1. **Applicant Identification:**
   City of Marion
   Post Office Box 959
   Marion, Alabama 36756

2. **Funding Requested:**
   a. **Assessment Grant Type:** Community-wide
   b. **Federal Funds Requested:**
      i. $388,000
      ii. Not Applicable

3. **Location:**
   a. **City:** City of Marion
   b. **County:** Perry County
   c. **State:** Alabama

4. **Target Area and Priority Site/Property Information:**
   - Community-wide Assessment Grant
     - Marion target area
     - City (Census tract not applicable)
     - Priority site addresses
       1. 620 Magnolia St., Marion, AL 36756
       2. 1410 S. Washington St., Marion, AL 36756
       3. 14890 Hwy 5, Marion, AL 36756

5. **Contacts:**
   a. **Project Director** & b. **Chief Executive**

   - **Name:** Mayor Dexter Hinton
   - **Phone Number:** (334).683.6545
   - **Email Address:** dexterhinton2@gmail.com
   - **Mailing Address:** City of Marion
     Post Office Box 959
     Marion, Alabama 36756

6. **Population:**
   3,275 in City of Marion
   (2019: ACS 5-Year Estimates. US Census Bureau.)
7. **Other Factors:**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>X</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<td>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).</td>
<td></td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 1.A. for priority site(s) within the target area.</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>

8. **Letter from the State Environmental Authority:** See Attachment

9. **Releasing Copies of Applications:**
   Not applicable
November 24, 2021

The Honorable Dexter Hinton, Mayor
City of Marion
Post Office Box 959
Marion, Alabama 36756

RE: EPA Brownfields Community-wide Assessment Grant

Dear Mayor Hinton:

We are pleased to support the City of Marion in its pursuit of a Brownfields Community-wide Assessment Grant from the US Environmental Protection Agency to address its key brownfield sites.

Since 1990, Marion’s population has declined by 26%. More than thirty businesses in Marion have permanently closed their doors in the last 20 years with over 400 jobs lost. This economic decline has resulted in the proliferation of brownfields in these environmental justice communities. Marion has a plan to change these bleak conditions which includes obtaining this EPA grant. If awarded this grant, it will be used to focus on the Marion target area, bounded by city limits. The city is rich in history and southern charm, and Marion will focus on drawing businesses and tourism back to the area to help revitalize the area.

Therefore, upon request, the Alabama Department of Environmental Management can participate in the various brownfields outreach activities needed to accomplish the City’s goals as described through the comprehensive plan. We wish you and the residents of Marion success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

M. Gavin Adams, Chief
ADEM Redevelopment Section
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area:

Located in West Central Alabama, the City of Marion was established in 1817. Marion is the seat of Perry County, and is the County’s largest City with 3,275 residents spread across 10.57 square miles.\(^1\) Marion is located south of Tuscaloosa, AL and west of Montgomery, AL. It is adjacent to the Talladega National Forest, but its best natural resource is its dark fertile soil, giving rise to the geographic term, the “Black Belt.” Marion is in the heart of the Black Belt that was once the center of slavery, and continues to have a large black population (54.7\%) into the 21st century.\(^1\) Today, the term “Black Belt” has become synonymous with three themes – poverty, race, and inequality. Marion is a persistent poverty area, with poverty rates of 29\% in 2019, 26\% in 2010, and 33\% in 2000.\(^2\) It is a poor, small, town-square town with plenty of charming antebellum architecture and not enough fundamental infrastructure, due to steady economic decline brought about by historic marginalization. The White House Environmental Justice Advisory Council’s Justice40 Initiative identified rural Alabama’s Black Belt as an Environmental Justice Community that needs a “whole of government” approach to address the need for federal investments to improve air and water quality, and basic health services.\(^3\) This proposed project will help address these needs by focusing on brownfields in the Marion target area, which is geographically defined by City limits.

Marion’s brownfield problems are the result of population and economic decline, which further deepen each other. Since 1990, Marion’s population has declined by 26\%.\(^4\) The economic decline of the Marion target area began in the 1900s and then started to free fall after the 1940s. The decline was due to heavy losses in agriculture mainly due to depleted soils from over-farming that led to lower productivity and boll weevil infestation in the cotton crops. In 1950, Alabama had approximately 200,000 farms. By 2002, that number dropped to roughly 45,000. The area’s economy shifted somewhat by becoming very strong in manufacturing, which accounted for more than 20\% of the jobs in the area.\(^5\) However, this economic sector was hit hard near the turn of the 21st century. According to the State of Alabama Worker Adjustment and Retraining Notification (WARN) List, more than 400 jobs in Marion were lost since 2004, a significant number in our small town of just over 3,000 people. Marion’s mayor also compiled a list of about 30 businesses that permanently closed their doors in the last 20 years. According to the Bureau of Labor Statistics, Perry County now has the lowest wages in the State.\(^6\) Marion was built on one-crop farming and manufacturing, but several colleges were also established here, resulting in the City being known as the “College City.” Among the colleges formed in Marion are the Marion Military Institute, Judson College, Alabama State University (ASU), and Samford University. Both ASU and Samford moved to other towns, and Judson College, the largest of the colleges, closed on July 31, 2021, leaving only the Marion Military Institute in Marion today.

An important part of Marion’s culture is its long struggle with civil rights. For generations, residents have suffered with imbalances in land ownership and political representation, economic opportunity, and disinvestment, which contributed to the problems with decline discussed above. In 1964, Marion became ground zero for the national voter civil rights movement that started with protests by local black residents. After the shooting in Marion of resident Jimmie Lee Jackson during a voter registration protest, Dr. Martin Luther King organized the famous “Bloody Sunday” March from Selma to Montgomery from Marion’s downtown Zion Church. The movement was organized through grassroots efforts, which is still how the community connects today. While traditional pedagogies of top-down interventions are often met with distrust, the community has a strong desire for improvements in the City, and is hopeful for opportunities with transparency and public participation.

Our long history of economic decline and marginalization has led to a proliferation of brownfields, which further exacerbate decline and generational gaps in wealth and opportunity in our Black Belt community. Marion has a plan to change these bleak conditions and part of our plan includes obtaining this EPA Community-wide Assessment (CWA) grant. The grant will focus on redeveloping brownfields to draw

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\(^1\) Reference: https://data.census.gov/

\(^2\) Reference: https://www.biggestuscities.com/city/marion-alabama

\(^3\) Reference: https://www.encyclopediaofalabama.org/article/h-2458

\(^4\) Reference: https://data.census.gov/

\(^5\) Reference: https://data.census.gov/

\(^6\) Reference: http://www2.labor.alabama.gov/LAUS/clfbycnty.aspx
new businesses, residents and wealth into the area in order to help revitalize the Marion target area.

1.a.ii. Description of the Priority Brownfield Site(s):

There are dozens of brownfields in the Marion target area, including abandoned gas stations, former industrial sites, a former armory, buildings with hazardous construction materials, and other commercial sites where chemical use was known or suspected. Marion has selected three priority sites for this proposed project. Each site is considered a priority due to the concern over the potential contaminants, redevelopment potential, and concerns voiced by the community over the physical or chemical threat posed by these sites. None of the sites identified were found to be within the 100-year flood plain. The first priority site is the old Fort W. David Cobb National Guard Armory, located at 620 Magnolia St., which is now owned by the City. The building is approximately 25,000 square feet and sits on 28 acres. To the north of the property is a row of residences, starting at about 200 feet away. Commercial business surround the property on all other sides. From the 1950s to 2010s, the site was used to train guardsmen in military operations and to store materials assigned to the units. The primary environmental concerns are oils and grease used in maintenance operations, and possible contamination from the use and storage of petroleum fuels. The Armory site was identified as a priority for the community because of its size, its proximity to residences, and its reuse plans (a job training and workforce development center). AIM Distributing is the second priority site. It is a former industrial site located at 1410 S. Washington St., just off the Highway 5 Corridor. The property has a 13,000 square-foot derelict metal building that sits on approximately 9.1 acres of land. Various food spice products were processed and distributed from the site. The dilapidated structure has been vacant for many years and has increasingly become a safety hazard for anyone who may wander onto the unfenced property. There is a line of residences to the west of the priority site, with the closest about 500 ft. from the building. Properties to the north, east, and south are industrial and commercial use. There are environmental concerns that the site may have petroleum and solvent contamination from its industrial and shipping operations, and asbestos containing building materials onsite. The AIM site is a priority to the community because of its size, its proximity to residences, and the health and safety threats it poses. The third priority site is the former Coles Truck Stop located at 14890 Hwy 5. Highway 5 is the most traveled highway/roadway in Perry County, and is the primary gateway into the heart of Marion. The property is 2.15 acres with a concrete pad and no buildings. The original building was constructed prior to 1960, and has been razed. For many years trucks parked there for refueling, servicing, meals, and breaks. It is believed there are old gas tanks remaining in the ground. To the south is a church. The closest residence is about 200 ft. to the east and appears to have a private drinking water well. The environmental concern with this priority site is the potential for benzene and other components within the gasoline to have contaminated the groundwater supply. The Truck Stop site is a priority for the community because of its highly visible and frequently traveled location at the northern gateway to the city, and the serious health effects of the suspected contaminants to the community. In addition to these three priority sites, Marion plans to address six other potential brownfields, including abandoned gas stations and commercial properties where chemical use was known or suspected.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans:

Due to the small size of the City and a lack of resources, there has been no funding to pay consultants for the development of any written Comprehensive Plan, Strategic Plan, Revitalization Plan, or Economic Development Plan. However, the City has a list of community priorities, developed organically between the people living in the Marion target area and government officials. The grassroots community priorities list has 5 goals: 1) Improve the aesthetics of the City, especially in the downtown areas and the Highway 5 Corridor, through demolition, cleanup, and beautification programs. 2) Improve the sense of community through hosting events to draw people to the downtown areas. 3) Improve the roads and infrastructure primarily at the core of Marion and along the Highway 5 Corridor. 4) Attract and increase tourism capitalizing on our rich civil rights history. 5) Improve education and workforce training in order to attract more skilled, job-generating businesses.

The plan for each of the priority sites aligns with Land Use Plans and the grassroots community priorities. Marion plans for the old Fort W. David Cobb National Guard Armory priority site to be redeveloped into a job training and workforce development center. The City has been using another location for these services, but the programs have become so popular that they need a larger facility, and they have identified the old armory as the prime candidate. The reuse strategy meets land use plans as a commercial facility, and community priority goal #5 as an education and workforce center that attracts skilled, job-generating businesses. The AIM Distributing priority site has become an eyesore along the main entrance to the
Marion target area from the south on the Highway 5 Corridor. Its reuse strategy is to remove the onsite structure and make the property marketable for development as light industrial, which follows the City’s Land Use Plans and community priority goal #1, demolish and cleanup blighted properties along Highway 5. The Coles Truck Stop priority site is another highly visible property on the Highway 5 Corridor. The reuse strategy at this priority site is to make the property a roadside diner, attracting visitors entering Marion from the north. The reuse plan aligns with Land Use Plans (commercial), and with community priority goals #1 (improve aesthetics along Highway 5) and #4 (attract tourism).

1.b.ii. Outcomes and Benefits of Reuse Strategy:

The redevelopment projects at our priority sites will work towards achieving Goal 1, Objective 3, of the EPA’s FY 2018-2022 Strategic Plan by revitalizing land and facilitating the identification of threats that will aid in preventing contamination. Additionally, Marion is an economically disadvantaged community as defined in EO 14008 Section 223, Justice40 Initiative. Our largely minority population lives in persistent poverty. Jobs are scarce. Unemployment rates are high. There is a large out migration of jobs and individuals. Therefore, any outcomes of this project will clearly benefit a disadvantaged community. The following table summarizes how revitalization plans in this proposed project will potentially stimulate economic and non-economic development in the Marion target area. Marion will encourage renewable energies and energy efficient measures in all reuse projects.

<table>
<thead>
<tr>
<th>Site</th>
<th>Projected Reuse</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Old Fort W. David Cobb National Guard Armory</td>
<td>Workforce Development and Training Center</td>
<td>Make 28 acres ready for reuse, reduce the threat of groundwater contamination, provide workforce development and training for underserved workers to help decrease the poverty rate</td>
</tr>
<tr>
<td>AIM Distributing</td>
<td>Light Industrial Facility</td>
<td>Make 9.1 acres ready for reuse, remove blight and safety hazards, create up to 50 new jobs, improve tax base in persistent poverty area, reduce threat of groundwater contamination</td>
</tr>
<tr>
<td>Coles Truck Stop</td>
<td>New restaurant</td>
<td>Make 2.15 acres ready for reuse, create 10 jobs, improve tax base in persistent poverty area, reduce threat of groundwater contamination</td>
</tr>
</tbody>
</table>

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse:

There are several sources of funding that this CWA grant can use to help stimulate reuse projects at our priority sites. The Delta Regional Authority (DRA) offers resources for projects that encourage the development of new jobs, education, and basic improvements to enhance quality of life, which could be applicable at all of our priority sites, but especially at the old Fort W. David Cobb National Guard Armory priority site to be redeveloped into a job training and workforce development center. Community Development Block Grants (CDBG) are used to aid in the prevention or clearance of slum and blight, which could be applicable at all of our priority sites, but especially at AIM Distributing where a dilapidated building is presenting a health and safety threat to nearby residents. The Alabama Department of Economic and Community Affairs (ADECA) offers Enterprise Zone tax incentives for the purchases of construction-related materials, machinery and equipment used in development projects. Perry County is an Enterprise Zone and the ADECA incentives could be used at any of our priority sites, but especially at the AIM Distributing and Coles Truck Stop sites. The Alabama Department of Environmental Management offers funding for environmental assessments, community outreach, and brownfields projects under ADEM Section 128 Funding and the ADEM Revolving Loan Fund, which would be applicable at all of our priority sites. This summer, Marion applied for a USEPA Targeted Brownfields Assessment Grant to perform a Phase I assessment at the Fort W. David Cobb National Guard Armory priority site; if awarded, this CWA grant will be used to perform a Phase II assessment of the site and lead to other potential funding sources for remediation and reuse. Finally, Congress is seeking billions in funding to address infrastructure and basic health needs in the Black Belt region, which would enhance reuse strategies at all target sites.

1.c.ii. Use of Existing Infrastructure:

Utilities are already in place and available at all of the priority sites. The City has struggled with infrastructure issues related to its small size, as well as underservicing and marginalization issues across the Black Belt. However, Marion has recently received several grant awards to address these issues including American Rescue Plan funding for drinking water infrastructure, ADECA funding for water
infrastructure, DRA funding for wastewater treatment infrastructure, and CDBG funding for roadway infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a.i. The Community’s Need for Funding:

<table>
<thead>
<tr>
<th>Demographic &amp; Economic Indicators</th>
<th>Marion Target Area</th>
<th>EPA Funded Brownfield Properties (2019)(^c)</th>
<th>Alabama</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority(^a)</td>
<td>55.5%</td>
<td>21.7%</td>
<td>31.9%</td>
<td>27.5%</td>
</tr>
<tr>
<td>Vacant Residences(^a)</td>
<td>28.1%</td>
<td>15.2%</td>
<td>17.2%</td>
<td>12.1%</td>
</tr>
<tr>
<td>Unemployment Rate(^b)</td>
<td>9.0%</td>
<td>-</td>
<td>3.7%</td>
<td>6.1%</td>
</tr>
<tr>
<td>Avg. Per Capita Income(^a)</td>
<td>$13,939</td>
<td>$26,642</td>
<td>$27,928</td>
<td>$34,102</td>
</tr>
</tbody>
</table>


Since 1990, Marion has declined in population by 26%\(^7\). The State of Alabama WARN List reports more than 400 jobs lost in Marion since 2004. In the last 20 years, about 30 closed businesses were identified by Marion’s mayor. The City’s unemployment rate is 143.2% higher than state, and 64.9% higher than national rates. Marion’s loss of local jobs, and abandonment of businesses has put an incredible strain on Marion’s resources. The Marion target area population size is 3,275 residents. Marion is a persistent poverty area (30 years of poverty rates above 20%) with poverty rates of 29.9% in 2019, 26.5% in 2010, and 33.4% in 2000\(^8\). The rate of vacant residences is 84.9% higher than 2019 EPA funded brownfield properties, 63.4% higher than state, and 132.2% higher than national rates. The average per capita income in Marion is 47.7% lower than 2019 EPA funded brownfield properties, 50.1% lower than state, and 59.1% lower than national averages. As all of these facts show, there is simply just not enough of a tax base that will generate adequate funding to address Marion’s environmental and redevelopment needs. The CWA Grant is a critical step in the process of rebuilding Marion.

2.a.ii. Threats to Sensitive Populations
2.a.ii.(1) Health or Welfare of Sensitive Populations:

<table>
<thead>
<tr>
<th>Sensitive Populations</th>
<th>Poverty Rates</th>
<th>Poverty Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Women</td>
</tr>
<tr>
<td>Marion Target Area</td>
<td>29.0%</td>
<td>27.8%</td>
</tr>
<tr>
<td>Alabama</td>
<td>16.7%</td>
<td>18.4%</td>
</tr>
<tr>
<td>US</td>
<td>13.4%</td>
<td>14.6%</td>
</tr>
</tbody>
</table>


The health and welfare of the sensitive populations in the Marion target area is largely influenced by endemic poverty, generations of limited health care access, and mistrust of public health systems – typical in rural Black Belt communities. This grant will address poverty by creating new businesses that will increase jobs and economic opportunity, thereby increasing the socioeconomic status of residents. Poverty is also the key factor in limiting healthcare access, so addressing socioeconomic status will improve healthcare access as well. Lastly, this grant will address mistrust of government institutionalized health assistance by demonstrating that transparent and community-centered projects that improve health conditions associated with environmental pollution can have a positive influence on the community.

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:

<table>
<thead>
<tr>
<th>Health Conditions</th>
<th>Marion Target Area</th>
<th>Perry County</th>
<th>Alabama</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cancer Incidence Rate (per 100k)(^9)</td>
<td>454.6</td>
<td>449.7</td>
<td>451.5</td>
<td>448.7</td>
</tr>
<tr>
<td>Lung Disease Mortality (per 100k)(^10)</td>
<td>65.6</td>
<td>65.6</td>
<td>56.8</td>
<td>40.2</td>
</tr>
<tr>
<td>Asthma (Medicare Population)(^11)</td>
<td>5.7%</td>
<td>5.7%</td>
<td>5.0%</td>
<td>5.0%</td>
</tr>
</tbody>
</table>

Health condition data for the Marion target area was not always available, so Perry County data was analyzed when target area data was not available. The data shows the Marion Target Area has a greater overall cancer rate, lung disease mortality rate, and asthma rate than the state and the nation. Addressing potential contaminants at the priority sites at Fort W. David Cobb National Guard Armory, AIM Distributing, and Coles Truck Stop, will facilitate the identification of the threat of petroleum and other harmful chemicals migrating into groundwater, and reaching the public and private water supplies. Vapor intrusion, friable asbestos-containing materials impacts, and soil/groundwater contamination like those that may be present at our priority sites can contribute to the development of health conditions like asthma and cancer. Pregnant women and infants are sensitive populations that experience adverse health conditions related to these environmental hazards also. The low birth weight rate in Perry County is greater than both the state and national rates. Also, birth defects accounted for a slightly higher rate of infant deaths in Perry County than the national rates. Assessment activities under this grant will ultimately lead to cleanup of those sites where adverse environmental conditions are confirmed, which will result in the reduced exposure risk of all the sensitive populations living in the target areas.

2.a.ii.(3) Promoting Environmental Justice:

### Environmental Impacts

<table>
<thead>
<tr>
<th>Environmental Impacts</th>
<th>Marion Target Area</th>
<th>Alabama</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>NATA* Air Toxics Cancer Risk (risk per MM)</td>
<td>45</td>
<td>43</td>
<td>32</td>
</tr>
<tr>
<td>NATA* Respiratory Hazard Index</td>
<td>0.72</td>
<td>0.65</td>
<td>0.44</td>
</tr>
<tr>
<td>Lead Paint Indicator</td>
<td>0.3</td>
<td>0.18</td>
<td>0.28</td>
</tr>
</tbody>
</table>


Marginalization of sensitive populations and disinvestment has led to Environmental Justice inequities in the Marion target area. The population living within the target area is small, largely minority, impoverished, and disproportionately impacted. EPA EJSCREEN shows higher concentrations of cancer related air toxics, respiratory hazards, and lead based paint (LBP) in the target area. The threat of airborne contaminants, such as asbestos and benzene, LBP, and groundwater contaminants, such as petroleum, will be identified and eventually cleaned up as a result of this brownfields project, which will help to reduce rates of disease in the target areas. Assessments funded through this grant would facilitate the identification of environmental impacts and cleanup planning services to facilitate remediation in the target areas, which will promote Environmental Justice in the target area.

2.b. Community Engagement

2.b.i. Project Involvement & 2.b.ii Project Roles:

The following community partners will be actively involved with the City on this project.

<table>
<thead>
<tr>
<th>Organization/Group</th>
<th>Point of Contact (name, email, &amp; phone)</th>
<th>Specific Involvement in the Project or Assistance Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama Department of Economic and Community Affairs</td>
<td>Kenneth Boswell, 334-242-5591 <a href="mailto:kenneth.boswell@adeca.alabama.gov">kenneth.boswell@adeca.alabama.gov</a></td>
<td>Will attract potential developers to consider redeveloping available brownfield sites and help choose options for future reuse.</td>
</tr>
<tr>
<td>Alabama-Tombigbee Regional Commission</td>
<td>John Clyde Riggs,</td>
<td>Brownfield Advisory Committee (BAC) member and The Chamber of Commerce. Will communicate project progress and updates with the business community, and aid in site identification.</td>
</tr>
<tr>
<td>AIDT</td>
<td>Ed Castille, 334-242-4158 <a href="mailto:ecastil@aidt.edu">ecastil@aidt.edu</a></td>
<td>Workforce development. Will advise community of hiring that may take place from</td>
</tr>
</tbody>
</table>

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City of Marion, Alabama: Brownfield Community-Wide Assessment Grant Application

<table>
<thead>
<tr>
<th>Organization /Entity/Group</th>
<th>Point of Contact (name, email, &amp; phone)</th>
<th>Specific Involvement in the Project or Assistance Provided</th>
</tr>
</thead>
</table>
| Black Belt Citizens        | Ben Eaton, 334-507-8951
blackbeltcitizens@gmail.com | Will assist with brownfield site reuse.                  |
| Marion Community Bank and Trust Company | Angela Holifield, 334-683-6131
aholifield@marion-bank.com | Will work with businesses that may arise from redeveloped sites, provide loans. |
| Sowing Seeds of Hope       | Francis Ford, 334-683-4666
fixit843@aol.com | BAC Member. Will facilitate public communication and community outreach. |
| Alabama Brownfields Association | Mike McCown, 205-836-5650
admin@albfa.org | Will assist in promoting economic revitalization, site reuse, restoration, remediation, financial and regulatory incentives, legislative advocacy, and real estate resources. |
| Marion United Methodist Church | Linda Tucker, 334-683-6543
lintuck_5@att.net | Will facilitate public communication and provide meeting space for community outreach events. |
| Perry County Historical and Preservation Society | Kay Beckett, 334-292-0319
krbecket@bellsouth.net | Will help identify brownfield sites with need for historical preservation. |

2.b.iii. Incorporating Community Input:
The City has compiled a list of BAC members who will meet quarterly, and as needed, to prioritize/suggest sites, review progress reports, and discuss redevelopment strategies. Selected BAC members represent the diversity of Marion and include property/business owners, developers, community leaders, and interested citizens. Marion will also hold public community meetings twice per year. The first meetings will be primarily educational but input will be solicited during each meeting to solicit concerns over which sites are of the greatest concern to the community and why. Community input will be encouraged through visioning sessions to gain input on what redevelopment is most needed on the brownfield properties. Later meetings will include project progress updates and input opportunities, as needed. We will hold these meetings in the center of downtown Marion. This will ensure that citizens can walk to the meetings (if transportation is unavailable). Community meetings will be announced through the City’s website, news media and will be published in the local newspaper. Notifications may also be provided through flyers distributed throughout the community. Adjacent property owners/occupants to priority Brownfield sites will be personally invited to community meetings. Knowing that the community has an innate distrust of top-down, government-led changes brought about through decades of racial discrimination and marginalization, Marion will also enact a grassroots campaign to solicit community input and keep the community involved in the Brownfields project. The church community will be an important part of that effort and Marion will coordinate community input efforts with church-based project partners. Also, grassroots activists in Marion have a strong social media presence; therefore, Marion will utilize project partners to share information for dispersal on social media. Marion anticipates there will be no need for translation services; however, these services will be provided as needed to accommodate individuals attending the meetings. All community input and questions will be managed by the Grant Project Director. The Grant Project Director will collect input, forward questions that will require a response to the appropriate City Official, BAC member, or project partner to be answered, and ensure a response is provided in a timely manner as required. In the event of COVID-19 restrictions, Marion will also provide both virtual and non-digital outreach alternatives that meet CDC guidelines. Meetings will be held outdoors when possible, and will adhere to social-distancing guidelines. When feasible, Marion will utilize phone calls and virtual-conferencing.

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

| Task/Activity: Grant Management |
i. Project Implementation: Management tasks will include: preparation of a work plan, preparation of quarterly, semi-annual, annual, and final closeout reports, ACRES database reporting, financial reporting, and meetings and communication with EPA. The reports will be sent electronically to both the EPA Project Officer and to the ADEM Brownfields Coordinator. These reports will cover work status, work progress, difficulties encountered, financial expenditures, preliminary data results, anticipated activities and any changes of key personnel. In order to ensure the highest level of expertise, Marion will select a Qualified Environmental Professional (QEP) to assist with these program management tasks in addition to performing the technical aspects of the project such as environmental assessments and remediation planning. The QEP will report to the Grant Project Director for scheduling and reporting progress of all contracted work. Marion will establish a contract with a QEP following a qualifications-based procurement process in compliance with 2 CFR 200 and 2 CFR Part 1500. After the QEP is selected, the project team, including the QEP, EPA, and ADEM will hold a project kick-off meeting to review the work plan and terms, and the conditions of the cooperative agreement. The project team will distribute a timeline, review responsibilities and partnership roles, and explain the modes of communication that will be utilized between the community and stakeholders during the project life, as well as announce the location for the document repository.

ii. Anticipated Project Schedule: The contract with the QEP will be secured within 60 days of award notice so all work may begin at the beginning of the grant period in October 2022.

iii. Task/Activity Lead(s): Marion will have responsibility for overall management of this assessment grant but will obtain reporting assistance as needed from the QEP. Marion will also include input from the BAC concerning decisions beyond the priority sites.

iv. Outputs: 1 Work Plan; 1 Kickoff Meeting; 12 quarterly reports; 1 Final Closeout report; Federal Financial Reporting & DBE Reporting (SF 425); ACRES updates quarterly at a minimum; and two Marion personnel attending Brownfields conferences.

Task/Activity: Community Outreach

i. Project Implementation: A Community Involvement Plan (CIP) will be prepared with the purpose of promoting community interest and participation throughout the Grant and to support effective dialogue amongst Marion, the BAC, the community, and other stakeholders to help all parties involved understand the Brownfields Program and the opportunities it offers to those who participate in the decision-making process regarding environmental assessment, cleanup, and reuse. The objective of the CIP is to ensure communication is occurring on a continual basis throughout the project. Marion will conduct community outreach activities with the assistance of the selected QEP. Community comments and input will be recorded and addressed during each brownfields meeting. Marion will lead outreach efforts, while the selected QEP will provide input and information at the meetings. The selected QEP will also prepare materials such as flyers to distribute at the meetings in order to educate the community concerning any issues with the brownfield sites and to share information on project progress. The meetings will also be held to gather and address public concerns, obtain information on additional brownfield properties, and solicit site prioritization input. Sites will be prioritized based on several factors, such as: potential threat to human health and/or the environment, level of interest in redeveloping the site, potential for job creation, potential cost for assessment and cleanup, and redevelopment potential based on location of the site. Citizen and stakeholder input will be considered under the project’s community outreach agenda. In addition, sites that may potentially be purchased by the local governments will also be considered for priority. Priority will also be given to sites where site access authorization is procured.

ii: Anticipated Project Schedule: Community Involvement Plan-1st quarter; Community Outreach Meetings-2nd & 4th quarters of each year of 3-year grant period.

iii. Task/Activity Lead(s): Marion will lead outreach efforts, assisted by the QEP.

iv. Outputs: 6 community meetings; 12 BAC meetings; 12 quarterly document repository updates; 6 informational flyers.

Task/Activity: Project Assessments

i. Project Implementation: Phase I ESAs will be performed in accordance with the EPA’s All Appropriate Inquiry (AAI) Rule and the current (ASTM E-1527-13 or E-1527-21) Standard
Practice. Phase I ESAs for priority sites will be performed first and during the first grant year. Conducting Phase I ESAs immediately will provide more knowledge of recognized environmental conditions (RECs) at sites allowing for better site prioritization, providing information needed to determine site eligibility and the design of Phase II ESA work plans. Phase II ESA activities may include ground penetrating radar (GPR) to locate subsurface concerns such as underground storage tanks (UST), collection of environmental media samples such as soil, soil vapor, surface water, and groundwater samples, collection of building material samples such as asbestos and lead-based paint (LBP), and removal of USTs to access underlying soil and groundwater. Site eligibilities for hazardous sites will be primarily submitted to the EPA for approval. Site eligibilities for petroleum sites will be submitted to ADEM for their first option of approval. Phase II ESAs will be performed in accordance with Alabama and/or federal ESA standards and/or Alabama UST standards for performing environmental assessments and will be governed by Generic and Site-Specific Quality Assurance Project Plans (QAPP/SSQAPP) and Health and Safety Plans (HASP) that will receive prior EPA approval before beginning the Phase II ESAs. The Phase II ESAs will focus on the nature and extent of contamination so that cleanup alternatives and estimated cleanup costs for redevelopment purposes can be determined. Phase I ESAs for 6 additional sites and Phase II ESAs for 4 additional sites will be performed as time and budget allow, after completion of the priority site assessments.

ii. Anticipated Project Schedule: The Generic QAPP will be completed in Year 1, Quarter 1. In general, Phase I ESAs will take 3-4 weeks to complete; Site-Specific QAPPs Addendums will take 2 weeks to prepare; and Phase II ESAs will take approximately 2 months to complete. Site profiles and assessment information will be updated quarterly in the EPA ACRES database by the QEP. The 3 priority site Phase I’s will be conducted in Year 1, Quarters 2-3. The 2 priority Phase II’s will to be conducted in Year 1, Quarter 4, and Year 2, Quarter 1. The remaining 6 Phase I ESAs will be conducted in Year 2, Quarters 2-3. The remaining 4 Phase II ESAs will be conducted in Year 2, Quarter 4, and Year 3, Quarters 1-2.

iii. Task/Activity Lead(s): Conducted by the QEP, under the guidance and direction of Marion.

iv. Outputs: 1 Generic QAPP; 9 Phase I ESAs; 9 Site-Specific QAPPs and 6 Phase II ESAs

Task/Activity: Project Planning

i. Project Implementation: Marion will rely on its selected QEP to perform cleanup planning activities that may include Analysis of Brownfields Cleanup Alternatives (ABCAs), development of remedial action plans, and redevelopment planning. ABCAs for each site will include an analysis of remedial alternatives and a cost/benefit analysis for each alternative. Remedial alternatives typically include “no action,” implementation of engineering or institutional controls, limited excavation or natural attenuation monitoring, and sometimes full scale remediation technologies such as dual-phase vacuum extraction, air or ozone sparging, soil vapor extraction, and enhanced bioremediation. Marion estimates that 3 ABCAs will be developed and they will be performed in the second and third years of the grant period. These plans will be developed after the Phase I and Phase II ESAs have been completed for a site and will only be developed for sites that have pending redevelopment interests, have the greatest likelihood of being redeveloped, and/or are subject to EPA Cleanup Grant applications. As part of the ABCA process a Risk Assessment may also be performed in accordance with the Alabama Risk-based Corrective Action (ARBCA) to establish the site-specific cumulative risk and risk-based target levels (RBTL) to support cleanup cost estimates.

ii: Anticipated Project Schedule: ABCA’s will be conducted in Year 2, Quarters 2-4 & Year 3, Quarters 1-3.

iii. Task/Activity Lead(s): Conducted by the QEP, under the guidance and direction of Marion.

iv. Outputs: 6 ABCAs

3.b. Cost Estimates

3.b.i. Development of Cost Estimates:

The following table breaks down the planned allocation of grant funds for the project tasks. Note that 69% of grant funds will be allocated for tasks/activities directly associated with Phase I and Phase II Assessments, and no grant funds will be allocated for administrative costs.
3.b.ii. Application of Cost Estimates:

TASK 1 - Program Management Cost Breakdown: Personnel: $15,000 budgeted for $50/hour x 300 hours. Travel: $22,200 budgeted for two personnel to attend three conferences: Conference registration at $200/conference x 2 people x 3 conferences = $1,200; Airfare at $1,000/flight x 2 people x 3 conferences = $6,000; Hotels at $200/night x 5 nights x 2 people x 3 conferences = $6,000; Per Diem at $300/night x 5 nights x 2 people x 3 conferences = $9,000. Contractual: $20,000 budgeted for an average professional rate of $160/hour x 125 hours. Total $57,200.

TASK 2 - Community Outreach Cost Breakdown: Personnel: $15,000 budgeted for $50/hour x 300 hours. Supplies: $1,800 budgeted for 1,000 postcards = $500, six 40" by 60" poster display boards, one per public meeting = $600, 50 tri-fold brownfield project brochures = $600, 50 property owner brownfields program brochures = $100. Contractual: $24,000 budgeted for an average professional rate of $160/hour x 150 hours (including CIP preparation). Total $40,800.

TASK 3 – Project Assessments Cost Breakdown: Contractual: One generic QAPP will be prepared. It is estimated that there will be 9 Phase I ESAs and 6 Phase II ESAs. It is estimated that the cost per site will vary due to site size and varying need for testing, but the table below reflects the average costs of these sites. Total $260,000.

<table>
<thead>
<tr>
<th>Subtask</th>
<th>Est. Cost</th>
<th>Output</th>
<th>Est. Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generic QAPP</td>
<td>$5,000</td>
<td>1</td>
<td>$5,000</td>
</tr>
<tr>
<td>Phase I ESA</td>
<td>$5,000</td>
<td>9</td>
<td>$45,000</td>
</tr>
<tr>
<td>Phase II ESA</td>
<td>$35,000</td>
<td>6</td>
<td>$210,000</td>
</tr>
<tr>
<td>Total Assessments</td>
<td></td>
<td></td>
<td>$260,000</td>
</tr>
</tbody>
</table>

TASK 4 – Planning Cost Breakdown: Contractual: $30,000 budgeted for 6 ABCAs at $5,000 each. Total $30,000.

3.c. Measuring Environmental Results:

From our knowledge of local government, we understand that if actual results are not measured and tracked, then it becomes even harder to justify the expenditures. Therefore, Marion is completely committed to measuring, tracking, and verifying the results of every task listed in Section 3a. The Grant Project Director plans to stay in weekly communication with the selected QEP to obtain a progress report on the stage of each task. The Grant Project Director will specifically track: the number of community outreach events attended by the number of people attending these events; the number of Phase I, and Phase II ESAs completed; the number of ABCAs and cleanup plans completed; the amount of sites and acres of property redeveloped; acreage of greenspace created; amount of private investment leveraged; amount of other funding leveraged; number of jobs created/retained from redevelopment projects; increased property/sales tax revenue generated; and increased property value. All applicable information will be uploaded to EPA’s ACRES database on a quarterly basis, at a minimum.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Capacity, 4.a.ii. Organizational Structure, & 4.a.iii. Description of Key Staff:
Marion is a small city with a small, but capable staff who has the ability to carry out the programmatic, administrative, and financial requirements to successfully manage the proposed project and grant. There are several resources available to help Marion with the project as needed. To help with community engagement, Marion will engage the BAC. Marion will also utilize the resources that the ADEM has to offer such as hosting visioning events and providing their knowledge and expertise. In addition, Marion will also use the resources that the Alabama Brownfields Association has to offer for assisting the City if needed.

Mayor Dexter Hinton of Marion will be the Grant Project Director for this EPA CWA Grant. Mayor Hinton will communicate with the BAC and other project partners to discuss the site prioritization and other important decisions but will have the sole final decision making authority. Mayor Hinton will also be the primary conduit of communications through the EPA and the selected QEP.

Mayor Hinton is uniquely qualified to manage this grant with the wide-ranging work experience he has gained. Mayor Hinton has received a Master’s Degree in Leadership Management from Ambridge University in Montgomery, AL. In addition to local government management, his job skills and experience includes a career technical educator, a construction specialist, a heavy equipment repairman, a middle school teacher and a clinical researcher. In addition, Mayor Hinton has previous experience working with the EPA on environmental issues in Perry County. Laura Hinton, the City Treasurer will provide grant management and financial management assistance to the Mayor. Mayor Hinton and Ms. Hinton will work closely with the QEP and EPA to ensure grant compliance is met.

4.a.iv. Acquiring Additional Resources:

Following award of this grant, Marion will have a Requests for Qualifications (RFQ) prepared and advertised by website, newspaper, and other media outlets for firms having experience in providing assistance with brownfields assessment grants. Upon receiving submittals, the City will select and procure a QEP within 30 days to assist with management and implementation of the grant. Marion will comply with all procurement standards in 2 CFR 200 and 2CFR Part 1500. Marion will require the consultant to subcontract with woman-owned and minority owned firms for a minimum of 5% of our awarded contract amount.

4.b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements:

Marion has managed several federal grants successfully in the past and has the full capability to manage the EPA Community-wide Assessment Grant and perform all phases of work under the grant.

4.b.ii.(1) Accomplishments:

Marion’s experience in managing federal and state grants and programs is indicated below.

<table>
<thead>
<tr>
<th>Program</th>
<th>Awarded</th>
<th>Amount</th>
<th>Purpose and Accomplishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Development Block Grant</td>
<td>2012</td>
<td>$500,000</td>
<td>Project was used to repave roads Project completed and grant was successfully closed out in February 2019</td>
</tr>
<tr>
<td>Alabama Department of Economic and Community Affairs</td>
<td>2016</td>
<td>$350,000</td>
<td>Project was used to repair storm drains damaged from tropical storms Project was completed and grant was successfully closed out in June 2019</td>
</tr>
<tr>
<td>Main Street, Alabama</td>
<td>2014</td>
<td>$378,295</td>
<td>Project for revitalizing Downtown Marion buildings and landscaping Project is ongoing</td>
</tr>
<tr>
<td>Delta Regional Authority</td>
<td>2020</td>
<td>$201,253</td>
<td>Repair and replace wastewater treatment plant equipment Project will affect 1,080 families Project is ongoing</td>
</tr>
</tbody>
</table>

4.b.ii.(2) Compliance with Grant Requirements:

Each of the grants discussed above were completed in accordance with the grant requirements and in a timely manner. The grants were also completed in compliance with work plans, schedules, terms and conditions as required by the terms of each grantor.
Marion Threshold Criteria  
Community-Wide Assessment Grant

1. **Applicant Eligibility:** The City of Marion, Alabama, is a General Purpose Unit of Local Government as stated under 2 CFR 200.1. Therefore, the City of Marion is eligible to apply for EPA Assessment Grant funding.

2. **Community Involvement:**
The following community partners will be actively involved with the City on this project.

<table>
<thead>
<tr>
<th>Organization /Entity/Group</th>
<th>Point of Contact (name, email, &amp; phone)</th>
<th>Specific Involvement in the Project or Assistance Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama Department of Economic and Community Affairs</td>
<td>Kenneth Boswell, 334-242-5591, <a href="mailto:kenneth.boswell@adeca.alabama.gov">kenneth.boswell@adeca.alabama.gov</a></td>
<td>Will attract potential developers to consider redeveloping available brownfield sites and help choose options for future reuse.</td>
</tr>
<tr>
<td>Alabama-Tombigbee Regional Commission</td>
<td>John Clyde Riggs, [Redacted]</td>
<td>Brownfield Advisory Committee (BAC) member and The Chamber of Commerce. Will communicate project progress and updates with the business community, and aid in site identification.</td>
</tr>
<tr>
<td>AIDT</td>
<td>Ed Castille, 334-242-4158, <a href="mailto:ecastil@aidt.edu">ecastil@aidt.edu</a></td>
<td>Workforce development. Will advise community of hiring that may take place from businesses that arise from site reuse.</td>
</tr>
<tr>
<td>Black Belt Citizens</td>
<td>Ben Eaton, 334-507-8951, <a href="mailto:blackbeltcitizens@gmail.com">blackbeltcitizens@gmail.com</a></td>
<td>Will assist with brownfield site selection, grassroots communications with the community, acceptable cleanup methods and future reuse in the community.</td>
</tr>
<tr>
<td>Marion Community Bank and Trust Company</td>
<td>Angela Holifield, 334-683-6131, <a href="mailto:aholifield@marion-bank.com">aholifield@marion-bank.com</a></td>
<td>Will work with businesses that may arise from redeveloped sites, provide loans.</td>
</tr>
<tr>
<td>Sowing Seeds of Hope</td>
<td>Francis Ford, 334-683-4666, <a href="mailto:fixit843@aol.com">fixit843@aol.com</a></td>
<td>BAC Member. Will facilitate public communication and community outreach.</td>
</tr>
<tr>
<td>Alabama Brownfields Association</td>
<td>Mike McCown, 205-836-5650, <a href="mailto:admin@albfa.org">admin@albfa.org</a></td>
<td>Will assist in promoting economic revitalization, site reuse, restoration, remediation, financial and regulatory incentives, legislative advocacy, and real estate resources.</td>
</tr>
<tr>
<td>Marion United Methodist Church</td>
<td>Linda Tucker, 334-683-6543, <a href="mailto:lintuck_5@att.net">lintuck_5@att.net</a></td>
<td>Will facilitate public communication and provide meeting space for community outreach events.</td>
</tr>
<tr>
<td>Perry County Historical and Preservation Society</td>
<td>Kay Beckett, 334-292-0319, <a href="mailto:krbeckett@bellsouth.net">krbeckett@bellsouth.net</a></td>
<td>Will help identify brownfield sites with need for historical preservation.</td>
</tr>
</tbody>
</table>

The City has compiled a list of BAC members who will meet quarterly, and as needed, to prioritize/suggest sites, review progress reports, and discuss redevelopment strategies. Selected BAC members represent the diversity of Marion and include property/business owners, developers, community leaders, and interested citizens. Marion will also hold public community meetings twice per year. The first meetings will be primarily educational but input will be solicited during the each meeting to solicit concerns over which sites are of the greatest concern to the community and why. Community input will be encouraged through visioning sessions to gain input on what redevelopment is most needed on the brownfield properties. Later meetings will include project progress updates and input opportunities, as needed. We will hold these meetings...
in the center of downtown Marion. This will ensure that citizens can walk to the meetings (if transportation is unavailable). Community meetings will be announced through the City’s website, news media and will be published in the local newspaper. Notifications may also be provided through flyers distributed throughout the community. Adjacent property owners/occupants to priority Brownfield sites will be personally invited to community meetings.

knowing that the community has an innate distrust of top-down, government-led changes brought about through decades of racial discrimination and marginalization, Marion will also enact a grassroots campaign to solicit community input and keep the community involved in the Brownfields project. The church community will be an important part of that effort and Marion will coordinate community input efforts with church-based project partners. Also, grassroots activists in Marion have a strong social media presence; therefore, Marion will utilize project partners to share information for dispersal on social media.

All community input and questions will be managed by the Grant Project Director. The Grant Project Director will collect input, forward questions that will require a response to the appropriate City Official, BAC member, or project partner to be answered, and ensure a response is provided in a timely manner as required. In the event of COVID-19 restrictions, Marion will also provide both virtual and non-digital outreach alternatives that meet CDC guidelines. Meetings will be held outdoors when possible, and will adhere to social-distancing guidelines. When feasible, Marion will utilize phone calls and virtual-conferencing. Marion anticipates there will be no need for translation services; however, these services will be provided as needed to accommodate individuals attending the meetings.

3. **Named Contractors and Subrecipients**: Not applicable – Marion has not named a contractor or subrecipient in the grant application.

4. **Documentation of Available Balance**: Not applicable - Marion has not received EPA Brownfields Grant awards funding.