



**Narrative Information Sheet**

1. **Applicant Identification:** Gabriela Apartments, Inc.  
50 Vashell Way  
Suite 400  
Orinda, CA 94563
  
2. **Funding Requested:**
  - a. Grant Type: Single Site Cleanup
  - b. Federal Funds Requested: \$1,274,500
  
3. **Location:**
  - a. City: Selma
  - b. County: Dallas County
  - c. State: Alabama
  
4. **Property Information:**
  - **Old Baptist Hospital**  
15 Riverview Ave.  
Selma, AL 36701
  
5. **Contacts:**
  - a. Project Director:  
Francisco Borvice  
925-438-0016  
[fborvice@hdhousing.com](mailto:fborvice@hdhousing.com)  
50 Vashell Way  
Suite 400  
Orinda, CA 94563
  
  - b. Chief Executive/Highest Ranking Elected Official:  
Francisco Borvice  
925-438-0016  
[fborvice@hdhousing.com](mailto:fborvice@hdhousing.com)  
50 Vashell Way  
Suite 400  
Orinda, CA 94563
  
6. **Population:**  
Selma, Alabama - 18,429 (*2021 American Community Survey 5-Year Estimates Data Profiles, US Census*)



## GABRIELA APARTMENTS, INC.

50 Vashell Way Suite 400, Orinda, CA 94563  
925.438.0016 | 925.478.7745 fax

### 7. Other Factors Checklist:

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<u>Other Factors</u>	<u>Page #</u>
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) 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 thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	p.3
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.	

8. Releasing copies of Application – Not applicable. No confidential, privileged or sensitive information is presented in the grant application

# NARRATIVE



## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **a. Target Area and Brownfields**

#### **i. Overview of Brownfield Challenges and Description of Target Area:**

The City of Selma is located 50 miles west of Montgomery and serves as the county seat of Dallas County. Selma is nestled in the heart of Alabama's Black Belt region, and it rests on the banks of the Alabama River. The Black Belt region originally got its name from the area's dark soil. The name took on additional meaning in the 19<sup>th</sup> century, when the quintessential cotton plantations of the south sprang up throughout the region, bringing a large population of enslaved African Americans in to tend and harvest the crops. Since then, Selma has played an important role in the American Civil Rights Movement and is well-known as the site of the infamous "Bloody Sunday" attack on civil rights marchers by law enforcement in 1965. The City is also the commencement point of the subsequent Selma to Montgomery March led by Martin Luther King Jr. in the same year.

Selma is one of Alabama's oldest surviving cities.<sup>1</sup> With a population loss of more than 11% since 2010,<sup>2</sup> it is also one of Alabama's fastest-shrinking cities.<sup>3</sup> During WWII era, the City was a thriving place. The historic Craig Air Force Base operated just four miles southeast of Selma. During the war, the Base was one of the busiest airfields in the nation, delivering a flurry of activity and prosperity to this area throughout its operational years. Throngs of people filled neighborhood shops and businesses. The Base's closure in 1977 took a devastating toll, and the effects can still be felt throughout Selma more than 40 years later. The City's economy never recovered from the loss of so many local jobs and so much revenue.<sup>4</sup> **The current per capita income of Selma is only \$19,262,<sup>5</sup> and 56% of the population is categorized as low income.<sup>6</sup>** The crime rate in the City is among the highest in the nation.<sup>7</sup> With abandoned homes and crumbling buildings scattered throughout the City, blight and decay have grown to be major issues. When a powerful tornado tore through Selma in January 2023, the difficulties already facing the community were worsened. Because of its severely deteriorating infrastructure, Selma was already dealing with a housing problem. Numerous houses were destroyed by the storm, forcing hundreds of people to flee their homes. Roofs and porches were torn off. Trees were thrown into people's living rooms by the tornado, and in some places, the trunks can still be seen jutting out of windows. Selma residents simply do not have the capacity to fund the repairs that would put people back into their houses, so they remain displaced, with nowhere to turn. The devastating impacts of brownfield challenges are evidenced throughout all of Selma by excessive unemployment, poverty, stifled economic growth, homelessness, and rampant criminality. Alabama's Black Belt region was designated as an Environmental Justice Community by the White House Environmental Justice Advisory Council's Justice40 Initiative. This region requires federal investments to improve basic health services, and air/water quality. A "whole of government" approach is required to address this need.<sup>8</sup>

Our Target Area for this cleanup application is Census Tract 01047956702, which encompasses nearly 2.5 square miles in the southwest corner of Selma. This area is bordered to the northwest by railroad tracks, to the northeast by Valley Creek, to the southeast by the Alabama River, and to the southwest by Beaver Dam Branch. Like much of Selma, our Target Area has become a hollow shell of what it once was. Roofs are collapsing, buildings are falling apart, and neighborhoods that were once full of vivacious character, are now crumbling. Trees can be seen growing up through the center of buildings that were once beautiful, historic homes. Our target area encompasses some of the poorest and most underserved neighborhoods in the City, with a poverty rate of **nearly 30%<sup>9</sup> and a 20% unemployment rate within**

<sup>1</sup> [Selma: One Of The Oldest Surviving Cities In Alabama \(onlyinyourstate.com\)](#)

<sup>3</sup> [Birmingham, Montgomery among Alabama's fastest shrinking cities - al.com](#)

<sup>3</sup> [U.S. Census Bureau QuickFacts: Selma city, Alabama](#)

<sup>4</sup> [EXTRA: Craig Air Force Base: 40 Years Later - Alabama News](#)

<sup>5</sup> US Census, ACS, 2021 5 Year Estimates

<sup>6</sup> EJ Screen Report for City of Selma

<sup>7</sup> [Selma, AL Crime Rates and Statistics - NeighborhoodScout](#)

<sup>8</sup> "Justice40 Climate and Economic Justice Screening Tool & Executive Order 12898 Revisions, Interim Final Recommendations." White House Environmental Justice Advisory Council. May 13, 2021. pp21-22.

<sup>9</sup> US Census Bureau, Small Area Income and Poverty Estimates. 2021. Source geography: County



**Census Tract 01047956702.**<sup>10</sup> With this grant funding, we plan to cleanup a 3.32-acre parcel of land that is referred to as the **Old Baptist Hospital**. This former hospital is situated in the middle of a residential neighborhood, and the adjoining properties to the north, east, and south consist of small residences. To the west is a small office building that has been converted from a historical residence, and approximately 0.1 miles to the west is Valley Creek Park, a public park that offers outdoor recreation and nature preservation for the Selma community to enjoy. Just under 500 feet to the south (down-gradient) of the Old Baptist Hospital is the Alabama River. The Old Baptist Hospital will be redeveloped as affordable housing for the City's elderly impoverished population, a reuse strategy that will facilitate the removal of real, physical dangers that pose significant health and safety risks; create affordable housing for this economically devastated community; eliminate unsafe eyesores in close proximity to residential areas; and remove environmental contaminants that are endangering nearby sensitive populations.

ii Description of Proposed Brownfield Site(s):

The Old Baptist Hospital is located at 15 Riverview Avenue in Selma, AL and is currently owned by Gabriela Apartments, Inc (Gabriela Apartments), a 501(c)(3) nonprofit that was formed for the purpose of developing affordable, low-income housing opportunities for communities in need across the country. The Old Baptist Hospital consists of 3.32 acres that is currently developed with a large, former hospital/office building surrounded by grassy areas.

A Phase I ESA/Asbestos Survey was performed at the Old Baptist Hospital in September 2009; a Phase II ESA was completed in October 2011; a supplemental Phase II ESA was completed in September 2020; and an updated Phase I ESA/Asbestos Survey were completed in September 2023. These assessments have documented the presence of ACM in building materials at the Old Baptist Hospital, as well as elevated concentrations of benzo(a)pyrene in soil and groundwater samples. The property historically operated as a hospital from 1924 to 1978, and then as an office building until 2003. Since 2004, it has been vacant. Twenty years of sitting idle and empty have taken a detrimental toll. The roof is collapsing, and the walls are weathered and worn, with many of them beginning to visibly crack and crumble. Located adjacent to numerous residences, this former hospital is not secured and presents a grave danger for curious children living and playing nearby who may easily wander inside and get hurt. There is a significant danger of exposure to friable asbestos that may blow into nearby communities if the deteriorating, structurally unsafe building is left to face the harsh wind and weather that is characteristic of the South. The impacts to soil and groundwater also present serious concerns for the disadvantaged communities living next door. The Alabama River is approximately 450 feet down-gradient of the Old Baptist Hospital. According to ASTM E2600 Standard, this distance puts the Alabama River within a critical down-gradient distance of our brownfield site. This means that there is real potential for the migration groundwater with elevated concentrations of petroleum constituents and hazardous substances to reach the river. Given the contaminants found at the site, this presents serious concerns regarding the water quality of the river.

**b. Revitalization of the Target Area**

i. Reuse Strategy and Alignment with Revitalization Plans:

For the Old Baptist Hospital, Gabriela Apartments has analyzed multiple reuse strategies. Based on input from the community and the site's location, we have determined that this property is well positioned for redevelopment as affordable housing units that will provide some desperately sought-after relief for the impoverished sensitive communities in Selma. The public (including underserved communities) and project partners are fully on board with our reuse strategy, and we are confident we have the full support of City representatives. Our reuse strategy aligns nicely with Selma's *Comprehensive Community Master Plan*. Community visioning sessions were held by the City during the development of this Plan, and input from community members indicates that more affordable housing is a top priority for City residents. The City is currently suffering from a major housing crisis, with an owner-occupied housing unit rate of less than 47%.<sup>11</sup> This means that the majority of residents are renters, and for those looking for safe, affordable rental units, the options are slim. Blight and dilapidation absolutely plague this community. Far too many run-down, derelict properties are littered across the City, posing a danger to children living and playing in neighborhoods. The dilapidation serves as a stark reminder of loss for older generations. Redevelopment

<sup>10</sup> EJ Screen Report Census Tract 01047956702

<sup>11</sup> [Montgomery Advertiser](#)



will remove the blight that lingers in this neighborhood, and it will be a beacon of positive change and economic relief for the community.

ii. Outcomes and Benefits of Reuse Strategy:

Cleanup of the Old Baptist Hospital and development as affordable housing units will have numerous outcomes and significant benefits for the community. Reaching far beyond fulfilling a basic need for shelter, affordable housing uplifts residents, encourages social connection, reduces overcrowding, attracts businesses and jobs to the area, and even lowers crime rates. When low-income populations have to worry less about making rent each month, more disposable income is available for local spending. This supports a steady revenue stream for businesses and contributes to the creation of jobs and economic growth in the entire community. In addition, affordable housing can free up resources for low-income residents to pay for quality healthcare and to invest in healthy habits and lifestyles. It also promotes diversity, creating a dynamic place where people of all different cultural, socio-economic and educational backgrounds can come together and thrive.

In addition, redevelopment of the Old Baptist Hospital as safe, affordable housing can have a significant impact on local climate adaptation, mitigation capacity, and resilience. Housing intersects with climate change through its impact on greenhouse gas emissions and in the ways that it exposes or protects residents from natural disasters related to climate change. Gabriela Apartments plans to utilize energy-efficient construction methods and energy-efficient appliances during renovations, thereby reducing the impact that this redevelopment project might have on climate change. This reuse strategy will also provide housing that is designed and built to be much more resilient to natural disasters than much of Selma's current inventory of housing options. Many natural disasters have become more frequent and severe because of climate change, and our reuse strategy will provide safe, stable shelter from these events for a community that is facing more than their fair share of catastrophic environmental justice issues.

c. **Strategy for Leveraging Resources:**

i. Resources Needed for Site Characterization: Site characterization has been completed at the Old Baptist Hospital, including two Phase I ESA/asbestos surveys, one Phase II ESA, and one limited, supplemental Phase II ESA. Significant coordination with the City of Selma, the EPA and the Alabama Department of Environmental Management (ADEM) has already begun for this project, with the first Phase I ESA at the Old Baptist Hospital paid for by the City of Selma's FY06 EPA Brownfield Assessment Grant, and the 2011 Phase II ESA performed by ADEM through their EPA Brownfields 2002 Revolving Loan Fund. The level of assessment currently completed at the site is expected to be sufficient for cleanup to begin; however, if additional characterization is needed, Gabriela Apartments will seek further assistance from ADEM's Section 128(a) funding program. ADEM has indicated in their Support Letter that such funds are available on a first-come/first-serve basis, and Gabriela Apartments will request such funding should additional assessment be necessary.

ii. Resources Needed for Site Remediation: Gabriela Apartments anticipates that EPA funding requested in this application will be sufficient to complete the cleanup of the Old Baptist Hospital. Cost estimates were prepared with input from an environmental professional with extensive experience in brownfields cleanup projects. These costs were presented in a draft version of the Analysis of Brownfields Cleanup Alternatives (ABCA) that has been recently created (in October 2023) to reflect current market rates.

iii. Resources Needed for Site Reuse: To complete the reuse of the Old Baptist Hospital, Gabriela Apartments plans to seek Low Income Housing Tax Credits to subsidize the construction of affordable rental housing for low-income households. Gabriela Apartments will also seek assistance from the Delta Regional Authority (DRA), which offers resources for projects that encourage the development of basic improvements to enhance quality of life. The Alabama Department of Economic and Community Affairs (ADECA) offers Enterprise Zone tax incentives for the purchases of construction-related materials, machinery and equipment used in development projects, and Dallas County is considered an Enterprise Zone. Congress is also pursuing billions in funding to improve infrastructure and basic health needs in the Black Belt Region, which is another avenue of funding that could enhance Gabriela Apartments' reuse strategies. Finally, Gabriela Apartments will explore opportunities to apply for financing through the Alabama Housing Finance Authority (AHFA) to support the redevelopment plans at the Old Baptist Hospital.

iv. Use of Existing Infrastructure: Sufficient infrastructure, including power, utilities, water and





sewer, is already present to support the anticipated redevelopment at the Old Baptist Hospital. No other infrastructure is anticipated to be necessary for new development at the Old Baptist Hospital.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

**i. The Community's Need for Funding:**

Selma is a small community of 18,429 that is rapidly getting smaller, losing more than 11% of its population since 2010.<sup>12</sup> A key factor in our population decline is a lack of high-paying jobs in the local community. With a low **per capita income that is just over half the national average, and a high poverty rate that is more than twice the national average**, our community is facing real challenges with poverty and **low income**. The **unemployment rate in Selma is more than three times the national average**, and the rate of SNAP food benefits is **almost three times the national average**. Loss of considerable revenue when Craig Air Force Base closed in 1977, along with the closing of other businesses that catered to Base personnel, created a significant economic deficit in the City that continues to be a major issue today. The derelict conditions at the Old Baptist Hospital and throughout the rest of Selma have caused multiple opportunities for revenue-generating redevelopment to fall through in the years since

Gabriela Apartments acquired the property, creating significant budget shortfalls. These are the reasons why Gabriela Apartments and the local community has an inability to fund environmental remediation at the Old Baptist Hospital. The former hospital is not only an eyesore, but also a current environmental and safety hazard. Gabriela Apartments' reuse strategies will alleviate environmental and safety concerns and provide a desperately-needed opportunity for the struggling low-income residents of Selma to access safe, affordable housing.

Economic Indicators	Selma	Dallas County	AL	US
Per Capita Income <sup>a</sup>	\$19,262	\$20,747	\$30,457	\$37,637
Poverty Rate <sup>a</sup>	29.41%	24.31%	15.79%	12.63%
Unemployment Rate	12% <sup>b</sup>	9% <sup>b</sup>	2.3% <sup>a</sup>	3.8% <sup>a</sup>
SNAP Food Benefits Rate <sup>a</sup>	36%	36%	15.2%	12.6%
<sup>a</sup> US Census, ACS, 2021 5 Year Estimates				
<sup>b</sup> EJ Screen Report				

Gabriela Apartments acquired the property, creating significant budget shortfalls. These are the reasons why Gabriela Apartments and the local community has an inability to fund environmental remediation at the Old Baptist Hospital. The former hospital is not only an eyesore, but also a current environmental and safety hazard. Gabriela Apartments' reuse strategies will alleviate environmental and safety concerns and provide a desperately-needed opportunity for the struggling low-income residents of Selma to access safe, affordable housing.

**ii. Threats to Sensitive Populations:**

**(1) Health or Welfare of Sensitive Populations:**

Sensitive Populations	Selma	Dallas County	Alabama	US
Children <sup>a</sup>	24.0%	24.0%	22.5%	22.5%
Black Minority <sup>a</sup>	84%	71%	27%	13%
Female <sup>a</sup>	56%	54%	51%	51%
Disabled <sup>a</sup>	18%	19%	16%	13%
Obesity <sup>b</sup>	42%	42%	32%	29%
Poor Health	32% <sup>d</sup>	29% <sup>c</sup>	20% <sup>c</sup>	16% <sup>c</sup>

As shown in the table to the left, sensitive populations including children, minorities, women, the disabled, the obese, and those suffering from poor health, abound in our target community. The health and welfare of these sensitive populations in Selma is largely influenced by poverty, food insecurity, crime, and limited access to health resources. The City has a violent crime rate of 911 per 100,000, compared to the US at 416 per 100,000.<sup>13</sup> Selma has a property crime rate of

<sup>a</sup> Source: US Census, ACS, 2021 5 Year Estimates  
<sup>b</sup> Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion. 2021. Source geography: County  
<sup>c</sup> Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Accessed via the PLACES Data Portal. 2021. Source geography: Tract  
<sup>d</sup> Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Accessed via the PLACES Data Portal. 2019. Source geography: Tract

5,423 per 100,000, compared to the country's rate of 2,466 per 100,000.<sup>9</sup> In addition, 27.2% of City residents are experiencing food insecurity, which is **nearly three times** the rate seen in the U.S. (10.2%).<sup>14</sup> The City has only 74 mental health professionals per 100,000 people, compared to 296/100,000 in the

<sup>12</sup> [U.S. Census Bureau QuickFacts: Selma city, Alabama](#)

<sup>13</sup> FBI Uniform Crime Reports. Additional analysis by the National Archive of Criminal Justice Data. 2015-17.

<sup>14</sup> Feeding America. 2020.



U.S.<sup>15</sup>, and there are only 34 dentists per 100,000 people in Selma, which is **less than half the national rate** of 72/100,000.<sup>16</sup> This grant will address poverty and the City’s housing crisis by creating a safe, affordable housing option for the City’s low-income population. This will, in turn, help to increase the socioeconomic status of residents by decreasing their housing cost burden and improving their financial security. Since poverty is a key factor in limited healthcare access, food insecurity, and even crime, addressing socioeconomic status will improve these welfare issues as well. This grant will demonstrate a transparent and community-centered project designed to improve health conditions associated with environmental pollution and improve the quality of life for the City’s impoverished sensitive populations. In addition, this grant will reduce the number of derelict properties in the community that tend to attract criminal activity.

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

Adverse Health Conditions	Selma	Dallas County	AL	US
Cancer Incidence Rate <sup>a</sup>	467.4	468.8	440.7	442.3
Heart Disease Mortality Rate <sup>b</sup>	143.5	143.5	83.7	91.5
Birth Defect Occurrence <sup>c</sup>	0.31%	0.26%	0.26%	-
Asthma Prevalence <sup>d</sup>	11.8%	11.80%	10.4%	9.7%
COPD Prevalence <sup>d</sup>	10.1%	10.1%	8.3%	6.4%
Low Birth Weight <sup>e</sup>	14.0%	14.0%	10.4%	8.2%

<sup>a</sup> State Cancer Profiles. 2014-18. Rate per 100,000.  
<sup>b</sup> Center for Disease Control & Prevention, CDC, National Vital Statistics System. Accessed via CDC WONDER 2016-20. Rate per 100,000.  
<sup>c</sup> Alabama Department of Public Health – total number of birth defects/total population  
<sup>d</sup> Center for Disease Control & Prevention, Behavioral Risk Factor Surveillance System. 2019  
<sup>e</sup>University of Wisconsin Population Health Institute, County Health Rankings. 2014-2020. Source geography: County

Dallas County is considered one of the least healthy counties in Alabama.<sup>17</sup> Prolonged exposure to hazardous substances like those found at the Old Baptist Hospital poses a significantly increased risk for many dangerous health conditions that are plaguing the entire Selma community. Asbestos exposure is documented to be a potential root cause of certain types of cancer, as well as COPD. Numerous breathing conditions, such as asthma, may be exacerbated by inhalation of microscopic asbestos fibers. Benzo(a)pyrene is also a probable cancer-causing agent, with evidence surfacing that it could cause skin, lung, and bladder cancer. Both ACM and benzo(a)pyrene are documented to be present at our brownfield site. Given the dilapidated condition of the former hospital, there is a real danger for contaminants, such as friable asbestos, to blow into neighboring areas, further increasing the risks to the community. Asthma, COPD, and cancer can all be seen at increased rates in the Selma community, compared to the State and nation. Pregnant women and infants are at heightened risk for many detrimental health consequences that can be linked to environmental hazards, and Selma has an increased rate of birth defects and low birth weight compared to both the County and the State. Evidence has surfaced that exposure to benzo(a)pyrene can impact fetal cardiovascular development, which may lead to cardiovascular dysfunction later in life.<sup>18</sup> Selma’s heart disease mortality rate is more than 1.5 times the national rate. Abatement of the ACM and remediation of benzo(a)pyrene in soil and groundwater at the Old Baptist Hospital will decrease the risk of cancer and other adverse health conditions that impact the lungs and heart, helping to ensure the future safety of the sensitive populations living in Selma.

<sup>15</sup> Centers for Medicare and Medicaid Services, [CMS - National Plan and Provider Enumeration System \(NPPES\)](#). Accessed via [County Health Rankings](#). 2022.

<sup>16</sup> US Dept. of Health & Human Services, Health Resources & Services Admin, HRSA - Area Health Resource File. 2021.

<sup>17</sup> [Dallas County, Alabama | County Health Rankings & Roadmaps](#)

<sup>18</sup> [Benzo\(a\)pyrene and cardiovascular diseases: An overview of pre-clinical studies focused on the underlying molecular mechanism - PMC \(nih.gov\)](#)





(3) Environmental Justice:

(a) Identification of Environmental Justice Issues:

Based on the statistics demonstrated in the table to the right, the Climate & Environmental Justice Screening Tool (CEJST) has identified our Target Area (Census Tract 01047956702) as disadvantaged because it meets more than one burden threshold, in addition to the related socioeconomic threshold. Our Target Area is in the 86<sup>th</sup> percentile for low income, and they are dealing with extreme projected flood risks, excessive energy costs, and sky-rocket rates of diabetes, heart disease and low life expectancy. In addition to these statistics, the EJ Screening Tool has helped us identify a multitude of environmental justice issues detailed in the table below that are plaguing the community living within Census Tract 01047956702. The creation and proliferation of health disparities in communities is largely driven by these environmental and economic conditions. Disproportionate and adverse impacts of environmental justice issues in our target community are evidenced by Selma’s struggle with low income, high unemployment, limited access to health services, and poor overall health.

CEJST Data for Census Tract 01047956702	
Variable	Percentile
Low Income	86
Projected Flood Risk	96
Energy Cost	94
Diabetes	91
Heart Disease	91
Low Life Expectancy	90

Environmental Justice Issues – Census Tract 01047956702		
Variable	State %tile	US %tile
EJ Index for Air Toxics Respiratory Hazard	82	92
EJ Index for Lead Paint	85	85
EJ Index for RMP Facility Proximity	80	79
EJ Index for Wastewater Discharge	88	88
Unemployed	94	95
People of Color Population	74	71
Cancer	83	78
Source: EJ Screen Report Census Tract 01047956702		

(b) Advancing Environmental Justice: By eliminating environmental hazards that have long posed long-standing threats to our community, this grant and the reuse plan for the Old Baptist Hospital will advance environmental justice among underprivileged populations in our target community, thereby alleviating the health disparities that exist throughout the City. It will also improve the socioeconomic status of sensitive populations by decreasing their housing cost burdens, opening up opportunities and availability of expendable funds that residents can invest into higher education (which opens doors for higher wages), healthier eating habits/lifestyles, and recreational activities that encourage physical activity, social connections, and/or improves mental wellbeing.

This grant will not cause or contribute to the displacement of the City’s impoverished communities. In fact, the eventual development of affordable housing as a result of this grant will have the opposite effect. With inflation driving prices to all-time highs in recent years, redevelopment projects can sometimes come with particular apprehension. With redevelopment often comes increases to the cost of living in urban areas. As these areas become more attractive and, in turn, more costly, it drives low-income populations away out of sheer desperation. The City of Selma has made it a priority outlined in their *Comprehensive Community Master Plan* to bring new job opportunities to local residents. They are taking active steps to make this priority goal a reality. These new employment opportunities, coupled with the low cost of safe, secure housing that Gabriela Apartments will supply, is going to create a powerful anti-displacement strategy. This strategy will simultaneously provide comfortable, livable wages to locals and provide an avenue for low-income individuals to access low housing costs. The goal of this grant is to help an impoverished population get back on their feet and improve the socioeconomic situation of a struggling community, not drive them from their homes because of skyrocketing prices.

**b. Community Engagement**

i. Project Involvement & ii. Project Roles: Local organizations that will be involved in the cleanup project for the Old Baptist Hospital are detailed in the table on the next page.



Name of Org	Point of Contact	Specific Involvement/assistance Provided
Delta Regional Authority	Kemp Morgan, 662.624.8600, kmorgan@dra.gov	Work with Governor's office to find redevelopment resources.
Selma/Dallas County Economic Development Authority	Wayne Vardaman vardaman@selmaeda.com	Redevelopment planning and implementation assistance
Selma District Chamber of Commerce	Char Tucker, 555.891.2235 chamberdirector@cityofselma.com	Mobilize local businesses/community to support the redevelopment
Alabama Brownfields Association	Russ Griebel, President, (205) 699-4484 rgriebel@unitedconsulting.com	Brownfields education; ADEM negotiations; resource sharing.
Economic Development Partnership of Alabama	Greg Barker, 205.943.4700, gbarker@edpa.org	Coordinate with state, regional, local and corporate organizations to bring resources to the project.
Alabama-Tombigbee Regional Commission	John Clyde Riggs, 334-682-4234 [REDACTED]	Communicate project progress and updates with the business community & aid in Community Outreach.
City of Selma - Planning & Development	Danielle Wooten dwooten@selma-al.gov	Future redevelopment planning
Selma Housing Authority	Kennard Randolph kennard.randolph@selmahousing.com	Future redevelopment planning

iii. Incorporating Community Input:

To share the progress of the Brownfield Program, a Community Involvement Plan (CIP) will be created to describe the project's planned community-engagement activities, schedule, background, and key players. Residents can review the CIP on Gabriela Apartments' website. Gabriela Apartments has already taken steps to ensure meaningful community engagement for this project. We held a community meeting in October 2023. This meeting was held to discuss plans to obtain EPA Brownfields Cleanup Grant funding subsequent to the assessments completed at the Old Baptist Hospital. This meeting was advertised through the local newspaper. As required by the grant guidelines, notification was given regarding the intent to submit this cleanup grant application. An overview of how the brownfields program was presented and potential benefits to the community were discussed, along with the environmental impacts and planned redevelopment of the Old Baptist Hospital. The meeting drew local residents and partners. Concerns regarding the impacted site and the safety hazards posed by the site were discussed openly, and the interest level for cleanup and future redevelopment was high. The meeting was advertised in advance, and a draft of the Analysis of Brownfield Cleanup Alternatives (ABCA)/grant proposal was available for review. No objections to the project were raised, and we are confident that we have full community support for the cleanup and redevelopment of the Old Baptist Hospital. Once the grant is awarded, an additional meeting will be held prior to scheduling of remediation activities, which will be advertised through the previously-used effective methods.

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

**a. Proposed Cleanup Plan**

A draft ABCA was developed for the Old Baptist Hospital, presenting several cleanup alternatives which are summarized below.

**Demolition Debris Containing ACM:** Due to the dilapidated condition of the Old Baptist Hospital, it is not practical or safe to abate ACM from the building prior to demolition. The best method of abating this building will be determined in consultation with the demolition contractors during the bidding and planning process, but until that time comes, it is assumed the building will be demolished first using wet methods and the ACM materials will be segregated into stockpiles. If new suspect ACM is encountered during demolition, it will be segregated and sampled to confirm the absence or presence of



ACM. Materials that do not contain ACM will be disposed of at a Construction and Demolition (C&D) landfill. Materials that do contain ACM will be disposed of at a Subtitle D landfill.

**Subsurface Mitigation for Contaminated Soil and Groundwater:** Based on the findings from the Phase II ESAs at the Old Baptist Hospital, the recommended cleanup alternative to address identified soil, soil vapor, and groundwater impacts will consist of the following:

- Entry into the ADEM Voluntary Cleanup Program (VCP)
- Soil excavation of all impacted soil to a depth of 1 feet BGS, then replacement of the soil to the original grade with pre-screened clean fill. Because soils deeper than 1 feet BGS are below Residential RSLs, the soil remediation will be complete and there will be no need for an engineered cap.
- Entry into a Restrictive Covenant with ADEM that will restrict the use of groundwater. This Restrictive Covenant will be implemented and attached to the land title.

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

The cleanup grant guidelines for this section requests that (i) Project Implementation; (ii) Anticipated Project Schedule; (iii) Task Activity/Lead; and (iv) Outputs be addressed. We have addressed these criteria in a single table, provided below. This table provide a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, the schedule for completion, who will lead task efforts, and the anticipated outputs. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*.

i. Project Implementation	ii. Project Schedule	iii. Task Activity/Lead	iv. Outputs
<b>TASK 1. Project Management/Administrative</b>			
Execute Cooperative Agreement	30 days after award	Applicant	Executed Cooperative Agreement, grant management oversight, contract with an EP, 1 EPA kickoff meeting, 12 quarterly reports in ACRES database, 3 annual DBE reports, closeout documents
Grant Management	Continuous	Applicant	
Select/Finalize Contract with Environmental Professional (EP)	60 days after award	Applicant	
Prepare EPA Progress Reports	Quarterly	Applicant & EP	
Travel to Brownfield Conference	Year 1	Applicant	
Kickoff Mtg with EPA and BAC	60 days after award	Applicant	
Final Closeout	30 days after grant closeout	Applicant and EP	
<b>TASK 2. Community Involvement</b>			
Draft CIP	30 days after award	Applicant and EP	1 CIP; 3 meetings/minutes
Community Mtgs.	Quarters (Q) 1, 4, and 5	Applicant and EP	
<b>TASK 3. Cleanup Planning</b>			
ADEM VCP Mtg. and VCP Enrollment, and evaluate need for health monitoring	Q2	Applicant and EP	1 SSQAPP, 1 Final ABCA, 2 meetings with ADEM/minutes, 1 bid specification document, selected subcontractor contract documents, 1 Corrective Action Plan for ADEM VCP, 1 ADEM VCP acceptance
Site-Specific QAPP	Q1	EP	
Final ABCA	Q2	EP	
Submit ADEM VCP Cleanup Plan	Q6	EP	
Prepare Plans, Specifications and Bid Documents to address ACM and for Soil Remediation	Q2	EP	
ACM and Soil Excavation Contractor Selection	Q2	EP	
Begin Planning for Building Demo	Q2	Applicant and EP	





TASK 4. Cleanup Activities			
Soil Excavation/Transport/Disposal	Q4	EP and Applicant	Removal of contaminated media, lab reports, demolishing of buildings, backfilling of excavation, 1 final VCP Cleanup Report, 1 ADEM letter of concurrence.
Confirmation Sampling/Backfilling	Q4	EP	
Demolish buildings and prepare for ACM removal	Q5	Applicant	
Confirmation sampling of demo waste piles for ACM/LBP	Q5	EP	
Remove demo waste piles	Q5	Applicant, EP and cleanup subcontractor	
Cleanup Report Preparation	Q6	EP	
Institutional controls/ VCP Letter of Concurrence	Q6	EP	

c. **Cost Estimates:** The anticipated budget for the tasks described above are provided in the following table:

Cost Estimates						
Budget Categories		Project Tasks (\$)				Total
		Project Management	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel	\$30,000 <sup>1</sup>	\$5,000 <sup>2</sup>	\$10,000 <sup>3</sup>	\$15,000 <sup>4</sup>	\$60,000
	Travel	\$6,000 <sup>5</sup>				\$6,000
	Equipment					
	Supplies					
	Contractual	\$22,500 <sup>6</sup>	\$9,000 <sup>7</sup>	\$15,000 <sup>8</sup>	\$100,000 <sup>9</sup>	\$146,500
	Construction				\$1,027,000 <sup>10</sup>	\$1,027,000
	Other				\$35,000 <sup>11</sup>	\$35,000
<b>Total Direct Costs</b>		<b>\$58,500</b>	<b>\$14,000</b>	<b>\$25,000</b>	<b>\$1,177,000</b>	<b>\$1,274,500</b>
<b>Indirect Costs</b>						
<b>Total Federal Funding</b>		<b>\$58,500</b>	<b>\$14,000</b>	<b>\$25,000</b>	<b>\$1,177,000</b>	<b>\$1,274,500</b>
<b>Total Budget</b> <i>(Total Direct Costs + Indirect Costs)</i>		<b>\$58,500</b>	<b>\$14,000</b>	<b>\$25,000</b>	<b>\$1,177,000</b>	<b>\$1,274,500</b>

**Federal Funding Details**

- <sup>1</sup>Gabriela Apartments Project Manager to assist with pgmt/reporting: \$100/hr x 300 hrs. = \$30,000
- <sup>2</sup>Gabriela Apartments Project Manager to assist with community involvement: \$100/hr x 50 hrs. = \$5,000
- <sup>3</sup>Gabriela Apartments Project Manager to assist with cleanup planning: \$100/hr x 100 hrs. = \$10,000
- <sup>4</sup>Gabriela Apartments Project Manager to assist with cleanup activity oversight: \$100/hr x 150 hrs. = \$15,000
- <sup>5</sup>Travel expenses for two Gabriela Apartments representatives to attend one BF conference: \$6,000 (no labor, only conf. fee, travel/expenses)
- <sup>6</sup>EP to assist with project mgmt/reporting: \$150/hr x 150 hrs. = \$22,500
- <sup>7</sup>EP to assist with CIP and meeting attendance: \$150/hr x 60 hrs. = \$9,000
- <sup>8</sup>SSQAPP (\$5,000) + Final ABCA (\$10,000) = \$10,000
- <sup>9</sup>EP oversight for soil remediation (\$150/hr x ~133.3 hrs. = \$20,000) + EP oversight for ACM abatement/demolition (\$150/hr x ~533.3 hrs. = \$80,000) = \$100,000
- <sup>10</sup>Soil Remediation Activities (\$20,000) + Environmental Covenant (\$18,000) + Asbestos Abatement via Demolition (989,000) = \$1,027,000
- <sup>11</sup>ADEM VCP Fees = \$35,000

**d. Plan to Measure and Evaluate Environmental Progress and Results:**

Outputs, results, and eventual outcomes of the cleanup of the Old Baptist Hospital will be clearly identified in the project work plan. They will be carefully tracked and will be reported in the quarterly



progress reports submitted to the EPA Project Officer via the EPA ACRES database. Our mechanism for tracking progress includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; and regular communications between project team members via email and phone. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures will be implemented to get the project back on track. These may include meetings with the EP, contractors, ADEM, and EPA to establish root causes and corrective actions. Key tasks and outputs to ensure the desired environmental results are achieved within the 4-year grant window are presented in the table in *Section 3.b* above.

Anticipated outcomes from the cleanup include liability protection via the ADEM VCP; alignment of EPA funding objectives with redevelopment; removal of blight; reduction or elimination of future contaminant exposure; and the return of sites to productive use that provides affordable housing to a community in dire need. These outcomes align well with EPA strategic plan objectives.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **a. Programmatic Capacity**

i. Organizational Structure and ii. Description of Key Staff: Gabriela Apartments is a small organization, but has a very capable staff. There are several other groups to help with the project. Gabriela Apartments will utilize the resources that ADEM has to offer such as hosting visioning events and providing their knowledge and expertise. In addition, Gabriela Apartments will rely on the resources that the Alabama Brownfields Association has to offer, if needed. Mr. Francisco Borvice, Operations Manager with Gabriela Apartments, will be the project manager for this cleanup project. Mr. Borvice has a Bachelor of Arts degree in English from the University of California at Berkeley, as well as a Juris Doctor degree from California Western School of Law. He has extensive experience with redevelopment projects, and in his position at Gabriela Apartments, he is directly responsible for coordinating consultants, architects, engineers, and general contractors for rehabilitation and/or new construction projects. This experience will be an invaluable asset to the Old Baptist Hospital Site's cleanup and redevelopment. Assisting Mr. Borvice on this project will be Ms. Camille Gamab, who currently serves as a Project Manager. In addition, Inna Karpenko, Account Executive, will be responsible for handling bookkeeping and financial reporting. Ms. Karpenko will provide financial oversight for this grant program, separately from the other personnel managing cleanup tasks. This team has extensive experience managing the complexities of multiple construction and redevelopment projects. This impressive expertise will allow them to successfully manage this cleanup grant.

iii. Acquiring Additional Resources: The primary additional resource necessary to this project will be a qualified environmental professional (EP or Consultant) who is experienced with the EPA Brownfields Cleanup Grant process and ADEM's Brownfield program and Voluntary Cleanup Program (VCP). The EP, procured by Gabriela Apartments in accordance with federal guidelines, will be responsible for preparing the final ABCA/cleanup plans, QAPP, Brownfield/VCP application, bid specifications; overseeing site work; conducting sampling during remediation activities; executing waste manifests as an authorized agent of Gabriela Apartments; ensuring all quality control objectives are met; and preparing all reports. The EP will also be responsible for preparing all programmatic reports and updating the ACRES database. The EP will coordinate excavation contractors, Subtitle D landfills, hazardous waste transporters, and laboratories. The EP will be overseen and monitored by Gabriela Apartments.

Gabriela Apartments has plans in place to promote strong labor practices and promote local hiring/procurement in all of our projects, and the cleanup and redevelopment of the Old Baptist Hospital will be no different. We will utilize local workers whenever possible throughout the lifecycle of this cleanup project, with local contractors and subcontractors procured for the project whenever this option is available and feasible.

##### **b. Past Performance and Accomplishments**

iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements: Gabriela Apartments has never received any type of federal or non-federal assistance agreements.

**Award of this cleanup grant represents a significant next step bringing needed change to our community through the creation of affordable housing for the City's impoverished elderly population. We appreciate your consideration of our proposal.**



## THRESHOLD CRITERIA

## **THRESHOLD CRITERIA FOR THE OLD BAPTIST HOSPITAL SITE (OWNED BY GABRIELA APARTMENTS) IN SELMA, ALABAMA**

**1. Applicant Eligibility:** Gabriela Apartments, Inc. is a 501(c)(3) nonprofit entity (Articles of Incorporation and IRS designation letter are attached), and therefore, is an eligible entity to receive an EPA Brownfields Cleanup grant.

**2. Previously awarded Cleanup Grants:** Gabriela Apartments, Inc. has never received an EPA Brownfields Cleanup Grant.

**3. Expenditure of Existing Multipurpose Grant Funds:** Gabriela Apartments, Inc. has never received an EPA Brownfields Multipurpose Grant.

**4. Site Ownership:** Gabriela Apartments, Inc is the sole deed owner of Old Baptist Hospital, the target site proposed for funding under this grant application.

- Gabriela Apartments, Inc. acquired the Old Baptist Hospital Site on November 1, 2023 (Deed is attached).

### **5. Basic Site Information:**

- a) Name of the site: Old Baptist Hospital
- b) Address of the site: 15 Riverview Ave., Selma, AL 36701
- c) Current owner of the site: Gabriela Apartments, Inc.

### **6. Status and History of Contamination at the Site:**

a) Type of Contamination: Hazardous substances

b) Operational History and Current Use: Historical fire insurance maps, aerial photographs, and city directories indicate the southeast and northeast portions Old Baptist Hospital Site were developed with residences from at least 1925 to 1963. The Old Baptist Hospital Site operated as Alabama Baptist Hospital from 1924 to 1948 and Selma Baptist Hospital from 1949 to 1978. The structure was occupied by the County Department of Pensions and Security from 1979 to 1987, Dallas County Department of Human Resources from 1988 through 1992, Alabama Department of Human Resources from 1993 through 2002, and the Dallas County Child Protection Center in 2003. Currently, the site is vacant and has been that way since 2004.

c) Environmental concerns:

- Soil Impact: benzo(b)pyrene
- Groundwater Impact: benzo(b)pyrene
- Building Materials: Asbestos-containing materials (ACM)

d) How Site Became Contaminated, Nature and Extent of Contamination: A Phase II ESA confirmed the presence of asbestos-containing materials (ACM) in the building material of the Old Baptist Hospital. This building was constructed in the 1920s, prior to the 1978 federal ban of ACM and LBP in building materials. Due to the dilapidated condition of the structure, there is a risk for asbestos to become friable and blow into adjacent areas. The Phase II ESA also revealed the presence of one PAH (benzo(a)pyrene) in soil and groundwater. The area of benzo(a)pyrene-

impacted soil has been delineated and consists of an area of 10 feet by 15 feet (150 square feet) around with a depth of 1 feet BGS. The source of this contamination is largely unknown. Possible sources of this contamination could include the former hospital's use of petroleum products to fuel a diesel generator that was once located in the basement, or the former hospital's historic pesticide use on the grassy areas surrounding the building.

### **7. Brownfields Site Definition:**

The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

**8. Environmental Assessment Required for Cleanup Grant Applications:** Gabriela Apartments, Inc. has conducted environmental assessments at the site to determine environmental conditions. These assessments include:

- ASTM E1527-13 Phase I Environmental Site Assessment (ESA) prepared on September 30, 2009
- ASTM E1527-21 Phase I ESA prepared on September 25, 2023 (prior to acquisition)
- ASTM E1903-19-equivalent Phase II ESA prepared on October 13, 2011
- Limited Phase II ESA/Cleanup Work Plan prepared on September 28, 2020.

### **9. Site Characterization:**

The Alabama Department of Environmental Management (ADEM) operates a Voluntary Cleanup Program (VCP). Fee driven, the VCP attempts to facilitate rapid movement of the project through the regulatory process. The program allows for the assessment and remediation of contaminated sites and grants certain liability protections, including protection from third party lawsuits, to those non-responsible entities wishing to redevelop brownfield sites. In this case, Gabriela Apartments would apply as a non-responsible party since they did not cause the impacts. The liability protections are fully transferable to any non-responsible party who may purchase the site provided all land use controls are adequately maintained. If deemed eligible, the applicant submits a review fee and will be responsible for site assessment and cleanup. Upon successful completion of cleanup activities, ADEM will issue a Letter of Concurrence which grants the applicant the full liability protections cited in the Act. If the site is not remediated to unrestricted use, the applicant must enter into an Environmental Covenant with ADEM that identifies institutional and/or engineering controls use to protect human health and the environment. As long as these use controls are maintained, the site retains its liability protections provided by the program.

While Gabriela Apartments, Inc. intends to enroll in the ADEM VCP, doing so requires a significant Application Fee for the agency to even determine eligibility, and other significant fees to review site characterization reports and to approve remediation plans. It is a process, with fees due at every step, and premature to enroll the site at this time. While Gabriela Apartments is fully confident that the site will be eligible because it meets all of the CERCLA/Petroleum Liability conditions described in detail in Item 12 below, ADEM will make the final eligibility determination after the site is formally enrolled, anticipated to incur in early to 2023. Note that the VCP program is *voluntary*, entry is not required by ADEM to begin remediation, and a Qualified Environmental Professional (QEP), as defined in 40 CFR 312, has certified that there is a sufficient level of site characterization from the Phase II ESA performed for the remediation work to begin on the site.

Also, the EPA Cleanup Grant guidelines ask that the State Environmental Authority provide an indication that there is a sufficient level of site characterization from the site assessment for remediation work to

begin, or if additional site assessment is needed, or that this data be obtained by June 15, 2024. Since Gabriela Apartments, Inc. has not entered the VCP yet, ADEM has not been provided such reports for review to make this determination. However, ADEM has confirmed that the site is eligible to submit an application for the VCP program in their support letter (see attached). It is unlikely that ADEM will require the additional sampling, and a qualified environmental professional (QEP) has certified that there is a sufficient level of site characterization from the Phase II ESA performed for the remediation work to begin on the site.

#### **10. Enforcement or Other Actions:**

There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including Gabriela Apartments, Inc.) for the hazardous substances at the site, or any liens.

#### **11. Sites Requiring a Property-Specific Determination:**

This site does not require a Property-Specific Determination.

#### **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

##### **a. Property Ownership Eligibility – Hazardous Substance Sites:**

Gabriela Apartments, Inc. meets the requirements for asserting an affirmative defense to CERCLA liability through bona fide prospective purchaser liability protection at the Old Baptist Hospital. Sections i. and ii. do not apply to this site.

##### **iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**

###### **(1) Bona Fide Prospective Purchaser Liability Protection**

For the Old Baptist Hospital Site, Gabriela Apartments, Inc. asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection and demonstrates compliance with the following requirements.

- Gabriela Apartments, Inc. acquired title to the Old Baptist Hospital on November 1, 2023.
- The applicant conducted an all appropriate inquiry (AAI) investigation prior to acquiring the property by conducting a Phase I ESA All Appropriate Inquiry in compliance with ASTM E1527-21. The report was dated September 25, 2023, and was conducted within 6 months prior to site acquisition. The Phase I ESA was conducted by an environmental professional.
- Gabriela Apartments, Inc. is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.
- Gabriela Apartments, Inc. did not arrange for the disposal of hazardous substances before it acquired the site.
- Gabriela Apartments, Inc. has and will exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site.
- Gabriela Apartments, Inc. will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- Gabriela Apartments, Inc. will provide full cooperation, assistance, and access to authorized persons.
- Gabriela Apartments, Inc. will comply with any CERCLA information requests and

administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.

- Gabriela Apartments, Inc. will not impede performance of a response action or natural resource restoration.

(a) Information on the Property Acquisition

The following is information on the property acquisition.

- (i) Gabriela Apartments, Inc. acquired ownership by voluntary purchase.
- (ii) Gabriela Apartments, Inc. acquired the property on November 1, 2023.
- (iii) Gabriela Apartments, Inc. is the sole owner by fee simple purchase.
- (iv) The property was purchased from Housing Development and Neighborhood Corporation.
- (v) Gabriela Apartments, Inc. does not have, nor has had, a familial, contractual, corporate, or financial relationship or affiliation with any prior owner, operator, or other potentially responsible party of the property, including the entity from which the property was acquired.

(b) Pre-Purchase Inquiry

- (i) Gabriela Apartments, Inc. conducted an ASTM E1527-21 Phase I ESA on September 25, 2023 prior to taking ownership.
- (ii) The ASTM E1527-21 Phase I ESA was completed by a qualified environmental professional, PPM Consultants, Inc. (a 100+ environmental firm with 29 years of experience).
- (iii) The ASTM E1527-21 Phase I ESA was completed within 180 days prior to Gabriela Apartments, Inc.'s acquisition of the property in order to take advantage of the bona fide prospective purchaser provision.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

Any disposal of hazardous substances at the site occurred before Gabriela Apartments, Inc. acquired the property. Gabriela Apartments, Inc. did not cause or contribute to any release of hazardous substances at the site. Gabriela Apartments, Inc. has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Since Gabriela Apartments, Inc. acquired ownership of the property, it has been vacant and unused.

(e) Continuing Obligations

- (i) As a vacant and unused building, there is no known activity at the property and none that would release hazardous substances.
- (ii) To prevent any threatened future release, Gabriela Apartments, Inc. has committed to land use plans at the property that will not require the use of hazardous materials. All construction materials used in renovations will be free of known hazardous substances.
- (iii) To prevent or limit exposure to any previously released hazardous substances, Gabriela Apartments, Inc. keeps all doors locked and secured and makes sure the community is aware of the dangers through effective communication with the City and local residents.

Gabriela Apartments, Inc. affirms its commitment to:



- (i) Comply with any land use restrictions and not impede the effectiveness or integrity of an institutional controls;
- (ii) Assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) Provide all legally required notices.

### **13. Cleanup Authority and Oversight Structure:**

a. Describe how Gabriela Apartments will oversee the cleanup at the site(s). Gabriela Apartments, Inc. plans to enter the Alabama ADEM VCP to secure formal regulatory approvals, expedite document reviews, and obtain transferrable liability protections for soil and groundwater impacts. A draft ABCA that presented several cleanup alternatives to address the impacted soil and groundwater at the site was developed, and the final report will consist of a full Voluntary Cleanup Plan for ADEM approval if entry into the VCP is warranted. The ADEM Air Division requires that notification be provided prior to demolition of commercial structures, and such notification will be provided. Gabriela Apartments will retain a Qualified Environmental Professional (QEP) with experience in the EPA brownfields cleanup and ADEM procedures to assist with these efforts, grant management and reporting. Gabriela Apartments, Inc. personnel are experienced in overseeing contractors and professional service firms and will manage the selected firm and process throughout the grant period. Our procurement process will follow standard procurement procedures and comply with the fair and open competitive process outlined in 2 CFR Part 200 and 2 CFR Part 1500. Disadvantaged Business Enterprises will have a fair opportunity to participate in the competition for all contract work. A responsive and responsible consultant will be selected by a review panel using a ranking system based on qualifications, experience, capacity, costs, and overall value.

b. Cleanup response activities: Gabriela Apartments, Inc. already owns the Old Baptist Hospital, and access to other properties will not be required. However, an additional community meeting will be held prior to conducting remediation activities to inform area residents of the remediation activities and to address any concerns that may be raised. One public meeting has already been held to announce the project.

### **14. Community Notification:**

Gabriela Apartments, Inc. provided the community with notice of our intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft application. Details are provided below.

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): On November 3, 2023, Gabriela Apartments, Inc. held a community meeting and allowed the community an opportunity to comment on the draft application, and the attached draft ABCA.

b. Community Notification Ad: Gabriela Apartments, Inc. provided public notification on October 26, 2023, advertising Gabriela Apartments, Inc.'s intent to apply for this cleanup grant, and for the community meeting scheduled and conducted on November 3, 2023. The method of community notification that was employed for this grant application is as follows:

- Community meeting notification advertised in the Selma Sun Newspaper on October 26, 2023.

c. Public Meeting: The public meeting to discuss the cleanup grant proposal was held at the Selma Dallas County Public Library in the Kathryn Windham Conference Room on November 3, 2023 at 1:00 pm. No persons with limited English proficiency or disabilities were in attendance but would have been accommodated as needed. A copy of the draft grant application and the draft ABCA was presented, along with instructions on where the documents can be reviewed prior to submittal of the proposal. Meeting minutes (which include a summary of questions asked and answered) and a sign-in sheet are provided as attachments.

d. Submission of Community Notification Documents: A copy of the newspaper ad that demonstrates solicitation for comments, meeting minutes (which includes a summary of questions asked and answered), a sign in sheet, and a copy of the draft ABCA are attached. The meeting was open to all, with no pre-registration.

### **15. Contractors and Named Subrecipients:**

#### **Named Contractors:**

Not applicable. Gabriela Apartments, Inc. has not selected a contractor that will be compensated with EPA funds made available under the RFA.

#### **Named Subrecipients:**

Not applicable. Gabriela Apartments, Inc. will not engage a subrecipient to conduct the work proposed in this application.

# ADEM SUPPORT LETTER



Alabama Department of Environmental Management  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

November 7, 2023

Francisco Borvice, Operations Manager  
Gabriela Apartments, Inc.  
50 Vashell Way Suite 400  
Orinda, CA 94563  
[fborvice@hdhousing.com](mailto:fborvice@hdhousing.com)

RE: Support Letter, Old Baptist Hospital, FY2024 EPA Brownfields Cleanup Grant

Dear Mr. Borvice:

I am in receipt of your request for a letter of support and technical assistance associated with Gabriela Apartments, Inc.'s pursuit of a FY2024 Brownfields Cleanup Grant from the U.S. Environmental Protection Agency (EPA) for the Old Baptist Hospital Site. The Alabama Department of Environmental Management (ADEM) looks forward to supporting your efforts for the exciting redevelopment plans being proposed.

ADEM understands that the Old Baptist Hospital Site sits on approximately 3.32 acres of land that operated as a former hospital from 1924 to 1978, and then as an office building until 2003. Since 2004, the property has been vacant. Currently, the historical hospital structure is severely dilapidated. The roof of the building is collapsing and presents a grave risk to children living and playing in the surrounding neighborhood, who may wander inside and get hurt. A Phase II Environmental Site Assessment (ESA) has been conducted to evaluate soil and groundwater conditions, as well as to determine the presence of asbestos-containing materials (ACM). One PAH (benzo(a)pyrene) was discovered at elevated concentrations in both soil and groundwater, and ACM was identified in multiple locations throughout the building. We understand that you have prepared a draft Analysis of Brownfield Cleanup Alternatives (ABCA) that presents several cleanup alternatives to address the impacted soils, groundwater, and building materials. Likely remedial methods will include demolition of buildings and disposal of ACM with demolition debris, potential excavation and Subtitle D landfill disposal of contaminated source area soils, and potential land use restrictions such as the implementation of environmental covenants for groundwater.

ADEM understands that once remediation is complete, Gabriela Apartments plans to utilize the Old Baptist Hospital as affordable elderly housing, a reuse strategy that will have far-reaching benefits for Selma's disadvantaged, impoverished populations.

**ADEM Voluntary Cleanup Program:** The Department understands that the new EPA Cleanup Grant guidelines ask that the State Environmental Authority affirm that the site is eligible for enrollment in a Voluntary Cleanup Plan (VCP) and that a sufficient level of site characterization





**Alabama Department of Environmental Management**  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
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has been completed for remediation work to begin. While Gabriela Apartments has stated that you will likely enroll the site in the VCP, you are not quite ready to take that step until some additional funding is in place. Please note that while we encourage enrollment in the VCP, it is not required that you do so prior to beginning remediation. ADEM has determined that the Old Baptist Hospital site is eligible to apply for the Voluntary Cleanup Program. We will review site assessment data to determine if additional site characterization is needed to approve any cleanup plans you intend to submit to us as you work towards securing a Letter of Concurrence from our Department. We can work with you to expedite review of the existing assessment data and a cleanup plan, as well as options to combine such documents into single reports to streamline approvals so you can get started on cleanup next fall should the cleanup grant be awarded. Further, at this time, the Department sees no reason that you could not begin remedial efforts immediately using your existing assessment data while you pursue the grant and entry into the VCP. If you decide to enter the VCP in the near future, we will work with you to ensure prompt review of any additional site characterization data you choose to obtain so it is completed by June 15, 2024 as requested by the EPA guidelines.

Gabriela Apartments, Inc. has also requested potential technical assistance from ADEM on the project that might include additional sampling, public outreach/visioning sessions, and assistance with entering into the VCP. Upon request, the Department will be happy to discuss available assistance as the project and specific needs develop.

ADEM looks forward to supporting your efforts for the exciting redevelopment plans being proposed. We wish you and the residents of the community success in the pursuit of funds to make this redevelopment a reality. Please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal Collins", with a long horizontal flourish extending to the right.

Crystal Collins, Chief  
Redevelopment Unit  
Land Division

