1. **Applicant Identification:** The Regional Planning Commission of Greater Birmingham ("the Commission") as a government entity, with an address of 2 20th Street North #1200 Birmingham, Alabama 35203, requests consideration of the following EPA Brownfield Assessment Grant proposal.

2. **Funding Requested:**
   a. **Assessment Grant Type:** Community-wide
   b. **Federal Funds Requested:**
      i. $500,000
      ii. The Regional Planning Commission of Greater Birmingham is applying for a Community-wide Grant, therefore this section does not apply.

3. **Location:** Greater Birmingham, Alabama (Walker, Shelby, St. Clair, Jefferson, Blount, and Chilton Counties of Alabama)

4. **Target Area and Priority Site/Property Information:**
   a. **Target Area(s):**
      i. Tuxedo Junction, Ensley Neighborhood of Birmingham, AL (Jefferson County Census Tract 32)
      ii. Indian Head Mill Village, Neighborhood of Cordova, AL (Walker County Census Tract 215)
      iii. Warrior River Industries, Cordova, AL (Walker County Census Tract 215)
   b. **Priority Site(s) Address(es):**
      i. Belcher-Nixon Building: 1726-30 20th Street Ensley-Birmingham, Jefferson County, AL 35218
      ii. Indian Head Mill: Northwest of 405 School Street, Cordova, Walker County, AL 35550
      iii. Horsecreek Run: Horsecreek Boulevard (Southwest of 6885 Horsecreek Boulevard), Cordova, Walker County AL 35550

5. **Contacts**
   a. **Project Director:** Ms. Jesslan Wilson, the Director of Economic Development for the Commission will serve as the Project Director for this proposal. Ms. Wilson’s contact information is as follows: Phone: (205) 251-8139, Email: jwilson@rpcgb.org, mailing address: 2 20th Street North #1200 Birmingham, Alabama 35203
   b. **Highest Ranking Executive Official:** Mr. Charles Ball, Executive Director of the Commission will serve as the highest-ranking executive official. Mr. Ball’s contact information is as follows: Phone: (205) 251-8139, Email: cball@rpcgb.org, mailing address: 2 20th Street North #1200 Birmingham, Alabama 35203

6. **Population:**
b. Priority Site(s) Population:
   i. Belcher-Nixon Building (Ensley-Birmingham, AL) Population:
      - Ensley Neighborhood Population (Census Tracts 32, 33, and 34): 4,527 (ACS, 2019)
      - Birmingham Population: 212,297 (ACS, 2019)
   ii. Indian Head Mill (Cordova, AL) Population: 2,006 (ACS, 2019)
   iii. Horsecreek Run (Cordova, AL) Population: 2,006 (ACS, 2019)

7. Other Factors:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or</td>
<td>NA</td>
</tr>
<tr>
<td>United States territory.</td>
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<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>1</td>
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<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the</td>
<td>2</td>
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<tr>
<td>priority site(s) is contiguous or partially contiguous to the body of water,</td>
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<tr>
<td>or would be contiguous or partially contiguous with a body of water but</td>
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<td>for a street, road, or other public thoroughfare separating them).</td>
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<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from</td>
<td>NA</td>
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<tr>
<td>wind, solar, or geothermal energy.</td>
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<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency</td>
<td>NA</td>
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<tr>
<td>measures.</td>
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<tr>
<td>30% or more of the overall project budget will be spent on eligible</td>
<td>NA</td>
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<tr>
<td>reuse/area wide planning activities, as described in Section I.A., for</td>
<td></td>
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<tr>
<td>priority site(s) within the target area.</td>
<td></td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired</td>
<td>NA</td>
</tr>
<tr>
<td>power plant has recently closed (2011 or later) or is closing</td>
<td></td>
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</tbody>
</table>

8. Letter from the State or Tribal Environmental Authority:
   See Attachment.

9. Releasing Copies of Applications:
   NA; no portions of the application are confidential.
November 22, 2021

Charles Ball, Executive Director
Regional Planning Commission of Greater Birmingham
2 20th Street North, Suite 1200
Birmingham, Alabama 35203

RE: EPA Brownfields Community-Wide Assessment Grant

Dear Mr. Ball:

We are pleased to support the Regional Planning Commission of Greater Birmingham (RPCGB) in its pursuit of a Brownfield Assessment Grant from the U.S. Environmental Protection Agency for key brownfield sites within their jurisdiction.

The communities that have properties that have engaged include the Birmingham Neighborhood of Ensley and the City of Cordova. They have a common thread of historic mining, ore processing, and textile production; facilities that are now closed, leaving a negative environmental legacy. In addition to the priority sites, there are other inventoried sites within the target areas that have redevelopment potential.

Upon request, the Alabama Department of Environmental Management can participate in technical reviews and various brownfield outreach activities needed to accomplish RPCGB’s goals. We wish you and the residents of the region served by RPCGB success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

M. Gavin Adams, Chief
Redevelopment Section
Land Division
MGA/
cc: John Hargraves via email, Hargraves@pmenv.com
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

   a. Target Area and Brownfields

      i. Background and Description of Target Area

      Established in 1963, the Regional Planning Commission of Greater Birmingham (the “Commission”) provides planning services for 6 counties and 84 communities in Central Alabama. The Region includes Blount, Chilton, Jefferson, Shelby, St. Clair, and Walker Counties, occupying a total of 4,745 square miles and home to roughly 1,110,000 people. Rolling hills and subtle mountain tops gave way to an early economy reliant on the land itself, producing a surplus of crops, cotton included. Taking advantage of this bounty, a group of investors opened a series of textile mills throughout the Region beginning in the late 1800’s. Simultaneously, tremendous iron ore, coal, and limestone deposits were discovered in the area. These three critical ingredients for steel production sparked the South’s steel industry, forever changing the rural landscape. The Region’s economy quickly shifted from subsistence agriculture to mining, steel, and textile production. Communities that were originally developed around a primary employer were hardest hit as manufacturing quickly declined in the late 20th Century. As a result, many residents relocated from the Greater Birmingham Region’s smaller communities to the more economically diverse City of Birmingham for employment opportunities. Today, these small towns still struggle to regain their economic footing because of the loss of jobs, reduced populations, and declining resources. Brownfield properties were created as the result of this economic shift. Within the Region, this assessment grant proposes to address two communities and three corresponding Target Areas.

      The first Target Area, Tuxedo Junction, stretches two blocks within Ensley, a historically Black neighborhood, west of central Birmingham. The Jefferson County neighborhood spans approximately 1,300 acres and is home to approximately 4,500 people (American Community Survey (ACS)). Annexed in 1910 under the “Greater Birmingham” legislation, the then independent City of Ensley mourned the death of their lively independent community. Home to Ensley Works, the location of the largest cluster of iron blast furnaces at the time, Ensley continued to enjoy prosperity through the 20s and early 30s. The intersection of Tuxedo Junction served as the nightlife hub for the Black population as it was the only venue for dining, dancing, shopping, and live music these residents could call its own. However, downfall became reality for the Neighborhood when Ensley Works closed its doors for good in 1979. The vast majority of local workers were left without employment and consequently relocated for new opportunities. Today, the heavily trafficked Tuxedo Junction Intersection is characterized by contrasting historic and modern commercial buildings and a large vacant lot, flanked by single family bungalows on either side.

      The second and third Target Areas are located within the City of Cordova, a 30 minute drive northwest from Ensley, in the adjacent County of Walker. Cordova, along with many other Greater Birmingham communities were deeply affected by a violent tornado outbreak in 2011. Previous to this event, Downtown Cordova served as the primary socializing location for the small City of approximately 2,000 residents (ACS). The tornadoes destroyed the majority of Downtown Cordova and now only a few commercial buildings remain. One block west of Downtown is the second Target Area, Indian Head Mill Village. The Indian Head Target Area encompasses a mile circumference around the former mill property which includes the surrounding mill village homes, a vacant 12 acre field, a city-owned recreational park, municipal buildings, and roughly 680 households. 42% of the households within the Mill Village Target Area are considered low income (earning $25,000 or less annually) (EPA’s Environmental Justice Screen (EJ SCREEN)). The third Target Area, Warrior River Industries, is located about a mile southeast of Indian Head Target Area. Located east of Downtown Cordova, the 250 acre Target Area is hugged on three sides by the Warrior River. A large portion of this acreage was previously strip mined for coal and subsequently utilized for a steel fabrication business. Today, the Target Area consists primarily of undeveloped forested land with two industrial sites sitting adjacent to an affordable housing apartment complex and small neighborhood. Approximately 250 people live within the Target Area and nearly 400 within a half mile (EJ SCREEN). With the help of a Brownfield Assessment Grant, the Commission will be able to focus development efforts throughout these communities which lag behind by means of investment, employment, income, livelihood, and opportunity. The redevelopment efforts described within this application seek to provide such resources for Target Areas which support Birmingham’s current success.

      ii. Description of the Priority Brownfield Site(s)

      Within the Target Areas, three priority sites have been selected from the inventory based on current threats to human health, welfare, and the environment, established redevelopment plans, and anticipated benefits. **Belcher-Nixon Building (Jefferson County; Census Tract 32):** Located at the Tuxedo Junction within the Ensley Neighborhood, the Belcher-Nixon Building is the last remaining historic commercial structure at this once vibrant intersection. The surrounding commercial buildings have been demolished and
replaced with residential homes and an affordable housing apartment complex. The Belcher-Nixon Building was built in 1922 and listed on the National Register of Historic Places in 2009. The ground floor was occupied by a social rights activist who operated his dental practice here. The second floor served part time as a dance hall, providing a gathering space for lively nights of entertainment. Included in the Building’s legacy is Erskine Hawkins’ 1939 song “Tuxedo Junction”, which was performed at dances held in the hall. The unutilized property has been vacant since the 1990s. Due to the building’s construction date, Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP) are likely incorporated building materials, both of which pose undue health concerns to sensitive populations. The majority of Ensley’s population is considered sensitive as 98.7% are minority, 30.2% are youth (ages 18 and younger), 82.3% are low income (earning less than $25,000 annually), with 66.4% of minorities living in poverty (ACS). The Belcher-Nixon Building is a priority site due to its cultural significance, surrounding sensitive populations, and pending redevelopment plans.

The second priority site is Indian Head Mill (Walker County). Opening in 1898, the Indian Head textile Mill boasted production of 10,000 bales of cotton and the employment of 1,000 workers at its peak. When the Mill closed in 1962, the loss cost Walker County an estimated $2 million in revenue. Following years of vacancy, the property was purchased in 2011 by the City of Cordova and the last remaining structure, was demolished. Today, the majority of the field remains vacant, and a portion of the property has been converted into recreational fields. The Village population located within a mile radius of the site includes nearly 1,700 people; 41% of households are considered low income, earning less than $25,000 annually (EJ SCREEN). Pollutants from the Mill may include Volatile Organic Compounds (VOCs) from degreasers used on machinery and within dyes. The historic mining and burning of coal on the property likely introduced Polycyclic Aromatic Hydrocarbon (PAHs) and heavy metals such as lead, arsenic, aluminum, and manganese. Inhalation of VOCs increases the likelihood of respiratory ailments and lung cancer, posing significant health effects if sensitive population were to be exposed. Additionally, it is possible for ash and coal to be buried on site, causing surficial soil contamination, thus creating a dermal contact risk. Indian Head Mill is a priority site because the onsite pollution must be assessed and abated prior to the implementation of community redevelopment plans.

The third priority site is Horsecreek Run (Walker County). Of the 47 acre vacant site, 5 acres flood regularly and are in the AE flood zone (FEMA). The property was surface mined between 1945 and 1974, followed by steel fabricating operations until 1997, when the business closed. Associated buildings were later demolished. According to a previously completed Phase I Environmental Site Assessment (ESA), the property is listed on the Toxic Release Inventory (TRI) based on metal fabricating plate work processes and the reporting of air and land releases primarily of manganese, chromium, and nickel associated with these processes. Additional contaminants may include hexavalent chromium, Polyaromatic Hydrocarbons (PAHs) and Volatile Organic Compounds (VOCs). Manganese, an essential trace element necessary for proper health, can reach toxic levels via oral absorption from contaminated water, food, and soil and inhaled in the form of dust (National Center for Biotechnology Information (NCBI)). The neurotoxin causes clinical symptoms similar to Parkinson’s disease (NCBI). As for chromium, dermal exposure has been demonstrated to produce irritant and allergic contact dermatitis (Agency for Toxic Substances and Disease Registry (ATSDR)). Chronic exposure to chromium dust irritates and obstructs the airway, and can cause lung, nasal, or sinus cancer (ATSDR). “Hexavalent chromium compounds have been shown to cause lung cancer in humans” (National Institute of Environmental Health Sciences (NIH)). Furthermore, according to Agency for Toxic Substances and Disease Registry (ATSDR), hexavalent chromium can easily become airborne when wind picks up the substance from contaminated soil. An overexposure to nickel can cause an allergic reaction, cardiovascular and kidney diseases, lung fibrosis, and lung and nasal cancer (NCBI). These contaminants are of concern as they can easily be transported off site and into the Warrior River. Currently owned by the Cordova Utility Board, the Horsecreek Run property is a priority site because pollution must be mitigated prior to developing the land, a forefront prerogative for the City of Cordova to protect nearby residents and secure the Developer that is actively pursuing the property.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The Target Areas and priority sites were chosen based on local and federal planning efforts which include the Commission’s annually updated Comprehensive Economic Development Strategy (CEDS) document, Pratt Ensley Framework Plan, the Horsecreek Run Schematic Layout, and the EPA Strategic Plan. The CEDS details three main goals directing the redevelopment outlined in this application, which include: 1) empowering the community through leadership development, 2) maintaining and improving upon current built and environmental infrastructure, and 3) cultivating competitive economic assets such as
the regional workforce and neighborhood facilities. As a whole, Greater Birmingham residents strive to re-envision their communities’ historic brownfields as functional, sustainable destinations capable of achieving these goals. The Commission is coordinating with the private landowner to redevelop the Belcher-Nixon Building in partnership with Sabre Finance, the Commission’s partner organization which manages the Commission’s Revolving Loan Fund. The Pratt Ensley Framework Plan, completed in 2018 with public input from 123 neighborhood residents and 80 local stakeholders, details the redevelopment strategy. The Plan focuses on Tuxedo Junction, citing a top priority as “provid[ing] start-up help, training, technical and financial assistance to encourage entrepreneurship and business development”. As a small business incubator, the building will also meet all three CEDS goals. The incubator will encourage leadership development within the community and provide critical resources for emerging businesses. Furthermore, the project will renovate an existing historic building, integral meeting CEDS goal 2.

In regards to the Indian Head Mill property, a landscape architect firm was contracted by the City of Cordova to create the Mill Site Park Master Plan. The Master Plan details the proposed park which will provide a community green space with rental pavilions and a bandstand created from the historic mill’s loading docks. The Park will also have an amphitheater, an interactive fountain/splash pad, a multi-use court, dog park, and walking paths with fitness stations. The Park will connect with downtown through an adjacent tunnel running under the historic spur rail line. Redeveloping the Mill property will fulfill CEDS goals 2 and 3 and EPA’s Strategic Plan goal 3 as the land will be remediated and redeveloped, creating a community asset capable of drawing in additional residents. Created by an interested Developer, the Horsecreek Run Schematic Layout, details the redevelopment layout for the property. Plans include creating a Neighborhood by subdividing the property into 147 single-family residential lots. Additionally, three greenspaces are incorporated within the Neighborhood, which includes a central 0.4 acre park, a 6.5 acre greenspace, and a 5.25 linear acre Riverwalk Trail. As a residential neighborhood, the Horsecreek Run site will also meet CEDS goals 2 and 3 in a manner similar to the Indian Head Mill Park. All redevelopment plans described here adhere to the EPA Strategic Plan part 3 of goal 3: “revitalize[ing] land and prevent[ing] contamination.”

ii. Outcomes and Benefits of Reuse Strategy

The Commission seeks to improve the quality of life for disadvantaged residents by catalyzing redevelopment efforts of properties that have long contributed little to the economic base. Renovating the Belcher-Nixon Building and creating a small business incubator will provide local entrepreneurs with critical resources necessary to start a new business. Such programs boast benefits which include leadership development and an enriched economy, increasing the local business base. The incubator will spur the success of additional startups and support existing business; dollars from which are then invested within the Ensley community by means of increased tax dollars, job opportunities, and employee wages. Over time, this process will help to decrease the long-term poverty rates. Redeveloping the Indian Head Mill property will provide a safe outdoor recreational space catered to all age groups, in an area where such opportunities are currently lacking. As the Park will be centrally located within Cordova, it will be widely accessible to all populations, particularly for the surrounding low-income residents. Assessing the on-site contamination will ensure contamination is properly mitigated, reducing any existing exposures. As the entirety of Downtown Cordova was leveled by the 2011 tornado outbreaks, the Indian Head Mill Park will serve as new meeting ground. The Park and its variety of offered activities will encourage physical exercise, thus reducing diet-related health complications such as diabetes, obesity, and heart disease (World Health Organization (WHO)). Finally, remediating and developing the Horsecreek Run site will alleviate the housing strain Cordova currently experiences as the majority of the housing stock was built in conjunction with the construction of Indian Head Mill. The outdated housing puts a financial strain both on current owners and those that wish to purchase a home as the costs to repair and upkeep the homes far exceeds the homes’ value. Additionally, the limited housing stock hinders the City’s ability to attract and retain new residents. In turn, the Horsecreek Run Neighborhood will add nearly 150 new homes to the City of Cordova. Thus, the Developer will relieve strains on the local housing crisis.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

A readily available inventory of incentives and grants will allow the Commission to complete these projects from start to finish. The Commission will be eligible to apply on behalf of or in partnership with another municipal entity and/or developer for all resources outlined below.

<table>
<thead>
<tr>
<th>Funding Title and/or Source</th>
<th>Purpose/Role (Assessment/Remediation/Reuse) and Applicable Priority Site</th>
</tr>
</thead>
</table>

Page 3 of 10
Walker County Area Community Foundation (Don Drummond Fund)  
**Reuse:** The Foundation allocated $140,000 to Cordova for Indian Head Mill Park redevelopment. To date, funding has been used to create a Master Plan, remove some building material from the property, and refurbish and stock the Mill pond. Remaining funds will be used to help pay to remove remaining rubble, create a greenspace, build pedestrian trails and a basketball court, and purchase outdoor exercise equipment and install landscaping throughout the Park, following assessment activities.

City of Cordova  
**Reuse:** Cordova purchased the Indian Head Mill property in 2012 for a total of $100,000. Additionally, the City completed all to-date Park renovations with in-kind labor, contributing an estimated $1,000 in labor.

Alabama Historical Commission, the State Historic Preservation Office  
**Remediation/Reuse:** Allocated on a yearly basis, renovation funding up to $50,000 is available for the Belcher-Nixon Building. Under this grant, the Commission would be able to partially remediate ACMs and LBP from the building.

Regional Planning Commission of Greater Birmingham  
**Reuse:** The Commission operates a Revolving Loan Fund (RLF) in partnership with Sabre Finance to provide gap financing for new and growing small businesses located within the Region. A variety of loans are available for small businesses locating in the Belcher-Nixon Building, including micro loans: financing for up to 6 years with a $50,000 maximum. Building and Real Estate loans are available with a 5-year term with up to 20-year amortization. Machinery and Equipment loans are available for useful life and Working Capital loans last up to 7 years. Loan Rates will be determined on an individual basis. One new job must be created for every $35,000 of RLF assistance.

Alabama Power Foundation: Good Roots Grant  
**Reuse:** The Horsecreek Run Developer would be able to apply for this annual grant to fund the tree planting and beautification efforts necessary to provide the new neighborhood with multiple cohesive greenspaces. Funding is limited to $1,000.

### ii. Use of Existing Infrastructure

Current municipal and building infrastructure will be utilized wherever possible in order to maximize funding and sustainability. The Belcher-Nixon Building will be renovated and utilize existing municipal connections which includes water, sewer, electricity, sidewalks, and internet. Indian Head Mill and the Horsecreek Run sites will redevelop currently underutilized parcels. However, the latter of which will require the Developer to install utilities to cater to housing needs.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

### i. The Community’s Need for Funding

Between 1980 and 2020, the populations of Ensley and Cordova have dwindled rapidly, losing an estimated 58% and 81%, respectively (U.S. Census). The historic and ongoing loss of industry has resulted in high poverty rates and low incomes. The per capita incomes for Cordova and Ensley are $29,606 and $26,260, respectively (ACS). Compare this to the U.S. average of $65,712 (ACS). In combination with shrinking populations, Cordova receives minimal tax revenue and operates on a very limited budget. In Ensley, current funding is prioritized to removing historic blight and improving livability. Cordova, on the other hand prioritizing maintaining and demolishing severely storm-damaged buildings throughout Downtown. The Commission itself is funded through grant awards and dues paid by communities. All grants have specific guidelines on spending limitations. Additionally, many rural municipalities struggle financially, failing to pay agreed upon dues, leaving the Commission with limited funds to create additional programs. The Commission’s budget is carefully allocated to equally provide each of its six counties with contractually agreed upon planning and economic development services. This forces the Commission to prioritize projects upon importance, causing the Region to lack the funding for developing a brownfields program. Without federal funding from this application, the Commission will remain unable to assess and redevelop brownfields within the Region.

### ii. Threats to Sensitive Populations

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

Youth (18 years or younger), elderly (65 years or older), minority, and low-income (annual household income of less than $25,000) individuals have been identified as sensitive populations most impacted by
brownfield properties within the Target Areas. Within a one-mile radius of the Belcher-Nixon Building, 37% of the population is considered youth and 97% of the population is minority (EJ Screen). Compare these demographics to the national rates of 22.2% and 40% for youth and minority populations (ACS). Furthermore, 50% of the entire population that lives within a one-mile radius of the site is considered low income (earning less than $25,000 annually) (EJ Screen). To compound these matters, 66.4% of the minority population within Census Tract 32 (in which the Belcher-Nixon Building is located) lives below the poverty line (ACS). Within the Cordova Target Areas, the elderly and low-income individuals serve as largest sensitive populations. Within the City of Cordova, 22.4% are elderly, 5.9 percentage points greater than the national average. Additionally, 42.2% of all Cordova residents are considered low income, and nearly 20% of residents have a household income of $10,000 or less (ACS). High poverty rates coupled with a lack of local resources places an additional strain on the health and well-being of these Greater Birmingham communities. Take for example, 56% of residents within Walker County do not have access to exercise opportunities (County Health Rankings (CHR)). On average, children within the two-County Region are nearly twice as likely to experience food insecurity (Kids Count). This statistic is concerning considering health complications, especially in children are compounded by a lack of accessible nutritious foods. Additionally, the entirety of Cordova is a food desert (USDA Food Access Research Atlas). Such factors play into long-term health complications such as elevated preventable hospital stays, injury deaths, and premature deaths (CHR). With the average County rate of premature deaths coming in at 12,950 deaths per 100,000 people, this rate is more than twice that of the Top U.S. Performers (CHR). Redevelopment following a successful assessment will provide a makers’ space, neighborhood park, and residential development, resources critical to improving livelihood, independence, and economic opportunities, thus alleviating adverse conditions for sensitive populations.

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

In 2020, Alabama was ranked in the bottom five states as having one of the worst overall health outcomes (United Health Foundation). Health Outcomes include cancer deaths, cardiovascular deaths, diabetes, disparity in health status, frequent mental and physical distress, infant mortality, and premature death. This statement is backed by statics published by County Health Rankings (CHR) through the University of Wisconsin Population Health Institute which assembles data from a number of national sources. Take for example, the Walker and Jefferson County average premature death rate is 140% higher than the Top U.S. Performers (CHR). This measure can be traced back to poor diet, lack of exercise, environmental contaminants, and inadequate medical care. Because infant statistics provide an early snapshot of childhood health, it is important to note in 2020, the State of Alabama experienced a 12.5% preterm birth rate, indicating an “F” grade by the March of Dimes. Statistics for minorities are even graver, “with the preterm birth rate among Black women 51% higher than the rate among all other women” (March of Dimes). On average, the two Counties experience an infant mortality rate of 10.9 per 1,000 (compare to the national rate of 5.9) (Kids Count). Numerous heavy metals associated with priority sites are reason for concern as residents are located nearby. For example, the closest resident lives a mere 50 feet from the Mill property; 800 feet separates government funded housing from the Horsecreek Run property; and 35 feet of driveway stands between the Belcher-Nixon Building and a private residence.

Lead, a contaminant potentially located within the Indian Head Mill site, can cause miscarriage, stillbirth, premature birth, and low birth weight (CDC) when a mother is exposed. Furthermore, a manganese release was reported from the Horsecreek Run property; an element which negatively impacts neurodevelopment scores in infants (NCBI). Both lead and manganese can be ingested by the pregnant mother via drinking water and subsequently transferred to the fetus through the placenta. This concern could, in fact, be a reality as Cordova has a history of water and wastewater violations. To make matters worse, one of Birmingham Water Works Board’s water intake is located approximately 7 miles downstream of the Horsecreek Run site, potentially exposing hundreds of thousands of people to legacy contamination. Additionally, in 2018, statistics published by the CDC show the disproportionate death rates related to lung, female breast, and prostate cancer in Alabama. Lung and bronchus deaths occur more than twice as often as the latter two cancers previously mentioned, at a rate of 45.6 per 100,000 people (CDC). Respiratory ailments and lung cancer are commonly associated with exposure to high concentrations of VOCs, PAHs, and heavy metals such as lead, arsenic, aluminum, manganese, chromium, hexavalent chromium, and nickel, which can enter the body through dermal, inhalation, and/or ingestion routes at the Horsecreek Run site (EPA). Finally, VOCs associated with degreaser and dyes used on textile mills can cause conjunctival irritation, headache, nausea, damage to the liver, kidney, heart, immune, and central nervous systems, and male reproductive anatomy (EPA). The last health concern—male reproductive damage may explain the state-wide elevated rates of prostate cancer. The successful identification of contaminants will contribute to
identifying and mitigating exposures that may contribute to causes of elevated diseases, cancers, and premature death, leading to long-term public health improvements.

(3) Promoting Environmental Justice

Within the Target Areas, the Commission serves communities which have historically seen little investment. Following the closure of Ensley Works, the once independent City was forced to rely on Birmingham’s social security net. Severely lacking in terms of municipal resources, funding, planning, and infrastructure, Ensley’s job market never improved, and the community was left to decay over time. Consisting mainly of Black residents, one must consider racial injustices when discussing the lost cultural relics. Still today, Ensley has an extremely high minority rate (97.8%) and minority poverty rate (66.4%) (ACS, 2019). The latter statistic is more than twice as high as the average poverty rate for the census tract (ACS, 2019). Although to a much lesser extent, Cordova residents also experience disproportionate poverty rates for minorities. Within Cordova, of the 17.5% minority population nearly 50% of these individuals are living in poverty (ACS, 2019). Similarly, Cordova has lacked a healthy job and housing market beyond what was provided by the Indian Head Mill Village. The textile and steel/iron industries that once created economic prosperity, have created liabilities which unfairly impose health and safety hazards upon struggling communities and vulnerable populations. The development of neighborhood resources, in combination with identifying and mitigating environmental contamination will limit exposure, reduce environmental justice concerns, and create a more level playing field for the residents of both Target Areas. In turn, the grant will provide the opportunity for impactful personal and community successes.

b. Community Engagement

i. and ii. Project Involvement and Project Roles

The Commission will continually build upon this list to ensure inclusion of all stakeholders, each partner will be included in public involvement opportunities to provide input in making decisions for additional site selection, cleanup, and reuse.

<table>
<thead>
<tr>
<th>Organization and Point of Contact</th>
<th>Project Role</th>
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<tbody>
<tr>
<td>Ensley Alive</td>
<td>Ensley Alive is a movement powered by a group individually and collectively dedicated to Ensley’s renaissance. Created by a group of invested professionals dedicated to Ensley’s success, Ensley Alive has the networks necessary to disseminate information regarding the Belcher-Nixon Building project to the public. In addition, the Commission will engage Ensley Alive to collaborate with public engagement events pertaining to the brownfield project.</td>
</tr>
<tr>
<td>Brian Hawkins, Co-Founder/Project Manager (205) 585-4101</td>
<td></td>
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<tr>
<td>Enlsley Neighborhood Association</td>
<td>Ensley Neighborhood Association meets monthly at the Ensley Recreation Center within the Neighborhood to discuss how local initiatives can be met with city resources to improve quality of life. The Association’s president also participates in Birmingham’s City-wide Citizens Advisory Board, communicating key needs and opportunities to a wider audience, providing an opportunity to share brownfield updates. The Association will also be included in public engagement meetings so updates regarding the project can be shared during regularly scheduled meetings.</td>
</tr>
<tr>
<td>George A. McCall, President (205) 215-5453</td>
<td></td>
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<tr>
<td>Walker Area Community Foundation</td>
<td>The Walker County Area Foundation is a nonprofit, grantmaking organization which has allocated $26 million to more than 490 nonprofit organizations. Eager to help in any way possible, the Foundation has expressed interesting in educating the public on the topic of brownfields and will act as a liaison between the citizens of Cordova/Walker County and the Commission.</td>
</tr>
<tr>
<td>Paul Kennedy, President <a href="mailto:pkennedy@wacf.org">pkennedy@wacf.org</a> (205) 302-0001</td>
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</tr>
<tr>
<td>Cordova Parks and Recreation</td>
<td>Responsible for coordinating sporting and community events at the Park portion of the Indian Head Mill site, Cordova Parks and Recreation fully supports the additional redevelopment efforts. The group will also aid in distributing informational fliers and garnering community input.</td>
</tr>
<tr>
<td>Daniel Headrick (205) 483-9266</td>
<td></td>
</tr>
<tr>
<td>Mt Carmel Baptist Church</td>
<td>With a congregation of approximately 620 people, the Mt Carmel Baptist Church is located a third of a mile from the Horsecreek Run site. As a staple in the community, the church will be notified</td>
</tr>
<tr>
<td>Dustin Murray, Pastor</td>
<td></td>
</tr>
</tbody>
</table>
The EPA, Alabama Department of Environmental Management (ADEM), and County health department are established partners and/or will be involved throughout the grant cycle, each contributing in their own capacity.

iii. Incorporating Community Input

Following this grant’s award, a Project Kick-Off Meeting will be held, which will be open to the public and include stakeholders from each Target Area. The Kick-Off Meeting will outline the goals of the grant, how to provide public input, and what the funds mean to the Commission and its residents, ensuring an educated public and allowing for additional community involvement. Ongoing communication throughout the life of the grant will be conducted in a variety of ways, including regularly held public meetings. To accommodate COVID-19 and in order to practice social distancing, meetings may be held virtually through Zoom or a combination of in person and virtual, with which the community, project partners, brownfield committee, and local citizens have prior experience using. The meetings will be held at hours agreeable to most schedules to ensure a high level of attendance and involvement from all communities. Additionally, those that cannot be present during the live meeting, can access the recorded meeting online, at the Commission’s website and/or can utilize a call in number provided during the meeting. Meetings will provide a platform for public comment to identify additional brownfield sites, reprioritize known brownfield sites based on established criteria, and voice potential concerns. Commentary will be collected via public comment periods on each meetings’ agenda, through Zoom’s chat feature during meetings, and via phone or email to the project manager/project partners throughout the grant period so that affected parties’ input can be captured and documented for use in decision making when selecting and prioritizing sites. All comments will receive feedback from the grant project manager on how that input is being utilized or if additional information may be needed to better incorporate the input into the grant decisions. Additional communication regarding grant updates and public input opportunities will be conducted in a variety of ways including press releases with the local newspapers which will include Alabama.com, Daily Mountain Eagle, and The Birmingham Times (online and in print). Brownfield related announcements will also be featured during sporting events at the Cordova Park and church services at Mt Carmel Baptist, on local news stations, and flier distribution/website updates via local businesses, project partners, and community organizations. The Commission’s Facebook and Twitter, as well as the following Facebook pages will be used: Ensley Neighborhood Association, City of Birmingham Government, The Birmingham News, City of Cordova – Government, reaching over 132,000 followers.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
   a. Description of Tasks and Outputs

Task 1: Cooperative Agreement Oversight
   i. Project Implementation: General grant management; develop Brownfields Advisory Committee (BAC); Qualified Environmental Consultant (QEC) selection based on a competitive bid process (per 40 CFR 30); meeting facilitation with the BAC, ADEM, and EPA; required reporting; budget reconciliation.
   ii. Schedule: Quarters 1-12: The BAC will be developed within 1 month of funding and meetings will be held at regular intervals throughout the project. A QEC will be selected within 1-2 months of funding. Quarterly and MBE/WBE reports will be submitted on a quarterly basis and as needed. ACRES will be updated throughout the grant period.
   iii. Task Lead: The Commission will oversee this task, with assistance from the BAC and selected QEC.

Task 2: Inventory and Community Outreach
   i. Project Implementation: Develop marketing materials, which will be available online and in hard copy; notify the community of site-specific public information meetings and assessment schedules; advertise for public meeting through online and in-person methods; hold public meetings to solicit input, inform, educate, and update the community regarding assessment and redevelopment activities; provide updates as necessary at local development council meetings. An inventory of 21 sites, including the three priority sites, has already been established, however, the secondary brownfield inventory will continue to grow through community input. The Commission will also attend various brownfield conferences.
ii. Schedule: Quarters 1-12: Community outreach will be performed for the duration of the grant period; the first public meeting will be held within 3 months; the 2nd public meeting will be held after the first round of assessments have been completed; and the 3rd public meeting will be held when assessments are nearing completion and reuse planning begins.

iii. Task Lead: The Commission will oversee this task, with assistance from the BAC, ADEM, QEC, and community partners.

iv. Outputs: Public meeting advertisements; press releases and project update reports; educational materials to support public meetings (PowerPoint presentations and handouts); kick-off meeting; 3-12 public meetings; one-on-one meetings with property owners, as needed; updated brownfield inventory; attend various brownfield conferences, including two EPA Region 4 Conferences and the National Brownfield Conference.

Task 3: Environmental Site Assessments (ESAs)

i. Project Implementation: ASTM-compliant Phase I ESAs; Phase II ESAs; ADEM and EPA reviewed Generic Quality Assurance Project Plan (GQAPP) and Site-Specific Quality Assurance Project Plans (SSQAPPs); Hazardous Material (Haz Mat) Surveys. Costs for these activities include contractual consulting and reporting expenses, and printing.

ii. Schedule: Quarters 1-10: A QAPP will be completed within 1 month of selection. Once approved by ADEM/EPA, site-specific assessment activities will begin within 1 month. Assessment and reporting will occur throughout the grant period, with the goal of completing assessment activities by quarter 10.

iii. Task Lead: The QEC will oversee this task, with assistance from the Commission and BAC.

iv. Outputs: Priority Sites: 3 Phase I ESAs (3 Haz), 3 Phase II ESAs (3 Haz), 1 Haz Mat Survey; Additional Sites: 14 Phase I ESAs (8 Haz and 6 Petro), 11 Phase II ESAs (7 Haz and 4 Petro), 3 Haz Mat Surveys

Task 4: Cleanup Planning and Planning Activities

i. Project Implementation: Creation of cleanup plans and implementation strategies for developing and utilizing resources; development of Analysis of Brownfield Cleanup Alternatives (ABCAs) for priority sites that require remediation based on Phase II ESA data. The ABCAs will include remedial actions for each identified regulated contaminant that exceeds applicable guidelines. Remedial actions will be compared based metrics such as cost, feasibility, and effectiveness in protecting human health and the environment. ABCAs will be developed through considering the potential reuse scenario(s) for each site.

ii. Schedule: Quarters 5-10: ABCAs will be completed within 3-6 months of finalizing the Phase II ESA reports.

iii. Task Lead: The QEC will oversee the completion of ABCAs.

iv. Outputs: 3 ABCA reports.

b. Cost Estimates

A list is provided below, which outlines how costs were derived for each task. Allocation of grant funds is included within the following table.

Task 1: Cooperative Agreement Oversight

- Personnel: 125 hours at an average rate of $50/hour = $6,250 for programmatic costs such as financial and performance reporting.
- Fringe Benefits: $500
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: $875
- Contractual: 100 hours at an average rate of $100/hour = $10,000 to assist in reporting needs throughout the grant’s lifecycle.

Task 2: Inventory and Community Outreach

- Personnel: 125 hours at an average rate of $50/hour = $6,250 for programmatic costs such as financial and performance reporting.
- Fringe Benefits: $500
- Travel: Estimating two staff members traveling for three conferences averaging three days each; $250/round trip flight, $200/hotel room per night (assuming 3 nights each) and $50/day per diem per person. Estimated cost: $6,000
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: $875
- Contractual: 100 hours at an average rate of $100/hour = $10,000 to assist in reporting needs throughout the grant’s lifecycle.

Task 3: Environmental Site Assessments (ESAs)
FY2022 EPA Assessment Grant Application – The Regional Planning Commission of Greater Birmingham, Alabama

- Personnel: 125 hours at an average rate of $50/hour = $6,250 for programmatic costs such as financial and performance reporting.
- Fringe Benefits: $500
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: $875
- Contractual:
  - Priority Sites: $91,000
    - 3 Phase I ESA: estimated cost of $4,000 per ESA = $12,000
    - 3 Phase II ESA: estimated cost of $23,000 per ESA = $69,000
    - 1 Hazardous Material Survey: estimated cost of $10,000 = $10,000
  - Secondary Sites: $339,000
    - 14 Phase I ESAs: average estimated cost of $4,000 per ESA = $56,000
    - 11 Phase II ESAs: average estimated cost of $23,000 per ESA = $253,000
    - 3 Hazardous Material Survey: estimated cost of $10,000 = $30,000
  - Total of All Sites: $430,000
    - 17 Phase I ESAs: $68,000
    - 14 Phase II ESAs: $322,000
    - 4 Hazardous Material Surveys: $40,000

**Task 4: Site Specific Cleanup Planning and Planning Activities**

- Personnel: 125 hours at an average rate of $50/hour = $6,250 for programmatic costs such as financial and performance reporting.
- Fringe Benefits: $500
- Supplies: Office supplies will include copies, maps, and handouts. Estimated cost: $875
- Contractual: 3 ABCAs: average estimated cost of $4,500 per ABCA = $13,500

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Cooperative Agreement Oversight</th>
<th>Task 2: Inventory and Community Outreach</th>
<th>Task 3: Environmental Site Assessments</th>
<th>Task 4: Cleanup Planning and Planning Activities</th>
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<tr>
<td>Total Budget (Direct + Indirect)</td>
<td>$ 17,625</td>
<td>$ 23,625</td>
<td>$ 437,625</td>
<td>$ 21,125</td>
<td>$ 500,000</td>
</tr>
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</table>

**c. Measuring Environmental Results**

A schedule will be developed for the milestones to be achieved under the grant on a quarterly basis. The Commission will then track and evaluate against the schedule through detailed quarterly reports, and the EPA ACRES database. Together, these will outline the project’s progress in achieving outputs and outcomes through documenting completed tasks, assessment results, and drawn funds. The Commission will be in regular communication with the selected contractor, ADEM, and EPA through community meetings and monthly telephone calls to ensure the project stays on schedule, on budget, and there are no impediments in achieving the project outputs identified above in a timely manner. At the end of the three-year grant period, a final report similar to quarterly reports will be produced. The Commission will continue to track the future cleanup and reuse of sites assessed under the grant, updating the ACRES database accordingly.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

a. Programmatic Capability

i, ii, and iii. Organizational Capacity, Structure, and Key Staff

Project management and grant administration responsibilities will be conducted by the Commission’s Director of Economic Development, Jesslan Wilson. Raised in rural Alabama, Ms. Wilson’s education in Public Administration, Economics, and Political Science lends her important tools to pursue her passion in economic development in underserved communities. Ms. Wilson has experience in grant procurement and has successfully managed over $1 Million in grants for both rural and urban areas throughout the Region.

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Ms. Wilson will manage the day-to-day activities associated with the grant such as reporting and invoicing and will be assisted by Charles Ball. As the Executive Director of the Commission Mr. Ball has over 15 years of supervisory experience in local government settings. Mr. Ball coordinates regional and community-level planning activities for Alabama’s largest metropolitan area. Throughout the grant, Mr. Ball will manage community engagement activities and monitor all fund expenditures. Ms. Wilson and Mr. Ball both have a strong understanding of the functional needs of the community and recognize the potential of this assessment grant. The Commission will also work with and leverage their established partnerships with government agencies and community-based organizations to utilize their experience and capacity to reach the target communities.

iv. Acquiring Additional Resources

The Commission has extensive experience managing grant funds and thus know to begin the contractor procurement process immediately following work plan and cooperative agreement approval with the EPA. The desired consultant will be experienced in brownfield programs including community outreach, brownfield inventory development, ESAs, Haz Mat Surveys, ABCAs, and Generic Quality Assurance Project Plan (GQAPP), which will be produced within the first 60 days of the grant so that proposed assessments and activities are not delayed. These services will be secured in accordance with the EPA’s selection protocol and the Commission purchasing policies. Standard procedure includes a Request for Qualifications be published for response by qualified firms. Firms will be allotted guidelines with a deadline for submissions, all submissions will be available as public record. Following receipt of proposals, each application will be reviewed by a committee of Commission staff, appointed by the Executive Director and the selected consultant will be recommended to the Board of Directors Committee for approval.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

Economic Development Administration (EDA) Partnership Planning Grant: The Commission has been the designated Economic Development District for the Greater Birmingham Region for decades. Through this established partnership with the EDA, a branch of the U.S. Department of Commerce, the Commission applies for and is awarded approximately $420,000 every three years. This multi-year grant provides support to the Commission for the development, implementation, and revision of the Comprehensive Economic Development Strategy. It also includes specific work elements such as providing technical assistance and assisting with the development of state and federal grant applications for local governments. Outputs have included the 2017-2022 CEDS, yearly CEDS updates, semi-annual progress reports, and annual Government Performance Results Act (GPRA) reports, all of which followed the grant’s guidelines and stipulations.

Appalachian Regional Commission (ARC) Local Development District (LDD) Administrative Grant: The Commission has also served as the Local Development District, designated by the ARC, for the region for years. Through this designation, the Commission applies for and is awarded approximately $150,000 annually through the ARC’s LDD Program. This purpose of this award is to support the Commission in providing technical assistance and support to local governments. Specifically, outcomes of the 2019 grant included supporting educating local governments and nonprofits on applicable grant opportunities and assisting at least two entities with writing and submitting their ARC grant applications.

Economic Development Administration (EDA) Coronavirus Aid, Relief, and Economic Security (CARES) Act Grant: The Commission, through its partnership with the EDA, applied for and was awarded a two-year $400,000 grant, funded through the CARES Act of 2020. The purpose of this federal grant is to support local governments by aiding the prevention, preparedness, and/or response to the coronavirus (COVID-19) pandemic or the economic injury that occurred as a result of coronavirus. Through this award, the Commission will engage stakeholders to identify pressing needs and priorities caused by the pandemic develop a Pandemic Analysis Report to outline how the pandemic has affected the Greater Birmingham Region and update the region’s current Comprehensive Economic Development Strategy (CEDS) to include a focus on pandemic recovery and resiliency.

(2) Compliance with Grant Requirements

We have had no audit findings and we have met all benchmark compliance goals on each grant Required reporting was conducted on time and serves as an integral part of maintaining the grants’ timely implementation. Because of successful grant management, the Commission have the opportunity and will continue to pursue all opportunities that support the community. Overall, grant work plans, schedules, and terms and conditions have been applied in accordance with awarding party requirements.
1. **Applicant Eligibility:**
The Regional Planning Commission of Greater Birmingham (“the Commission”) operates as an inter-local governing body between Walker County, Shelby County, St. Clair County, Blount County, Chilton County, and Jefferson County in the State of Alabama. Please see the attached applicant eligibility documentation.

2. **Community Involvement:**
Following this grant’s award, a Project Kick-Off Meeting will be held, which will be open to the public and include stakeholders from each Target Area. The Kick-Off Meeting will outline the goals of the grant, how to provide public input, and what the funds mean to the Commission and its residents, ensuring an educated public and allowing for additional community involvement. Ongoing communication throughout the life of the grant will be conducted in a variety of ways, including regularly held public meetings. To accommodate COVID-19 and in order to practice social distancing, meetings may be held virtually through Zoom or a combination of in person and virtual, with which the community, project partners, brownfield committee, and local citizens have prior experience using. The meetings will be held at hours agreeable to most schedules to ensure a high level of attendance and involvement from all communities. Additionally, those that cannot be present during the live meeting, can access the recorded meeting online, at the Commission’s website and/or can utilize a call in number provided during the meeting. Meetings will provide a platform for public comment to identify additional brownfield sites, reprioritize known brownfield sites based on established criteria, and voice potential concerns. Commentary will be collected via public comment periods on each meetings’ agenda, through Zoom’s chat feature during meetings, and via phone or email to the project manager/project partners throughout the grant period so that affected parties’ input can be captured and documented for use in decision making when selecting and prioritizing sites. All comments will receive feedback from the grant project manager on how that input is being utilized or if additional information may be needed to better incorporate the input into the grant decisions. Additional communication regarding grant updates and public input opportunities will be conducted in a variety of ways including press releases with the local newspapers which will include Alabama.com, Daily Mountain Eagle, and The Birmingham Times (online and in print). Brownfield related announcements will also be featured during sporting events at the Cordova Park and church services at Mt Carmel Baptist, on local news stations, and flier distribution/website updates via local businesses, project partners, and community organizations. The Commission’s Facebook and Twitter, as well as the following Facebook pages will be used: Ensley Neighborhood Association, City of Birmingham Government, The Birmingham News, City of Cordova – Government, reaching over 132,000 followers.

3. **Named Contractors and Subrecipients:**
NA; The Regional Planning Commission of Greater Birmingham has not selected a contractor nor subrecipient.

4. **Expenditure of Existing Grant Funds:**
NA; The Regional Planning Commission of Greater Birmingham does not have an existing EPA Brownfield Grant.