the TCDC. Project funding will also support the hiring of an Environmental Justice Director (responsible for overall TCDC compliance and completion of TCDC's grant-funded project), Resilience Hub Manager, and Home Improvement Grant Manager. [redacted]

A schedule of project milestones can be found in the Readiness Approach (Attachment G). Monthly reports on project progress will be made to the EPA and ECJC. These reports will allow project reiteration throughout the performance period. Periodic project progress and financial reports will also be made before City Council to ensure public awareness and fiduciary responsibility.

2.5 Past Performance

The City has successfully managed numerous Community Development Block Grant programs, most recently in FY2021 with Dewey City, Phase 1 (Project # 21p-x-136-2-6232) which is closing in Summer 2024: Total project cost is $1.8 M with $750,000 in grant funding. All tasks were completed and documents through required quarterly reports. All Quarterly and Financial Reports were provided in a timely manner and approved by GA Department of Community Affairs (DCA). The FY2023 Interim Audits for both projects have been submitted and approved by DCA. This program required clearance of special conditions to include NEPA and Section 106, Title IV, Buy American, and Davis Bacon regulations. Dewey City, Phase 2 was awarded in FY2022, and construction began in Summer 2024.

The US Economic Development Agency (EDA) awarded the City $2 million in grant funds to complete upgrades to the Wastewater Treatment Plant (Project # 04-01-07638): total project cost is $9.3 million. Construction began in September 2022 and will be completed by the end of 2024. Due to material delays, a project extension was requested and granted: the original completion date was June 4, 2024, the new completion is estimated October 2024. All quarterly reports have been submitted in a timely manner and approved by the EDA Post Award Manager. All required federal financial forms have also been submitted and approved. A new agreement is under review for an EPA Community Grants Program awarded under the STAG-Clean Water State Revolving Fund for $1.2 million: City of Thomasville's Wastewater Master Plan, Phase 1 Olive Creek. All pre-award conditions have been cleared.

3.1 Feasibility

The City's Civil Engineering Department has managed projects and activities similar to those in this application. Since 2014, they have provided survey, design, project management, and contract management (professional engineering and construction) services for all public works and public roads projects totaling around $59 million. The work proposed herein is work already underway and within the work plans of the relevant project leads. However, EPA funding will expand the work being done and ensure benefits flow directly to priority populations in a measurable way. TCDC and Douglass Alumni Association have a signed lease agreement allowing improvements (Attachment G). Upon award, the ECJC will be formed and begin working with TCDC and the city to develop an architecture bid process for design of the Community Resilience Hub. Douglass School Senior Apartments construction (not CCG-funded) will begin January 2025.

The City has demonstrated the organizational capacity to complete infrastructure and capital improvement projects of comparable size and scope. As a new community development corporation, TCDC's limited organizational capacity poses a challenge for the scope of projects proposed. The TCDC Board and Staff can overcome this challenge through strong partnerships and proposed new hires. When community stakeholders gathered to recommend a Board of Directors for the TCDC, they built a Board capable of creating a model rural development corporation with an ambitious agenda to create a sustainable non-profit development group capable of building affordable housing and businesses in historically underserved neighborhoods. The Board includes known neighborhood residents and business owners, but also well-resourced and community-minded individuals including a local foundation director, a bank president, a Fortune 500 brand manager, and a minority real estate developer. The Board

intentionally hired staff with experience building multi-disciplinary teams to launch public-private partnerships. Grant-provided funding for additional staff, as well as professional consultants, itemized in project budgets will be necessary to complete projects on time. In addition, in partnership with Tapestry Development Group, TCDC staff will concurrently be managing the affordable housing construction project adjacent to the hub site. This project timing will allow for simultaneous project bidding and ensure architecture, engineering, and construction firms will be capable of ensuring that the project meets federal grant compliance guidelines and timelines.

3.2 Sustainability

The City is developing a long-term Capital Improvement Project Plan to ensure continuity of services. Along with the adopted Financial Policies and Operations and Maintenance Plan for Wastewater System, these plans will ensure the long-term sustainability of the system and keep our community strong, safe, and sustainable. The City also received Building Resilient Infrastructure and Communities (BRIC) Direct Technical Assistance from FEMA which provided staff with vital resources to inform restoration and new development for a more sustainable community.

The provision of funding for hub renovations will allow the owners (DHSAA) to invest their assets into an endowment to ensure long-term property maintenance. TCDC's 10-year commitment to property management and programming, paired with operational support from the Williams Family Foundation of Georgia, will ensure program sustainability. TCDC's long-term revenue streams include LIHTC development fees, CDFI interest and fees, and public and private grant funding. Fundraising for the extension of environmental justice programs beyond the grant performance period will be the responsibility of grant funded TCDC staff. Since 2005, Primary Care of Southwest Georgia has ensured access to the medically underserved in our region and are committed to being a long-term tenant in the hub. They currently operate seven regional clinics and pharmacies. Other nominal rental fees to ensure sustainability will be collected from community partners (daycares, YMCAs, senior centers) as well as from community members hosting special events in the hub. Free electricity from the grid will reduce operational costs and enhance programmatic capabilities.

3.3 Program Budget Description

Program budgets have been broken down by project areas: Community Resilience Hub (CRH), Home Improvement Grant Program (HIGP), Critical Water Infrastructure (CWI), and Federally Qualified Health Center (FQHC). Detailed budget estimates for each program can be found in tabs on the attached Program Budget Template. As noted in Section 1.2A, 44% of the total budget will be spent on the Pollution Reduction Strategy 3 (Critical Water Infrastructure) as this poses the greatest health and safety risks to residents of the disadvantaged neighborhoods in the other project areas. Of the $8.8 million spent on the wastewater infrastructure, $8.7 million is for the sewer line construction; additional funding will be used to cover project management and annual audits. Climate Action Strategy 5 is the next largest budget allocation, totaling $6.9 million for the construction and programming of the hub. The hub project is listed as a Subaward to TCDC as the lease agreement between DHSAA and TCDC (Attachment G) allows TCDC to

do the renovations to the DHSAA-owned gymnasium. This includes $4.93 million for the construction (including a 4% construction contingency), $1.55 million is for solar microgrid (Climate Action Strategy 4), and $91,040 for environmental justice programming—all of these expenses provide a direct benefit to the disadvantaged community. An additional $349,813 covers staff and other operating expenses for the hub ($349,813), which would provide an indirect benefit to the community as good faith attempts will be made to hire from within the project area. Extending TCDC's Home Improvement Grant Program has an anticipated budget of $3.34 million with $2.8 million going directly towards energy efficiency and indoor air quality improvements for priority populations. Approximately $491,806 of the Home Improvement Grant project budget supports staffing and operational expenses. The compliance measures necessary for successful implementation of the Home Improvement Grant Program will require a generous staffing budget to ensure compliance to federal regulations, as well as long-term benefit to the community. The remaining grant budget ($108K) covers contractor training and additional air quality monitors and purification devices for priority population residents.
Altogether, the majority of the Community Change Grant funding will be for project construction ($17.2 M or 87%) of the wastewater infrastructure ($8.7 M), the hub and microgrid ($5.6 M), and the home improvements ($2.8 M). The required competitive bid process will ensure cost effectiveness for the project. As noted in the Compliance Plan, TCDC and the City will also follow EPA's Six Good Faith Efforts to hire Disadvantaged Business Entities. Personnel ($1.23 million, including fringe benefits) and contractors ($1.67 M) to support project work make up an additional 14% of total project costs. The Environmental Justice Director is listed in both of TCDC's project budgets (Community Resilience Hub and Home Improvement Grant Program) with 50% of their time dedicated to each project. For TCDC-led projects, hiring from within the project area will be prioritized as this may provide more direct impact and build trust in the project work. All projects were selected for their exclusive benefit to the disadvantaged community. Further, applicants will prioritize the hiring of contractors and grant-funded staff from within the disadvantaged project areas (See Attachment F, Community Strength Plan). EPA's nearly $20 million investment will make transformative difference in the lives of the priority population in the project area by (**1) taking action to improve environmentally influenced health outcomes** and **(2) preventing future health and safety challenges through proactive pollution reduction strategies.**

Meaningful Involvement Strategy
Upon funding, TCDC and City of Thomasville project managers will use EPA's Meaningful Involvement Policy to guide the communications, and engagement plans for each grant-funded project. A representative ECJC will ensure distributed, community-led decision making. Specifically, TCDC will work with the ECJC to identify the decisions in each project that may be influenced by public input (Step 1). The committee will then use EPA's public participation spectrum to determine the appropriate level of public decisions making (Step 2). Finally, the ECJC will secure resources necessary for meaningful engagement. Any ECJC feedback will be considered for incorporation into the plan (Step 3). Committee members are expected to collaborate with TCDC staff on executing planned community engagement activities. Resources to support community engagement are accounted for in the Community Resilience Hub Subaward budget. This plan will include outreach methods that provide opportunities for broad and diverse participation of project area residents. To promote transparency and meaningful

accountability TCDC recommends the following minimum reporting for communication of project progress and outcomes:

1. Monthly meetings of the ECJC will include activity and outcome reports from TCDC and City grant strategies. These meetings will be open to the public and follow Georgia's Open Meetings laws. Due to the City's appointment of members of the ECJC, the ECJC and the members of the ECJC will also be subject to Georgia's Open Records laws. In addition, meeting times, dates, and places will be accessible and noticed on TCDC's website and social media channels.
2. Quarterly reports will be printed and made available for use in community spaces, church bulletins, and neighborhood mail-outs. In addition to project updates on all grant-funded activities, reports will also include surveys to get resident feedback on activities performed. In addition, formal and informal oral presentations of these reports will be made by the Environmental Justice Director and project managers to interested community groups, as well as in locally produced podcasts, radio shows, and other neighborhood information outlets.
3. Regular neighborhood canvassing will be conducted by the TCDC in coordination with other trusted community partners.
4. Occasional (3+ per year) community outreach events, including workshops, townhall meetings, or panel discussions will be held in community spaces.
5. Grant reports will be shared in relevant City meetings and activities, which may include quarterly reports to the City Manager or designee and City Council. The City's participation in community activities will be coordinated through the City's Community Outreach program or relevant department.

The ECJC will recommend measures to mitigate barriers to neighborhood participation in project development, implementation, and awareness. These may include:

1. Bilingual presentation of materials and/or translator services during community meetings
2. Provision of transportation, food, and child/elder care services to allow priority populations and Project Area residents to attend meetings.
3. Use of trusted neighborhood "navigators" to present the information and solicit feedback from Project Area residents.