

1. Applicant Identification: C3 of Northwest Alabama, Inc.
D/B/A Northwest Alabama Economic Development Alliance
4020 US Highway 43
Guin, Alabama 35563-3435
2. Funding Requested:
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested:
 - i. \$500,000
 - ii. N/A.
3. Location:
 - a. Fayette and Brilliant
 - b. Marion, Lamar, Fayette
 - c. Alabama
4. Target Area and Priority Site/Property Information:

Community-wide Assessment Grant
Target Area: I-22 Corridor
Census Block Tracts: 9642, 9644.01, 9644.02, 9645 (Brilliant), 9646, 9647.01, 9647.02

Target Area: Sipsey Watershed
Census Block Tracts: 9645 (Brilliant), 9647.01, 9647.02, 201, 202 (Fayette), 203 (Fayette)

Target Sites:

Former Fayette Cotton Mill
3rd St. SE & 7th Ave. SE
Fayette, AL 35555

Former Brilliant Mine
State Hwy. 129 & County Rd. 68
Brilliant, AL 35548
5. Contacts:

Project Director / Chief Executive:
Mr. Tom Wisemiller, President & CEO
Address: 4020 US Highway 43, Guin, AL 35563-3435
Phone: 205-468-3213
Email: twisemiller@northwestalabamaeda.org
6. Population: (data from the 2019 American Community Survey 5-Year Estimate)
Fayette, AL: 4,285
Brilliant, AL: 845
NW Alabama EDA Region: 59,634

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	1, 2
The priority site(s) is adjacent to a body of water (i.e., the border of the priority 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).	1, 2
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	2
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority: Attached
9. N/A. This application does not have confidential, privileged, or sensitive information.

LANCE R. LEFLEUR
DIRECTOR



KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

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November 29, 2021

Mr. Tom Wisemiller, President & CEO
Northwest Alabama Economic Development Alliance
4020 U.S. Highway 43
Guin, Alabama 35563

RE: U.S. EPA Brownfields Community-Wide Assessment Grant Application

Dear Mr. Wisemiller,

The Alabama Department of Environmental Management (ADEM) Redevelopment Section acknowledges and supports the Northwest Alabama Economic Development Alliance's (EDA) application for a U.S. EPA Brownfields Community-Wide Assessment Grant. We understand that the Northwest Alabama EDA represents the joint economic and marketing pursuits of the cities and unincorporated areas of Marion, Lamar, and Fayette Counties and that the EDA promotes brownfield redevelopment as a catalyst for economic revitalization and environmental restoration in its cities and towns. We are aware that the priority sites for the application are located in the Fayette and Brilliant areas within the EDA's footprint. ADEM recognizes that this grant award would be a significant economic and environmental boost for these communities and the entire tri-county area.

The ADEM Redevelopment Section offers technical project guidance in accordance with the Alabama Land Recycling and Economic Redevelopment Act (ALRERA). This guidance is vital in ensuring that grantees are efficient in applying federal funds. The liability protection afforded by the ALRERA Voluntary Cleanup Program (VCP) is also a significant benefit to potential developers and lenders on redevelopment projects.

In addition to technical oversight, the Redevelopment Section can assist the EDA with community outreach efforts and provide information to residents and other stakeholders regarding the purpose and benefits of the program. We applaud the EDA's efforts to better the economic and environmental conditions of their communities, and we look forward to teaming with you on this and future brownfields initiatives.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Gavin Adams".

M. Gavin Adams, Chief
ADEM Redevelopment Section

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
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(251) 304-1176
(251) 304-1189 (FAX)

Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

The Northwest Alabama Economic Development Alliance (EDA) includes the 3 counties of Marion (pop. 29,341), Lamar (pop. 13,972), and Fayette County (pop. 16,321), Alabama.¹ This rural region of just under 60,000 residents includes the City of Fayette (pop. 4,285) and Town of Brilliant (pop. 845), among others. Our region includes the 24,922-acre Sipsey Wilderness Area (the first such area designated east of the Mississippi River). Explored by Hernando DeSoto in the 1500s but not largely settled until the early 1800s, our region was known for logging and fertile farming. A toll highway project authorized in 1822 by the state government connected our region to Tuscaloosa and Nashville and later railroads in the late 1800s. The late 1800s into the 1900s brought industry in the form of cotton mills, mining, and manufacturing. Our region suffered economic decline as these sectors moved employment and operations overseas, leaving many brownfield sites in their wake. In 2012, the Federal Highway System established I-22 connecting Birmingham and Memphis, bisecting the northern part of our 3-county region. Our Target Area includes two zones, the east-west *I-22 Development Corridor* and the north-south *Sipsey Watershed*. These zones overlap in the area around Brilliant, AL, and are defined by the following Census Tracts (note: 3 tracts overlap):

- **I-22 Corridor:** 9642, 9644.01, 9644.02, 9645 (Brilliant), 9646, 9647.01, 9647.02
- **Sipsey Watershed:** 9645 (Brilliant), 9647.01, 9647.02, 201, 202 (Fayette), 203 (Fayette)

ii. Description of the Priority Brownfield Site(s)

There are a range of brownfield properties across the region and within the two zones making up the Target Area. Partners have identified a mix of mills, manufacturing sites, warehouses, and gas/service stations. This includes a former Die Casting plant, several garment factories, and multiple cotton mills. Altogether, our community partners have identified over 30 brownfield properties in the Target Area. Primary environmental concerns include toxic heavy metals, solvents, oils, dyes, Polycyclic Aromatic Hydrocarbons (PAHs), petroleum products, asbestos, and lead based paint. There are also a handful of former mines with metals possibly leaching into groundwater, including potential impacts on sensitive habitats within the Sipsey Watershed.

Our first priority site is the former Cotton Mill in the City of Fayette. The Fayette Cotton Mill was constructed in 1928 by Alabama Mills and employed up to 350 workers. The property is located on 22 acres within the Sipsey Watershed adjacent to the Sipsey River itself. Most of the site buildings were demolished in 2011-2012. Large debris piles remain on the concrete slabs of the foundation, and four smaller structures or outbuildings are still standing. The site is fenced and vegetation is overgrown around the perimeter and sprouting through cracks in the former parking lots. Approximately two dozen homes remain in the former mill village adjacent to the large site in close proximity to the site's suspected contamination, including asbestos, mercury, polychlorinated biphenyls (PCBs), toxic heavy metals, volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs). The site was selected as a priority due to its current blighted appearance, its proximity and potential impact to residential homes and the environmentally-important Sipsey Watershed, and its large acreage and redevelopment potential.

Our second priority site is the former Brilliant Mine located outside the town of Brilliant in Marion County. Once one of the wealthiest and most densely populated communities in the county because of the Brilliant Coal Company (formerly Aldridge Mining Company), its closure near the end of the 1950s left the town decimated and in state of steady decline – though several smaller mines continued to operate in the surrounding area until the early 1990s. At its height,

¹Source: U.S. Census Bureau, 2020 Decennial Census

the mine employed 600 workers, and the name “brilliant” was a reference to the exceptionally high-quality coal found in that location, known as the Black Creek seam. Today, Brilliant is one of the lower-income towns throughout the entire 3-county region. This site is selected as a priority for redevelopment, because it sits at the junction of both the environmentally-important Sipsey Watershed corridor – located adjacent to waterways connected to the Sipsey River – and the I-22 development corridor – located just north of the interstate off of Exit 30. Environmental concerns for this site are also very high. The primary risk is from runoff at the site carrying contamination from former mining operations into the protected environmental habitats of the Sipsey River. This site includes ponds created by extraction pits that are likely to have contamination, and mine spoils (i.e. “gob piles”) are likely still present on the 19-acre site. A few former mining structures remain on the site, including the former 1,500-square-foot gate house and truck scales. Surface water runoff from these piles and possible underground waterway connection points may be carrying acidic water contaminated with heavy metals and sulfur-bearing minerals into the adjacent waterways.² This could include sulfuric acid, lead, manganese, cadmium, chromium, copper, iron, mercury, arsenic, selenium, and zinc – substances known to have substantial and long-lasting effects on aquatic biosystems.³

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Fayette worked with the EPA’s Office of Community Revitalization to develop a community action plan under the *Local Foods, Local Places* initiative. The project’s report, published in December 2020, recognizes the impact from the many mills and factories located around the city and a diverse set of industries, including lumber, oil products, textiles, food production, concrete production, and metal fabrication. Local officials note the presence of the following brownfield sites in addition to the Fayette Cotton Mill: Shelby Die Casting, Lanier Clothing, Okie Garment, and Winfield Cotton Mill -- a significant number of large sites for small communities. The *Local Foods, Local Places* report focused on improving urban food access for the neighborhood south of downtown, which has high poverty, subsidized housing, and vacant buildings and lots. The recent closure of the area’s only grocery store and no public transportation means access to healthy food choices is extremely limited. The plan recommended leveraging the EPA’s brownfield grant programs to help redevelop these former industrial sites to promote economic development, remove blight, and spur community gardening projects. The Fayette Cotton Mill is located in this community and is envisioned as a mixed-use redevelopment to strengthen the adjacent former mill village with new affordable, energy-efficient housing, space for community gardens and recreation, including access to the Sipsey River, and commercial and light industrial businesses to create jobs and bring services to the community.

The abandoned mine near Brilliant is located near I-22, making it a prime opportunity as an industrial or commercial site. An industrial park owned by the Town of Brilliant is located nearby, and manufacturing remains an important part of the regional economy. Many local factories are connected to the nation’s manufacturing supply chain and use access to the interstate to transport their goods and materials. The *Economic Development Playbook, 2017-2021* – a Comprehensive Economic Development Strategy for West Alabama Region II – focuses on developing this automotive sector to drive job creation and regional innovation. A key component of this plan is leveraging the region’s industrial sites to recruit automotive manufacturers and component suppliers to the I-22 corridor. The Brilliant Mine site is strategically situated within 100 miles of the Toyota plant on I-22 in Tupelo, MS, the Toyota-Mazda plant in Madison, AL, and the Mercedes Benz plant in Vance, AL. The former mine and

² Source: US EPA. Polluted Runoff: Nonpoint Source (NPS) Pollution – Abandoned Mine Drainage. Available: <https://www.epa.gov/nps/abandoned-mine-drainage>

³ Source: US EPA. (August 2000). *Abandoned Mine Site Characterization and Cleanup Handbook*. 910-B-00-001

the smaller abandoned mines near the town may also have the potential to incorporate greenspace reuse to compliment the commercial and industrial properties near Exit 30.

ii. Outcomes and Benefits of Reuse Strategy

Recruiting auto industry suppliers as global firms increasingly “re-shore” manufacturing operations and respond to the increased US-content requirements of the US-Mexico-Canada Trade Agreement (USMCA) will create new job opportunities within this sector. However, these businesses will require ready-to-develop industrial sites for their operations. Ensuring brownfield properties along the I-22 corridor are assessed and the environmental risks defined, increases the ability for the EDA to attract these firms to the brownfield properties instead of pursuing greenfield development. The redevelopment of abandoned and underutilized sites throughout the region will stimulate economic development, particularly along the I-22 corridor, creating jobs for our Target Areas and driving population growth. This will have spillover benefits in the commercial and retail sectors of the economy, real estate property values, and household wealth creation. Some sites, including the Fayette Cotton Mill, may also provide new housing opportunities, urban food access, and new greenspace and recreational opportunities.

Regardless of the intent, cleaning up these sites will protect our natural environment, which the Sipsey Watershed is of particular concern. Both the Fayette Cotton Mill and Brilliant Mine sites are adjacent to Sipsey Watershed waterways and their vital ecological environments. The Sipsey River is a critical habitat for a variety of priority species, including a wide variety of mussels native to the region.⁴ Cleaning up these and other associated brownfield sites along the waterway is essential for protecting these habitats.

Disadvantaged communities in our region will benefit from these revitalization efforts since they tend to be located in close proximity to the brownfield sites. For example, the former mill village adjacent to the Fayette Cotton Mill is a low-income neighborhood (59% vs 38% of AL) with a higher percentage of the population having less than a high school education (17% vs 14% for AL).⁵ While the median household income in AL is \$50,536, the incomes for Fayette County (\$39,856), Lamar County (\$38,364), and Marion County (\$35,930) are roughly 20-30% lower. The City of Fayette, with a median income of \$33,472, is lower still (-34%), and the Town of Brilliant (\$24,643) is less than 50% the state average.⁶ These communities are in urgent need of economic revitalization and job creation, which this project will help foster through the redevelopment of the brownfield sites.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The EDA and the City of Fayette are partnering with Alabama Extension (Alabama A&M University and Auburn University) to conduct an initial Site Analysis of the Fayette Cotton Mill site in Fayette, and the EDA has allocated limited funds in the 2021-2022 and 2022-2023 budgets to pay for debris removal and site preparation to support future Phase I and Phase II Environmental Site Assessments and eventual redevelopment planning efforts. The EDA and/or City of Fayette will be able to apply for an EPA Cleanup grant for site cleanup. Additionally, the EDA and/or City of Fayette may also consider applying for a low interest loan from the Alabama Land Recycling Revolving Loan Fund Program to assist with site cleanup expenses. Developers who enter into the Alabama Department of Environmental Management (ADEM)’s voluntary cleanup program are eligible for certain tax abatements upon completion that can be leveraged for redevelopment. Should additional assessments be required beyond the scope of this project, the EDA may request funding for limited site assessments from ADEM’s brownfield technical assistance program. For the redevelopment of sites, the EDA will work to leverage funding from

⁴ Source: Alabama Rivers and Streams Network. *Sipsey River*. Available: <http://www.alh2o.org/sipsey-river>

⁵ EPA EJScreen Mapping Tool, population within 1 mile of Fayette Cotton Mill. <https://ejscreen.epa.gov/mapper/>

⁶ Source: US Census Bureau, American Community Survey, 2019.

private partners and may assist by pursuing grants from the US Economic Development Administration, the US Department of Agriculture, or the Alabama Department of Economic and Community Affairs Community Development Block Grant. Private developers can also leverage Alabama's Historic Preservation Tax Act's tax credit which provides a 25% tax credit for qualified rehabilitation expenses for properties at least 60 years old.

Similarly, the EDA will work with Marion County and the Town of Brilliant to access the funding options described above in order to address the abandoned Brilliant Mine as well. In addition, because of the former mine's location in the Sipsey Watershed, the EDA may also work with project partners to pursue wildlife protection grants. However, in order to unlock these funding sources, environmental assessments and cleanup planning activities must first be completed.

ii. Use of Existing Infrastructure

Our priority sites have existing electric, gas, fiber, water, and sewer utilities and infrastructure with sufficient capacities to support their reuse. Depending on the ultimate reuse plans, some upgrades, such as to the Brilliant Mine site, may include surface preparation, access road improvements, and electrical and other utility system installations. These upgrades will either be funded through economic development site-ready programs and/or through the private investment of companies locating to the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Our region lacks income and a strong tax base to fund complicated development projects. As previously cited, US Census data shows communities such as Fayette and Brilliant have low incomes (-34% and -51%, respectively below the state's average household income). In addition, our region lacks a strong business network. According to 2019 County Business Patterns, there are 2.0 businesses for every 100 people in Alabama but only 1.8 in our three counties (a gap of approximately 120 firms).⁷ More starkly, the annual payrolls of these companies are only 61% of those in the state (a loss of \$329M). These millions in lost business revenues and personal income means our communities are less equipped to address the burden of these numerous brownfield sites, including a weak tax base for local government intervention. In addition, our counties are very rural. There are only 59,634 people in the tri-county region and our priority sites are in very small communities – the City of Fayette, one of our more urbanized centers, has a population of only 4,285, and the population of the Town of Brilliant is a mere 845.⁸ These small, low-income communities lack the organizational capacity and resources to draw upon other sources of funding to address the environmentally-challenging brownfield sites plaguing our region.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Sensitive populations exist in close proximity to brownfields in our region. For example, the City of Fayette skews older than the general population. In AL, 23.0% of the population is 60 years+ and only 6.7% are age 75+, while Fayette's 60 years+ population is 30.8% and 14.1% is 75+ (approximately double state and regional averages for this age category).⁹ The EJScreen tool report for the population living within 1 mile of the Fayette Cotton Mill is in the 73rd percentile in the US for people over the age of 64 as well as in the 81st percentile for children under 5 years of age. In addition, the community is in the 68th percentile for having less than a HS education and 88th percentile for low-income population.

⁷ Source: US Census Bureau, County Business Patterns, 2019.

⁸ Source: US Census Bureau, Decennial Census, 2020.

⁹ Source: US Census Bureau, American Community Survey, 2019.

The Town of Brilliant, by contrast is home to many children. In AL, 6.0% of the population is under 5 years old, while Brilliant's population under 5 years old is 9.0% (a 50% increase over the state average).¹⁰ According to the EPA EJScreen tool, the community within a 1-mile radius of Brilliant are in the 78th percentile for children under 5 years of age compared to AL as well as 77th percentile for low income population and 81st percentile for less than a HS education compared to US averages. Both the very old and very young are at a greater risk from the impacts of environmental contamination, particularly the heavy metals, PCBs, and VOCs suspected at the priority sites. Poor health outcomes can be exacerbated by other conditions present in these communities, such as low educational attainment, poverty, and minority status. Through this project, the EDA can assist the communities with identifying the potential exposure risks, developing mitigation strategies, and facilitating the redevelopment of the brownfield sites in order to improve the economy, health, and welfare of the Target Areas.

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

The EJScreen tool identifies the key environmental risk factors for Brilliant including respiratory issues (80-90th percentile vs. the US) and cancer risk (70-80th percentile). Brilliant, home to higher percentages of children, is also ranked in the 56th percentile in the state for lead paint risk. Within a 1-mile radius of the Fayette Cotton Mill, the population is in the 80-90th percentile for both respiratory issues and cancer risk relative to the US as whole and 81st percentile for lead paint risk compared to AL. These risks can translate into higher negative health impacts for such things as cancer, asthma, and birth defects. The Institute for Health Metrics and Evaluation (IHME) at the University of Washington generally confirms a higher rate of cancer deaths in our three counties.¹¹ For example, per 100,000 population, the mortality rate from lung cancers were significantly higher for men (117 Fayette / 116 Marion / 121 Lamar vs. 68 US) and from breast cancer for women (32 / 29 / 33 vs. 26). More recent data (2018) found that Fayette County has a significantly higher number of deaths from cancer (269 per 100,000) than both state and national benchmarks (141 and 129 respectively).¹² Similar data was found by Alabama Department of Public Health, which reported in 2013 that the rate of cancer deaths per 100,000 population was 280 for Fayette County and 249 for Marion County vs. 213 for AL and 185 for the US.¹³ Exposure to heavy metals, such as those suspected at the Brilliant Mine priority site, have been linked to higher incidences and higher mortality of breast, gastric, and prostate cancers, among others. Exposure to asbestos and PAHs, such as those suspected at the Fayette Cotton Mill priority site, have been linked to Lung Cancers. The assessments funded by this grant and eventual remediation and redevelopment of these properties will reduce the targeted community's exposure risk to the suspected contaminants and help lower the incidences of adverse health conditions.

(3) Promoting Environmental Justice

Sensitive populations within the Target Areas live in homes that are in close proximity to former industrial operations, and in some cases, such as the former Fayette Cotton Mill community, share a property boundary or are located immediately across the street. In the past, the Target Areas disproportionately shared the negative environmental consequences of the mining or industrial operations, and now the low-income, elderly, and youth communities (Sec.2.a.ii(1)) of neighborhoods adjacent to the priority sites continue to bear the negative environmental burden associated with the brownfields. For example, in Fayette, residents in the Blockgroup 010570203001 which surrounds the former Fayette Cotton Mill have elevated percentages of all

¹⁰ Source: US Census Bureau, American Community Survey, 2019.

¹¹ Note: 2014 Data, Available: <https://vizhub.healthdata.org/subnational/usa>

¹² Source: LiveStories. Demographic Differences in Fayette County Cancer Deaths. Available: <https://www.livestories.com/statistics/alabama/fayette-county-cancer-deaths-mortality>

¹³ Source: Office of Primary Care and Rural Health, Alabama Department of Public Health and the Alabama Rural Health Association. (April 2013). *Selected Health Status Indicators: Fayette County*. Available: <https://www.alabamapublichealth.gov/ruralhealth/assets/Fayette13.pdf> and *Selected Health Status Indicators: Marion County*. Available: <https://www.alabamapublichealth.gov/ruralhealth/assets/Marion13.pdf>

EJ Indexes used by the EPA to define environmental justice concerns in EJSCREEN, especially the Index for Wastewater Discharge Indicator (75th percentile), Particulate Matter, Ozone, NATA Air Toxic Cancer Risk, NATA Respiratory Hazard Index (64th percentile), and Superfund Proximity (61st percentile.) Homes in this neighborhood are from an aging housing stock with 77% of homes constructed prior to 1960, which presents lead-based paint concerns. In addition, many of the homes in the neighborhood may have been constructed with asbestos siding. With 52.9% of families with children living below the poverty threshold in the surrounding Census Tract 203,¹⁴ major home repairs are highly unlikely to be completed to remove lead-based paint and/or properly abate asbestos (which may be an exposure threat due to deteriorating conditions). As the data shows, residents here face significant environmental justice challenges resulting from a time when government policies allowed mines, heavy industries, and residential properties to locate in close proximity. Thus, residents are at more risk of exposure to wind-blown contaminants or contaminated site runoff. Site assessments and cleanup planning under this project will identify potential contaminants, migration pathways, and containment measures to help prevent offsite transport and exposure to contaminants.

This project will specifically address some of these environmental challenges by first determining what risks are indeed present, and then encouraging the redevelopment of the problematic brownfield sites which will mitigate health risks, create jobs, provide safe, energy efficient, and quality affordable housing, and protect the natural environment. Through this initiative, the EDA can help the Target Areas overcome the Environmental Justice burdens and barriers present in their neighborhoods.

b. Community Engagement

i. Project Involvement & ii. Project Roles

Partner Name	Point of Contact	Specific Role in the Project
West Alabama Economic Development Association (WAEDA)	Andy Johnson ajohnson@bankofvernon.bank 205-712-6995	Will support site identification, prioritization, and reuse planning.
West Alabama Regional Commission (WARC)	Dennis Stripling, Exec. Director dennis.stripling@westal.org 205-333-2990 Ext. 218	Will support the regional brownfields team on community planning and engagement efforts.
Community Development Foundation	Wade Nixon, Chair wade.nixon@bscc.edu 205-412-6032	Will provide a member to the task force and provide redevelopment leveraging and planning support during this project.
Fayette First Baptist	Brother Scott Davis, Pastor fayettefbc1@gmail.com (205) 932-5562	Will assist in raising awareness about brownfields programs including upcoming community engagement meetings. One of the largest churches in Fayette.
Alabama Extension, Fayette County office (Auburn Univ. and Alabama A&M Univ.)	Ronni Rena Brasher rrb0006@aces.edu 205-932-8941	Assisting with a site analysis on the Fayette Cotton Mill site to provide a framework for potential acquisition of the property by the City of Fayette or prospective investor for purposes of redeveloping the site.
North Alabama Council of Local Governments	Keith Jones, Executive Director kjones@nacolg.org 256-389-0555	Will help develop regional strategies for growth and development, provide planning assistance to local governments for site reuse plans.

iii. Incorporating Community Input

The EDA is experienced in regional community initiatives and gathering public input. Our region is largely rural and gathering community support and engagement requires a multi-channel outreach strategy that leverages a mix of digital and in-person communication, leveraging strong grassroots social and professional networks. Our initial approach is to create a more resonate regional identity by focusing on the commonalities of mill and mining towns and shared cultural history of the communities in the I-22 corridor and Sipsey Watershed. We will

¹⁴ Source: US Census American Community Survey 2019 5-year Estimates Data Profiles

work with our contractor to develop a branded outreach campaign across our digital and print platforms. Messages on the initiative launch, upcoming meetings, accomplishments, and video clips of sites and events will be distributed electronically using this same theme, including hashtags, as needed but no less than 2 times per month on our Facebook, Twitter, and LinkedIn accounts. These will be shared by our project partners (listed above) for a wide regional distribution and enhanced with periodic post boosts. The campaign will feature a virtual tour of brownfield properties in our region. Key project information will be shared on our brownfields project landing page.

We will issue press releases and work with local media (TV and radio) to broadcast key milestones and accomplishments from the project, including project launch, mid-project review, and during development of the multi-corridor revitalization plan as well as the times, dates, and locations of community meetings.

The EDA will couple these digital and media efforts with an on-the-ground outreach effort that will begin with briefings at our regional and local partners and extending, through referral introductions, to local community organizations in the towns and cities with key brownfields priorities. These meetings will take place throughout the project lifecycle, but will be concentrated in the first year of the initiative. We anticipate meeting with an average of 2 organizations per month during that year for a total of 24 organizational meetings. The meetings will inform these community partners, but also recruit them to disseminate information by sharing our social media content, sharing project brochures and fact sheets, and hanging informational flyers on community message boards. We will keep our partner organizations informed of key project accomplishments and activities through a monthly status report distributed by email and an open quarterly partnership meeting held via a digital video conferencing system such as Zoom or MS Teams.

We will work with these partner organizations to coordinate community meetings at key milestones to disseminate information, answer questions, solicit inputs, and engage residents. This will include a review of our inventory of brownfields sites to discuss redevelopment priorities and gather feedback on the selection and prioritization of targeted sites. A second type of planning event will be held to gather input on site reuse concepts, where we will share market data, environmental considerations, and other factors to discuss potential opportunities for each property – parking, entry/exit points, commercial/residential/ industry reuse options, related job creation, greenspace/parks, multimodal transportation access, landscaping concepts, and signage and frontage designs. Our team will employ interactive and creative input methods such as Design Charrettes to gather feedback.

Due to the high Hispanic populations residing in the affected census tract, project-related materials will also be prepared in Spanish and a translator made available at public meetings, as needed. Additionally, the project landing page will be designed for easy translation to Spanish. Assistance will also be made available to those persons with physical disabilities, such as holding meetings at locations that are handicap accessible. We will also work closely with our community-based partners, collaborative partners, and other contacts to ensure that communication messages reach all constituent groups in the affected area. If COVID restrictions limit our ability to hold face-to-face meetings, we will coordinate virtual events assisted by creative virtual collaboration tools such as Google Jamboards, IdeaFlip, or Ideaboardz.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

The following Work Breakdown Structure (WBS) defines the major tasks required to implement our proposed 3-year brownfields project. We competitively procured an expert professional services firm (Contractor) with experience in brownfields redevelopment and EPA grant project implementation to help execute selected WBS tasks and subtasks, as indicated.

	Task 1.0 Management	Task 2.0 Community Involvement	Task 3.0 Env. Site Assessments	Task 4.0 Cleanup Planning
i. Implementation	<ul style="list-style-type: none"> Plan and track project tasks, schedule & budget Oversee Contractor Report to Stakeholders Attend National and Local/Regional Brownfield Conferences 	<ul style="list-style-type: none"> Hold Quarterly Partner meetings Develop & publish outreach materials, including press releases, radio announcements, fact sheets, brochures & social media posts Hold community information & planning meetings Update BF inventory 	<ul style="list-style-type: none"> Submit Site Eligibility Forms to the EPA Conduct Phase I & Phase II Environmental Site Assessments (ESA) at priority sites Author generic and site-specific Quality Assurance Project Plans (QAPP) and Health & Safety Plans (HSP) Conduct Asbestos-Containing Materials (ACM) and Lead-based Paint (LBP) Surveys 	<ul style="list-style-type: none"> Prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) at priority sites to evaluate cleanup options with public input Create site-specific vision concepts Generate an area-wide revitalization plan for our primary redevelopment corridors
ii. Schedule	36 Months (ongoing)	36 Months <ul style="list-style-type: none"> Quarterly Partner Meetings Organizational meetings Q1-4 Community meetings in Q4-12 Planning meetings concentrated in Q6-12 	27 Months <ul style="list-style-type: none"> Phase I ESAs will concentrate in Q2-8 Phase II ESAs will concentrate in Q3-10 ACM & LBP Surveys will concentrate in Q3-8 	18 Months <ul style="list-style-type: none"> ABCAs will concentrate in Q5-12, following Phase II ESAs Site Concept Plans will concentrate in Q6-12, following Phase II ESAs Multi-Corridor Plan will take place Q8-10
iii. Lead	Project Director	Project Director	Contractor	Contractor
iv. Outputs	<ul style="list-style-type: none"> 12 Quarterly Reports 3 Annual Disadvantaged Business Enterprise Utilization Reports 3 Financial Status Reports ACRES Updates Final Summary Report 	<ul style="list-style-type: none"> Print & Digital Outreach Materials Meeting Minutes & Sign-in Sheets News Articles BF Inventory 	<ul style="list-style-type: none"> 15 Site Eligibility Forms 15 Phase I ESA Reports (ASTM 1527-13 & AAI Rule 70FR66070) 7 Phase II ESA Reports (ASTM 1903-11) 1 Generic QAPP & HSP 7 Site-specific QAPPs 7 Site-specific HSPs 8 ACM & LBP Surveys 	<ul style="list-style-type: none"> 4 ABCAs 4 Site Concept Plans 1 Multi-Corridor Plan

b. Cost Estimates

All cost estimates (below) are based upon information provided by the Contractor on expenses incurred by other EPA Brownfield grantees and the experience of the region with similar environmental and community projects.

Personnel: We anticipate our program management team will spend approximately 360 hours over the course of the 3 years of the project’s period of performance (avg. 10 hours per month X 36 months) for oversight and program management, attending brownfields conferences, and related tasks. An additional 180 hours will be spent by our team to support community outreach activities, organization briefings, and local events (avg. 5 hours per month X 36 months). These costs are provided as an in-kind contribution of \$27,000 (540 X \$50).

Travel: Travel expenses will be incurred to travel to state and national brownfields meetings. We anticipate attending a total of 3 meetings at an average costs identified below (total cost estimated at \$5,200).

1 National (2 staff)	X	\$1,800/trip/staff	=	\$3,600
2 State/Region	X	\$800/trip	=	\$1,600

Supplies: Supplies include items needed to help facilitate community meetings such as post-it notes, markers, printed handouts, pens, writing boards, printed schematics and maps, etc.

36 meetings	X	\$100/meeting	=	\$3,600
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Contractual: Costs for contractor activities are built up from informal estimates provided by experts in the industry to assist us with this application. They are listed below by type of activity

at a total cost of \$491,200.

Task	Quantity		Unit Cost		Total Cost	Task #
Project Management Support	100 Hours	x	\$150/hr	=	\$15,000	1.0
Outreach Material Design	48 Hours	x	\$125/hr	=	\$6,000	2.0
Quarterly Partner Meetings	12 Meetings	x	\$250/mtg	=	\$3,000	2.0
Support Comm. Mtgs/Events	36 Meetings	x	\$500/mtg	=	\$18,000	2.0
Generic QAPP	24 Hours	x	\$125/hr	=	\$3,000	3.0
Phase I ESAs	15 Assessments	x	\$3,500/ea.	=	\$52,500	3.0
SSQAPP, HSP & Ph II ESAs	7 Assessments	x	\$42,386/avg.	=	\$297,500	3.0
ACM & LBP Surveys	8 Surveys	x	\$4,500/ea.	=	\$36,000	3.0
ABCA	4 ABCAs	x	\$4,000/ea.	=	\$16,000	4.0
Site Concepts	4 Plans	x	\$5,000/plan	=	\$20,000	4.0
Multi-Corridor Plan	200 Hours	x	\$125/hr	=	\$25,000	4.0

Budget Categories		Project Tasks				TOTAL
		Task 1.0	Task 2.0	Task 3.0	Task 4.0	
DIRECT COSTS	Personnel					
	Fringe					
	Travel	\$5,200				\$5,200
	Equipment					
	Supplies	\$3,600				\$3,600
	Contractual	\$15,000	\$27,000	\$388,200	\$61,000	\$491,200
	Other					
Total Direct Costs		\$23,800	\$27,000	\$388,200	\$61,000	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Budget		\$23,800	\$27,000	\$388,200	\$61,000	\$500,000

c. Measuring Environmental Results

The project team will meet monthly to review activities, accomplishments, schedule and budget to ensure goals are achieved and corrective actions are taken when necessary. The project's progress will primarily be measured by the production of deliverables (see above table) and expenditure of funds. In addition, the team will track outputs: # of community meetings and attendees; # of presentations delivered to local community groups and organizations; # of brownfield sites identified and profiled in the inventory; and, outcomes: # of sites and acres assessed; acres ready for reuse; amount of leveraged funding; and jobs created. These metrics will be tracked throughout the project and reported in our Quarterly Reports. Property specific information will also be entered into ACRES during the project and after the period of performance as outcomes are realized.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity, ii. Organizational Structure & iii. Description of Key Staff

C3 of Northwest Alabama, Inc. now branded as the Northwest Alabaman Economic Development Alliance (EDA), was incorporated in the fall of 2010 as a cooperative marketing and economic development alliance for the cities and counties throughout Marion, Lamar and Fayette (3 counties or C3). Our mission is to create and promote an environment wherein businesses will choose to invest and create jobs for area residents. The EDA and its staff have the requisite capacity to administer the EPA grant funds based on a combination of previous experience in federal and state grant management and partnerships with organizations who have experience in implementation of EPA Brownfield grants. Mr. Tom Wisemiller, President and CEO, was previously the project manager for a city's local brownfields program, which received over \$1,000,000 in EPA brownfields grants. Mr. Wisemiller was responsible for all facets of the program, including budgeting, program payments, compliance, etc. Mr. Wisemiller holds a master's degree in City and Regional Planning from Cornell University. He has 15 years of experience in downtown revitalization, economic development, community and economic

planning, and other tasks applicable to the proposed program. Mr. Wisemiller will be supported by Jamie Christian, the EDA’s Marketing and Membership Director. Ms. Christian has a bachelor’s degree from the University of North Alabama in Marketing. Ms. Christian has extensive experience supporting local communities and business as an Executive Director/Marketing Director of chambers of commerce in Alabama and Colorado. She currently manages the EDA’s day-to-day budgeting, accounts payable and receivable, and regularly prepares financial reports for the Board of Directors. Ms. Christian will assist with financial management and administrative duties throughout the grant period. The EDA will also rely on regional planning partners to support community planning and engagement efforts.

iv. Acquiring Additional Resources

To assist with technical aspects of the project, the EDA procured a QEP experienced in brownfields assessment and redevelopment. On September 14, 2021, the EDA released a competitive Request for Qualifications (RFQ) in accordance with 2 CFR Part 200 and 1500. The EDA received 4 responses by the October 1st deadline, and a committee of staff and members of the Board of Directors evaluated the proposals. The Executive Director conducted phone interviews of the two top-ranked firms, and recommended the top-ranked firm to the Board of Directors, which approved the selection. The EDA will negotiate a contract task order with the firm upon grant award. The EDA’s Project Manager will closely supervise the QEP to ensure all requirements are met within the three-year duration of the project

b. Past Performance and Accomplishments

ii. Has Not Received an EPA BF Grant but has Received Other Assistance Agreements.

1. Purpose and Accomplishments:

Assistance Program	Awarding Agency	Amount Awarded	Funds Remaining	Year Awarded	Grant Accomplishments
Coal Severance Tax (State of Alabama)	West Alabama Economic Development Association; Community Development Foundation	\$1,301,000	\$0	2014-2021 (annual awards)	Coal Severance Tax funds to be utilized on promoting economic development opportunities in Alabama counties that previously relied on the coal industry as a key economic driver. Since 2011, EDA has supported 22 new businesses and 85 business expansions with \$575 million in private capital investment and creating or retaining approximately 5,600 jobs.
Coronavirus Relief Fund (federal funds)	State of Alabama, Governor’s Office	\$15,000	\$0	2020	This grant plugged a funding gap caused by COVID 19, which enabled our organization to maintain full support for our existing major employers, which in turn were disrupted by COVID-19 during this period.
EDA CARES Act (via NACOG)	North Alabama Council of Local Governments	\$12,500	\$0	2020	The purpose of this program is to equip local economic development organizations and communities to quantify the impacts of the COVID-19 pandemic on local businesses and industries while identifying factors most detrimental to each company. Through this program, our organization has worked with 5 major employers, as part of our ongoing Business Retention and Expansion Program, to address specific COVID-19 related challenges and link these businesses to resources.

2. Compliance with Grant Requirements: The EDA met all of the requirements and conditions of the grant funding programs described above, including completing the projects according to the work plans and schedules, achieving and reporting the expected results, and submitting all required reports in a timely manner.

Threshold Criteria

1. Applicant Eligibility

C3 of Northwest Alabama, Inc., DBA Northwest Alabama Development Alliance (NWEDA), is a regional governmental agency. A copy of the Articles of Incorporation is attached.

2. Community Involvement

The EDA is experienced in regional community initiatives and gathering public input. Our region is largely rural and gathering community support and engagement requires a multi-channel outreach strategy that leverages a mix of digital and in-person communication, leveraging strong grassroots social and professional networks. Our initial approach is to create a more resonate regional identity by focusing on the commonalities of mill and mining towns and shared cultural history of the communities in the I-22 corridor and Sipsey Watershed. We will work with our contractor to develop a branded outreach campaign across our digital and print platforms. Messages on the initiative launch, upcoming meetings, accomplishments, and video clips of sites and events will be distributed electronically using this same theme, including hashtags, as needed but no less than 2 times per month on our Facebook, Twitter, and LinkedIn accounts. The campaign will feature a virtual tour of brownfield properties in our region. Key project information will be shared on our brownfields project landing page.

The EDA will couple these digital and media efforts with an on-the-ground outreach effort that will begin with briefings at our regional and local partners and extending, through referral introductions, to local community organizations in the towns and cities with key brownfields priorities. The meetings will inform these community partners, but also recruit them to disseminate information by sharing our social media content, sharing project brochures and fact sheets, and hanging informational flyers on community message boards.

Due to the high Hispanic populations residing in the affected census tract, project-related materials will also be prepared in Spanish and a translator made available at public meetings, as needed. Additionally, the project landing page will be designed for easy translation to Spanish. Assistance will also be made available to those persons with physical disabilities, such as holding meetings at locations that are handicap accessible. We will also work closely with our community-based partners, collaborative partners, and other contacts to ensure that communication messages reach all constituent groups in the affected area. If COVID restrictions limit our ability to hold face-to-face meetings, we will coordinate virtual events assisted by creative virtual collaboration tools such as Google Jamboards, IdeaFlip, or Ideaboardz.

3. Named Contractors and Subrecipients

N/A. NWEDA did not name a contractor or subrecipient in the narrative portion of this grant application.

4. Expenditure of Existing Grant Funds

N/A. NWEDA does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.