



Betty P. Beville
Director of Finance

Steven L. Reed
Mayor

Montgomery City Council Members
Charles W. Jirright - President Brantley W. Lyons Glen O. Pruitt, Jr
C.C. Calhoun - President Pro Tem Audrey Graham Oronde K. Mitchell
Clav McInnis Marche Johnson Ed Grimes

City of **Montgomery**, Alabama

IV.D. NARRATIVE INFORMATION SHEET

1. Applicant Identification

Name: City of Montgomery, Alabama
Full address: City of Montgomery
Grants Department
103 North Perry Street
Montgomery, AL, 36104

2. Funding Requested

a. Assessment Grant Type: Community-wide
b. Federal Funds Requested: \$500,000

3. Location

a) City: City of Montgomery, Alabama
b) County: Montgomery County
c) State: State of Alabama

4. Target Area and Priority Site Information

- Target Area(s): Centennial Hill and West Montgomery
- Census Tract(s): Centennial Hill (CT 01101000600)
West Montgomery (01101001100, 01101001000,
01101003000, and 01101002400)
- Address of the priority site(s): 1) Former Ben Moore Hotel - 902 High Street
2) Former Capital City/Bryant Street Cleaners -
505 & 573 S Decatur Street
3) Former Service Center - 533 Mobile Street

5. Contacts

a. Project Director:
Name: Carrie Allison, Grants Administrator
Phone Number: 334-625-2749
Email Address: callison@montgomeryal.gov
Mailing Address: 103 North Perry Street
Montgomery, AL, 36104

b. Chief Executive/Highest Ranking Elected Official

Name: Mayor Steven L. Reed
Phone Number: 334-625-2000
Email Address: mayor@montgomeryal.gov
Mailing Address: 103 North Perry Street
Montgomery, AL 36104

6. Population: 200,951 (US Census Bureau, 2021: ACS 5-Year Estimates)



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City of Montgomery, Alabama

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	5
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The 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.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3 & 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <u>Section I.B.</u> , for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority: Attached

9. Releasing Copies of Applications: Not Applicable



Alabama Department of Environmental Management
adem.alabama.gov

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Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

November 1, 2023

Ms. Kelbrey Porter, Grants Director
City of Montgomery
Post Office Box 1111
Montgomery, Alabama 36101-1111
kporter@montgomeryal.gov

RE: FY24 Brownfields Assessment Grant Support

Dear Ms. Porter:

The Alabama Department of Environmental Management (ADEM) is pleased to support the City of Montgomery in your pursuit of a Brownfields Assessment Grant from the U.S. Environmental Protection Agency (EPA).

As we are headquartered in Montgomery, we certainly see first-hand the numerous brownfield challenges that are present in the city, especially in the western portions near the Selma-Montgomery National Historic Trail. We understand that you hope to target this area, as well as other underserved areas in the city. As resources allow, ADEM would be glad to participate in the various brownfield outreach activities needed to accomplish the goals of the grant or provide other technical resources from our Department.

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

Sincerely,

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

Crystal Collins, Chief
Redevelopment Unit
Land Division





1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION; 1.a. Target Area & Brownfields; 1.a.i. Overview of Brownfield Challenges & Description of Target Area: Nestled in the heart of south-central Alabama, along the Alabama River, lies the historic city of Montgomery—an enclave of immense significance in both state and national history. From its inception in 1818, Montgomery was built on the backs of enslaved African laborers, who quite literally laid the foundation of this once-thriving capital city. It's no surprise that Montgomery played a pivotal role in the Civil Rights Movement, being the home of the iconic Rosa Parks, the epicenter of the famed bus boycotts, and the stopping point for the March from Selma to Montgomery for Voting Rights. These defining moments were born from the crucible of Montgomery's history—shaped by the Federal-Aid Highway Act of 1956, the oppressive "Jim Crow" laws, and the complex dynamics that followed emancipation. **The proposed geographic boundary for conducting eligible activities under this grant is the City of Montgomery's jurisdictional limits.**

In this deeply entrenched Jim Crow society, racial tensions fueled economic hardships, leading to the segregation of African-American communities, particularly in two communities, **the Target Areas (TAs) for this grant: West Montgomery and Centennial Hill.** Both TAs are located along and adjacent to the 54-mile-long Selma-Montgomery National Historic Trail (Civil Rights Trail), the route Dr. Martin Luther King Jr. and his supporters walked on their way to the State Capitol to secure voting rights. The Civil Rights Movement cast a pall over the city, unveiling a litany of racial injustices that continued to accumulate and expand, impacting not only Montgomery but the racially divided South as a whole. Federal government policies- notably the infamous "redlining" lending practices- created barriers to mortgages and economic development, mirroring the Centennial Hill and West Montgomery communities in generational poverty. The denial of homeownership was a major setback to the main source of intergenerational wealth transfer, followed by under-investment by private businesses and government at all levels. The Federal Aid Highway Act of 1956 further eroded the local black business community and tore through the center of Centennial Hill and West Montgomery when I-65 was built. Nearly 75 percent of the homes and businesses in the path of I-65, and later I-85, that were razed for the interstate construction belonged to African-American families. Though protested by the neighborhood's residents, these interstates irreparably altered the landscape, contributing to an economic decline that persists to this day. Government policies on taxes, mortgages, public housing, and urban redevelopment schemes exacerbated the effects of the interstate highway system construction on inner-city neighborhoods. During the 1950s through the 1970s the national program destroyed low-income city neighborhoods, provided no displacement relief to residents, undermined inner-city transit, and encouraged the outmigration of more affluent residents, commercial uses, and manufacturing to the suburbs. The highway era coincided with a massive migration of African-American families from rural southern areas into urban communities. During this tumultuous time, African-American businesses were disproportionately affected, with little recourse due to disenfranchisement laws and local ordinances. These interstates created physical and metaphorical barriers, dividing Montgomery's residential areas and eroding the community bonds that once defined it. The aftermath of these policies and infrastructural developments helped create the **brownfield challenges observed today: shuttered black-owned businesses, abandoned and dilapidated buildings, and the environmental issues that accompany such conditions, leading to substandard housing, high unemployment, and an overall loss of sense of community.** Finally, a recent comprehensive study on blighted properties was completed highlighting the critical issues these two communities face. It examined structure ratings, vacancy rates, utility shut-offs, tax data, and other indicators. This study found a worrying concentration of low-rated structures and blighted properties in the West Montgomery and Centennial Hill neighborhoods, highlighting the need for targeted revitalization. Written plans for the priority brownfield sites presented in this proposal are in place, and the significance of this grant lies in its capacity to furnish the vital resources necessary for the transition from mere project plans to full-fledged implementation. Crucially, each of these redevelopments have been meticulously tailored to address the acute and pressing needs of these two communities. We want to accelerate positive change by strategically allocating these resources, which support economic rebirth, housing renovation, job opportunities, and restoring a strong sense of community.

The City plans to target these two historic African-American communities along the Civil Rights Trail as our Target Areas (TAs). The brownfield challenges in these two communities have *significantly* impacted the families residing in them. These challenges have led to increased health risks and limited economic development opportunities in the Target Areas. The first target area, Centennial Hill, southeast of downtown, was a prestigious Black business district and neighborhood during the mid-1900s. The boundaries include South Hull Street to the west, Washington Avenue to the north, a defunct rail spur and Forest Avenue to the east, and Interstate 85 to the south, and is in a disadvantaged census tract (01101000600). This community produced some of Montgomery's most influential African-American leaders. In addition, the community was frequented by Dr. Martin Luther King Jr. and other civil rights leaders. African-American residents living there, in many ways, were working within the mechanisms of white society, yet simultaneously were navigating the difficulties of Jim Crow ordinances and norms. The second target area is West Montgomery, separated from Centennial Hills by I-65. West Montgomery is defined by Maxwell Boulevard to the North, Court Street to the East, Interstate 85 and West South Boulevard to the South, and US Highway 31 to the West and includes four disadvantaged census tracts (01101001100, 01101001000, 01101003000, and 01101002400). By the 1940s, West Montgomery housed the largest concentration of the City's African-American population, with most of these individuals working as



laborers, domestic workers, and railroad workers. This underserved minority section of town in the area was decimated by the construction of the I-65/85 interchange.

1.a.ii. Description of the Priority Brownfield Site(s): In preparation for this grant application, the City conducted an initial inventory and recorded photos, coordinates, and site descriptions of all brownfields within the two target areas. The following brownfields were identified in the target areas:

1) Centennial Hill: Our initial inventory revealed 23 brownfield sites in this target area. These brownfields include three former gas stations, two former dry cleaners, a former hotel, a former school, and various vacant industrial and commercial buildings. While there are many sites that need attention, the following are considered a priority:

Priority Site #1/Ben Moore Hotel, 902 High Street: This historic hotel, a key site in Centennial Hill, was originally constructed in 1951 and was one of the few African-American-friendly hotels at that time. It featured 28 rooms, the Malden Brothers Barber Shop (Dr. Martin Luther King Jr. was a customer), and a rooftop garden restaurant known as the Afro Club, which hosted renowned African-American musicians like B.B. King and Tina Turner. This iconic hotel served as a meeting place for Civil Rights Movement leaders like Dr. King and Rev. Ralph Abernathy. Notably, the rooftop restaurant, with its skyline view, became a hub for socializing, strategizing, and civil rights activism. Its strategic location atop the hotel allowed activists to keep an eye on potential threats, and there was even a secret underground escape route accessible through a pantry if danger loomed. In recent years, the brick-built hotel has fallen into disrepair, with the façade crumbling and windows broken. This site has dozens of single-family houses adjacent to and in the surrounding area. According to EJ Screen, there are 185 people and 114 households living within 2 blocks of this site, including: 183 people of color (99%); 144 people living in poverty (78%), 52 children under 18, and 31 people over the age of 65. Because the building is adjacent to a residential neighborhood, youth frequently trespass in the building, despite barricades, and are potentially exposed to friable asbestos and flaking lead-based paint suspected to be present in the building. It is also possible that soil and groundwater impacts are present from longer-term commercial development at surrounding properties. The long-vacant building also provides a setting for drug use/abuse and requires frequent inspection by City police. **The City plans to reuse this hotel as a museum, restaurant, and barber shop. This site was identified as a priority because redevelopment aligns with the broader goal of preserving a crucial piece of Civil Rights history while safeguarding the well-being of the community and its children.**

Priority Site #2/Formal Capital City/Davis Cleaners, 505 and 573 S Decatur Street: These two abandoned dry cleaners (occupying 1.5 acres total, first opened in 1901, and treated as one site due to common ownership) are located across the street from each other at the same intersection. Originally suspected to be a potential contributor to the “Capital City Plume” (large, well-documented chlorinated solvent plume located beneath downtown Montgomery), initial sampling coordinated by the Alabama Department of Environmental Management (ADEM) indicated it was not a major contributor. However, full assessment of the sites has not been conducted, and soil vapor and indoor issues have not been investigated. Since 2014, this site has had 33 code violations.¹ According to EJ Screen, there are 20 homes within 2 blocks: 74% are low-income; 92% are people of color, 22% are children under 18, and 20% are people over 65. **This site was identified as a priority for reuse for several reasons: 1) Montgomery Mayor Steven Reed has personally stated that redevelopment of these sites is a priority due to their high visibility and environmental concerns; and 2) the proposed site reuse (via written plans) is for a mixed-use development of commercial and housing. The reuse plan includes the development of 136 multi-family units, and 34,800 square feet of commercial space.**

2) West Montgomery: Our initial inventory revealed 55 brownfield sites in the West Montgomery community along the Civil Rights Trail. These sites included numerous former manufacturing and industrial facilities, auto repair shops, dry cleaners, a motel, and other various abandoned sites of unknown historical uses. While there are many sites that need attention, the following is considered a priority:

Priority Site #3/Formal Service Station, 533 Mobile Street: This 3-acre property is owned by the City and is a former art-deco-style service station built in 1945. It has served as a gas station, auto repair shop, upholstery shop, AM station, and finally, an auto sales lot before becoming vacant in 1999. It has been vandalized (graffiti), and the building reflects the fact that it has been abandoned for almost 25 years. It is located on a corner lot with excellent visibility. This site also shares a property line with multiple homes. Some initial assessment work was conducted at the site by the ADEM Redevelopment Section, but groundwater was not tested. Contaminants of concern identified in soil included arsenic, chromium, lead, mercury, and benzopyrenes. ADEM did not determine if USTs were present at the site or if groundwater has been impacted by petroleum products or hazardous substances. According to EJ Screen, there are 167 people and 74 households living within 1/8 of a mile (roughly 2 ½ city blocks), including 23 children under the age of five, 20 people over the age of 65, 100 low-income people, and 150 (90%) people of color. **This site was chosen as a priority due to its historical significance along the Civil Rights Trail, as well as the City's plan to redevelop it as one of**

¹ [Code Violations \(2014 - Present\) \(arcgis.com\)](https://arcgis.com)



eight historic sites aimed at preserving Black history along the Trail. The site was specifically identified (plan linked in next section) to become a workforce training center and electric vehicle (EV) charging station.

1.a.iii. Identifying Additional Sites: As previously stated, the City has already completed a preliminary inventory (78 sites), and all of the brownfield sites in the target areas are located in underserved communities and disadvantaged census tracts, as per the Climate and Economic Justice Screening Tool (CEJST). After all of the priority sites listed above are assessed, the City will continue assessing the remaining sites identified in the City’s inventory. A Site Prioritization Matrix will be developed, addressing such factors as various EJ-Screening data tools (EJ Screen, CEJST, etc.) to determine which sites are closest to the highest number of underserved populations; have the most cumulative impacts on those living in close proximity to the site; which sites pose the most significant health risks; level of developer interest; site access, and which proposed reuses will provide the most benefit to the target communities. To ensure the target communities have meaningful involvement in this process, the to-be-formed Brownfield Advisory Committee (BAC) and any other interested members of the community may be invited to be a part of this process. The most crucial factor in the Site Prioritization Matrix will be ensuring the chosen sites will help the most underserved populations living in close proximity to the site. To develop the Matrix, we will utilize information from consulting with the EPA Region 4 TAB provider, the EPA’s Community Reuse Property Prioritization Tool, and the Delta Institute’s Brownfield Marketability Scoring Tool.

1.b. Revitalization of the Target Area; 1.b.i. Reuse Strategy & Alignment with Revitalization Plans: All of these redevelopments align with multiple facets of the City’s 2040 Comprehensive Plan (adopted in 2020, [Montgomery Envision-Montgomery-2040 2020 web.pdf](#)) including: “Addressing blight and neighborhood disinvestment” (pg. 15); “Support and encourage the continued remediation of brownfield areas” (pg. 248); “Reinvest in commercial corridors (all sites are located on main corridors)” (pg. 247); “Establish Incentives to Prompt Redevelopment” (pg. 239); and “Encourage integrated neighborhood commercial development to provide local services to residents” (pg. 239). The table below outlines how each site’s reuse strategy aligns very specifically with local revitalization plans and community priorities:

TA	Site/Reuse Strategy	Alignment with Revitalization Plans
Centennial Hill	Former Ben Moore Hotel into Museum, restaurant, & barber shop	These redevelopments clearly align with both the City’s Comprehensive Plans and neighborhood-level plans. For the Ben Moore Hotel , the City is interested in converting the majority of the hotel into a museum with a rooftop restaurant, and restoring the original barber shop on the first floor. This aligns with pg. 38 of the City’s Comprehensive Plan to, “Continue to increase local preservation of Centennial Hill and other historic African-American Districts”. Furthermore, this redevelopment clearly aligns with and advances goals outlined in the Centennial Hill Choice Neighborhood Transformation Plan (December 2022) to, <i>Diversify the economy through historic and cultural tourism: Ben Moore Hotel to be acquired and redeveloped by 2027</i> (pg. 23); and <i>Renovate important neighborhood historical assets, such as the Ben Moore Hotel and Malden Barbershop</i> (in Ben Moore Hotel) (pg. 58). Furthermore, this plan identifies the Ben Moore as part of Pilot Site #2 , which includes the adaptive Reuse of the Ben Moore Hotel, 26 single family homes, 12,375 sq. ft. of commercial space, and 7,800 sq. ft. of park/greenspace (pg.78).
	Former Davis /Capital Dry Cleaners into Mixed-use commercial, retail, & housing	This site was identified by the Centennial Hills Neighborhood Transformation Plan (December 2022), as one of two Pilot Development sites (Pilot Site 1) as follows: <i>The development scenario illustrates a mixed-use development at the important gateway corner of South Decatur Street and High Street. The street level of the building features 34,800 sq. ft. of commercial space suitable for in-line retail services or office and four levels (136) of residential units stacked above the commercial space</i> (pg. 77). Link to Plan: Centennial Hill Choice Neighborhood Transformation Plan 08.2022.pdf
West Mont.	Former Art Deco service station/radiator repair into Workforce Training Hub & charging station	The proposed reuse clearly aligns with and advances both City land use and revitalization plans and community priorities. According to the City’s Plan entitled, “ One Trail, One Voice ”, the reuse plan for the former service station is a workforce training hub and charging station for EVs. The plan also includes renderings of this site, denoting this site’s importance in preserving black modernism. Link to plan: Planning for the 60th Anniversary of the Voting Rights March, Summer 23 pdf.pdf . Link to another grant application discussing this project: Narrative - Construction.docx

1.b.ii. Outcomes & Benefits of Reuse Strategy: The proposed project/redevelopment plans will stimulate significant economic development in the target communities. For example, the redevelopment of the **Ben Moore Hotel** into a **museum, restaurant, and barber shop** will make a sizable impact. According to an Economic Impact Analysis, just the museum alone **will bring in \$136,556 of local government revenue annually, and create 36 full-time jobs**. Furthermore, this redevelopment will have far-reaching effects on community businesses as well. Studies² show that for every dollar of revenue created at a museum, that dollar generates \$2.20 in other areas of the economy. Lastly, the Ben Moore is part of Pilot Site #1 (mentioned in previous section), which will include 7,800 square feet of park/green space. Additionally, the redevelopment of the **service station** into a **workforce training hub and EV charging station** will have significant benefits. A charging station will promote and attract EVs into the community, which when compared to gas-powered or diesel vehicles, reduces local air pollution, which in turn, improves air quality. Improved air quality can

²Museums as Economic Engines, a National Report: An Economic Impact Study for the American Alliance of Museums, December 2017



enhance the community’s resilience to health-related challenges. Furthermore, EVs and charging stations are less vulnerable to disruptions in fuel supply chains compared to gasoline or diesel vehicles. In the event of natural disasters or fuel shortages, EVs can continue to operate if there is access to electricity, **improving local climate change mitigation capacity**. As EV technology becomes more affordable, it is critical that the local community can support the demand for charging stations to ensure accessibility, especially in low-income communities. Additionally, research shows that communities with strong workforce development programs are more resilient and better prepared to respond to economic crises (such as pandemics), as they can more quickly adapt to changing job market demands. The planned reuse for the **former dry cleaners** will feature **34,800 sq. ft. of commercial space** suitable for in-line retail, services or office and **four levels (136) residential units** above the commercial space. These new houses will be more energy efficient thus reducing energy costs. Furthermore, these planned mixed-use developments, including commercial and residential spaces, not only bolster economic activity but also create a more resilient community by providing essential services and amenities within walking distance. This reduces dependency on transportation during emergencies. Montgomery recognizes the importance of climate planning, and issued an RFQ for Resilience and Climate Change Action Planning and Implementation in the summer of 2023. Once written and adopted, the policies outlined in this plan will be implemented in future brownfield and other developments.

1.c. Strategy for Leveraging Resources; 1.c.i. Resources Needed for Site Reuse: Applying for other sources of funding to help support the redevelopment of the historic Civil Rights Trail is a high priority for the City. The table below outlines various funding sources that will both stimulate the availability of additional funds and will be used to support the completion of assessment, remediation, and reuse of the priority sites:

Funding Source	Amount	How Funds Will be Used to Support Reuse of Sites/Stimulate Availability of Other Funds	Use
AL's CDBG Economic Development Program	\$400,000, 20% match requirement	May provide for “infrastructure improvements”, including water, sewer, rail spurs, and access roads. Each project must have a committed business that will create or retain jobs for Low-Moderate Income (LMI) persons.	Reuse
HUD’s CDBG Program	Est. \$5 Million over 4 yrs.	Aids in demolition, assessment, site cleanup, and rehabilitation of sites/buildings; conduct activities relating to energy conservation and renewable energy resources.	Assessment, Reuse
ADEM Section 128a Funding and RLF	Varies by project	Provides ADEM with funds to conduct Phase I and II ESAs, community outreach, and loans for cleanup, available to Montgomery on request.	Assessment, Cleanup
US DOT	\$36,663,000	In September Of 2023, the City applied for a Regional Partnerships Challenge Grant. The Winners will be announced in the Spring of 2024. If awarded, the grant will pay for the complete redevelopment of Priority Site #2 in its entirety.	Reuse
Montgomery Blight Project-HUD Appropriation	\$4,000,000	Funding will be used to redevelop blighted properties within the City and revitalize neighborhoods that have historically seen a lack of investment opportunities (can be used at priority sites).	Reuse
Growing Alabama Credit	Up to \$5.5 Million	Approved projects are funded when taxpayers make contributions to a local economic development organization.	Reuse
Alabama Jobs Tax Credit	Varies by project	Encourages job creation by crediting 3% annually of the previous year’s gross payroll (not including fringe benefits) for eligible employees for up to 10 years.	Reuse
HUD Choice Neighborhood Implementation Grant	\$40,000,000	The City was awarded a Planning Grant in 2019 and completed the plan in 2022. The City and the Housing Authority are working together to apply for the Implementation Grant which will add 400 homes to the Centennial Hill area.	Reuse

1.c.ii. Use of Existing Infrastructure: The priority sites are already located in a dense, urban area serviced by existing infrastructure (water, sewer, telecommunications, power) and existing roads. Encouraging in-fill redevelopment in the target areas ensures that redevelopment helps diminish existing blight and urban sprawl, and reduces overall project costs.

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

Due to their small and economically disadvantaged populations, the African-American communities in West Montgomery and Centennial Hill struggle to secure initial funding vital for assessments, remediation, and redevelopment, as shown in the table below. **West Montgomery’s low-income population is 104% higher than the state and 150% higher than the nation. Centennial Hill’s low-income population is 129% higher than the state and 180% higher than the nation.** Employment gaps worsen these communities' financial burdens. In West Montgomery, unemployment is 83% higher than the state and national averages. The unemployment rate in Centennial Hill is 50% higher. Additionally, each area has fewer than 10,000 residents, compounding their financial issues. These small communities cannot afford debt for urgent assessment, remediation, and reuse projects due to their small demographic base, as evidenced by the table on the following page.



Low Income and Small Population Indicators

Metric	West Montgomery	Centennial Hill	City of Montgomery	Montgomery County	Alabama	USA
Total Population	8,348	1,759	200,951	228,954	5,024,279	331,449,281
Low-Income Population	77.5%	87%	41%	38%	38%	31%
Per Capita Income	\$14,395	\$12,717	\$28,542	\$30,100	\$30,457	\$37,637
Unemployment Rate	11%	9%	7%	7%	5%	6%
Households Receiving SNAP Benefits	61%	44%	21%	19%	13%	14%

Source: US Census Bureau, American Community Survey, 2017-21

Furthermore, the CEJST indicates that Centennial Hill (01101000600) is in the 99th percentile in the entire nation for poverty; and West Montgomery (01101001100, 01101001000, 01101003000, and 01101002400) is in the 93rd percentile. This compelling data shows that West Montgomery and Centennial Hill face significant financial barriers that prevent them from completing assessments, remediation, and reuse projects to revitalize these historic communities. **This grant will provide critical pre-development funds for assessment and reuse planning for community-selected, priority sites that are otherwise unfunded.**

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

Sensitive populations, which include young children (8-12%), elderly (14-18%), minorities (95.5-99%), and low-income populations (77.5-87%), often bear the greatest burden of disease, yet have the fewest resources to improve their conditions when compared to healthier, more economically advantaged groups. Studies³ also show that children living in poverty experience greater exposure to environmental toxins, noise, poor quality housing, inadequate green space, and other environmental factors that adversely affect psychosocial and physical development. As outlined in the data table above, **between 65-71% of all children in the target areas are living in poverty.** Furthermore, nearly 100% of those living in poverty, are Black. Studies⁴ show that health and poverty are inextricably intertwined. Research⁵ also demonstrates that access to workforce development programs (planned reuse of one of the priority sites) can lift families out of poverty by helping them secure stable employment with better wages. **Therefore, the redevelopment of this priority site will address the issues faced by these target areas and facilitate the reduction of threats to the health and welfare of these historic African-American communities.**

Sensitive Populations in the Target Areas						
Metric	W.M.	C.H.	City	County	Alabama	USA
Total Population	8,348	1,759	200,951	228,954	5,024,279	331,449,281
Low-Income Population	77.5%	87%	41%	38%	38%	31%
Children Under <18 in Poverty	71%	65%	33%	31%	22%	17%
Elderly (65+) In Poverty	36%	38%	14%	13%	11%	10%
Minority Populations	95.5%	99%	71%	68%	38%	39%
Children Under 5	8%	12%	7%	7%	6%	6%
Fertility* (Child-bearing)	19.1%	14.8%	7.5%	7.7%	9%	10.2%
Adults with Poor Mental Health	24%	22%	18%	17%	17%	14%

Source: EPA's EJ Screen, *US Census Bureau, 2021: ACS 5-Year Estimates, Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System

Mental health conditions are more prevalent among Black Americans than other groups, plus they are more likely to live in areas marked by elevated temperatures, air pollution, higher flood risks, and poor-quality housing, such as historically redlined areas.⁶ According to the CEJST, Centennial Hill and West Montgomery are both in census tracts with historic underinvestment across multiple categories, including energy, health, housing, legacy pollution, transportation, and workforce development. With an almost 100% minority population base, the target area is challenged by the discrimination, danger, and disinvestment that often accompanies communities with high minority populations (in the 89th and 90th percentile for housing cost, 66th and 73rd percentiles for homes that are likely to have lead paint). Furthermore, according to the US Census Bureau, a disproportionately larger percentage (27-30%) of the target area's populations are living in severe substandard housing conditions when compared to the County (19%), State (15%), and National (18%) percentages. The reuse of a priority site as an EV charging station will help reduce air pollution, thereby facilitating the reduction of threats associated with poor air quality. **The reuse of the dry cleaners site as mixed-use development with housing (136 units) will lower the percentage of severe substandard housing in the target area by 1.1%, reducing health and welfare threats by reducing the percentage of families living in poor-quality housing.⁷**

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the EPA⁸, certain diseases or conditions, including asthma, birth defects, and cancer are known to be caused or exacerbated by exposure to environmental contaminants. The table below details the proven link between exposure to certain contaminants and

3 Evans, 2004
 4 Murray S. Poverty and health. CMAJ. 2006 Mar 28;174(7):923. doi: 10.1503/cmaj.060235. PMID: 16567753; PMCID: PMC1405857.
 5 The National Skills Coalition's report on workforce development
 6 Berberian AG, Gonzalez DJX, Cushing LJ. Racial Disparities in Climate Change-Related Health Effects in the United States. Curr Environ Health Rep. 2022 Sep;9(3):451-464. doi: 10.1007/s40572-022-00360-w. Epub 2022 May 28. PMID: 35633370; PMCID: PMC9363288.
 7 4,293 (# of housing units in target area) + 136 = 4,429 / 1,268 (number of severely substandard housing units)
 8 <https://www.epa.gov/report-environment/human-exposure-and-health>



certain health conditions, those contaminants likely link to priority sites, and the greater than normal incidences of diseases and health conditions in the target area.

Greater-Than-Normal Incidence of Disease and Adverse Health Conditions & Site Reuse Threat Reduction						
Priority Sites/COC/ Disease & Adverse Health Condition	Greater than Normal Incidence of Disease and Adverse Health Conditions					
Ben Moore Hotel – Asbestos (Lung Cancer, ovarian cancer)	<p>The target areas are suffering from greater-than-normal incidences of diseases and conditions that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum that are suspected to be present at the priority sites. The only target-area level cancer data available is from EJ Screen, which showed a higher rate of cancer in Centennial Hill and two of the four census tracts that make up West Montgomery. Furthermore, Montgomery County has an elevated incidence rate (12) of cervical cancer, as opposed to the State (9.9) and National rate (8.5), and has the second highest rate of cervical cancer in Alabama. Montgomery County also has an elevated incidence rate (132) of breast cancer, as opposed to the State (129) and National rates (127). The County also has the highest death rate (4,7.4) for Blacks of any county in the State of Alabama and for non-Hodgkin lymphoma and ovarian cancer and is higher than the State (3.6, 6) and the National rates (3.9, 5.7). Also, Montgomery County has the second highest death rate for Blacks with stomach cancer (4.5) in the State and is higher than the State (4.1) and National rates (3.5).⁹ Furthermore, as evidenced in the table below, the target areas have asthma rates 23% higher than the City as a whole, and 31% higher than the nation. The funding of this grant will allow us to identify what brownfields may be threatening the health of those residing in the target areas, and in turn reduce those threats.</p>					
Dry Cleaner – Perchloroethylene (PCE) (Birth defects, bladder cancer, non-Hodgkin lymphoma, esophageal, kidney, cervical, and breast cancer ¹⁰ ; Trichloroethylene (TCE) (Kidney disease, kidney cancer, non-Hodgkin lymphoma, liver cancer ¹¹); Vinyl Chloride (Birth defects, liver cancer ¹²); Asbestos (Lung Cancer, ovarian cancer ¹³)						
Service Station - Arsenic (High Blood Pressure ¹⁴); Chromium (Asthma, lung cancer, liver cancer, stomach cancer ¹⁵); Lead (High Blood Pressure, kidney disease ¹⁶); Benzopyrenes (Asthma, lung cancer, birth defects ¹⁷)						
Metric	West Montgomery	Centennial Hill	City	County	Alabama	US
Cancer Prevalence	5.5	6.9 (65 th & 67 th Percentile for State & US)	5.5	5.6	6.4	6.1
Asthma Prevalence	13.8 (98 th Percentile- State & US)	13.8 (98 th Percentile for State & US)	10.9	10.7	10.2	10
Adults with Poor Physical Health	20%	22%	14%	13%	13%	11%
Adults with Kidney Disease	5%	7%	4%	4%	3%	3%
Adults with High Blood Pressure	54%	61%	48%	47%	42%	32%
Source: EJ Screen; Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System						

As part of this grant application research process, we contacted the Alabama Department of Public Health (ADPH) in search of birth defect data for Montgomery County. Unfortunately, Alabama is one of the states that does not have a birth defect registry, but they are working on one. Although community-specific or city-level birth defect data was not available, we were able to get death rates for “Congenital Malformations, Deformations, and Chromosomal Abnormalities” (a type of birth defect) at the County level. This ADPH data revealed that in Montgomery County, **the death rate for these birth defects for Black babies in Montgomery is 17% higher than the State rate.**¹⁸ Environmental exposure is responsible for approximately 10% of all birth defects. According to research¹⁹, environmental exposure to certain contaminants that are most likely present at the priority sites can cause birth defects. Unfortunately, there is a high percentage of pregnant women in the target areas and significant health risks are associated with maternal exposure to environmental contamination. Furthermore, studies²⁰ have linked linked hypertension (high blood pressure) with the exposure to metals like lead, mercury, and arsenic (suspected contaminants at priority sites). **This grant will facilitate the identification and reduction of any potential threats posed by brownfield sites in the target areas, as described in depth above.**

(3) Environmental Justice; (3)(a) Identification of Environmental Justice Issues: Centennial Hill and West Montgomery are confronting pronounced environmental justice challenges. Unjust cumulative effects from multiple stressors, differential proximity and exposure to adverse environmental hazards, and a degraded physical infrastructure all disproportionately plague these two historical Civil-Rights era communities. **Not only are all the priority sites in disadvantaged census tracts, according to CEJST, but the entirety of both target areas and every site in our inventories are too.** According to EPA’s ECHO database, there are 734 facilities in Montgomery reporting to the EPA. Most of these

⁹<https://statecancerprofiles.cancer.gov/deathrates/index.php?stateFIPS=01&areatype=county&cancer=018&race=28&sex=2&age=001&year=0&type=death&sortVariableName=rate&sortOrder=default#results>

¹⁰ <https://www.epa.gov/sites/default/files/2016-09/documents/tetrachloroethylene.pdf>

¹¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3621199/>

¹² <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/vinyl-chloride.pdf>

¹³ <https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos>

¹⁴ <https://www.sciencedirect.com/science/article/pii/S2214750022000452>

¹⁵ <https://www.ncbi.nlm.nih.gov/books/NBK158851/>

¹⁶ N. D. Vaziri, D.A. Sica Lead-induced hypertension: role of oxidative stress, Curr. Hypertens. Rep., 6 (2004), pp. 314-320

¹⁷ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9181839/>

¹⁸ Alabama Department of Public Health, 113 Causes of Death, 2021

¹⁹ Weinhold B. Environmental Factors in Birth Defects: What We Need to Know. Environ Health Perspect. 2009 Oct;117(10):A440–7. PMID: PMC2897222.

²⁰ <https://www.sciencedirect.com/science/article/pii/S2214750022000452>



sites are located in the two target areas. The minority target areas are extremely poor, and almost totally comprised of sensitive populations. In addition to these factors, these two target communities also have higher concentrations of environmental pollution and subsequent health risks. These conditions are complex and all-encompassing with air quality, water quality, and even hazardous living conditions. The presence of particulate matter in both neighborhoods is notably high, with West Montgomery and Centennial Hill ranking in the 80th and 83rd percentiles, respectively in Alabama. Furthermore, both neighborhoods are facing elevated air toxins cancer risks, alarmingly in the 94th percentile in the Nation. These exposures are exacerbated by other potential threats, such as the clustering of underground storage tanks, where Centennial Hill in particular ranks in the 95th percentile in the State of Alabama. The age of housing stock in both areas, with median ages dating back to the early 1960s, amplifies the concerns for exposures to lead paint and asbestos, which can further exacerbate existing diseases and adverse health conditions. Severe substandard housing is another pressing issue, with West Montgomery and Centennial Hill exhibiting rates of 30% and 27%, respectively. These data points explicitly highlight the critical environmental justice challenges facing these neighborhoods. The severity of environmental justice issues plaguing the target area are detailed further in the data tables below:

Part 1: Severity of Environmental Justice Issues Affecting Disadvantaged Census Tracts in the Target Areas						
Metric	West Montgomery		Centennial Hill		City of Montgomery	
	%tile in AL	%tile in US	%tile in AL	%tile in US	%tile in AL	%tile in US
Particulate Matter	80 th	88 th	83 rd	88 th	77 th	86 th
Air Toxics Cancer Risk	64 th	94 th	64 th	94 th	2 nd	52 nd
Underground Storage Tanks	89 th	80 th	95 th	86 th	78 th	72 nd
Housing Stock Median Age	1963		1961		1978	
Severe Substandard Housing	30%		27%		20%	

Source: EJ Screen; US Census Bureau, American Community Survey. 2017-2021

Part 2: Environmental Justice Issues and How They Affect Disadvantaged Census Tracts in the Target Area											
Metric	Centennial Hill TA		West Montgomery TA								
	CT 01101000600	01101001100	01101001000	01101003000	01101002400						
Low Income	97 th		97 th	99 th	96 th	85 th					
Energy cost (energy cost/household income)	96 th		98 th	99 th	98 th	96 th					
Health (Asthma)	95 th		96 th	98 th	95 th	86 th					
Housing (Historic Underinvestment & lead paint)	Yes	97 th	Yes	72 nd	Yes	71 st	No	53 rd	No	77 th	
Legacy Pollution (Proximity to RMP facilities)	56 th		95 th		93 rd		97 th		96 th		
Workforce Development (Unemployment & Less than High School Education)	80 th	15%	96 th	35%	75 th	40%	99 th	33%	73 rd	20%	

Source: CEJST, [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#)

(3)(b) Advancing Environmental Justice: This grant will advance environmental justice by focusing funding on two of the most disadvantaged communities in the entire Country. Each of the planned redevelopments have written plans that were created with extensive community involvement in the decision-making process. These reuses will also advance environmental justice by meeting some of the communities’ most pressing needs: safe housing, job training and job creation, new community amenities, and preservation of these communities’ civil rights histories. This funding provides the necessary capital to create a sustainable cycle of job creation on brownfield sites (redevelopment of priority sites), with the City training locals to fill the resulting roles (redevelopment of priority site into a workforce training center). This, in turn, helps alleviate poverty and unemployment while advancing environmental justice. It is not anticipated that any residents or businesses will be displaced by our brownfield program. In fact, one of the action items being addressed in the Centennial Hills Choice Neighborhood Transformation Plan is creating a community retention strategy to minimize displacement as property values rise as a result of revitalization plans.²¹

2.b. Community Engagement; 2.b.i. Project Involvement; 2.b.ii. Project Roles: The City of Montgomery has initiated strategic partnerships to strengthen these redevelopment projects. These diverse collaborations comprise essential community representatives, particularly from the Centennial Hill and West Montgomery Communities, positioned to liaise effectively with stakeholders. These partners will play crucial roles in decision-making concerning site selection, cleanup, and subsequent reuse. Their specific roles are detailed in the table below.

Name of Organization/ Entity/Group	Point of Contact (name & email)	Specific Involvement in the Project or Assistance Provided
Centennial Hill Advisory Board	Glynis Tanner, gtanner@mhatoday.org	Leads the implementation of the Centennial Hill Neighborhood Transformation Plan. The Board includes three committees: Housing, People, and Neighborhood. There are also five task forces who conducted in-depth assessments into specific topic areas and formulate recommendations on projects and programs for inclusion in the Transformation Plan: 1) Education, 2) History, Culture, and Economic Development, 3) Public Safety, 4) Health and Wellness, and 5) Mixed-Income Housing. Will serve on the

²¹ Page 85 of the Centennial Hill Choice Neighborhood Transformation Plan, December 2022



		Brownfield Advisory Committee (BAC), and provide feedback regarding site selection, cleanup, and future reuse.
Vantage Development Group	Amanda Slaton, aslaton@thevantagegroup.biz	The Vantage Group is partnering with the City to develop the First Smart Neighborhood Affordability Development Model for future affordable housing with energy-efficient units and lower billing for vulnerable populations. Will serve on the BAC, and will provide guidance on site reuse.
Hope Inspired Ministries	John Bowman, JBowman@hopeinspiredministries.org	Provides a workforce training program, ACE is a no-cost training course that targets low-income neighborhoods, designed by the Alabama Community College System to provide Alabamians with relevant, cutting-edge, and industry-driven employability skills training to better prepare individuals for the Alabama workforce. Will sit on the BAC, and connect target communities to job opportunities that arise as a result of site reuses.
Paterson Innovators	Charles Ruch, cnimgm@mhatoday.org	Group of Centennial Hill and Paterson Court residents who merged Neighborhood Associations to convey information and provide insight into potential issues and opportunities related to Choice Neighborhood Initiative. Consisting of the Martin Luther King Parsonage and Dr. Richard Harris House, which housed Freedom Riders until the National Guard escorted the Riders to safety. Serve on the BAC, provide meeting space, and provide input on site selection, cleanup, and reuse.
Pounds of Care (West Montgomery)	Joyce Stinson Pearson poundsofcaresoc@gmail.com	Pounds of Care is an established partner in the city's workforce equity initiative. Their mission is to provide training and assistance for low-income individuals who lack adequate skills to achieve economic independence and provide child care and other services to those in need. Their goal is to promote self-sufficiency through training, work experience, supportive services, and job placement in unsubsidized employment. Many of the jobs Pounds of Care works to establish are in construction and manufacturing. They will serve on the BAC and connect the target communities to jobs that may arise as a result of this grant.

2.b.iii. Incorporating Community Input: The City places a high value on community involvement. Our desire is to effectively promote active community involvement in these two target communities to ensure the redevelopment projects are well-supported and meet their current needs. If awarded an EPA Community-wide Assessment Grant, we'll start a Community Involvement Plan (CIP) and hold a well-attended meeting to tell people about the grant and get their meaningful input regarding site choices and concerns. A Brownfield Advisory Committee (BAC) will be formed, which will include City employees, community members living in the target areas, and the project partners listed above. Formal semi-annual or project-specific meetings will be held at various locations in the target area, in a hybrid format (in-person and virtually), to maximize accessibility. Whenever possible the meetings will “piggyback” on other community events or meetings to reach the broadest audience in the target areas and promote the brownfield program. Fact sheets, along with social media posts, will be used to advertise in advance. The BAC will solicit community comments, questions, and concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meeting attendees will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. Relevant documents and studies (will be maintained online by the City and placed in a central repository within the target area for ease of access. The target area is predominantly English-speaking. Where needed, the City will make translation services available at meetings and provide translated materials.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS; 3.a. Description of Tasks/Activities and Outputs: The City plans to divide this grant into four major tasks: Project Management, Inventory & Outreach, Assessments, and Planning. Grant activities will also include the identification of additional sites throughout the grant period. Sections 3.a.i through 3.a.iv are combined in the tables below.

Task 1: Project Management (PM)	
i. Project Implementation	ii. Anticipated Project Schedule
Track, measure, evaluate, and correct problems with project progress as needed using Project Management Software for assistance	Continuously throughout the project period
Complete EPA quarterly reports	Within 30 days after each reporting period, except for the last quarter
Complete MBE/WBE Reporting	By October 30 th of each project year
Complete Federal Financial Reports (FFR)	Annually by December 31 of each project year and at the close of the grant
Complete Projections	With the April 30 quarterly report of each project year
EPA ACRES database updates and other programmatic support (work plan development, reimbursement requests, etc.)	Continuously throughout the project period
Final Performance Reporting	Within 90 days after the expiration or termination of the approved project period
iii. Task/Activity Lead(s):	The City, with assistance from a Qualified Environmental Professional (QEP)
iv. Output(s):	Work Plan, 4 MBE/WBE reports, 15 quarterly reports, 1 final report, ACRES database updates, regular drawdowns
Task 2: Inventory & Outreach	
i. Project Implementation	ii. Anticipated Project Schedule
Finalize site inventory and/or site prioritization plan	Q2-Q12



Develop/maintain strategic partnerships	Continuous
Create a City of Montgomery Community Involvement Plan (CIP)	Q1, updated as needed
Hold meetings with project team, QEP, EPA, and ADEM	Q1
Hold BAC Meetings	Semi-annually
Disseminate information/comments to/from the community and stakeholders	Continuous
Host community meetings, focus groups, charrettes, and/or visioning sessions	Semi-annually
Print informational materials for community meetings	Semi-annually
Create informational press releases to submit to local news	Semi-annually
Attend national and regional brownfields-related training conferences/workshops	TBD
iii. Task/Activity Lead(s):	The City, with assistance from QEP; BAC
iv. Output(s):	Site inventory, CIP, meeting agendas and minutes, brochures, press releases
Task 3: Assessments	
i. Project Implementation	ii. Anticipated Project Schedule
Create 1 Generic Quality Assurance Project Plan (QAPP)	Q2
Conduct 13 ASTM-AAI compliant Phase I Environmental Site Assessments (ESAs) - 3 priority sites, 10 additional sites (including site eligibility, characterization, access agreements, etc.) The City has already inventoried 78 brownfield sites in the target areas and is expecting significant interest following the catalyst project Phase Is.	Q2-Q12
Create 8 Site Specific Quality Assurance Plans (SSQAPPs) Health & Safety Plans (HASP). – 3 priority sites, 5 additional sites	Q2-Q12
Conduct 8 Phase II ESAs (asbestos and/or LBP surveys included) 3 priority sites, and 5 additional sites.	Q4-Q13
iii. Task/Activity Lead(s):	QEP with the City oversight
iv. Output(s):	13 Phase I ESAs, 1 Gen QAPP, 8 SSQAPPs, SAPs and HASPs, 8 Phase II ESAs
Task 4: Planning	
i. Project Implementation	ii. Anticipated Project Schedule
Select sites for remediation and/or reuse plans.	Q7-Q14
Create Analysis for Brownfields Cleanup Alternatives (ABCAs) for 4 sites.	Q7-Q14
Develop 3 Site Reuse Visions	Q8-Q12
Begin securing financial support for the cleanup	Q16
iii. Task/Activity Lead(s):	QEP (ABCAs) & the City (Site Reuse Visions)
iv. Output(s):	4 ABCAs, 3 Site Reuse Visions
*Non-EPA grant resources to carry out tasks/activities (for tasks 1-4) if applicable: Not Applicable	

3.b. Cost Estimates: *These cost estimates were developed from our review of other EPA brownfield grants:*

Task 1: Project Management \$71,625;

Personnel: 497 hours at \$75 per hour = \$37,275 **Travel:** National

Brownfields Conference & Southeast

Brownfields Conference. Two

Conferences at \$3,350 per

conference for two people =

\$4,350.00 [\$1,000 per flight per

person (\$2,000/two people per

conference); hotel at \$200/night for

four nights per person (\$1,600/two

people per conference); per diem of \$50/day for five days per person (\$500/two people per conference); registration

at \$125 per person (\$250/two people per conference)] **Contractual:** 200 hours at \$150 per hour = \$30,000

**Personnel and Contractual Note: Additional Hours required will not be charged to the grant.*

Task 2: Inventory & Outreach: \$21,500

Personnel: 100 hours at \$75 per hour = \$7,500/ **Contractual:** 80 hours at \$150 per hour = \$12,000

Supplies: \$2,000 for community meeting materials over four years (\$500 year/4-year project period)

Task 3: Assessments: \$334,275

Contractual: 1 Generic QAPP at \$6,025/13 Phase I ESAs at \$5,250 = \$68,250/8 Phase II ESAs at \$32,500 = \$260,000

(All Phase II ESAs include funding for Site-Specific QAPP, Health and Safety Plan, drilling, reporting, and analytical).

Task 4: Planning: \$72,600; Contractual: Three Site Reuse Visions at \$15,000 = \$45,000/4 ABCAs at \$6,900 = \$27,600

Budget Categories		Project Tasks (\$)				
		Task 1 – PM	Task 2 - I & O	Task 3 - Assessment	Task 4 - Planning	Total
Direct Costs	Personnel	\$37,275	\$7,500			\$44,775
	Fringe Benefits					
	Travel	\$4,350				\$4,350
	Equipment					
	Supplies		\$2,000			\$2,000
	Contractual	\$30,000	\$12,000	\$334,275	\$72,600	\$448,875
	Construction					
Total Direct Costs		\$71,625	\$21,500	\$334,275	\$72,600	\$500,000
Indirect Costs						
Total Budget		\$71,625	\$21,500	\$334,275	\$72,600	\$500,000

3.c. Plans to Measure and Evaluate Environmental Progress and Results: The City will work in conjunction with the QEP to track, measure, and evaluate project progress and will utilize several mechanisms to ensure expected project outputs, overall project results, and eventual project outcomes are achieved. The mechanisms we plan to utilize are progress reporting, monthly scheduled team update meetings, and budget spreadsheets. Outputs and outcomes will also be utilized to track



project progress and ensure the expected community benefits will be achieved in both target communities. ACRES will be updated for each property at the completion of Phase I, Phase IIs, at the completion of the project period, and as significant events occur (i.e., leverage dollars or jobs) at the site, but not later than the end of the quarter in which the event occurred. At the start of the project, the City will complete the EPA Work Plan that will incorporate all requirements under the cooperative agreement. As part of the Work Plan, the City will detail a project timeline, which will be shared with the EPA, ADEM, our QEP, and the BAC. Should any milestones or measures not be achieved, the City will convene with local stakeholders and the QEP to assess and modify the project strategy and timeline. Concurrently, the project team will liaise with our EPA Project Officer to address concerns and formulate a corrective action plan. Copies of all documents associated with the project will also be continuously added to the document repository as they are completed. Eventual project outcomes will also be tracked and recorded in ACRES for three years after the close of the grant.

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: The City has the capacity, experience, and key staff necessary to carry out and manage this project's programmatic, administrative, and financial requirements. Carrie Allison, Grants Administrator, will serve as the Grant Manager, and has over ten years of grant administration experience managing state and federal health-based grants and projects. As Grants Administrator with the City, some of her current job duties include direct grant preparation and management, providing technical support to other Departments in the City, identifying grant opportunities, budgeting, and database management. For this grant project, Ms. Allison will assist with preparing all financial reports and administering all grant-related activities. Ms. Allison reports to Kelbrey Porter, Grants Department Director, who can serve as alternate Project Manager if needed. Ms. Porter ensures that all the City's grant programs are undertaken promptly, efficiently, and in compliance with all Federal, State, and local regulations. Ms. Porter has extensive experience managing and administering grant programs and interacting with agencies, including the United States Department of Housing and Urban Development, the Federal Emergency Management Agency, the Federal Communications Commission, the Federal Transportation Agency, and the Alabama Department of Emergency Management. Before joining the City, Ms. Porter served as a Grants Administrator for 5 years. Betty Beville, the City's Finance Director, has over 20 years of accounting experience. She oversees all financial, human resources, and building responsibilities with 5 departments and over 50 employees under her supervision and will handle all financial aspects of the grant.

4.a.iv. Acquiring Additional Resources: Montgomery has a system in place to appropriately acquire additional expertise and resources as outlined in the City's Interim Grant and Federal Funding Policies and Procedures Manual, adopted in 2021 (Manual: [637708502767500000 \(montgomeryal.gov\)](https://www.montgomeryal.gov/637708502767500000)). In adherence to our standard procurement procedures and in compliance with the competitive criteria set forth in 2 CFR Part 200 and 2 CFR Part 1500, and other applicable EPA procurement guidance documents, we have selected a QEP to furnish essential technical support. This selection process involved issuing a Request for Proposals (RFP) via widely-read online newspapers, ensuring a transparent and equitable selection process. Price was considered in the selection process. The QEP will assist the City through various stages of grant implementation, encompassing program management, community outreach, environmental assessments, cleanup planning, other eligible tasks, and compliance with EPA reporting requirements. The City and QEP team also includes members from Disadvantaged Business Enterprises (DBEs). We do not anticipate the need for Subawards in this project. This project will also promote local hiring/procurement and strong labor practices. The planned reuse of a priority site as a workforce training center utilizes a former brownfield site to target the local community for specialized workforce training and assistance. Furthermore, the City is partnering with Hope Inspired Ministries (HIM), a local organization that provides a no-cost training course designed by the Alabama Community College System to provide Alabamians with relevant, cutting-edge, and industry-driven employability skills training to better prepare individuals for the Alabama workforce. Individuals who complete the ACE program receive the ACT's National Career Readiness Certificate and an Alabama Certified Employee Certificate. This program targets its recruiting efforts to marginalized individuals in lower-income communities and neighborhoods. The City's collaboration with this program and the reuse of a priority site as a workforce training center will link the Centennial Hill and West Montgomery residents to any employment opportunities that may arise from this brownfield project.

4.b. Past Performance and Accomplishments; 4.b.i. Currently Has or Previously Received an EPA Brownfield Grant; (1) In 2001, the City of Montgomery was awarded a \$250,000 Hazardous Substances Brownfield Assessment Pilot Grant. **Accomplishments:** The pilot grant targeted the dilapidated riverfront area north of downtown Montgomery. According to ACRES, 5 Phase Is and 4 Phase IIs were completed. The grant was able to leverage \$198,450 for the Riverfront Park Property (ACRES ID 12249) and created 480 jobs. **(2) Compliance with Grant Requirements:** The City maintained compliance with the workplan, schedule, and terms and conditions of the grant, as well as accomplish the expected results. The City prepared and submitted all EPA-required reports including quarterly, semi-annual, and final reports on time. The City also updated the ACRES online database to accurately and consistently track project outputs and outcomes. The riverfront area has been completely redeveloped and is a thriving, walkable area that draws heavy tourism as a result of the initial brownfield funding provided in the 2001 brownfields Pilot Grant.



Threshold Criteria For Montgomery, AL - CWA 2024

1. APPLICANT ELIGIBILITY

- a. The City of Montgomery is a General Unit of Local Government as defined by 2 CFR 200.1, and therefore is an eligible entity for grant funding.
- b. Not applicable.

2. COMMUNITY INVOLVEMENT

The City of Montgomery places a high value on community involvement, and has a solid plan in place to engage the community regarding our brownfields program in the proposed Target Areas presented in our grant application (West Montgomery and Centennial Hill). Our desire is to effectively promote active community involvement in these two target communities to ensure the redevelopment projects are well-supported and meet their current needs. If awarded this EPA Community-wide Assessment Grant, we'll start a Community Involvement Plan (CIP) and hold a well-attended meeting to tell people about the grant and get their meaningful input regarding site choices and concerns. A Brownfield Advisory Committee (BAC) will be formed, which will include City employees, important community members living in the target areas, and the project partners listed above. Formal semi-annual or project-specific meetings will be held at various locations in the target area, in a hybrid format (in-person and virtually), to maximize accessibility. Whenever possible the meetings will “piggyback” on other community events or meetings to reach the broadest audience in the target areas and promote the brownfield program. Fact sheets, along with social media posts, will be used to advertise in advance. The BAC will solicit community comments, questions, and concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meeting attendees will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. All deliverables (Phase I/II, QAPPs, HASPs, ABCAs, Q&A docs, site eligibility forms, etc.) will be maintained online by the City and placed in a central repository within the target area for ease of access. The target area is predominantly English-speaking

The City has also initiated strategic partnerships to strengthen our brownfield program. These diverse collaborations comprise essential community representatives, particularly from the Centennial Hill and West Montgomery Communities, positioned to liaise effectively with stakeholders. These partners will play crucial roles in decision-making concerning site selection, cleanup, and subsequent reuse. Their specific roles are detailed in the table below.

Name of Organization/ Entity/Group	Point of Contact (Name & Email)	Specific Involvement in the Project or Assistance Provided
Centennial Hill Advisory Board	Glynis Tanner, gtanner@mhatoday.org	Leads the implementation of the Centennial Hill Neighborhood Transformation Plan. The Board includes three committees: Housing, People, and Neighborhood. There are also five task forces who conducted in-depth assessments into specific topic areas and formulate recommendations on projects and programs for inclusion in the Transformation Plan: 1) Education, 2) History, Culture, and Economic Development, 3) Public Safety, 4) Health and Wellness, and 5) Mixed-Income Housing. Will serve on the Brownfield Advisory Committee (BAC), and provide feedback regarding site selection, cleanup, and future reuse.
Vantage Development Group	Amanda Slaton, aslaton@thevantagegroup.biz	The Vantage Group is partnering with the City to develop the First Smart Neighborhood Affordability Development Model for future affordable housing with energy-efficient units and lower billing for vulnerable populations. Will serve on the BAC, and will provide guidance on site reuse.



Threshold Criteria For Montgomery, AL - CWA 2024

<p>Hope Inspired Ministries</p>	<p>John Bowman, JBowman@hopeinspiredministries.org</p>	<p>Provides a workforce training program, ACE is a no-cost training course that targets low-income neighborhoods, designed by the Alabama Community College System to provide Alabamians with relevant, cutting-edge, and industry-driven employability skills training to better prepare individuals for the Alabama workforce. Will sit on the BAC, and connect target communities to job opportunities that arise as a result of site reuses.</p>
<p>Paterson Innovators</p>	<p>Charles Ruch, cnimgm@mhatoday.org</p>	<p>Group of Centennial Hill and Paterson Court residents who merged Neighborhood Associations to convey information and provide insight into potential issues and opportunities related to Choice Neighborhood Initiative. Consisting of the Martin Luther King Parsonage and Dr. Richard Harris House, which housed Freedom Riders until the National Guard escorted the Riders to safety. Serve on the BAC, provide meeting space, and provide input on site selection, cleanup, and reuse.</p>
<p>Pounds of Care</p>	<p>Joyce Stinson Pearson poundsofcaremoca@gmail.com</p>	<p>Pounds of Care is an established partner in the city's workforce equity initiative. Their mission is to provide training and assistance for low-income individuals who lack adequate skills to achieve economic independence and provide child care and other services to those in need. Their goal is to promote self-sufficiency through training, work experience, supportive services, and job placement in unsubsidized employment. Many of the jobs Pounds of Care works to establish are primarily in construction and manufacturing. They will serve on the BAC and connect the target communities to jobs that may arise as a result of this grant.</p>

The City places a high value on community involvement. Our desire is to effectively promote active community involvement in these two target communities to ensure the redevelopment projects are well-supported and meet their current needs. If awarded an EPA Community-wide Assessment Grant, we'll start a Community Involvement Plan (CIP) and hold a well-attended meeting to tell people about the grant and get their meaningful input regarding site choices and concerns. A Brownfield Advisory Committee (BAC) will be formed, which will include City employees, community members living in the target areas, and the project partners listed above. Formal semi-annual or project-specific meetings will be held at various locations in the target area, in a hybrid format (in-person and virtually), to maximize accessibility. Whenever possible the meetings will “piggyback” on other community events or meetings to reach the broadest audience in the target areas and promote the brownfield program. Fact sheets, along with social media posts, will be used to advertise in advance. The BAC will solicit community comments, questions, and concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meeting attendees will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. Relevant documents and studies (will be maintained online by the City and placed in a central repository within the target area for ease of access. The target area is predominantly English-speaking. Where needed, the City will make translation services available at meetings and provide translated materials.

3. EXPENDITURE OF EXISTING GRANT FUNDS

The City of Montgomery does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. CONTRACTORS AND NAMED SUBRECIPIENTS

- Contractors

The City of Montgomery has already selected a contractor under a “dual procurement process” for both grant proposal writing and the services necessary to help the City carry out the grant. The City solicited firms by issuing a Request for Proposals (RFP) on July 21, 2023. The RFP was posted publicly on the City of Montgomery’s website and in the *Montgomery Advertiser*, the primary newspaper for the region. It was posted for 30 days and three submittals were received by the deadline. The solicitation was conducted in accordance with 2 CFR Part 200 and 2 CFR Part 1500 and 40 CFR Part 33, and EPA contractor procurement



Threshold Criteria For Montgomery, AL - CWA 2024

guidelines.

The City of Montgomery's RFP Time Schedule was as follows:

1. July 21, 2023: Formal announcement date and release to the public of RFP.
2. July 28, 2023: Deadline for submittal of any questions/clarification relative to RFP.
3. August 21, 2023 by 2:00 p.m.: Deadline for submittal of proposals.
4. August 24, 2023: Proposal evaluation completed
5. September 1, 2023: Notification of intent to award.

The City of Montgomery received three submittals/offers from interested firms before the due date. The City created a panel of individuals who met and reviewed and scored/ranked the firms based on the criteria outlined in the RFP, which included price/cost reasonableness. The panel selected the highest-scoring submittal (PPM Consultants, Inc.) and negotiated the services of completing the grant application and providing the scope of services for implementation of the grant if awarded. Documentation on our RFP process is attached.

- Named Subrecipients: Not Applicable