



EAST ALABAMA

Regional Planning and Development Commission

R04-24-A-042

1. Applicant Identification

East Alabama Regional Planning and Development Commission (EARPDC)
1130 Quintard Ave., Suite 300
PO Box 2186
Anniston, AL 36202

2. Funding Requested

- a. Assessment Grant Type – Assessment Coalition
- b. Federal Funds Requested
\$1,500,000

3. Location

Non-lead coalition member locations:

- Sylacauga Alliance for Family Enhancement (SAFE) – City of Sylacauga, Talladega County, Alabama
- Downtown Gadsden Inc. (DGI) – City of Gadsden, Etowah County, Alabama

All geographic boundaries to be covered:

- 10-County *EARPDC Jurisdiction* (Calhoun, Chambers, Cherokee, Clay, Cleburne, Coosa, Etowah, Randolph, Talladega and Tallapoosa Counties, Alabama)

4. Coalition Members' Target Areas and Priority Site Information

Target areas:

- EARPDC (lead) – Talladega Education Gateway
- SAFE (non-lead) – Avondale Mills Village
- DGI (non-lead) – Alabama City/Downtown Corridor

Census tracts:

- Talladega Education Gateway – 01121010700
- Avondale Mills Village – 01121011700, 01121011800
- Alabama City/Downtown Corridor – 01055000300, 01055000700, 01055000800, 01055000900, 01055001000, 01055001200



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Priority Sites:

- Avondale Mills Plant (Avondale Mills Village Target Area)
Alabama Ave. & Seminole Ave., Sylacauga, AL 35150
- Black Creek Greenway (Alabama City/Downtown Corridor Target Area)
Tuscaloosa Ave. & Black Creek, Gadsden, AL 35901
- Sears Building (Alabama City/Downtown Corridor Target Area)
741 Forrest Ave., Gadsden, AL 35901
- Wehadkee Yarn Mill (Talladega Education Gateway Target Area)
400 Battle St. W, Talladega, AL 35160
- Eddie's Used Tires (Talladega Education Gateway Target Area)
502 Battle St. W, Talladega, AL 35160

5. Contacts

a. Project Director

Eric Wright
256-490-0689
eric.wright@earpdc.org
1130 Quintard Avenue, Suite 300
Anniston, AL 36201

b. Chief Executive/Highest Ranking Official

Lori Sokol
Executive Director, EARPDC
256-237-6741
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Anniston, AL 36201

6. Population

City of Sylacauga: 12,278



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City of Gadsden: 33,335

City of Talladega: 14,674

7. Other Factors

| Other Factors | Page # |
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| Community population is 10,000 or less. | 1, 6 |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory. | |
| The priority brownfield site(s) is impacted by mine-scarred land. | |
| The priority site(s) is adjacent to a body of water (i.e., the border of the priority site is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public throughfare separating them). | 2, 3 |
| The priority site(s) is in a federally designated flood plain. | 5 |
| The reuse or the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | 5 |
| The reuse or the priority site(s) will incorporate energy efficient measures. | 5 |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. | 5 |
| At least 30% of the overall project will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority brownfield sites within the target areas. | |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing. | 2 |

8. Letter from the State or Tribal Environmental Authority

Attached.

9. Releasing Copies of Applications

Not applicable.



Alabama Department of Environmental Management
adem.alabama.gov

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(334) 271-7700 ■ FAX (334) 271-7950

November 1, 2023

Mr. Eric Wright, Director of Planning and Development
East Alabama Planning and Development Commission
Post Office Box 2186
Quintard Tower, Suite 300
1130 Quintard Avenue
Anniston, AL 36202
eric.wright@earpdc.org

RE: FY24 Brownfields Coalition Assessment Grant Support

Dear Mr. Wright:

The Alabama Department of Environmental Management (ADEM) is pleased to support the East Alabama Planning and Development Commission (EARPDC) in your pursuit of a Brownfields Coalition Assessment Grant from the U.S. Environmental Protection Agency (EPA).

We understand that the EARPDC serves a 10-county area including Calhoun, Chambers, Cherokee, Clay, Cleburne, Coosa, Etowah, Randolph, Talladega, and Tallapoosa counties, encompassing 6,140 square miles. This area was built on mining, cotton farming, and textiles. This area is primarily rural but includes 59 municipalities, half of them with a population of less than 1,000. Population and economic growth has been slow in the region, and the EARPDC is seeking to use EPA assessment grant funds to help spur revitalization in the area.

We also understand that you are considering communities in Gadsden, Talladega, and Sylacauga as the primary targets, but the funds may be used in other areas as well. We know that these communities have multiple brownfield challenges, and we applaud your efforts to assist them. As resources allow, ADEM would be glad to participate in the various brownfield outreach activities needed to accomplish the goals of the grant, or provide other technical resources from our Department.

We wish you and the residents of the EARPDC community success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal Collins".

Crystal Collins, Chief
Redevelopment Section
Land Division



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Coalition Members, Target Areas, and Brownfields

i. Coalition Members

There are three coalition members for this assessment coalition grant submission. The lead member is the East Alabama Regional Planning and Development Commission (EARPDC). The non-lead members are the Sylacauga Alliance for Family Enhancement (SAFE) and Downtown Gadsden Inc. (DGI). SAFE is a community-based, nonprofit organization that has been dedicated to providing meaningful opportunities for families, contributing to community growth, and promoting community cohesion for the last 20 years. SAFE has a small staff of people with experience in workforce and child development, fundraising, and community outreach. It is involved in dozens of projects around Sylacauga. It is unable to be a lead applicant for an EPA Community-Wide Assessment (CWA) grant because of its inexperience with environmental projects, and a limited number of staff lacking excess capacity to manage a brownfields program. DGI is also a community-based, nonprofit organization (a *Main Street* designee) that is dedicated to fostering economic development and enhancing Downtown Gadsden's architecture and historical heritage. DGI has a one-person staff and a volunteer board of directors comprising local business owners and citizens. It is unable to manage its own EPA Assessment grant because of its inexperience with environmental projects, and its lack of staff to manage a complex grant. While both of our coalition members are highly involved and passionate about their brownfields projects, they lack access to resources to address brownfield sites without the knowledge and experience of a partner like EARPDC.

ii. Overview of Brownfield Challenges and Description of Target Areas

EARPDC was established by the Governor to serve our impoverished 10-county area (Calhoun, Chambers, Cherokee, Clay, Cleburne, Coosa, Etowah, Randolph, Talladega and Tallapoosa,) which is the geographic boundary we are proposing to conduct eligible activities under this grant. Located between Birmingham and Atlanta, the *EARPDC Jurisdiction* is large geographically, spanning 6,140 square miles, but is rural with 58 municipalities; half with a population less than 1,000, and only nine with more than 10,000. Small-town life prevails here. The *EARPDC Jurisdiction's* economy was built on mining, iron and steel, cotton farming, and textiles. Our manufacturing industry has always been strong, but as operations have closed, we have been left with several large parcels, and unused and environmentally-complex land to address. This is the epicenter of our brownfields challenges and impacts. As large manufacturers closed, our economy deteriorated, jobs were lost, the population decreased as workers left for opportunities in other areas. Incomes declined, poverty persisted, and support businesses were forced to close as well (which led to more brownfields challenges), tax revenues slowed, and quality of life diminished. A declining economy with environmental struggles is particularly impactful in small, impoverished, underserved communities like ours, where we struggle with environmental justice issues. The combination of a poor economy coupled with environmental justice issues creates a cycle that is difficult to break without targeted goals and assistance. Indicators of brownfields impacts in our *EARPDC Jurisdiction* are evidenced in many ways. The Alabama Worker Adjustment and Retraining Notification Act (WARN) list shows **26,000 lost jobs** over the last 25 years in our region due to company closures and layoffs. Over the last 10 years, we experienced a - **2.4% population loss**, compared to a State population increase of 2.4%, and a national increase of 5.8%. Our regional **median household income is just 82% of the State's median**. The region's number of **families below poverty level is 21%**, while the State's number is only 11.2%. In our proposed Target Areas presented below, our brownfields challenges and impacts are even more pronounced.

Target Area 1: AVONDALE MILLS VILLAGE (SAFE's Target Area). *Avondale Mills Village* (census tracts (CT) 117 and 118) is in Sylacauga, in Talladega County. It is approximately 2.5 square miles bounded by Spring Valley Rd. to the north, Old Talladega Hwy. to the east, W 4th St. to the south, and Old Sylacauga Hwy. to the west. *Avondale Mills Village* was the economic heart of the City before becoming its largest brownfields challenge. Avondale Mills operated in the center of town for more than 100 years as a textile manufacturer, employing 3,000 workers. The company built housing, a hospital, schools, churches, and more to sustain mill workers and spin-off support industries. Residents from its heyday reminisce about the mill as a caring benefactor, with idyllic memories of a "healthy, flourishing" southern town. Generations of families lived and worked there. The former Sylacauga Mayor estimates 75% of citizens have a connection to the mill. Avondale Mills closed in June 2006 and the main factory building caught fire in June 2011. It took 15 minutes to destroy a century of history, leaving in its wake abandoned industrial facilities, houses, environmental and safety issues, and poverty in the surrounding low-income, minority neighborhoods. *Avondale Mills Village* was one of the Target Areas of our 2021 Assessment Coalition grant, which is more than 70% disbursed and completely allocated due to our region's vast need. With SAFE's involvement, redevelopment plans and funding are underway but additional assessment work is needed before construction can begin. The Target Area contains Justice 40 (Climate and Economic Justice Screening Tool (CEJST)) and EPA Inflation Reduction Act (IRA)-defined **disadvantaged communities**, where **61% are low income**, the number of people with **less than a high school education is double**

the national rate, and **45% are people of color**.¹ The closure of Avondale Mills and its effects on the surrounding historically underserved, low-income community are the root of this Target Area’s brownfield and environmental justice challenges.

Target Area 2: ALABAMA CITY/DOWNTOWN CORRIDOR (AC/DC-GADSDEN) – DGI’s Target Area. *AC/DC-Gadsden* (CT 3, 7, 8, 9, 10, 12) is in Gadsden in Etowah County. It is approximately 17 square miles, centered around Forrest Ave. *AC/DC-Gadsden* extends from Brentwood Dr. and Tuscaloosa Ave. to the north, the Coosa River to the east, Hickory St. to the south, and N 27th St. and Vandell Blvd. to the west. Just north of *AC/DC-Gadsden* is Noccalula Falls, a feature of Black Creek. Black Creek vertically bisects our Target Area and borders the Gadsden Industrial Park (GIP) (also known as the Gulf States Steel Superfund site). *AC/DC-Gadsden* encompasses historic downtown Gadsden, the GIP, and the historically black and low-income neighborhood called Alabama City. It contains Justice 40 (CEJST) and EPA IRA **disadvantaged communities**. Here, **three out of five people are low income, unemployment is nearly double the state average, and 62% are people of color**.² Just 1.5 miles to the east, the Gadsden Steam Plant, a coal-fired power plant closed in 2023. Brownfields and environmental justice challenges in this Target Area center around the closure of large manufacturing facilities, urban sprawl, and the surrounding historically underserved, minority, low-income populations.

Target Area 3: Talladega Education Gateway (Talladega Educ. Gateway) – EARPDC’s Target Area. The *Talladega Educ. Gateway* (CT 107) is in Talladega in Talladega County. It encompasses 2.2 square miles centered around Hwy 21/Battle St. It is roughly triangular in shape, extending from the Norfolk Southern rail line to the north, Spring St. to the east, the Eastern Alabama rail line to the south, and Hwy 275 to the west. The *Talladega Educ. Gateway* is just two blocks west of downtown Talladega and is the gateway to the sensitive populations education corridor, which includes Talladega College (a Historical Black College and University (HBCU)), the Helen Keller School for the deaf and blind, and the E.H. Gentry Educational Facility, a vocational and educational rehabilitation program serving adults who are deaf or blind and those with other or multiple accommodation needs. The *Talladega Educ. Gateway* brownfields challenges stem largely from a closed manufacturing facility located in the few city blocks between downtown and Talladega College. The landscape changes instantly from a revitalized, walkable, thriving downtown to rows of empty storefronts, a crumbling eyesore manufacturing building, and junkyard-style businesses before entering the HBCU, historically Black neighborhoods, and deaf and blind schools beyond. The separation caused by the brownfields also amplifies the environmental justice problems in the *Talladega Educ. Gateway*, which is **62% people of color, 32% people with disabilities, 47% low income**, and contains both *Justice40* (CEJST) and EPA IRA **disadvantaged communities**.³

This Assessment Coalition Grant will address our brownfields challenges and impacts by growing our economy, improving health effects in our community, and addressing environmental justice problems. Our economy will improve when brownfields are reused and the surrounding communities revitalized, bringing in new jobs, increasing tourism, expanding education opportunities, reducing unemployment, improving poverty, and increasing our tax base. When the brownfields are cleaned up, we will address contaminants that pose a threat to our populations, helping to improve the health of our residents. The grant will also help to mitigate environmental justice problems by focusing on sites that improve conditions in communities with sensitive populations. We will also involve our sensitive communities in our brownfields redevelopment process to ensure their needs are understood and met.

iii. Description of the Priority Brownfield Sites

There are 70 sites in our current brownfields site inventory that include former gas/auto service stations, dry cleaners, above-ground storage tank (AST)/underground-storage tank (UST) sites, small engine repair shops, railroad warehouse, foundry, and buildings with manufacturing and industrial use histories. From these, we have prioritized five sites in our three Target Areas for this brownfields grant.

AVONDALE MILLS VILLAGE (SAFE’s Target Area) – Priority Site (PS) 1: Avondale Mills Plant. The former *Avondale Mills Plant PS* is 46 acres in the center of Sylacauga, located at the intersection of Seminole St. and Alabama Ave. It is abutted by low income residences on three sides, a public high school on three sides, and vacant lots owned by the City to the east. The site has a fenced perimeter that contains a large, fire-damaged, crumbling main plant building and several dilapidated support buildings that are being demolished; numerous large piles of construction debris; a tall brick industrial stack; a railroad spur; concrete slabs; a small tributary of Shirtee Creek; heavy vegetative overgrowth, and a large population of stray dogs that live in the rubble. The mill manufactured cotton fabrics, yarn, and ropes from 1913 to 2006. More than 3,000 jobs were lost when the mill closed in 2006, significantly impacting the community. While in operation as a textile mill, the site included petroleum tanks, a former filling station, two automotive shops, a paint house, two paint shops, two oil houses, a laundry house, a compressor room, a machine shop, and a dye house with an adjacent waste

¹ EPA EJ Screen Community Report, custom shape. ejsscreen.epa.gov, accessed 10/26/23.

² EPA EJ Screen Community Report, custom shape. ejsscreen.epa.gov, accessed 10/26/23.

³ EPA EJScreen Community Report, custom shape/Talladega, AL. ejsscreen.epa.gov, accessed 10/26/23.

house/waste room. The mill was once listed as a Resource Conservation and Recovery Act (RCRA) large quantity generator of hazardous wastes. In 2021, we conducted initial environmental assessments on the site using our previous Assessment Coalition Grant. We identified COCs including semi-volatile organic compounds (SVOCs), petroleum, arsenic, and cadmium in soils/sediments and groundwater. Additional assessment is needed to better estimate the soil volume needing remediation, and to conduct cleanup planning. A portion of the site is owned by the Talladega County Board of Education (TCBOE), who originally took ownership to build ballfields in support of the adjoining high school. But after teaming up with SAFE and learning more about community needs, the TCBOE has broader plans for the priority site, and has provided site access. SAFE recently purchased parcels on the southern edge of the site to initiate redevelopment of the entire area. The site is a priority due to the solid brownfields redevelopment initiatives already underway to redevelop the former manufacturing facility as a workforce training center. Additionally, after decades of neglect, the crumbling, torched mill has become a scar on the land, and a vivid visual reminder of unemployment and decay. Lastly, soil, sediment and groundwater are impacted from 100 years of textile manufacturing operations during an era predating environmental regulation, so the site's health impacts to the surrounding low-income, underserved community also elevates its priority.

There are two priority sites in the **AC/DC-GADSDEN (DGI's Target Area)**. Priority Site 2: Black Creek Greenway PS, a 1.7-mile greenway extension of the Black Creek Trail, which follows Black Creek from Tuscaloosa Ave. south along the eastern border of the Gulf States Steel (GSS) Superfund site/Gadsden Industrial Park (GIP) and ends at the Martin Wildlife Park. While not within the boundary of the GSS Superfund site, the priority site directly adjoins the Superfund site. The portion of the GSS Superfund site that borders our priority site includes two stormwater lagoons. The lagoons collect stormwater runoff from across the GIP, are 50 yards away from our priority site, and discharge into Black Creek. During Superfund cleanup, slag piles were removed from around the lagoons. Along these adjoining areas, COCs include heavy metals and petroleum from stormwater runoff. The proposed Black Creek Greenway site was selected as a community priority due to its economic impacts on tourism, and the positive impacts its development can have on the several other brownfields surrounding the GSS Superfund site/GIP. Priority Site 3: Sears Building – The former Sears Building PS is a 1.5-acre parcel in downtown Gadsden located at 741 Forrest Ave. It includes an abandoned 25,000 square-foot brick building that is marked with graffiti, and a paved lot. It is an art-deco style building built in the 1940s that has peeling paint from overhangs dropping onto surrounding sidewalks, and broken glass windows where rain has entered the building for decades. It is surrounded by commercial and government buildings with empty lots abutting it to the north and east. COCs include asbestos containing materials (ACM) in the building, and other possible contaminants associated with past usage which may have included auto repair. The site is owned by the City, who has approved it for sale to a private developer who plan to revitalize it as a mixed-use commercial/housing facility. It was selected as a priority due to its strong investor interest, the removal of an eyesore, the economic benefits it will bring to the community, and its potential to be a catalyst for additional growth in the empty adjacent lots.

There are two priority sites in the **TALLADEGA EDUC. CORRIDOR (EARPCD's Target Area)**. Priority Site 4: Wehadkee Yarn Mill is a 6.2-acre parcel located at 400 W Battle St. in Talladega. It is enclosed by fencing, and includes a 96,000 square-foot main factory building, 3 warehouses, an office building, a rail spur, asphalt pads and gravel parking, and a small tributary of Town Creek. The site is surrounded by a vacant lot and the Mt. Cannan Baptist Church to the north, the City's primary grocery store to the east, and commercial properties and a rail line on the remaining sides. The main factory is crumbling brick/concrete block, with a collapsing roof, and broken windows. The facility was built in 1895, and operated as a cotton yarn mill until 2007. Operations included the presence of a machine shop, transformers, a waste house, an oil house, an auto paint shop, junk piles, and a dye plant. Some limited assessment was conducted in the early 2010s. COCs found include metals in soil and groundwater, VOCs in shallow groundwater, petroleum in soils, lead-based paint, and ACM in the building. Additional assessment is needed to quantify contaminants in the structures, soil and groundwater. The site has been owned by the City since 2010. It was identified as a priority site because of the community's interest in its reuse plans, its long-time struggles with redevelopment, the economic impact its reuse will have to the surrounding area, and the health effects to the surrounding low-income, high minority, underserved community due to its 100 years of yarn manufacturing operations during an era predating environmental regulation. Priority Site 5: Eddie's Used Tires is a 0.1-acre tract at 502 W Battle St. in Talladega. It is located at the entrance to Talladega College at a triangle-shaped intersection of Hwy 21 and Battle St. The site has been a used tire and service station for decades. It includes a 2,200-square-foot, crumbling block building (circa 1935) that has broken/boarded windows, a short gravel drive, piles of used tires, and rows of broken cars. The site is a junkyard-style eyesore at the entrance to the HBCU. COCs include petroleum products, VOCs, lead-based paint, and ACM in the building materials. The private owner has agreed to sell to the City, who has reuse plans, funding, and talent secured to transform the site into a civil

rights monument gateway to the education corridor, but the site needs environmental work completed before taking ownership. The site was selected as a community priority because of its unsightly presence at the main entrance to the HBCU, and hindrance to redevelopment of the civil rights-themed gateway improvement to the College and downtown due to environmental concerns.

iv. Identifying Additional Sites

Since we anticipate remaining grant funds after addressing our priority sites, our coalition has worked with community partners to create a large initial inventory of additional brownfields sites. We will add additional sites within our geographic boundary through town hall community meetings, and meetings with community members, local governments, developers, and real estate and lending professionals. To select additional sites, our coalition will develop a prioritization process with evaluation criteria, and select those that qualify most highly. The prioritization process will be based on the EPA *Community Reuse Property Prioritization Tool* (EPA 500-F-16-166). Criteria will include characteristics such as title/ownership clarity, immediate threat to human health and the environment, cleanup and reuse planning, community factors, financial constraints, infrastructure and access, and other factors to be identified by the coalition. First priority will be given to sites in our Target Areas to ensure that all our coalition members have fair participation in the brownfields program, and because they are all *Justice40* (CEJST) and EPA IRA disadvantaged communities. Furthermore, we will use EJSscreen and CJEST to identify if additional sites are *Justice40* (CEJST) and EPA IRA disadvantaged communities, and those sites will receive higher priority.

b. Revitalization of the Target Areas

i. Reuse Strategy and Alignment with Revitalization Plans

The Avondale Mills Plant PS will become the East Alabama Rural Innovation Training Hub (EARTH). SAFE (non-lead coalition member) is the lead organization developing EARTH. Redevelopment plans have already been created by a local architect, and presented in numerous community outreach meetings for the past 3 years. Planning documents were created to provide area residents and support partners details on the exciting plans. EARTH will include facilities to address a variety of rural community needs, including a state-of-the-art information technology training hub for K-12 and post-secondary students who have limited access to these advanced skills in a rural community; a workforce training facility that will teach the community to support rural economies; an early childhood development center; an entrepreneur-business incubator; a specialty farm/research garden; a soil bioremediation research cell (in concert with Auburn University); and greenspaces (walking trail, event lawn, dog park). The project is perfectly aligned with the City of Sylacauga's Comprehensive Plan, which was developed and published in 2021 by EARPDC. The Comprehensive Plan lists redevelopment of the Avondale Mills Village Target Area as a priority goal. The project also aligns with EARPDC's Comprehensive Economic Development Strategy (CEDS) goals to align needed skills with jobs; to increase the number of people prepared for high wage, high growth jobs; to utilize abandoned industrial sites; and to increase educational attainment by beginning with early education. Redevelopment plans also align with City land-use plans for the site and surrounding neighborhoods. When completed, the redevelopment of the Avondale Mills Plant PS will be the at the center of the larger Mill Village rebirth, and promises to be a well-deserved and long-overdue beacon of hope for the City and its residents.

The Black Creek Greenway PS will be a 1.7-mile extension of the existing Black Creek Trail, which originates at Nocalula Falls, the City's most popular tourism attraction and natural resource. The extension will follow Black Creek from Tuscaloosa Ave. south past the Central Recreation Park (ballfields, skatepark, tennis complex) along the eastern border of the Gulf States Steel (GSS) Superfund site/Gadsden Industrial Park (GIP) and end at the Martin Wildlife Park. The City has already applied for an Alabama Department of Transportation grant to begin the trail extension. The priority site will extend economic and tourism vitality into the AC/DC-Gadsden Target Area, which will not only improve the economy, but will help to improve interest in nearby brownfields reuse. It will also offer healthy activity venues to the community. The GROW Gadsden Comprehensive Plan, which is being developed with significant community input, is defining the community's vision and priorities for future growth and development. The reuse strategy at the Black Creek Greenway PS aligns with the GROW Gadsden goals to leverage natural resources and improve quality of life. The Sears Building PS will be a mixed-use retail/housing development. It will include up to five retail spaces and 20 apartments. Redeveloping this vacant, blighted property will bridge community interests one block to the west (the county courthouse, judicial building and sheriff's department) to the commercial businesses in downtown Gadsden one block to the east. Reuse plans align with GROW Gadsden goals to offer new and affordable housing, revitalize historic neighborhoods, address blighted properties, and promote city unity. The reuse strategies at both priority sites also align with City land-use plans.

The Wehadkee Yarn Mill PS is slated to be redeveloped as a City Conference Center and a Talladega College HBCU sports facility. The Talladega Revitalization Plan, which was developed with input from the City, County, developers, local businesses, and the community, names the site's reuse as one of the first priority revitalization projects in the City, and a catalyst project for continuing growth throughout the area.

The historic 96,000 square-foot building will be the Conference Center and Talladega College HBCU will lease the non-historic portion of the site for a sports venue. The Conference Center fills the need for event space in the City and County. Across the street, reuse plans are to redevelop the vacant 4-acre lot into an outdoor event greenspace, and the adjoining property to the east into a hotel, which will complement the Conference Center. The City has begun preliminary design of the Conference Center. The revitalization plans at the Wehadkee Yarn Mill PS align well with the City's future land use plans for commercial use in the area. At the Eddie's Used Tires PS, the City has secured federal funding to demolish the eyesore building, construct a traffic circle, and erect a monument of civil rights hero John Lewis. The traffic circle/monument will be located at the entrance to the historic assets of the HBCU campus, and will be an image gateway to the historical black neighborhood and the education facilities in our Talladega Educ. Corridor Target Area. The City recently installed a similar traffic circle just a few blocks east at the entrance to downtown. Reuse plans are a part of the first priority revitalization projects in the Talladega Revitalization Plan mentioned above. Reuse strategies at both priority sites align with the City's future land use plans.

ii. Outcomes and Benefits of Reuse Strategy (5 points)

At the Avondale Mills Plant PS, EARTH's primary purpose is a rural innovation hub, that will help to meet the local community's education and small business development needs. It will provide opportunities to people of all ages: early childhood, K-12, post-secondary, and adult workforce/entrepreneurs. Additionally, it will focus on the specific needs of our rural community, including local workforce and business needs. The majority of the site will be used as greenspace, including agricultural research, outdoor classrooms, parks, walkways, and gardens. The buildings will incorporate solar energy and energy efficiency measures as state-of-the-art facilities, and a large portion of the site will also be used for agricultural bioremediation research. Both of these uses support climate resilience by reducing energy consumption and greenhouse gases. The agricultural research conducted at the site will also help to investigate how climate change adaptations to drought, flooding, ground thaw/freeze, and extreme temperature can be implemented in agricultural applications to protect our vulnerable local, rural communities. The addition of greenspace/non-profit use will be a primary outcome of the reuse strategies at the Black Creek Greenway PS and Eddie's Used Tires PS. The Black Creek Greenway PS will also help to improve Gadsden's tourism economy, which earned \$58 million in Etowah County in 2021 and has a significant impact on the community.⁴ The Black Creek Greenway PS will also limit construction in the 100-year flood plain zone surrounding Black Creek, which will improve climate resilience. At the Sears Building PS, revitalization plans will stimulate economic development by improving the local tax base; bringing new jobs to the community; and improving the continuity of the downtown area to create synergies between businesses and services. The apartments will also incorporate energy-efficiency measures like energy-rated appliances and fixtures. Similar energy-efficiency measures will also be implemented at the Wehadkee Yarn Mill PS. The Wehadkee Yarn Mill PS will also improve the local economy by being a catalyst project that will transform three city blocks of the surrounding underserved and environmentally-challenged neighborhood into a premier public-use destination. It will also be a redevelopment catalyst for the block of abandoned historical storefronts sandwiched between the Wehadkee Yarn Mill PS and downtown areas, as visitors to the redeveloped Conference Center, sports venue, outdoor venue, and hotel look for retail, dining, and entertainment options nearby when visiting. The potential for increasing jobs, small businesses, incomes, tax bases, tourism spending, and even education opportunities through more college sports have a tremendous economic benefit.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

There are many resources available for site reuse projects in our EARPDC Jurisdiction. Two of our priority sites are nearly fully-funded and are awaiting completion of environmental work using assessment grant funds. We have identified other potential funding sources for our priority sites as shown in the table below.

| FUNDING SOURCE | DESCRIPTION | PRIORITY SITE(S) |
|--|---|--------------------------------------|
| EARPDC Revolving Loan Fund | Gap loans to expanding and start-up small business | Sears Building |
| Private and non-profit developers | Various, including cleanup and /or construction costs | Avondale Mills Plant, Sears Building |
| Congressional budget | Infrastructure, construction, art commissioning | Eddie's Used Tires |
| Alabama Land Recycling Revolving Fund Program | 10-year loans to government entities for site remediation | All sites except Eddie's Used Tires |
| Recreational Trails Program – Department of Transportation | Grants for government entities to acquire, develop and maintain recreational trails, up to 80% of total costs | Black Creek Greenway |
| Appalachian Regional Commission (ARC) | Grants for economic development, infrastructure, and education/skills development | All sites |

⁴ Alabama Tourism Department. (2022.) Alabama Tourism Industry Economic Impact Report 2021. tourism.alabama.gov/app/uploads/2022-Economic-Impact-Report-FINAL.pdf.

| | | |
|---|--|--|
| Economic Development Administration Public Works and Economic Adjustment Assistance | Grant for public works and economic development projects in distressed communities, including the development of brownfield sites | All sites |
| US Dept of Housing and Urban Development Community Development Block Grant (CDBG) | Grant for Entitlement Communities to expand economic opportunities | Black Creek Greenway, Sears Building |
| Alabama's CDBG Economic Development program | Grant funding for infrastructure improvements | All sites |
| Coosa Valley Resource Conservation and Dev. District | Grant funding for parks and trails | Black Creek Greenway |
| Alabama Reinvestment and Abatements Act Tax Credit | Abatement of sales and use tax on construction materials, property tax for up to 20 years, and increased utility services taxes for 10 years | Avondale Mills Plant, Sears Building, Wehadkee Yarn Mill |
| Alabama Jobs Act Tax Credit | 3% annually of the previous year's gross payroll for up to 10 years | Sears Building, Wehadkee Yarn Mill |
| Alabama Renewal Act: Growing Alabama Credit | Funding for site preparation and public infrastructure at industrial sites | Avondale Mills Plant, Wehadkee Yarn Mill |
| Alabama Enterprise Zone Act Tax Credit | State- and local-tax and non-tax incentives for locating or expanding within an Enterprise Zone | Sears Building |
| New Markets Tax Credit | Federal tax incentives for economic development in low-income areas | Avondale Mills Plant, Sears Building, Wehadkee Yarn Mill |

ii. Use of Existing Infrastructure

At the *Avondale Mills Plant PS*, broadband infrastructure will need improvements. SAFE is prepared to fund those improvements, but backup funding is available through State CDBG and/or ARC grants. The *Black Creek Greenway PS* may need an access roadway near the GSS Superfund/GIP border. State CDBG, ARG, and/or DOT grants can be used to fund those improvements. Otherwise existing infrastructure at the priority sites, including roadways, electric, water, sewer, stormwater, Internet, and phone will be sufficient.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Our communities have an inability to draw on other initial sources of funding to carry out environmental assessment, remediation and reuse projects because of their small population and low income. As previously discussed, the *EARPDC Jurisdiction* is large geographically, but is rural with 58 municipalities: half with a **population less than 1,000**, and only nine with more than 10,000. Furthermore, we have had struggles with population loss for decades. In the last 10 years, our geographic boundary has experienced a **-2.4% population loss**, compared to a State population increase of 2.4%, and a national increase of 5.8%. Nine of the 10 counties in our geographic boundary are Alabama Enterprise Zones (small populations with negative population growth.) All 10 counties in our geographical boundary have high rates of low-income populations, ranging between **35-43% low income**, compared to the national rate of 31%.⁵ Within our geographic boundary, our **average family income is 17.1% lower than the state** average and 33.3% lower than the national average.⁶ Our limited population size and low-income populations negatively impact our economy making funding brownfields projects a challenge. This grant will help to fund brownfields reuse in our communities that cannot afford to address the properties on their own, and help reverse these problems so that more brownfields project work can be continued in the future.

iii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The table below characterizes our sensitive populations, and the health and welfare issues that plague them. We have significantly higher numbers of people of color, disability rates, and children in single-parent households compared to State and national numbers. Children in single-parent families are more likely to live in poverty, have shorter educational trajectories, have less access to healthcare, have more contact with justice systems, and have employment challenges in adulthood.⁷ Reuse plans in *Avondale Mills Village* will include early childhood and K-12 education opportunities that will help to address these barriers for

⁵ EPA EJ Screen Community Report, county reports. ejscreen.epa.gov, accessed 10/31/23.

⁶ 2021: ACS 5-year Estimates. US Census Bureau. Accessed via the CARES Information Network. Geography Source: EARPDC 10-county boundary. sparkmap.org

⁷ "Child Well-Being in Single Parent Families," The Annie E. Casey Foundation. aecf.org. June 23, 2023.

| | AVONDALE MILLS ¹ | AC/DC – GADSDEN ² | TALLADEGA EDUC. GATEWAY ³ | ALABAMA | US |
|--------------------------------------|-----------------------------|------------------------------|--------------------------------------|---------|-------|
| People of Color | 45% | 62% | 62% | 38% | 39% |
| Disability Rate | 28.8% | 19.7% | 32% | 17% | 13.4% |
| Children in Single-Parent Households | 40% | 65% | 97% | 31% | 25% |
| Poverty Rate ⁴ | 28.7% | 31.9% | 29.8% | 15.8% | 12.6% |
| Low Income | 61% | 69% | 47% | 38% | 31% |
| Unemployment | 6% | 11% | 12% | 6% | 6% |
| > High School Ed. | 26% | 23% | 33% | 14% | 12% |

Source: EPA EJScreen. Custom shapes: Target areas. ejscreen.epa.gov.
¹ Etowah CT 3, 7-10, 12; ² Talladega CT 117-118; ³ Talladega CT 107
⁴ Source: 2021: ACS 5-year Estimates. US Census Bureau. data.census.gov.

sensitive populations near the Target Area. Additionally, reuse plans in the *Talladega Educ. Gateway* include the addition of sports venues and other expansion improvements for Talladega College. Sports programs at the college level not only have a positive effect on graduation rates, they also open up additional opportunities for disadvantaged students who may not otherwise participate

in higher education, which leads to higher incomes, and lower unemployment and poverty levels. In *AC/DC-Gadsden*, reuse plans include opportunities for small businesses and new jobs at the *Sears Building PS*, which will help to reverse poverty, raise incomes, and reduce unemployment for the sensitive populations in the surrounding community.

(2) **Greater Than Normal Incidence of Disease and Adverse Health Conditions**

Our Target Areas have higher rates of cancer, asthma, birth defects, and diabetes than State and national rates as presented in the table to the left. (Target Area-level data was not available for birth defects data, so county data was used.) Compared to State rates, our Target Areas' cancer rates are 4-8% higher, lung cancer rates are 14-22% higher, asthma rates are 14-23% higher, birth defects in *AC/DC-Gadsden*

| HEALTH CONDITIONS | AVONDALE MILLS ¹ | AC/DC – GADSDEN ² | TALLADEGA EDUC. GATEWAY ³ | ALABAMA | US |
|------------------------------------|-----------------------------|------------------------------|--------------------------------------|---------|-------|
| Cancer Incidence ⁴ | 467 | 458.4 | 475.9 | 440.7 | 442.3 |
| Lung Cancer Incidence ⁴ | 70.1 | 68.5 | 73.4 | 60.1 | 54 |
| Asthma ⁵ | 11.2 | 12.5 | 10.6 | 10.2 | 10 |
| Birth Defects ⁶ | 0 | 6.8 | 0 | 3 | - |
| Diabetes (adults) ⁷ | 12.1% | 12.7% | 12.1% | 11% | 9% |

¹ Etowah CT 3, 7-10, 12; ² Talladega CT 117-118; ³ Talladega CT 107
⁴ Rate per 100,000 population. Source: 2016-20 National Cancer Institute/Centers for Disease Control (CDC) State Cancer Profiles. Accessed via the CARES Information Network. Source geography: CTs. sparkmap.org.
⁵ Source: EPA EJScreen. Source geography: Custom shapes/target areas. ejscreen.epa.gov.
⁶ Death rate per 100,000 population. Source: 2021 Alabama Public Health 113 Causes of Death by County of Residence – Congenital malformations, deformations, and chromosomal abnormalities. Source geography: County. alabamapublichealth.gov.
⁷ Source: 2019 CDC National Center for Chronic Disease Prevention and Health Promotion. Accessed via the CARES Information Network. Source geography: CTs. sparkmap.org.

are more than double, and diabetes rates are 10-15% higher. These greater than normal incidences may be associated with exposure to the contaminants of concern in our target areas. We can begin to identify and reduce these contaminants through the environmental assessments and cleanup planning that will be conducted under this grant to improve the health conditions of our communities.

(3) **Environmental Justice**

(a) **Identification of Environmental Justice Issues**

| EJScreen Data | AVONDALE MILLS | | AC/DC-GADSDEN | | TALLADEGA ED. GATEWAY | |
|-------------------------------|----------------|----|---------------|----|-----------------------|----|
| | PERCENTILE IN | | PERCENTILE IN | | PERCENTILE IN | |
| | State | US | State | US | State | US |
| Particulate Matter | 64 | 81 | 50 | 78 | 55 | 79 |
| Diesel Particulate Matter | - | - | 76 | 59 | - | - |
| Toxic Releases to Air | - | - | 82 | 90 | - | - |
| Lead Paint | 88 | 71 | 91 | 76 | 87 | 70 |
| RMP Facility Proximity | 92 | 90 | 96 | 94 | - | - |
| Hazardous Waste Proximity | - | - | 87 | 60 | - | - |
| Underground Storage Tanks | 85 | 73 | 89 | 79 | - | - |
| People of Color | 65 | 63 | 75 | 73 | 75 | 74 |
| Low Income | 84 | 89 | 90 | 93 | 67 | 77 |
| Less than High School Diploma | 88 | 88 | 94 | 93 | 94 | 93 |
| Low life expectancy | 93 | 98 | 38 | 76 | 70 | 90 |

Source: EPA EJScreen. Source geography: Custom shapes/target areas. ejscreen.epa.gov.

As a tool to help label environmental justice (EJ) communities that will benefit from the Justice40 Initiative, CJEST identifies all of the census tracts (CTs) in all of our target areas as disadvantaged. CJEST shows the CTs in our target areas struggle with many burdens that far exceed threshold levels, particularly economic and health burdens. According to CEJST data, many burdens range from 90th-99th percentile of threshold

levels, such as expected population loss, low income, poverty, unemployment, energy cost, asthma, diabetes, heart disease, low life expectancy, lead paint, USTs & releases, and proximity to Risk Management Plan facilities. When combined with demographic and health effects data, as discussed in *Sections 2.a.i.* above, it is clear that the minority and sensitive populations in our target areas face severe EJ issues. Furthermore, EPA’s EJScreen data (see the table above) identifies pollution problems and sources, and socioeconomic indicators that significantly impact our target areas, further defining their EJ issues.

(b) Advancing Environmental Justice

Our brownfields projects will advance EJ by improving our Target Areas’ economies and health. Economies will be improved by creating more education, workforce development, business development, and agricultural research opportunities at the Avondale Mills Plant PS; by creating more jobs, small business, and housing opportunities at the Sears Building PS; by increasing tourism vitality at the Black Creek Greenway PS; and by creating new pathways to higher education through expanding Talladega College’s sports program and creating new jobs and business venues at the Wehadkee Yarn Mill PS. Increasing the jobs, education, and tourism opportunities will have an especially beneficial outcome on wages, poverty levels, graduation rates, and unemployment. Health will be improved by addressing and cleaning up potential contaminants at all priority sites; and creating more recreational greenspace and walking trails at Avondale Mills Plant PS and Black Creek Greenway PS. Removing contaminants and creating spaces for healthy outdoor activities will positively affect cancer and birth defect contributors, and asthma triggers; and will enable the community to increase activity levels, which reduce heart disease and diabetes, two diseases that disproportionately effect low-income, Black populations like those in our target areas. None of our brownfield projects will displace residents or businesses, as all of our sites except one are abandoned and dilapidated, or otherwise not in use. Additionally, while our brownfields projects will improve local economies, they are not anticipated to lead to housing demands that outprice surrounding residents, nor will small businesses be damaged by large businesses.

b. Community Engagement

i. Project Involvement and ii. Project Roles

The following Community Partners have already been identified who are vital to the to the success of our brownfields program. As the project progresses, we expect to add additional community partners.

| ORGANIZATION/ENTITY/GROUP | POINT OF CONTACT | SPECIFIC INVOLVEMENT OR ASSISTANCE PROVIDED |
|---|---|--|
| Difference Architecture | Ryan Coleman diffarch@gmail.com | Local architect. Provide primary technical direction on the EARTH master plan at Avondale Mills; assist with environmental reviews, cleanup planning, and future reuse. |
| Sylacauga City Schools | Dr. Michele Eller michele.eller@scsboe.org | Superintendent and founding member EARTH Investment Team. Provide leadership, staff, funding and support to advance the mission and goals of EARTH. Connect sensitive populations’ needs to the project. |
| The Chamber, Gadsden & Etowah County | Christi Robinson christi.robinson@etowahchamber.org | Mobilize local businesses and community to identify sites, and support future reuses. |
| Etowah County Master Gardeners | Regina Ford [REDACTED] | Grassroots group. Focus on community needs in site selection and future reuse. |
| Gadsden Beautification Board | Tiffany Parnell 256-393-2002 (no public-use email available) | Residents’ representative. Focus on neighborhood needs in site selection and future reuse. |
| Talladega College (HBCU) | Stanley Chatman schatman@talladega.edu | Neighboring property. Focus on neighborhood needs. Work within community to find future reuse/workforce resources. Provide meeting space. Connect sensitive populations to the project. |
| Talladega County Economic Development Authority | Calvin Miller millercalv@tceda.com | Mobilize local businesses and community to identify sites, and support future reuses. |

Each of our non-lead coalition members will be the functional lead for community outreach and engagement in their target areas and related geographic areas. For example, SAFE will lead community outreach in Avondale Mills Village in the City of Sylacauga, with the Talladega County Board of Education, and in other areas related to the Avondale Mills Plant PS. Similarly, DGI will lead community outreach in AC/DC-Gadsden, the City of Gadsden, and other areas related to the Sears Building PS and the Black Creek

Greenway PS. Throughout the project, our non-lead coalition members will also stay engaged and informed by serving on the Brownfields Advisory Committee (BAC), together with other key community and government partners, which will meet monthly, and will steer site selection, cleanup planning, and future reuse. EARPDC has enjoyed successful working relationships with both coalition members for several years and expects to continue that relationship well into the future.

iii. **Incorporating Community Input**

Our coalition team will build on the successful Community Involvement Plan (CIP) implemented in our 2021 CWA grant, which defines our plans for communicating with the community. We will use a variety of methods to communicate project progress to the local community, the underserved communities, and residents/groups directly affected by the project work. We will hold public meetings in each Target Area before starting work on the priority sites and annually throughout the project, with more meetings as needed. We will also hold virtual meetings to reach all communities in our geographic boundary, and to include underserved populations like our single-parent families who may not be able to attend in person. Public meetings in the *Talladega Educ. Gateway Target Area* will include sign language interpreters, as needed, to meet the needs of the deaf population in the community. Translation services will be provided in other areas as needed also. Project information will be provided on the EARPDC’s website, and distributed at scheduled public meetings. Meetings will be announced via local newspapers, the EARPDC website, our project partners’ social media, or other media to reach the public. Informational handouts will be provided during these meetings consisting of a general project description, information on the brownfield program, schedule/project duration, contact information to address questions during the project, and any health and safety aspects of the project. Materials will be developed in an easy to understand format. In addition to web-based community information and public meetings, local media resources will be used to provide instant information to the community regarding the project when necessary. Community feedback will be solicited with all project updates, and will be taken via face-to-face meetings, electronic meetings, phone calls, emails, and web forms. The Grant Manager will intake and respond to all community input, or forward the input to the appropriate coalition partner for response, as needed. The Grant Manager will also follow up to ensure responses are sent within a week, or as soon as possible.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

The brownfields project will take four years to complete. At least two sites will be assessed in each coalition member’s geographic boundary.

a. **Description of Tasks/Activities and Outputs**

| TASK 1: PROJECT MANAGEMENT | |
|---|---|
| i. Project Implementation: <i>EPA-funded tasks/activities:</i> Develop the Cooperative Agreement (CA) and workplan. Manage and track project progress, budgets, and fiscal expenditures and drawdowns. Work in partnership with EPA, ADEM and the BAC. Prepare quarterly/annual/DBE/final reports. Upload reports and other updates in ACRES. Manage, track and oversee contractor activities. Attend national and regional brownfields conferences. Capture and report in ACRES eventual project outcomes and benefits past assessment into cleanup and/or redevelopment and reuse. | |
| ii. Anticipated Project Schedule: | |
| <ul style="list-style-type: none"> ● Cooperative Agreement & workplan – Quarter (Q) 1 ● Kickoff meeting – Q1 ● Quarterly reports – end of each quarter ● Annual reports – end of year, annually ● DBE Reports – October annually | <ul style="list-style-type: none"> ● Federal Financial Reports (FFRs) – Dec annually ● Final Performance Report – Q16 ● ACRES Updates – monthly ● Attend 3 conferences – Q1, Q5 |
| iii. Task/Activity Lead(s): Grant Manager, supported by an Environmental Professional (EP). | |
| iv. Output(s): CA, workplan, 16 quarterly reports, 4 annual reports, 4 DBE reports, 4 FFRs, 1 final report, ACRES updates | |
| TASK 2: COMMUNITY OUTREACH | |
| i. Project Implementation: <i>EPA-funded tasks/activities:</i> Create a Community Involvement Plan (CIP) to educate and engage the community in the Brownfields Program, and to create an open dialogue about community goals and needs. Identify key community partners that will help with community engagement, drive participation, and announce and support public meetings. Hold public meetings at the beginning of work at the priority sites, annually, and as needed to inform the community about onsite work, and to collect inputs on the project. Use EARPDC, City, and community partner web and social media resources to drive community engagement. Update the EARPDC website to provide more detailed project information and to collect community inputs. Respond to community inputs in a timely manner. Use community inputs to create | |

a brownfields site inventory. Create a site prioritization process. Identify additional sites for assessment and/or cleanup planning using prioritization process. *Non-EPA grant resources needed:* Meeting spaces

ii. Anticipated Project Schedule:

- | | |
|---|--|
| <ul style="list-style-type: none"> ● CIP – Q1 ● Meeting announcements – at least two weeks prior to meetings. ● Community Meetings – at the start of work at priority sites and annually, with more as needed. ● Community Input Responses – within a week of receipt ● BAC meetings – quarterly in year 1, then semi-annual | <ul style="list-style-type: none"> ● Website – continuous ● Meetings with key partners – as needed ● Create brownfields site inventory – continuous ● Create site prioritization process – Q1 ● Identify sites for assessment/cleanup planning - continuous |
|---|--|

iii. Task/Activity Lead(s): Grant Manager, supported by EP.

iv. Output(s): CIP, agendas & minutes from community and key partner meetings, website updates, community inputs and responses.

TASK 3: ASSESSMENTS

i. Project Implementation: EPA-funded tasks/activities: Develop a Generic Quality Assurance Project Plan (GQAPP) to define field, sampling, and laboratory QA/QC procedures. All assessment work will be attempted at priority sites first before non-priority site work begins. Additional sites will be selected using the process described in *Section 1.a.iv*. Conduct ASTM Standard E1527-compliant Phase I ESAs. Conduct ground-penetrating radar (GPR) surveys to detect the presence of underground lines and/or tanks, as needed. Based on findings of Phase I ESAs, determine if Phase II ESAs are appropriate. Prepare Site-Specific QAPPs (SSQAPP) prior to all Phase II ESAs. Conduct Phase II ESAs, including asbestos-containing material (ACM)/lead-based paint (LBP) Surveys, as appropriate. Conduct Phase III ESAs with SSQAPPs. Create Risk Assessments (RAs). All ESAs will be conducted to address cleanup/No Further Action goals.

ii. Anticipated Project Schedule:

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Generic QAPP – Q1 ● 4 Phase I ESAs (<i>Black Creek Greenway PS, Sears Building PS, Wehadkee Yarn Mill PS, Eddie's Used Tires PS</i>) – Q1 ● 5 Phase II ESAs with SSQAPPs (Priority Sites) – Q2-Q3 ● 1 Phase III ESA with SSQAPP (Priority Sites) – Q3 | <ul style="list-style-type: none"> ● 1 RA (Priority Sites) – Q4 ● 32 Phase I ESAs (non-priority sites) – Q5-Q7 ● 15 Phase II ESAs with SSQAPPs (non-priority sites) – Q8-Q10 ● 2 Phase III ESAs (non-priority sites) – Q9 ● 2 RAs – Q10 |
|--|--|

iii. Task/Activity Lead(s): The EP, under supervision of the Grant Manager, due to the technical expertise required to perform the task.

iv. Output(s): Generic QAPP; 36 Phase I ESAs, 20 Phase II ESAs (with SSQAPPs), 3 ACM/LBP Surveys, 3 Phase III ESAs (with SSQAPPs), 3 Risk Assessments.

TASK 4: PLANNING

i. Project Implementation: EPA-funded tasks/activities: Complete 7 area-wide plans to evaluate market conditions and/or reuse options, and to create Resource Roadmaps to help condense the brownfield projects into distinct, fundable components, assign lead responsibilities, develop a multi-layered funding plan to support brownfields cleanup and reuse, and create a timeline for pursuing grants, loans, private and other sources of funds related to our brownfield projects. Use Phase II/III ESA findings to create Analyses of Brownfields Cleanup Alternatives (ABCAs), and Corrective Action Plans (CAPs).

ii. Anticipated Project Schedule:

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Reuse/Area-wide Plans – Q11-Q14 ● Resource Roadmap – ongoing | <ul style="list-style-type: none"> ● ABCAs – Q14-15 ● CAPs – Q15-Q16 |
|---|--|

iii. Task/Activity Lead(s): The EP, under supervision of the Grant Manager, due to the technical expertise required to perform the task.

iv. Output(s): 7 Reuse/Area-wide plans/ Resource Roadmaps, 8 ABCAs, 2 Corrective Action Plans

b. Cost Estimates

Cost estimates for implementing the anticipated project tasks are presented in the table below.

| BUDGET CATEGORIES | | PROJECT TASKS (\$) | | | | Total |
|-------------------|-----------------|--------------------|----------------|------------|----------|--------|
| | | Project Mgmt. | Comm. Outreach | Assessment | Planning | |
| Di | Personnel | 36,000 | 36,000 | | | 72,000 |
| | Fringe Benefits | | | | | |

| | | | | | |
|---------------------------|----------------|----------------|------------------|----------------|---------------------|
| Travel | 9,900 | | | | 9,900 |
| Equipment | | | | | |
| Supplies | | 2,500 | | | 2,500 |
| Contractual | 97,750 | 72,850 | 1,014,000 | 231,000 | 1,415,600 |
| Other | | | | | |
| Total Direct Costs | 143,650 | 111,350 | 1,014,000 | 231,000 | 1,500,000 |
| Indirect Costs | | | | | |
| Total Budget | 143,650 | 111,350 | 1,014,000 | 231,000 | \$ 1,500,000 |

Project Management personnel costs are for performance tracking and reporting, and are not subject to the 5% indirect administrative cost limitation. 83% of funds are allocated directly to assessment and planning activities.

Task 1: Project Management – Total: \$143,650. Personnel: 600 hours @ \$60/hr = \$36,000. Travel: 3 Brownfields conferences @ \$3,300/conference = \$9,900, includes flight (\$1,000), hotel (\$220/night for 5 nights), expenses (\$1,000), and registration (\$200). Contractual: 575 hours x \$170/hr = \$97,750.

Task 2: Community Outreach – Total: \$111,350. Personnel: 600 hours @ \$60/hr = \$36,000. Contractual: 425 hours x \$170/hr = \$72,250, and Sign-language translation services for community meetings - 4 meetings x \$150/meeting = \$600. Supplies: Printing meeting materials - \$1,000. Software & misc. (online meeting/project management application, etc) - \$1,500.

Task 3: Assessments – Total: \$1,014,000. Contractual: 1 Generic QAPP = \$5,500; 36 Phase I ESAs @ \$5,000 each = \$180,000; 8 GPR Surveys @ \$4,000 each = \$32,000; 20 Phase II ESAs (with SSQAPPs) @ \$30,000 each = \$600,000; 3 ACM/LBP Surveys @ \$5,000 each = \$15,000; 3 Phase III ESAs (with SSQAPPs) @ \$50,500 each = \$151,500; 3 Risk Assessments @ \$10,000 each = \$30,000.

Task 4: Planning – Total: \$231,000. Contractual: 7 Reuse/Area-wide plans/ Resource Roadmaps @ \$24,000 each = \$168,000; 8 ABCAs @ \$5,000 each = \$40,000 ; 2 Corrective Action Plans @ \$11,500 each = \$23,000.

b. Plan to Measure and Evaluate Environmental Progress and Results

EARPDC will develop a project plan with milestones and deliverables targets to track, measure and evaluate progress. Project management will be managed with software to assist tracking efforts. A budget will be developed to set cost expectations for each project task. Costs will be tracked monthly to ensure project progress is in line with spending and budgets. EARPDC will require the EP to provide a schedule of milestones, budgets and deliverables with monthly updates to integrate into monthly project tracking. When measures or timeline milestones are not being met, the Grant Manager will meet with EPA, coalition members and the EP to evaluate problems, find solutions, and identify steps to regain timeline losses and/or adjust the project as needed to meet expectations. ESAs will be completed as early in the project as possible to determine if there is extra capacity for additional sites in the Target Areas and other communities in the *EARPDC Jurisdiction* geographic boundary. Project outputs will be tracked and entered into ACRES on a quarterly basis and at annual intervals. Overall project results will be compiled at the end of the project and compared to initial project goals. EARPDC will also track overall project outcomes to facilitate EPA’s Strategic Plan. Outcomes such as the number and sizes of sites made available for reuse, jobs created, dollars leveraged, local government use, greenspace made available, energy efficiency measures implemented, and more will be entered into ACRES. Problems will be reported to EPA immediately and we will realign the project plan as needed to redirect work and get back on track efficiently.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity and ii. Organizational Structure

EARPDC has a 52 year history in providing resources to member communities and has proven experience in securing and managing federal funds. EARPDC will be the lead Coalition Manager and decision maker in all technical, administrative and financial decisions of the grant. We employ 4 planners and additional supporting staff including GIS mappers, lawyers, accountants, assistants, and more. We have been a force for change and improvement in our 10-County jurisdiction for many years. For decisions in the *AC/DC-Gadsden Target Area*, we will work closely with the Downtown Gadsden Executive Director, as well as the Director of Economic and Governmental Affairs who will gather inputs from City Council members, the Mayor, and other key City partners. For decisions in the *Avondale Mills Village Target Area*, we will work closely with the Executive Director for SAFE who has championed the EARTH redevelopment project (a priority site), the lead architect and engineering firm who are designing the project, and other SAFE partners identified in *Section 2.b.i*. In the *Talladega Educ. Gateway Target Area*, we will work closely with the City Planner and the Interim Planning Director who both have been heavily involved in identifying brownfield sites and overall redevelopment plans in the Target Area. All three partners have been deeply involved in

planning for this grant submittal, and have provided letters indicating their interest in this project, which are attached to the Threshold Criteria as requested.

iii. Description of Key Staff

Frank Humber, EARPDC Deputy Director, will provide executive oversight of the grant. He has a Masters of Urban Planning and 47 years of experience in planning and development. Eric Wright, EARPDC Director of Planning, will serve as the Grant Manager, with assistance from Shelby Peterson, Regional Planner. Mr. Wright has a Master of Public Administration and is an experienced local government leader with a demonstrated successful history in grant writing, economic development, and public policy. He supervises a team of 4 planners, a GIS Mapper, and a GIS supervisor, which provides community development, land-use, transportation, and environmental planning duties. Ms. Peterson, who is experienced with managing brownfield assessment grants, will assist Mr. Wright with scheduling and quarterly reporting activities. Karrissa Swearngin, EARPDC Director of Finance, will be the Financial Manager of the grant. Ms. Swearngin has been responsible for assisting with EARPDC’s financial management of over \$20 million dollars of federal and state grants since joining the organization. She has 15 years of experience working with federal grant budgets ranging up to \$10 million dollars. These individuals have the experience and credentials to effectively manage this brownfield grant.

iv. Acquiring Additional Resources

To expedite the project, EARPDC has already contracted with an environmental professional to assist with the technical aspects of the grant. The firm was selected through a competitive process per the EPA’s November 2022 *Best Practice Guide for Procuring Services, Supplies and Equipment Under EPA Assistance Agreements* and applicable portions of 2 CFR 200 and 40 CFR 33, among others. EARPDC ensured that the selected firm promote strong labor and diversity, equity and inclusion practices that include Disadvantaged Business Enterprises (DBEs) and local subconsultants/subcontractors on their team. No subwards are anticipated, but if needed, will comply with EPA’s Subaward Policy and will have fair opportunities to compete for work. Cost, experience, ability and capacity will be selection factors.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: EARPDC received a \$600,000 Coalition Assessment Grant in 2021 (BF-02D08621). Although the grant period officially ends on September 30, 2024, \$546,184 (91%) in grant funds have been drawn down and the remaining \$53,816 are allocated to existing projects. Numerous project funding requests were turned down due to lack of funding, prompting EARPDC to submit this grant application to meet the demand and needs in our member communities.

(1) Accomplishments: Outputs of this grant included: three community meetings, a Community Involvement Plan, a Generic QAPP, eight Phase I ESAs, eight Site-Specific QAPPs, eight Phase II ESAs, and removal of USTs at three sites. A total of \$71,169 (13%) was expended utilizing the services of Certified Minority-owned Business Enterprise and Women-owned Business (MBE/WBE) subcontractors. **Outcomes:** Of the nine properties assessed, three are under redevelopment and two sites are planned to be sold for redevelopment. One site under redevelopment has been demolished and is being developed into a large workforce innovation and training hub called EARTH that will serve the Sylacauga and surrounding communities, and the other site is an old 50’s- style gas station that, after the USTs were removed, is being developed into the *Sinclair Social* food and drink entertainment venue, that will help spur growth in Anniston’s new entertainment district. Environmental issues associated with a UST system and former car dealership were mitigated using grant funds at a former gas station located on a prominent corner at the entrance to the Town of Wadley, which was then purchased by a developer to build a much-needed pharmacy.

(2) Compliance with Grant Requirements: EARPDC complied with all terms of the Cooperative Agreement. A Work Plan was produced in the early stages of the project and closely followed throughout the grant period. Minor adjustments to schedules and budgets were provided to the EPA Project Officer when required. EARPDC prepared and submitted all EPA-required reports including quarterly, semi-annual, final reports; financial reports, and MBE/DBE utilization goals were surpassed. All work was updated in EPA ACRES to accurately and consistently track project outputs and outcomes, and the expected results presented in the grant application and Work Plan were achieved. All available grant funds have been drawn down or allocated, with only the Final Report remaining to complete the grant, a full year before the Cooperative Agreement expiration.

THRESHOLD CRITERIA

1. Applicant Eligibility

a. All Coalition members are eligible for application. The East Alabama Regional Planning and Development Commission (EARPDC) is eligible as a public agency/Regional Council established under governmental authority, chartered by the Governor's office in June 1971. (See Attachments A and B.)

b. The EARPDC is not a 501(c)(4) organization, but is exempt from Federal taxation.

2. Number and Eligibility of Non-lead Coalition Members

EARPDC has two non-lead coalition members: Sylacauga Alliance for Family Enhancement (SAFE) and Downtown Gadsden Inc. (DGI). SAFE is eligible as a nonprofit organization described in Section 501(c)(3) of the Internal Revenue Code. Downtown Gadsden Inc. is eligible as a Nonprofit organization described in Section 501(c)(3) of the Internal Revenue Code. See Attachments C and D for documentation of their Section 501(c)(3) of the Internal Revenue Code status.

3. Target Areas

See item 4 in the Narrative Information Sheet.

4. Existing Brownfields Grants to Non-lead Members

Each non-lead coalition member is not the recipient of an open cooperative agreement for MARC Grant funding or a MARC Grant that closed in 2016 or later.

5. Coalition Agreement

See Attachment E for SAFE's signed letter of agreement to be part of the coalition and Attachment F for Downtown Gadsden Inc.'s signed letter of agreement to be part of the coalition.

6. Community Involvement

We have a list of Community Partners who are vital to the to the success of our brownfields program. The list includes citizens groups, business organizations, local colleges and education leaders, and local economic development groups. As the project progresses, we expect to add additional community partners. Our Community Partners will help us make decisions with respect to site selection, cleanup, and future reuse of our brownfield sites.

Each of our non-lead coalition members will be the functional lead for community outreach and engagement in their target areas and related geographic areas. For example, SAFE will lead community outreach in *Avondale Mills Village*, in the City of Sylacauga, with the Talladega County Board of Education, and in other areas related to the *Avondale Mills Plant Priority Site (PS)*. Similarly, DGI will lead community outreach in *AC/DC-Gadsden*, the City of Gadsden, and other areas related to the *Sears Building PS* and the *Black Creek Greenway PS*. Throughout the project, our non-lead coalition members will also stay engaged and informed by serving on the Brownfields

Advisory Committee (BAC), together with other key community and government partners, which will meet monthly, and will steer site selection, cleanup planning, and future reuse. EARPDC has enjoyed successful working relationships with both coalition members for several years and expect to continue that relationship for many more years.

Our coalition team will build on the successful Community Involvement Plan (CIP) implemented in our 2021 Community-Wide Assessment (CWA) grant, which defines our plans for communicating with the community. We will use a variety of methods to communicate project progress to the local community, the underserved communities, and residents/groups directly affected by the project work. We will hold public meetings in each target area before starting work on the priority sites and annually throughout the project, with more meetings as needed. We will also hold virtual meetings to reach all communities in our geographic boundary, and to include underserved populations like our single-parent families who may not be able to attend in person. Public meetings in the Talladega Education Gateway Target Area will include sign language interpreters, as needed, to meet the needs of the deaf population in the community. Translation services will be provided in other areas as needed also. Project information will be provided on the EARPDC's website, and distributed at scheduled public meetings. Meetings will be announced via local newspapers, the EARPDC website, our project partners' social media, or other media to reach the public. Informational handouts will be provided during these meetings consisting of a general project description, information on the brownfield program, schedule/project duration, contact information to address questions during the project, and any health and safety aspects of the project. Materials will be developed in an easy to understand format. In addition to web-based community information and public meetings, local media resources will be used to provide instant information to the community regarding the project when necessary.

Community feedback will be solicited with all project updates, and will be taken via face-to-face meetings, electronic meetings, phone calls, emails, and web forms. The Grant Manager will intake and respond to all community input, or forward the input to the appropriate coalition partner for response, as needed. The Grant Manager will also follow up to ensure responses are sent within a week, or as soon as possible.

7. Expenditure of Existing Grant Funds

Attachment G is an SF 270 report from our FY2021 Community Wide Assessment Coalition (BF-02D08621) Grant showing \$546,181.52 (91%) of our \$600,000 award was drawn down as of July 31, 2023, before the before the October 1, 2023 deadline. The remaining 9% has been allocated to other projects and tasks, and the final report and grant close-out documentation will be submitted almost a year in advance to the 3-year grant period provided in the Cooperative Agreement.

8. Contractors and Named Subrecipients

EARPDC has already selected a contractor (Environmental Professional) to assist us with preparation of this grant application and to help implement the grant if awarded. Our organization does not have the technical environmental knowledge to prepare such an application, so we elected to procure a firm to assist us prior to submission. Award of this grant is an important part

of our redevelopment, and it was necessary for us to secure the technical support needed to assist with the effort.

Regarding our procurement process, we reviewed examples of Request for Qualifications (RFQ) documents used in our pursuit of a brownfield assessment grant in 2021 and those issued by other applicants since that time. Our Planning Department then created an RFQ that met our circumstances and needs under the “dual procurement process,” and advertised the RFQ in the public notice section of The Anniston Star (a local newspaper with wide circulation) on July 15, 2023, with a response due date of August 15th. The ad was also picked up by bid aggregating services such as Magnolia Clipping Service, GOVWIN, etc., which further increased the circulation. This procedure is consistent with our normal procurement processes. EARPDC does not send RFQs for professional services to individual firms, as we believe advertising our needs in a widely-distributed news source is the most fair and open way to procure services and make it available to all. We received three responses to the RFQ, which were reviewed by our selection committee. The qualifications of the submitting firms were evaluated against the rating criteria listed in the RFQ, which included price reasonableness, and the committee selected a firm (PPM Consultants, Inc.) that best met those criteria. We notified the firm of its selection on August 16, 2023. The firm then provided a contract to the EARPDC describing in detail the services it would be providing, along with cost estimates for review. The terms and costs of the contract seemed reasonable, so approval by the EARPDC Executive Director was given on October 12, 2023.

We are confident that our procurement procedures were fair and open, consistent with the RFQ process we routinely employ when seeking professional services; the federal procurement standards at 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33, as well as the EPA’s guidance documents: Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements and the Brownfields Grants: Guidance on Competitively Procuring a Contractor. The RFQ was advertised and readily available to interested firms. The selection criteria in the RFQ were reasonable, not designed to reduce competition, included price as a selection criterion, and we believe were in accordance with all federal requirements. Documentation of our procurement process, along with a copy of the signed contract with the selected firm as Attachment H.

No subrecipients will be named during the grant period.