

EPA BROWNFIELDS REVOLVING LOAN FUND

COMMUNITY INVOLVEMENT PLAN

WILLOW BRANCH APARTMENTS

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1. EXECUTIVE SUMMARY

Overview of the EPA Brownfields Revolving Loan Fund

The U.S. Environmental Protection Agency (EPA) awards funding to local jurisdictions to manage the award and disbursement of Brownfields Revolving Loan Funds (BRLF) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

In 2012, the EPA awarded Decide DeKalb Development Authority (Decide DeKalb) a \$900,000 BRLF clean up grant with supplemental funding in the amount of \$800,000 totaling \$1,700,000 (Cooperative Agreement # BF95498312). An additional supplemental \$2,500,000 grant was awarded in 2022 (Cooperative Agreement # 02D38522). Decide DeKalb awards BRLFs as low-interest loans to private property owners, and subgrants to non-profits, for up to 80% of eligible remediation costs to remediate environmental contamination and prepare for the redevelopment of a brownfield property located in DeKalb County.

The CERCLA defines a brownfield as real property whose expansion, redevelopment, or reuse may be complicated by the presence or potential presence of:

- A hazardous substance, pollutant, or contaminant;
- Controlled substances: a drug or other substance, or immediate precursor, included in Schedule I, II, III, IV, or V of Part B of Title 21 USC § 812, including but not limited to red phosphorous, kerosene, and acids;
- Petroleum or petroleum-related products; and
- Mine-scarred lands.

Brownfields typically include former industrial sites, gas stations, landfills, and dry-cleaning establishments.

Goals of the Brownfields Revolving Loan Fund Program

Many parcels in DeKalb County have actual or perceived environmental contamination and are often abandoned or underutilized. The presence of contamination along with the risks and costs associated with addressing contamination can be a significant barrier to redevelopment. Decide DeKalb's BRLF Program seeks to:

- Protect human health and the environment;
- Improve the quality of life for residents;



- Incentivize economic revitalization projects;
- Encourage sustainable redevelopment of brownfield sites;
- Maximize the effectiveness of the Program through collaboration and leveraging BRLF funds to attract other sources of capital;
- Increase the County's tax base by returning contaminated properties to safe and productive use; and
- Engaging with and educating the community.

Purpose of the Community Involvement Plan

A Community Involvement Plan (CIP) is a site-specific strategy and document that provides an accessible road map for members of the community to understand:

1. The EPA Brownfields Revolving Loan Fund environmental remediation and cleanup process.
2. How, when and where Decide DeKalb will provide site-related information to the public;
3. How the public can be actively involved in the BRLF process; and
4. Key points in the BRLF process and the ways in which the EPA and Decide DeKalb take public input into consideration during interim and final decisions.

Decide DeKalb and the project team will work to address community needs, concerns, and expectations that are identified through community and stakeholder involvement activities.

2. SITE DESCRIPTION

Project Description & Location

This Community Involvement Plan focuses solely on the proposed remediation and redevelopment of the Willow Branch Apartments, located at 822 N. Indian Creek Drive in Clarkston, DeKalb County, Georgia, 30021 ("Willow Branch" or the "Property"). While the address notes Clarkston, this Property is located in unincorporated DeKalb County just outside Clarkston city limits. The property is comprised of 13.7-acres, 14 residential multifamily rental buildings, one leasing/community building, and paved surface parking and driveways, with a creek running through a portion of the center of the property.

Site Name	Willow Branch Apartments
Site Location/Address	822 North Indian Creek Drive, Clarkston, DeKalb County, Georgia
Tax Parcel Identification Number(s)	18 067 01 026
Land Area	13.7 acres
Site Improvements	14 2-story residential buildings 1-story leasing/community building Asphalt paved parking and driveways
Year Built	1971
Total Residential Units	186

Units accommodate individual and family households with the following mix:

Bedroom Type	# of Units
1 bdrm 1 bath	48
2 bdrm 1 bath	90
2 bdrm 1.5 bath	20
2 bdrm 2 bath	2
3 bdrm 2 bath	26
TOTAL	186

The Property is bounded by wooded land, residential properties, and the Atlanta Area School for the Deaf to the north, Chelsea Court Apartments and residential and commercial properties followed by North Indian Creek Drive to the east; Indian Creek Elementary School and residential properties followed by green space followed by Indian Creek Way to the south; and Jolly Avenue South followed by Kristopher Woods Apartments to the west.

History and background of the site

The Property has maintained multifamily residential use since construction in 1971, undergoing moderate renovations in 1996. A joint venture partnership between the Housing Development Corporation, EduHousing, Inc., and the Housing Authority of DeKalb County (collectively, the "Developer,") has applied to Decide DeKalb for EPA BRLF funding to support their remediation and renovations of Willow Branch. All units will be reserved for households earning up to 55% of the area median income (AMI) for the Atlanta-Sandy Springs-Roswell metropolitan statistical area.

The Willow Branch Apartments community is one of eight (8) Star-C Properties in the Metro Atlanta area. Star-C programs partner with property

owners and managers to provide affordable apartment community residents with wrap-around services to reduce transiency, provide academic support, and improve quality of life for individuals and neighborhoods.

Willow Branch residents have access to wraparound services including Health & Wellness programs, Food Security (with community gardens located on-site), Star-C Select (tailored resources per apartment community), After-School Care, and Summer Camp programs at no cost to families. The Developer intends to reinvest in the Star-C program as part of its larger rehabilitation plan for the property.

Redevelopment Plan

The Developer is proposing to acquire and renovate the property to improve the quality of life of its residents. In 2024, the Developer was awarded a 4% Low Income Housing Tax Credits (LIHTC) allocation by the Georgia Department of Community Affairs (DCA) which will be used, in part, to finance the rehabilitation project. Rents will be maintained to support residents earning up to 55% AMI.

As part of the LIHTC application process, the Developer worked with Kimley-Horn to create and submit a Revitalization Plan to DeKalb County to support the efforts of this rehabilitation and the larger Georgia State University (GSU) area. In 2024, DeKalb County incorporated the GSU/Willow Branch Community Revitalization Plan into the Global City - Memorial Drive Community Revitalization Plan (Global City Plan), identifying strategies to support the redevelopment of the area between Memorial Drive and the City of Clarkston. The Global City Plan builds on the findings and recommendations developed in the Memorial Drive Corridor Plan and DeKalb 2050 Unified Plan. Additional information on the Global City Plan is provided in Section 3 Community Profile.

The Developer's proposed acquisition closing date is January 15, 2026, with an estimated start date for remediation on February 2, 2026. The estimated duration of the asbestos remediation will be 20 months. The estimated duration of the balance of capital improvements will be 24 months and will include the following unit renovations:

- New flooring,
- New windows,
- Fresh paint,
- Energy-efficient appliances,
- LED lighting,

- The installation of low-flow plumbing fixtures, and
- The creation of 10 accessible units.

Additional property upgrades will also be completed beyond the interior unit renovations listed above.

No rezoning will be necessary as the property's use will remain the same. Remediation and the accompanying rehabilitation of the property are estimated to be completed by Spring/Summer 2028.

Nature and extent of contamination, environmental and health concerns

In July 2024, Terracon Consultants, Inc. (Terracon) performed a Phase I Environmental Site Assessment (ESA) consistent with the procedures included in ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The Phase I ESA revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the Willow Branch Apartments property.

Additionally, Terracon completed a hazardous materials inspection of the property and provided a Hazard Materials Report in November 2024. The inspection was completed by Asbestos Hazard Emergency Response Act (AHERA) certified Asbestos Inspectors in general accordance with the sampling protocols established in the United States Environmental Protection Agency (USEPA) 40 CFR Part 763, Subpart E, known as AHERA.

Following a visual inspection, 100 bulk samples of materials that were suspected to contain asbestos (ACM) were collected for sampling. Random samples of suspect materials were collected in 13 various areas.

Based on the results of the suspect ACM sample collection, as well as laboratory analysis of the suspect materials samples collected from the property, asbestos was indicated in the following sampled materials:

- Black Mastic Under Carpet from Concrete Flooring (Main Office)
- Black Sink Undercoat
- Textured Ceiling
- Wallboard and Joint Compound (WB/JC)
- Brown/Black Exterior Door Caulk
- Popcorn Ceiling
- Exterior Black and Pink Door Caulk
- Exterior Black and Pink Window Caulk



Status of cleanup or redevelopment efforts

The Developer has selected United Consulting as their technical environmental consultant and Hibernia Enterprises as the remediation contractor. The proposed remediation approach is a complete removal and disposal of all ACMs identified in the Hazardous Materials Report, in accordance with NESHAP and Georgia EPD standards. This proposed ACM abatement scope of work includes:

- Removal of wallboard and joint compound (658,232 SF)
- Removal of ACM door caulking (186 doors)
- Removal of ACM window caulking (836 windows)
- Removal of black mastic under carpet (1,000 SF – main office)
- Black Sink Undercoat (186 sinks)
- Removal of sink undercoating (186 units)
- Textured and Popcorn Ceiling (Throughout units)

The total proposed cost of Asbestos remediation is approximately \$1.5-1.7M with Decide DeKalb proposing to provide a EPA BRLF total award up to 80% of the cost, in the form of a \$300,000 subgrant and a loan for the balance of the eligible BRLF award amount. The remediation is anticipated to begin in early February 2026.

3. COMMUNITY PROFILE

Demographics and socioeconomic characteristics

The Willow Branch property is located between Clarkston and Memorial Drive, a commercial corridor which serves as the gateway between Atlanta and Stone Mountain. Changing demographics and economic trends in recent decades have resulted in higher vacancies along the corridor, with the general socio-economic character defined by lower income households and nearby retail spaces. Commercial rents along the corridor are noticeably lower than other parts of the Atlanta MSA.

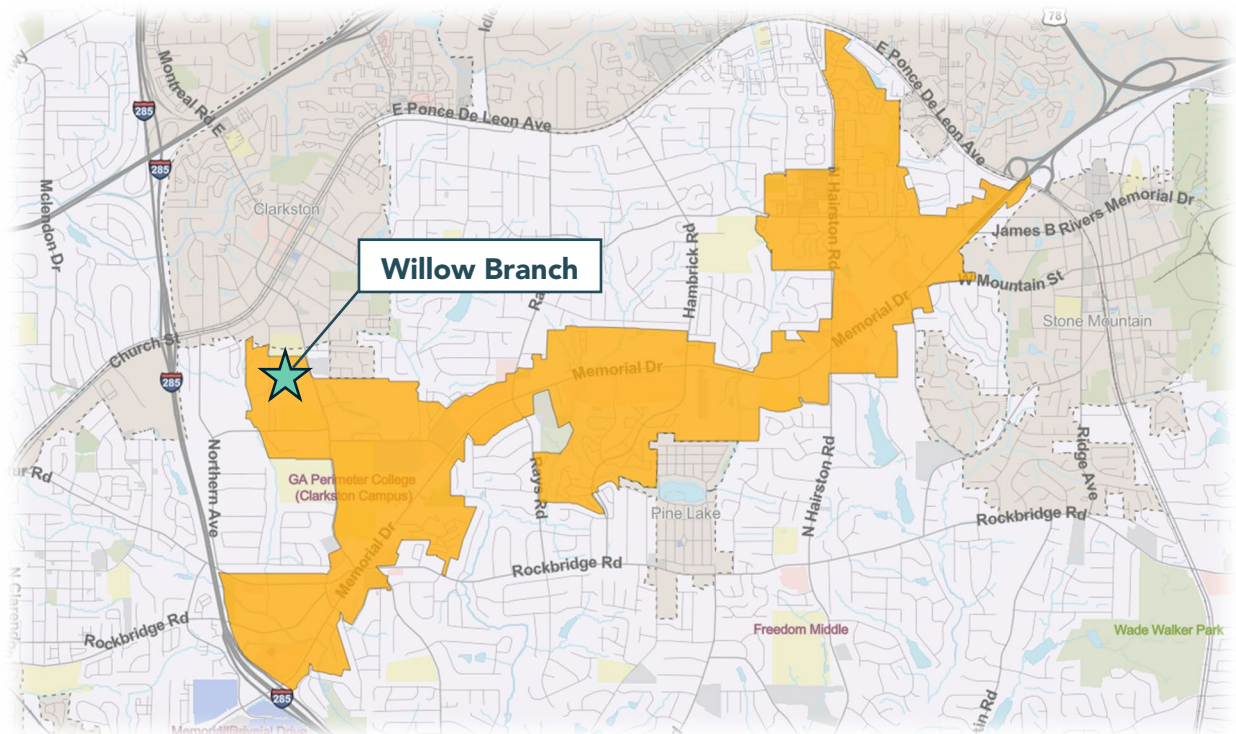
The area is served by a number of multifamily apartment complexes as well as some single-family rental options. The multifamily complexes generally serve lower income residents and their families, many of whom are immigrants who have resettled in the Clarkston area.

Clarkston, GA is often referred to as the most diverse square mile in America, thanks to its rich history as a refugee resettlement destination and its cultural and community vibrancy. The 2020 Census accounted for

approximately 14,756 residents hailing from over 40 countries.

Willow Branch is located in census tract 0220.12, designated as a low-income census tract¹, with a 2024 median family income of \$36,253 in comparison to the Atlanta metropolitan statistical area's (MSA) median family income of \$100,900. 92.09% of the residents are minorities, encompassing nearly 4,000 of the approximate 4,310 residents.

The DeKalb County 2019 Memorial Drive Revitalization Corridor Plan² illustrates the vision for redevelopment of the corridor, with a study area encompassing Memorial Drive east of Interstate 285 to East Ponce De Leon Avenue. Willow Branch is located on the northern portion of the small area plan, as indicated on the map below:



DeKalb County Memorial Drive Corridor Small Area Plan

The DeKalb County 2024 Global City - Memorial Drive Community Revitalization Plan³ identifies strategies for supporting existing and future

¹ [FFIEC Census Report Mapping](#)

² [Memorial Drive Revitalization Corridor Plan](#)

³ [Global City - Memorial Drive Community Revitalization Plan](#)

residents in the Global City study area. The study area is located just south of the City of Clarkston and Georgia State University. Perimeter College's Clarkston Campus and the Georgia Piedmont Technical College are situated in the eastern portion of the study area. A map of the study area is provided below:



DeKalb County Global City Memorial Dr Community Revitalization Plan Study Area

The DeKalb 2050 Unified Plan designates the Global City area with three future land use character areas, including Town Center, Suburban, and Institutional. These character areas promote a mix of commercial, residential, and mixed-uses at differing levels of density. Town Center is the predominant character area, within which Willow Branch is located, and is intended to support more dense, mixed-use development. It encompasses many properties along Memorial Drive, while also including a number of existing multifamily apartment communities in this denser, more mixed-use vision. The Global City Plan designates several communities priorities

including the following:

- Provide resources to address the diverse needs of the area's refugee and immigrant communities.
- Provide and preserve safe and affordable housing opportunities for residents at all income levels.
- Invest in pedestrian, bicycle, and transit infrastructure to improve local connectivity and mobility.
- Increase access to jobs and educational opportunities, community resources, and amenities.
- Improve public safety through equitable, community-based approaches in partnership with local law enforcement.
- Maintain local buildings and infrastructure to support neighborhood health and safety.
- Develop strong partnerships between local government, businesses, community organizations, and institutions.

The proposed remediation and rehabilitation of Willow Branch Apartments aligns with DeKalb County's goals – past, present, and future – to revitalize and sustain residents and businesses in this diverse community.

Local governance and community structure

The Willow Branch property is located in unincorporated DeKalb County. The property is located within DeKalb County Super District 6, led by Commissioner Ted Terry, and District 4 led by Commissioner Chakira Johnson. DeKalb County's CEO is Lorraine Cochran-Johnson, and DeKalb County is the government entity responsible for issuing permits, code enforcement, etc.

Community assets and institutions

Willow Branch is located less than half a mile from Indian Creek Elementary School and approximately half a mile from Clarkston High School. On the same street, two higher education institutions are accessible within just over a mile: Georgia Perimeter College – Clarkston Campus (.5 miles) and Georgia Piedmont Technical College (1.2 miles).

The Clarkston Library (a branch of the DeKalb County Public Library system) is located .5 miles away, and the property is located .5 and .3 miles away from two community gardens (Jolly Avenue Community Garden and Clarkston Community Garden). Willow Branch is located 1.4 miles from a regional grocery store chain, and approximately 3 miles from a national

grocery store chain location.

Access to I-285 is just over a mile (1.2) from the property using exit 40 – Church St., and US-78 is just over two miles (2.2) using exit 39B. The nearest MARTA rail station is located at Kensington, approximately 2.5 miles away. MARTA bus stops for Route 125 Clarkston are located at various points along N. Indian Creek Dr. This route intersects with the Kensington MARTA rail station on the southern end and takes riders as far north as Northlake Mall. The Kensington MARTA rail station provides access to at least six other regular bus routes.

4. REMEDIATION PROCESS

Following Decide DeKalb's preliminary applicant and project eligibility determination, the EPA reviews and approves its own Site Eligibility Determination Checklist. Once EPA's Site Eligibility Determination is approved, Decide DeKalb staff, its QEP, and the Applicant complete the following steps and documentation:

1. Applicant submits full application with evidence of financial capacity and environmental remediation contractor certification to qualify for the BRLF loan program;
2. Drafting of the Analysis of Brownfields Cleanup Alternatives (ABCA);
3. Drafting of the Community Involvement Plan;
4. Public Notice;
5. 30-Day Public Comment Period;
6. ABCA finalized and approved by EPA;
7. Decide DeKalb Board of Directors Approval of BRLF loan/subgrant award;
8. Quality Assurance Project Plan (QAPP), Abatement Corrective Action Plan (ACAP), and Monitoring & Oversight Plan completed;
9. EPA approves the QAPP;
10. Decide DeKalb and Applicant close the BRLF Loan;
11. Remediation Commences;

12. Monitoring of Compliance, including Davis-Bacon wage requirements;
13. Remediation completion and Project Close Out;
14. Loan Repayment Commences.

An ABCA is drafted by Decide DeKalb's QEP. The ABCA illustrates the ways in which a site may or should be environmentally remediated. This ABCA helps the applicant understand the cleanup options, as well as their associated costs and overall impact to the redevelopment. Additionally, the ABCA informs the award of BRLF loan funds and must be approved by the EPA prior to seeking approval from Decide DeKalb's Board of Directors.

A draft of the ABCA is posted to Decide DeKalb's website for the required 30-day public comment period. Additionally, the CIP is posted on Decide DeKalb's website for the public to access. During the public comment period, Decide DeKalb staff will meet with the appropriate County Commissioners based on the project's location to share details and answer any questions posed. It is important to note that the ABCA initially posted on the website is considered a draft for review and may be revised as new insights are gathered and questions are answered. The Project Team will consider any public comments to the ABCA received, and incorporate substantial revisions into the final version, if any. The final ABCA and CIP will be posted to the Decide DeKalb Brownfields Project website following the conclusion of the public comment period and final approval by EPA.

The final documents required before the start of remediation are the Quality Assurance Project Plan (QAPP) and the Abatement Corrective Action Plan (ACAP). The QAPP serves as a guideline for the project, highlighting data collection methods and ensuring the correct data is accurately gathered, thereby reducing time and costs of site investigations. The ACAP outlines how the remediation will take place, using details provided by the ABCA to select a method that will adequately address the identified environmental contamination. Both plans are reviewed and approved by Decide DeKalb and EPA, and represent the final steps before the BRLF loan closing may occur and remediation begins.

During remediation, a Monitoring & Oversight plan is adhered to as a means of ensuring the cleanup is conducted appropriately and that the activities undertaken on site represent eligible costs covered by the BRLF award. Once remediation has been completed, a Closure Compliance Report is submitted and filed, documenting the completion through data

and demonstration of cleanup to the identified standards in the CAP. Repayment of the loan begins once the remediation has been completed.

5. COMMUNITY NEEDS AND CONCERNS

Decide DeKalb is partnering with the Applicant to connect with public stakeholders, including DeKalb County elected officials and representatives.

Summary of community interviews and outreach

Below is a proposed schedule of public stakeholder and community outreach activities:

1. 7/21/2025: District #4 Commissioner Chakira Johnson meeting
2. 10/6/2025: Public Notice
3. November 2025: Super District #6 Commissioner Ted Terry update meeting
- 4. 11/5/2025: Public Comment Period Ends**
5. 12/5/2025: Decide DeKalb Development Authority Board of Directors Projects & Incentives Review (PIR) Committee meeting
6. 12/11/2025: Decide DeKalb Development Authority Board of Directors Meeting

6. PROVIDING COMMUNITY FEEDBACK

Methods for collecting public comments

Community members may review and provide comments on the draft ABCA during the 30-day public comment period. A draft of the ABCA is posted on Decide DeKalb's Brownfields project website, which can be located by navigating to the Redevelopment page and selecting the Brownfields Revolving Loan Fund. This page contains links to Brownfields site-specific webpages where all draft and final public documents are available for review.

Comments to the ABCA must be submitted via electronic mail to brownfields@decidedekalb.com during the 30-day public comment period commencing on October 6, 2025, and concluding on November 5, 2025.

At the conclusion of the 30-day public comment period, feedback will be reviewed, considered, and may be incorporated into ABCA revision



accordingly. Responses to general questions or inquiries will be included at the end of the document in a Q&A format.

Contingent upon the number of comments and breadth of feedback received, Decide DeKalb intends to finalize the revised ABCA within five (5) business days.

NOTE: Issues not directly related to the EPA BRLF remediation scope of work and activities on the Property cannot be addressed through this CIP, ABCA, or the BRLF remediation scope of work, nor can EPA use its BRLF Superfund authorities to compel potentially responsible parties to address any such other issues.

9. UPDATING AND REVISING THE CIP

Key themes and concerns raised by residents

Decide DeKalb and the Applicant will update this CIP as necessary throughout the community and stakeholder engagement process, public meetings, and public comment period.

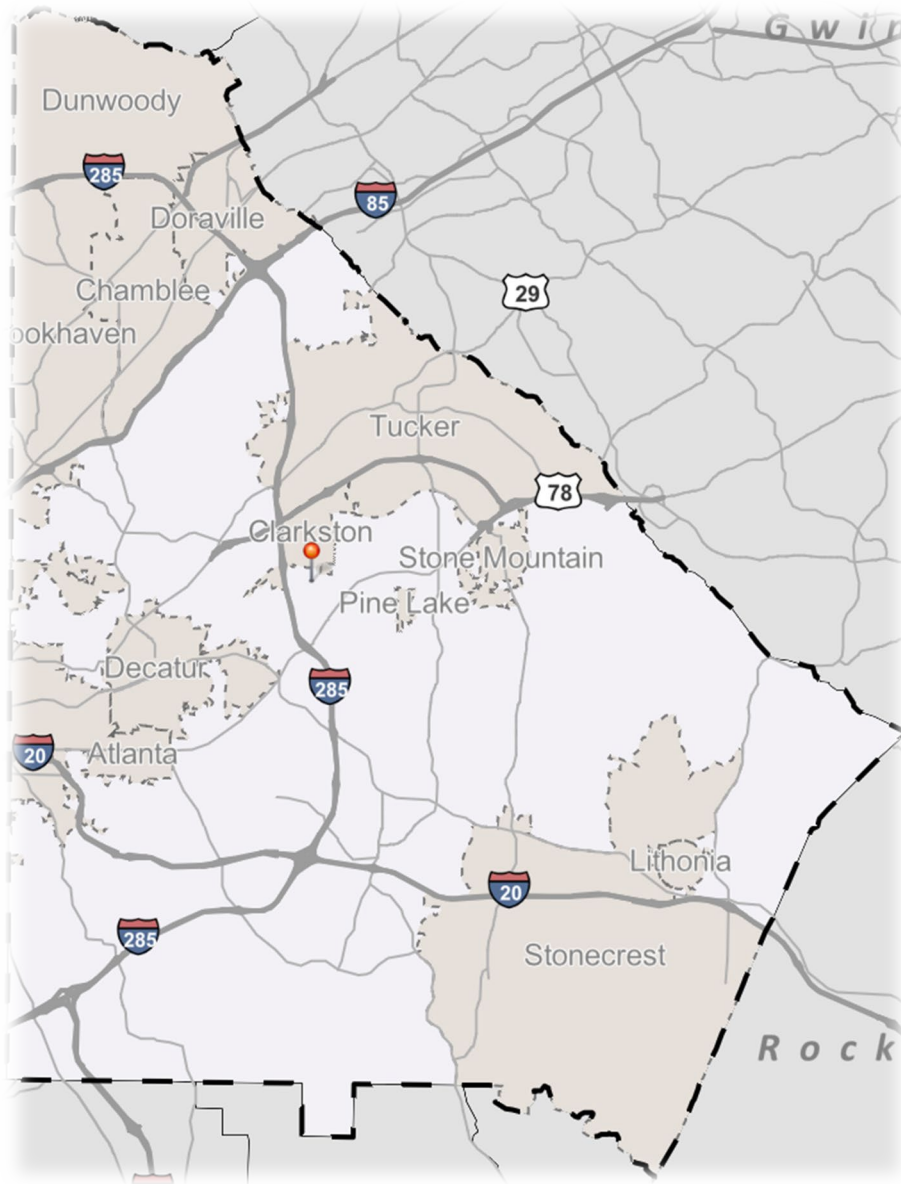
If necessary, the Community Involvement Plan will be updated following the close of the 30-day public comment period, and on a case-by-case basis if revisions or changes are made to the scope of work for the remediation.

10. APPENDICES

- A. Property Maps
- B. Site Diagram
- C. Topographic Map
- D. Current Photos
- E. Site Team Members
- F. Local, state, tribal, and federal agency contacts

APPENDIX A

Property Maps



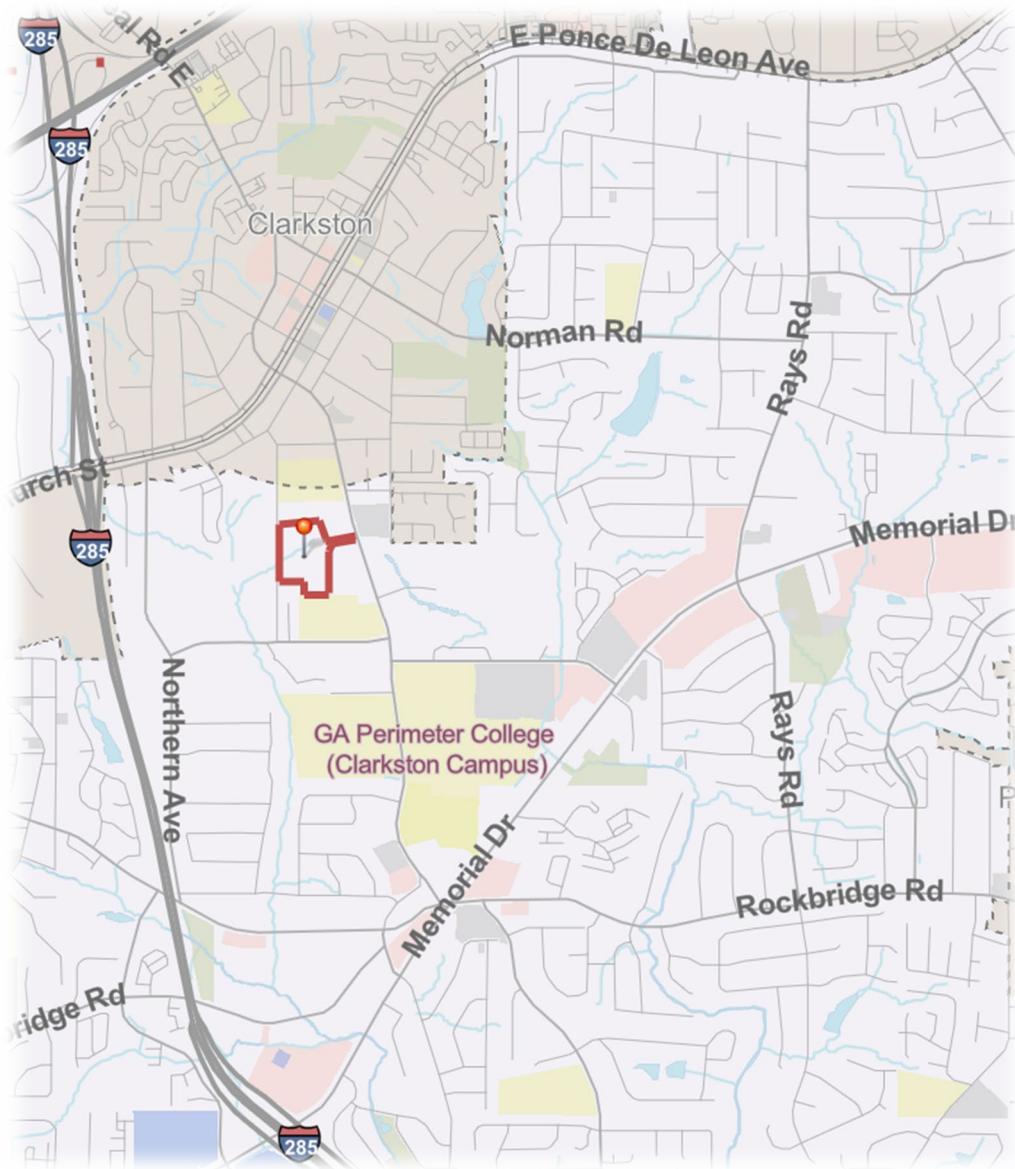
Community Involvement Plan

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Version Number: 1

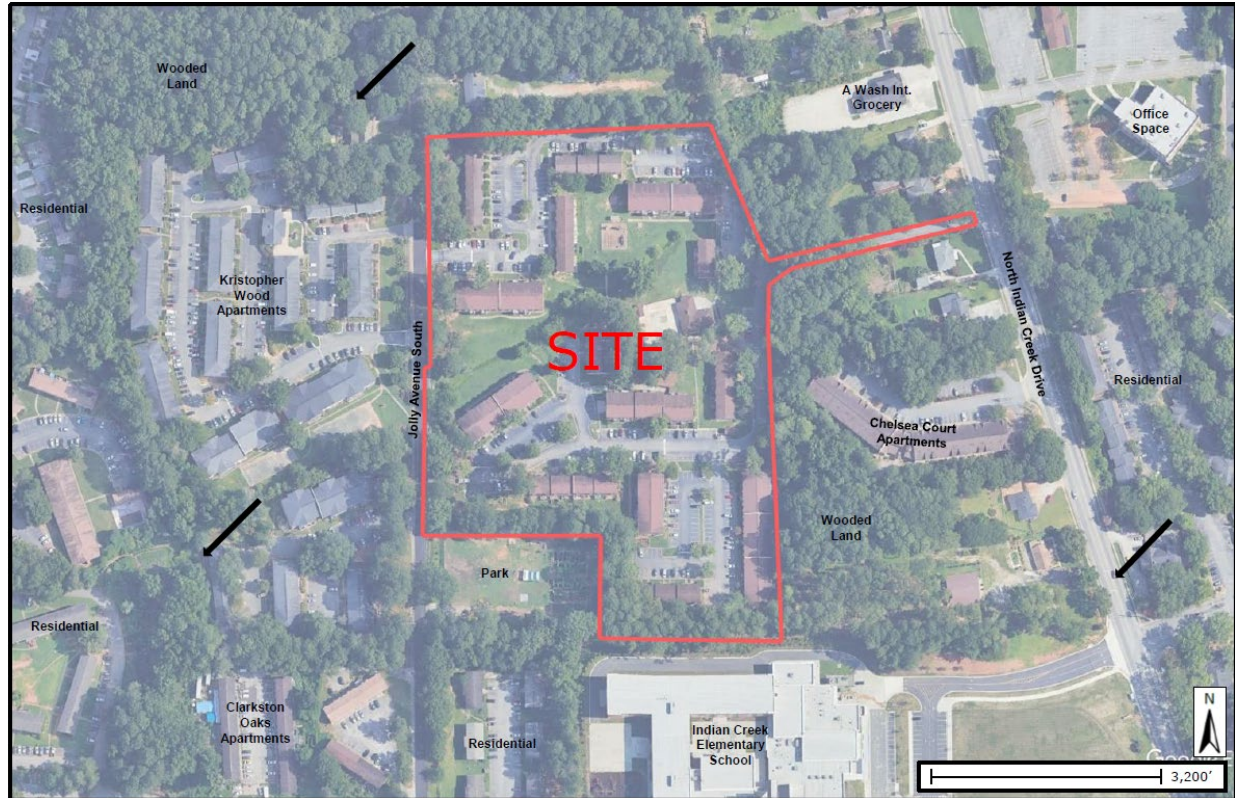
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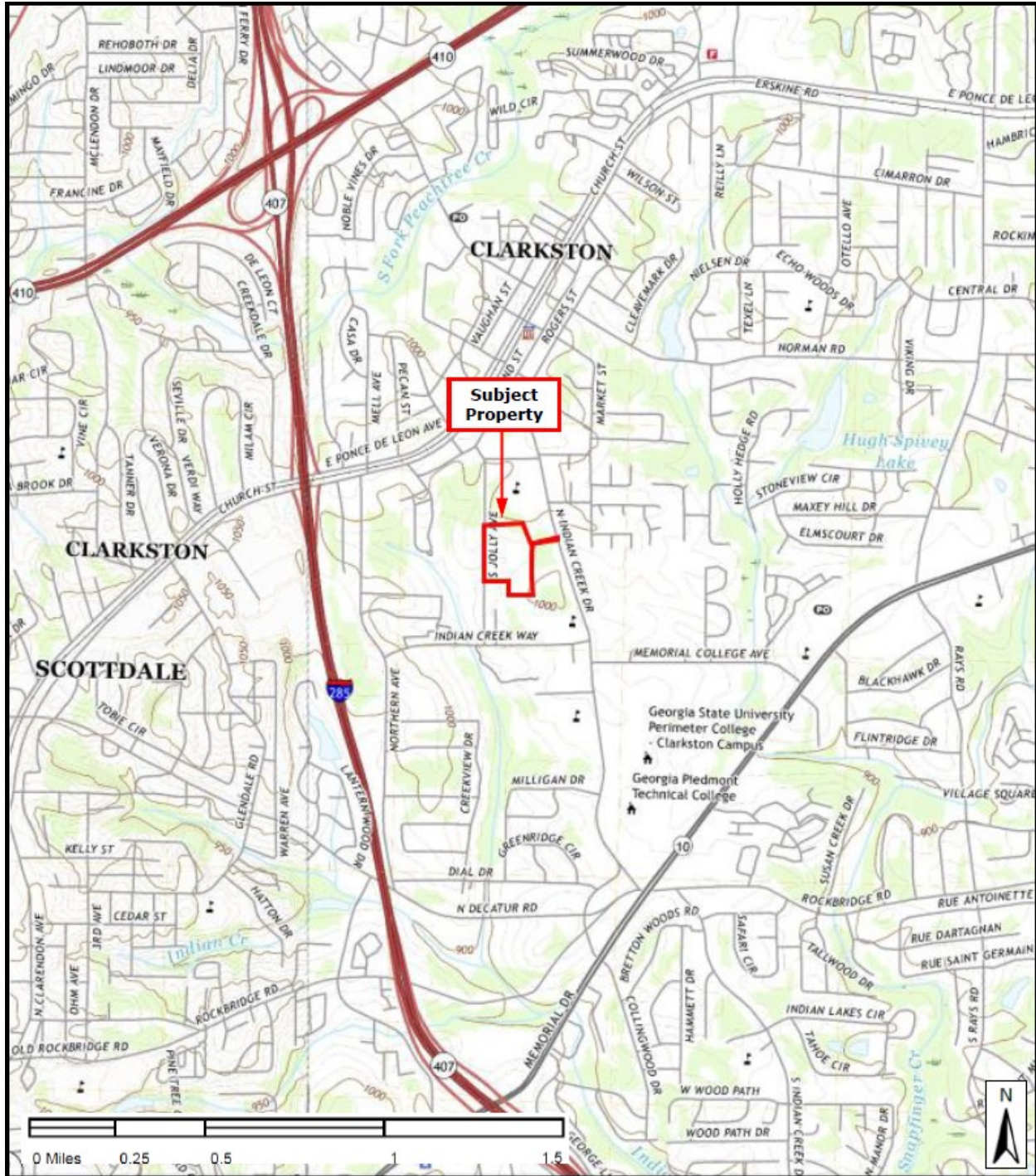


APPENDIX B

Site Diagram



APPENDIX C Topographic Map



APPENDIX D

Current Photos



Community Involvement Plan

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Community Involvement Plan

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APPENDIX E

Site Team

Firm/Entity	Role	Point of Contact	Responsibility
US Department of Environmental Protection Agency (EPA)	BRLF Project Officer	Siddhartha Patel	Reviews and approves BRLF project documents including Site Eligibility determination, CIP, QAPP, ABCA, and grant/loan documents
Decide DeKalb Development Authority	BRLF Grantee	Diana Pitcher-Williams	Cooperative Agreement recipient, fund manager and loan administrator
CERM	Qualified Environmental Professional	Darryl Edler	Drafts and reviews BRLF project documents, including remediation scope of work, cost proposals, CIP, QAPP, ABCA, and grant/loan documents Approval of Contractor Submittals & Invoices & Davis-Bacon Act Compliance
HADC Willow Branch, LP	Developer/Property Owner	Keri Taylor-Spann	BRLF loan/subgrant recipient Responsible for at least 20% of remediation costs
Terracon Consulting, Inc.	Environmental Technical Advisor	Tameka Gordon	Perform environmental assessments, identify contamination. Draft and review BRLF project documents including remediation scope of work, QAPP, CIP, and ABCA.
Hibernia Enterprises	Remediation/ Abatement Contractor	Robert Heavey	Draft and review BRLF project documents including remediation scope of work, CIP, QAPP, and ABCA. Perform remediation, and responsible for monitoring and compliance.

APPENDIX F

Local Government Agency Contacts

Office/Entity	Role	Point of Contact	Contact Information
DeKalb County	District 4 Commissioner	Chakira Johnson	cjohnson2@dekalbcountyga.gov
DeKalb County	Super District 6 Commissioner	Ted Terry	Ted@Dekalbcountyga.gov

