



R04-24-A-001

Northwest Alabama Council of Local Governments
P.O. Box 2603, Muscle Shoals, Alabama 35662
103 Student Drive, Muscle Shoals, Alabama 35661

Keith Jones
Executive Director
kjones@nacolg.org

Andy Betterton
Chairman

Mike Lockhart
Vice Chairman

256-389-0500
www.nacolg.org

Barry Moore
Secretary

Narrative Information Sheet - Northwest Alabama Council of Local Governments
FY 24

1. **Applicant Identification:**
Northwest Alabama Council of Local Governments (NACOLG)
P.O. Box 2603
Muscle Shoals, AL 35662
2. **Funding Requested:**
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested: \$500,000
3. **Location:**
Five County Area (Franklin, Colbert, Lauderdale, Marion, Winston), Alabama
4. **Target Area and Priority Site Information:**
 - Target Area 1: City of Leighton
Priority Site 1:
Former Leighton Training School
2255 North Washington Street
Leighton, AL 35646
 - Target Area 2: City of Tuscumbia
Priority Site 2:
Former Service Station
501 West 5th Street
Tuscumbia, AL 35674
 - Priority Site 3:
Former AmeriPride Commercial Laundry
805 N. Hook Street
Tuscumbia, AL 35674
 - Target Area 3: City of Haleyville
Priority Site 4:
Former Bama Textile Mill
1400 Alabama Avenue
Haleyville, AL 35565

5. Contacts:

a. Project Director:

Mr. Joseph Holt
P.O. Box 2603
Muscle Shoals, AL 35662
(256) 389-0517
jholt@nacolg.org

b. Chief Executive/Highest Ranking Elected Official:

Keith Jones, Executive Director
P.O. Box 2603
Muscle Shoals, AL 35662
(256) 389-0555
kjones@nacolg.org

6. Population: (Census, 2020)

Target Area 1: City of Leighton (687)
Target Area 2: City of Tuscumbia (8,977)
Target Area 3: City of Haleyville (4,343)

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	1,5
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.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve climate adaptation and/or mitigation measures capacity and resilience to protect residents and community investments.	4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., 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:

A support letter from the Alabama Department of Environmental Management attached.

9. Releasing Copies of Applications:

Not applicable



Alabama Department of Environmental Management
adem.alabama.gov

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

November 7, 2023

Mr. Joseph Holt
Director of Planning and Transportation
Northwest Alabama Council of Local Governments
103 Student Drive
Muscle Shoals, AL 35661
jholt@nacolg.org

RE: Brownfields Community-Wide Assessment Grant Support

Dear Mr. Holt:

The Alabama Department of Environmental Management (ADEM) is pleased to support the Northwest Alabama Council of Local Governments (NACOLG) in your pursuit of a Brownfields Community-Wide Assessment Grant from the U.S. Environmental Protection Agency (EPA).

We understand that NACOLG is a voluntary association of 37 governmental units in the five-county region of Colbert, Franklin, Lauderdale, Marion, and Winston Counties. NACOLG serves as an extension of city and county government through which officials get together to decide issues of region-wide importance and work together to solve problems that stretch beyond local government boundaries. NACOLG is seeking to secure and utilize EPA assessment grant funds to identify and resolve potential environmental issues at the numerous brownfield sites located in your region, and to help spur revitalization in the area.

The ADEM Redevelopment Section routinely aids governments interested in brownfields redevelopment. Upon request, ADEM may can participate in the various outreach activities needed to accomplish your brownfields project goals, entry of sites into the ADEM Voluntary Cleanup Program (VCP), or use of our own grant funds for conducting site assessment (offered on a first come/first served basis, subject to fund availability).

We wish you and the residents of the NACOLG community success in the pursuit of your grant. Please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal Collins", is written over a white background.

Crystal Collins, Chief
Redevelopment Unit
Land Division



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1. a.i. Overview of Brownfield Challenges and Description of Target Area

The Northwest Alabama Council of Local Governments (NACOLG) is a regional planning and intergovernmental coordination agency serving 37 governmental units in the 5-county northwest Alabama region including Colbert, Franklin, Lauderdale, Marion, and Winston Counties, and the 32 low-population municipalities therein, the geographical boundary of this grant application. NACOLG is not a government, but is an extension of city and county government through which officials get together to decide issues of region-wide importance and work together to solve problems that stretch beyond local government boundaries. And the problems that need addressing in this primarily rural region of Alabama are many. Terms like “Southern”, “Constant”, “Rural”, “Small Town” and “Traditional” are frequently used to describe the culture of Northwest Alabama. However, such settings can create challenges, such as the outmigration experienced by many of the counties and municipalities in the region due to lack of economic opportunity. The region’s economic health is far from stable, as economic crises of national and even global proportions repeatedly seems to wipe out gains, leaving a regional economy which suffers through the downward periods of business cycles without much improvement over time. Per capita income and average wages for jobs in various industries track well behind national averages. The region has fewer high school and college graduates than the statewide or national average, which is a significant challenge. Most employers today are not willing to hire employees without basic high school or equivalent education for even low skill positions. Other regional challenges include lack of broadband, low labor force participation, drug/crime problems, access to health care, and crumbling infrastructure.

Businesses exit because of these challenges, leaving a landscape littered with brownfield sites in its wake. NACOLG is submitting this EPA Community-wide Assessment Grant to help address such challenges throughout our 5-county jurisdiction, but we plan to focus the grant on three economically-stressed small communities in the Colbert County towns of **Leighton and Tuscumbia, and Haleyville** in Marion and Winston County. The municipal limits of each of these three small towns will be our Target Areas. The most impoverished of the three Target Areas is **Leighton**, home of legendary soul musicians like Percy Sledge. Located in a rural area east of Tuscumbia with a population of only 687 (59.5% minorities) in 2.16 square miles, it was built as a mill town around the long-gone cotton industry leaving former mills and related properties as blighted brownfield sites. Leighton suffers from a lack of jobs, low income, and high poverty rates. Approximately 26% of the population lives below the poverty level while the Per Capita Income (PCI) is only \$19,119¹. In fact, Leighton is listed as a *Persistent Poverty* area. Leighton has been hemorrhaging their population for decades, with a loss of over 55% since 1990.

The Town of Tuscumbia, the second proposed Target Area, is located on the Tennessee River and is considered one of the “Quad Cities” in the “Shoals Area” along with the adjoining cities of Florence, Muscle Shoals, and Sheffield. Tuscumbia is one of the oldest cities in the State of Alabama (1821), and has a population of 8,997 in 9.22 square miles. Tuscumbia is best known for being the birthplace of Helen Keller, but is also known as "America's First Frontier Railroad Town." Several sites in the City are listed on the National Register of Historic Places, including the Tuscumbia Historic District. The City has a charming, quaint downtown that has become somewhat blemished by a growing number of brownfield sites. Plant closings in the Quad City area resulting in job losses of over 2,000 people have contributed to other business closings in Tuscumbia.² The population of Tuscumbia living below the poverty level is almost double the national average (22.1% compared to 12.6%).

Haleyville, situated in both Winston and Marion Counties, has continued to dwindle in population since 1980, now at 4,343¹. This third proposed Target Area will include the 8.38 square mile City limits. Notably, Haleyville was the location of the first 911 call in the State of Alabama, but ironically, the town has been plagued by natural disasters since that time that have significantly damaged its economy. In 2001, an F3 Tornado ripped downtown streets, causing millions of dollars in damages to the local businesses. Since then, other weather events have wreaked havoc on this small town, contributing to substantially higher poverty rates than the national average, Also, over twice the national average of people in Haleyville are living on public assistance. A recent preliminary inventory of the downtown area revealed 10 brownfield sites along Main Street alone, and this does not include the many industrial brownfield sites located in the large industrial area destroyed by tornados in the underserved area of South Haleyville.

Our brownfields challenges will be addressed by this grant by helping us grow our economy, improve health, and overcome environmental justice problems. Brownfields redevelopment revitalizes communities, creates jobs, increases tourism and the tax base, expands education opportunities, and improves the environmental and public health by reducing contamination.

1.a. ii. Description of the Priority Brownfield Site(s): A preliminary brownfields inventory was conducted in all five counties, and approximately 34 sites have already been identified in the Target Areas such as former cotton mills, abandoned gas stations and automotive repair shops, schools, and countless sites with abandoned or dilapidated structures whose previous use was unknown. In Haleyville, 12 former manufacturing facilities wholly or partially

¹ US Census Bureau, American Community Survey, 2016-2020

² <https://www.madeinalabama.com/warn-list/>

destroyed by tornadoes were identified as brownfield sites. NACOLG has identified four locations in the three Target Areas as high-priority sites. **The first priority site is the former Leighton Training School** located at 2255 North Washington Street in Leighton. The school was built in 1929 using monies from the Julius Rosenwald Fund, intended for minority kids' education. Only 5% of these schools remain in the US. The school served several generations of Black students until it closed in 1970. The building was reopened in 1971 as the *Leighton Middle School*. The school closed at the end of the 1993-94 school year, and since that time, the building has been badly vandalized.³ It has been highlighted in *Alabama Heritage* magazine as a threatened historic site, and is ranked on the "Places in Peril" list compiled by the Alabama Historical Commission and the Alabama Trust for Historic Preservation. Among its prominent alumni include entertainer Percy Sledge. The school sits on approximately 5 acres of land and has two large brick buildings, a sturdy reminder of progressive African-American educational opportunities during the era before integration. Asbestos and lead-based paint are the primary environmental concerns. The vandalized building is surrounded by low-income housing, is known to contain asbestos, and there is valid concern of exposure to asbestos fibers that could be escaping into the neighborhood and affecting residents and local youth that frequently trespass on the property. EPA's *EJScreen* shows that the People of Color population living within a ¼-mile radius of the site is 45%, and the low-income population is 46%. This site was primarily chosen because of the overwhelming community interest in seeing this historic site being redeveloped along with the potential dangers that the asbestos poses to the surrounding neighborhood. A recently-held 30th Annual Leighton School commemoration event and parade drew over 200 participants from 10 different states, indicative of the level of interest in redeveloping the property.

The second and third priority sites are in Tuscumbia, and include a former service station located at 201 West 5th Street, and the former AmeriPride Linen and Uniform Services commercial laundry site, 805 N. Hook Street. The former service station building is dilapidated and sits on a prominent corner, directly across the street from the *Tuscumbia Depot and Roundhouse* railroad museum, a local tourist attraction. The vacant service station is an eyesore and detracts from the Museum, which serves to attract tourism to the City. In fact, it is located only 85 feet from a picnic table at on the museum lawn. Also of concern, the City's public water supply well is only 600 feet downgradient from the property, and Spring Park (a significant City greenspace and recreational attraction with a spring-fed lake) is located approximately 900 feet downgradient. The primary contaminants of concern are petroleum, heavy metals, volatile organic compounds (VOCs, including benzene and chlorinated solvents) from tank systems, parts cleaning, used oil, and hydraulic lifts. EPA's *EJScreen* shows a lead paint index of 0.59 within a one-quarter mile radius of the site, which is in the 81st percentile in the US, and a low-income population of 46% within this same radius. This site was chosen as a priority site due to the potential positive impact the site could have on tourism to the City if it was redeveloped, as well as the potential danger the site poses to Spring Park and the town's water supply in an area of karst limestone. The former **AmeriPride commercial laundry** is located adjacent to the Tuscumbia Housing Authority public housing project, which is fully occupied with low-income minority residents. The facility was closed after being purchased by another company in 2018, resulting in the layoff of 50 employees. The building was demolished in 2022, and was fenced to prevent local children from the public housing project and the adjacent McClain Park from playing on the site. Commercial laundry facilities are common sources of chlorinated solvent impact to soil and groundwater, and conditions at the site are unknown.

The fourth priority site is located in Haleyville: the former Bama Textile Mill. Located at 1400 Alabama Avenue, about 1/2 mile from downtown, the site covers approximately 7 acres and is mostly covered in rubble from buildings that were demolished following a large 2001 fire that 12 different fire departments responded to. Only one of more than a dozen previous buildings still stands today. Primary contaminants associated with the textile industry are VOCs from chlorinated solvents and petroleum-based oils. Per- and polyfluorinated Substances (PFAS) are also a concern based on the volume of foaming materials likely used to extinguish the 2001 fire. A pond is also located on the site that was reported to have held dye used in the manufacturing process. The site is a massive eyesore to the community and was abandoned 15 years before the fire in 2001. It is located only 100 feet from low-income housing to the south and less than 50 feet from an existing church along the south property line. More low-income housing is located approximately 50 feet east of the property. EPA's *EJScreen* data indicates that 22% of the population living within a 1/2-mile radius of this site are elderly, and 72% are low-income. This site chosen as a priority site due to its location, potential to serve as a catalyst site to jumpstart redevelopment along Alabama Avenue, and potential threat to human health and the environment associated with long-term industrial use and the chemicals and wastes likely used and stored on the site during operation.

1.a.iii. Identifying Additional Sites: Additional brownfield sites in our Target Areas and 5-County jurisdiction will be identified for assessment funding by our Brownfields Action Committee (BAC). The BAC will be led by NACOLG with assistance from a Qualified Environmental Professional (QEP), and will include a cross-section of community, government, business, investor and financial groups in our region. The process will begin with the QEP compiling an extensive brownfield site inventory. The initial inventory will be compiled by talking with local government and

³ <https://www.alabamaheritage.com/places-in-peril/leighton-training-school-leighton-colbert-county-1929-places-in-peril-2001>

community leaders; reviewing *EJScreen* Data Tools, EPA and AL Dept. of Env. Mgmt (ADEM) records; reviewing property records relevant to brownfields identification; reviewing historical documentation to identify past uses of concern; and surveying local developers, real estate brokers, property/business owners, and other stakeholders for information on potential sites and upcoming redevelopment projects. These sites will be evaluated using EPA's *Community Reuse Property Prioritization Tool* to narrow down candidate properties. Suitable properties will be presented to the BAC for approval and prioritization using high-priority criteria, such as reuse potential, environmental conditions and impacts, benefits to underserved communities, economic impact, alignment with area-wide goals, and community priorities. Other criteria may be considered as appropriate. Underserved communities will be identified using census, health, and environmental threat data, as defined in the *Justice40 Initiative*.

1.b. Revitalization of the Target Area

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

The redevelopment plans for the four priority sites align with most of the major goals and strategies listed in NACOLG's 2022-2026 *Comprehensive Economic Development Strategy* (CEDS) report, including:

- **Goal I: Economic Resilience;** lead community preparedness, planning, and risk assessment actions in the Region; support economic diversification, business services, and workforce development initiatives that prepare the region's economy to withstand natural and man-made disasters.
- **Goal II: Business and Industry Support and Recruitment;** provide resources to support new and existing businesses and industries.
- **Goal III: Infrastructure and Community Services;** Support the development and redevelopment of sustainable infrastructure and investments in community services to create attractive, safe communities that sustain and support local and regional economies.
- **Goal IV: Education and Workforce Development;** support local and regional efforts to improve the quality of education and workforce development necessary to economic development success throughout the region.
- **Goal V: Community Capacity Building and Planning;** provide support for local and regional coordination, planning, and capacity building including leadership development, capital and land use planning, and hazard mitigation plans. Goal V specifically includes "*Brownfields redevelopment planning and technical assistance leading to assessments and redevelopment plans for sites suffering from real or perceived history of contamination*" as a priority (pg. 27).

Details on each priority site are as follows, as well as additional information on how the proposed redevelopment will align with specific strategies associated with each of these CEDS goals.

Priority Site 1, Former Leighton Training School. Leighton has plans to redevelop the former training school into a Community Center, a Senior Citizen Center, and an office complex. There has been a groundswell of support from the surrounding community for years to redevelop this historic site. In fact, graduates of the school reunite on the grounds annually and have been doing so since the school closed in the 1970s. NACOLG has already helped secure a \$150,000 grant for the site's redevelopment, and Leighton has submitted a CBDG grant application for \$400,000 for the project, anticipated to be awarded in 2024. The redevelopment of this school into a Community Center, a Senior Citizen Center, and an office complex aligns with the NACOLG CEDS Goals 1, II and IV presented in Section 1.b.i above. Redevelopment of this site also aligns perfectly with the momentum established by Leighton's recent award of an \$800,000 Transportation Alternatives Program grant to implement a streetscape revitalization with bicycle lanes, sidewalk connectivity for the disabled, tree planting, and extension of the Singing River Trail (an extensive bike/pedestrian greenway which will extend through Leighton near the School site). The Town of Leighton is an important step toward linking each small town in the NACOLG area together to create new economic opportunities, community development, outdoor recreational areas, and a place of health and wellness. The site reuse strategy meets City land-use plans and has the full support of the community.

Former Service Station (Priority Site 2) and Commercial Laundry Site (Priority Site 3), Tuscumbia. The former gas station site would make a perfect location for a restaurant or coffee shop to complement the railroad museum located across the street, and the former commercial laundry site could be used as additional greenspace adjacent to the public housing complex and an extension of McClain Park. The NACOLG Community and Economic Development Department and the City of Tuscumbia will explore options to encourage such redevelopment by working with retail placement experts and the *Design Alabama* team. Tuscumbia was recently selected by Design Alabama to participate in their *DesignPlace* charette process, which included an extensive 3-day deep dive into how to create and enhance spaces throughout the community. A team of design experts with experience in architecture, landscape, urban design, graphic design, interior design, and planning engaged with City leaders and the public in the charrette. This was a major step in igniting redevelopment efforts in the City, allowing them to keep pace with redevelopment efforts in the three other surrounding cities that encompass the "Quad City/Shoals Area" (all of which have previously received brownfield assessment grants). The design focused on redeveloping the *Tuscumbia Commons*, a 300-foot-wide reservation of land around the perimeter of the Town's core. This reservation offers an important asset for Tuscumbia to position itself as a healthy community by using the feature as a continuous 5-mile circuit/path for pedestrians and cyclists around the downtown core. More than half of the town's residents live within a 5-minute walk of *The Commons*. The charette

identified redevelopment of brownfield sites as a component of the overall plan, and the former service station and commercial laundry priority sites are both located near *The Commons* greenspace. Developing the former gas station into a restaurant aligns with the NACOLG CEDS Goal II, III and V including the specific Goal V strategy of “providing brownfields redevelopment planning and technical assistance leading to assessments and redevelopment plans for sites suffering from real or perceived history of contamination” as a priority (pg. 27). This land use is entirely consistent with land City land use plans and community desires.

Priority Site 4, Former Bama Textile Mill, Haleyville. Haleyville has been seeking resources to redevelop this blighted industrial area to build back the job base, especially in the technical/technology sector. There is plenty of space and infrastructure available from all of the closed and abandoned industrial facilities such as the former Bama Textile Mill that were destroyed either tornadoes and fire. Haleyville needs to attract higher-paying and more skilled jobs to reinvigorate its economy. Removing the environmental stigma associated with this site and redeveloping it into a technical/technology-related business aligns with the NACOLG CEDS Goals I, Goal II, and V presented in *Section 1.b.1* above.

1.b. ii. Outcomes and Benefits of Reuse Strategy: There is a multitude of economic outcomes and other benefits to redeveloping the four priority sites, such as creating jobs and increasing the tax base. Redevelopment of the former Leighton Training School will benefit the community by restoring a historical landmark that holds great sentimental value to the community. Construction of a Community Center for area residents and senior citizens to come together and enjoy activities together will further help restore a sense of pride in the community. Converting a portion of the former school into office space should also spark new entrepreneurial business creation in Leighton and add more jobs in the community. In addition, the restoration of the existing building should reduce the threat of asbestos from spreading to the nearby population after assessment and abatement before redevelopment. Redevelopment of the school will also increase attendance at the Training School annual parade, increasing tourism dollars and awareness of what Leighton has to offer to others who utilize the Singing River Trail extension. Redeveloping the former Service Station in Tuscumbia into a restaurant or coffee shop across from the Railroad Museum will increase tourism to the downtown area and bring more retail taxes to the City. The restaurant will also serve to make downtown a more walkable environment. More importantly, any threat to the nearby water supply or the springs at Big Spring Park will be quantified through assessment, and if present, eliminated through cleanup efforts that began with assessment grant funds. Assessment of the former commercial laundry adjacent to the public housing complex in Tuscumbia will help determine if environmental impacts are present in soil and groundwater, and pave the way for redevelopment for potential greenspace for that community, tying in with the nearby *Commons* greenspace corridor that was highlighted as a key feature to economic development in the recent *DesignPlace* charette. Redeveloping the former Bama Textile Mill as part of a larger technology/technical corridor will create higher job wages than those offered by the manufacturers that previously dominated the area. Based on the number of jobs previously lost on the vacant parcels once occupied by thriving industries and businesses, the technology/technical corridor could easily bring hundreds if not thousands of jobs back to the area. In addition, the aesthetics of the entire area will be improved by the redevelopment since most of Alabama Avenue is now comprised of blighted buildings and vacant parcels with only concrete slabs and rubble remaining. The new corridor will also draw new skills and talent to the area that were effectively lost after many industries and businesses were closed following the tornadoes that previously devastated the area. The creation of additional greenspace and more walkable communities represents a good example of improvement in local climate adaptation/mitigation capacity through the reduction of vehicular traffic.

The path to all of these outcomes and benefits begins with environmental site assessments at the priority sites to remove environmental stigma, identify cleanup needs, initiate remediation, and obtain “No Further Action” status from ADEM so that redevelopment can begin. NACOLG will provide guidance to developers on the use of alternative energies, and energy efficient building practices and technologies at all of the priority sites and other projects within the Target Areas. No redevelopment projects will displace residents or existing businesses.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: As a long-time provider of financial support in the region, NACOLG has numerous avenues for securing funding for our communities to stimulate the availability of additional funds to support assessment/remediation and site redevelopment/reuse. Potential funding sources that can support our brownfield projects, include:

Funding Source	Potential Uses (Assessment/Cleanup or Reuse)
AL Dept. of Trans. Transportation Alternatives Program	Reuse: Leighton, a Target Area, received \$800,000 for improvements to downtown revitalization near one of the priority sites (Leighton Training School).
ADEM Section 128a Funding	Assessment/Cleanup: ADEM receives funds from EPA to conduct community outreach, Phase I and II ESAs, cleanup, etc. which is available to NACOLG upon request.
Alabama's CDBG Economic Development Program	Assessment/Cleanup and Reuse: Leighton anticipates award of a \$400,000 Community Enhancement grant to renovate the new at Leighton Training School priority site as a new Community Center/Senior Center. These funds can be used to abate asbestos and lead paint.

Appalachian Regional Commission	Reuse: Grant funding for infrastructure improvements, available for NACOLG region, and can be used at any of the priority sites.
Alabama Land Recycling Revolving Fund Program	Assessment/Cleanup: Low-interest loans to governmental entities on a competitive basis for the remediation of contaminated sites, and can be used at any of the priority sites.
NACOLG Revolving Loan Fund	Reuse: Gap loans to start-up and expand small businesses and industry. This could be used at any of the priority sites.
Jobs Tax Credit	Reuse: Provides 3% of the previous year's gross payroll for eligible employees for up to 10 years for jobs created after redevelopment of any of the priority sites.
Investment Tax Credit	Reuse: Cash rebate of up to 3% of the previous year's gross payroll for eligible employees for up to 10 years.
Existing Facility Tax Credit: Placed Back in Service	Reuse: Sales & use tax abatement of non-educational portion of sales & use taxes on construction materials, equipment, and other capitalized costs.
Growing Alabama Credit	Reuse: Up to \$5.5M available for approved projects when taxpayers make contributions to a local economic development organization.
Walker Area Community Foundation	Reuse: Provided capitol to the Haleyville Downtown Project Fund that will add life to the Haleyville community while creating an economic impact.

1.c.ii. Use of Existing Infrastructure: Infrastructure (roads, power, water, sewer, telecom) is present on all of the priority sites to support any new redevelopment. Rail access is also available at the former Bama Textile Mill. Using the existing infrastructure will ensure the reduction of raw materials needed for redevelopment and thereby help reduce the NACOLG Region's carbon footprint. NACOLG has access to other infrastructure-related funding sources such as CDBG grants from ADECA for other sites in the Target Areas should such resources be needed.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.A. COMMUNITY NEED

2.a.i. The Community's Need for Funding:

NACOLG is funded by federal matching grants, member government dues, an annual appropriation from the State of Alabama, and contract fees from the communities it serves. Low tax bases in our Region limit those revenue sources and therefore, the available funding for brownfields redevelopment projects. The communities themselves have limited funding for projects for the same reasons. The low tax base in our Region is rooted in a wide variety of problems that exacerbate each other, including small population size (all less than 10,000, one less than 5,000, and one less than 1,000); low income (far below the State and US levels); low property values; persistent poverty; a lack of workforce education/training; low labor force participation, and unemployment. Economic struggles from population loss and natural disasters have made it even more difficult. For example, Haleyville is only 78% of the size it was in 1980. Leighton is even worse, losing almost half of its population since 1980. Each of these towns also have a diminished workforce due to aging populations. At a minimum, 25% more elderly people are living in the Target Areas than the national average, leaving each small town with less workforce. In addition to these factors, all three towns suffer from low income and poverty. At best, the Per Capita Income (PCI) is close to 73% less than the national average in Haleyville. At worst, the PCI is close to 96% less than the national average in Leighton. Poverty levels are also far lower than the national average. The average poverty level for the three Target Areas is 21.1%, which is approximately 64% higher than the national average. The low income and small workforce affect the region's tax base, property values, and economics, which constricts each Target Area's budget for redevelopment projects. These economic conditions are demonstrated in the table below. This grant will help to fund brownfields reuse in these communities that cannot afford to address the properties on their own, and help to reverse these economic problems so that additional brownfields redevelopment can continue in the future.

Demographic & Economic Indicators	Haleyville	Tuscumbia	Leighton	Alabama	US
Population	4,343	8,977	687	4,987,675	329,725,481
Minority Rate	10.8%	31.64%	59.5%	33.0%	31.8%
Per Capita Income	\$21,682	\$21,846	\$19,119	\$30,457	\$37,637
Population Below 100% Poverty Rate	20.1%	22.1%	25.9%	15.8%	12.6%
Median Family Income	\$51,404	\$57,381	\$37,404	\$70,878	\$85,028
Children Below 200% Poverty Level	53.1%	52.9%	83.1%	44.7%	37.8%
Source: US Census, ACS, 2020 5-Year Estimates, Bold type indicates substantially worse indicators than the national average.					

In our 2022-2026 CEDS, we identified the lack of job opportunities and good pay among our chief weaknesses and threats to our Region. The people living in the Target Areas desperately need some good news. They need to hear that a grant from the federal government is going to be the kick-start needed to assess and clean up abandoned brownfield sites, which will help bring new employment opportunities with good-paying jobs to their cities. This EPA brownfield

grant will allow for each priority site to be assessed and remove the stigma of contamination. This is the first step in bringing redevelopment to the sites, which in turn will bring new job opportunities with good-paying jobs. We estimate that redevelopment of the former Leighton School will also affect tourism by drawing more people to Leighton to see this national historic site. The economy will immediately receive a shot in the arm from the estimated 70 jobs related to construction and renovation. More permanent jobs will be created by the new office space and the Senior Citizen Center and the Community Center. There is already a buzz of excitement (ignited by contacting community groups to partner on this project) about the prospect of this historic building being saved and restored. Redevelopment of the former service station in Tuscumbia is estimated to create 15 jobs, but even better, it should increase foot traffic downtown for tourism, which should help increase sales tax revenue to the City. Redeveloping the former Bama Textile Mill in Haleyville as part of a new technology/technical corridor could bring back hundreds if not thousands of jobs based upon the property's size. It could also be the catalyst that sparks redevelopment all along Alabama Avenue.

2.a.ii. Threats to Sensitive Populations;

(1) Health or Welfare of Sensitive Populations: NACOLG understands the threats to the health and welfare of sensitive populations living in the Target Areas. These sensitive populations are comprised of the elderly, minority children, people with disabilities, people with health conditions such as diabetes and heart disease, adults with generally poor health, and several others. A review of *EJScreen* data noted a substantial low-income population living within 1/4 mile of the priority sites. This low-income population was shown as high as 72% living near the Bama Textile Mill. These sensitive populations are likely more at risk from exposure to potential contaminants at the four priority sites and the many other brownfield sites within the Target Areas that need to be investigated. Key statistics demonstrating how these problems affect our sensitive populations are shown below:

Redevelopment in our Target Areas will help attract businesses, leading to more jobs and improved economic conditions that can help lower poverty rates and improve the lives and quality of life of sensitive populations.

Sensitive Population Indicators ⁴	Haleyville	Tuscumbia	Leighton	Alabama	US
Minority Rate	10.8%	31.64%	59.5%	33.0%	31.8%
Population with a Disability	20.4%	17.4%	27.1%	16.1%	12.6%
Children 0-4 years old	5.6%	8.0%	1.8%	5.9%	5.9%
Elderly Population 65 and older	16.2%	18.5%	20.5%	16.9%	16.0%
Populations with Diabetes	10.3%	12.7%	12.7%	11.5%	8.3%
Adults with Poor Physical Health over 18	21.0%	18.7%	18.7%	19.1%	15.2%

Furthermore, it is unknown what contaminants may be contributing to some of the health problems of the sensitive populations. Only through assessment of the brownfield sites can the impacts on sensitive populations be determined. For example, this EPA funding can determine if contaminants in groundwater are migrating toward the City well and the spring at Springs Park in Tuscumbia. It can help determine if contaminants are present in soil or groundwater at the former Bama Textile Mill or if asbestos from the former Leighton Training school is migrating to and impacting the surrounding sensitive populations with lung issues such as cancer and COPD.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: There is undoubtedly a greater incidence

Adverse Health Conditions	Haleyville	Tuscumbia	Leighton	Alabama	US
Infant Mortality ⁵	10.0	9.0	9.3	8.0	5.6
Asthma Prevalence ⁶	10.6%	10.4%	10.8%	10.5%	8.7%
Cancer Incidence Rate ⁷	528.3	460.4	447.6	440.7	442.3
Cancer Mortality Rate	182.7	178.4*	178.4*	167.3	149.4
Lung Cancer Incidence Rate	80.7	69.5	67.2*	60.1	54.0
COPD Medicare Population	22.6%	17.8%	17.8%	13.7%	11.5%
Mortality Lung Disease	78.4	71.5*	71.5*	56.0	39.1
*Denotes only county rate available					

(3) of certain diseases and adverse health conditions within the three Target Areas, and it is possible that these conditions may have some link to contaminants likely present at the priority sites. For example, the incidence of cancer in Haleyville is close to 30% higher than the national average, which could be caused by industrial contamination at sites such as the former Bama Textile Mill. Mortality

rates for lung cancer in the three Target Areas range from 19 to 22% higher than the national average. Lung cancer rates in Haleyville are 48% higher than the national average. In comparison, rates of COPD are 16% higher than the national average, indicating that there may be a particulate issue associated with the former mill and other brownfield sites destroyed by tornadoes. The areas near the mill site and the former gas station site have relatively large values for respiratory toxins, being ranked in the 74th percentile in the nation. The fact that infant mortality rates in the three

⁴ Community Health Needs Assessment 2022

⁵ University of Wisconsin , Population Health Institute, County Health Rankings, 2014-2020

⁶ Centers for disease Control and Prevention, Behavioral Risk Factor Surveillance System

⁷ Centers for disease Control and Prevention, National Vital Statistics System

Target Areas range from 63 to 75% higher than the national average is also alarming. In addition, *EJScreen* indicates a high lead paint value (77th percentile) for Leighton, which could contribute to 42% higher kidney disease than the national average⁸.

It is important to assess the brownfield sites to establish whether a link exists between the contaminants and the health conditions documented in the Target Areas that are worse than the national average. Only then can these health conditions be lessened through remediation of the priority sites and the dozens of other brownfield sites in the Target Areas. The threat of airborne contaminants is genuine, given the deteriorating conditions of some brownfield sites like the Leighton School, where most windows have been broken.

(3) Environmental Justice

3.(a) Identification of Environmental Justice Issues. Each of the three Target Areas are located either in areas categorized as “at risk” or “distressed,” according to the Economic Innovation Group⁹. The Haleyville and Tuscumbia Target Areas also fall within mapped disadvantaged communities according to *Justice40* Tract Maps¹⁰. Haleyville is considered disadvantaged according to the Climate and Economic Justice Screening Tool (CEJST). Studies have shown that disadvantaged populations encounter greater susceptibility to environmental hazards.¹¹ The *Justice40* Initiative describes “Disadvantaged Communities” by several characteristics, which include low income, higher populations of minorities, higher rates of health disparities, poorly maintained housing, children receiving free lunch programs, high asthma rates, and others. Each of the three Target Areas have at least half of these 13 characteristics. They all have low-income populations, higher asthma rates, and higher rates of other health disparities. Contaminants may be present at the brownfield sites within the Target Area that could be adversely impacting these underserved communities.

3.(b) Advancing Environmental Justice Issues This grant will promote environmental justice in the Target Area of Haleyville by addressing the Former Bama Textile Mill and other brownfield sites along Alabama Avenue. Assessments funded through this grant will provide information necessary to facilitate future cleanup and redevelopment. Revitalization of this site will be achieved by removing partially burned and collapsing structures, thereby making it more attractive for new businesses interested in locating in this reinvented technology/technical business corridor. The higher-paying jobs should also help raise income levels (PCI) and protect the surrounding community from contaminants such as PFAS through remediation if needed. Environmental justice will be promoted in Tuscumbia by addressing the petroleum and lead contaminants that may be migrating toward the town’s water supply and natural springs at Tuscumbia Spring Park. Environmental justice will be promoted in Leighton by assessing lead paint and asbestos issues in this low-income/high-minority area and providing important planning and cost estimating for cleanup of these contaminants. The grant will address environmental issues and promote a greater sense of community through the development of the historic Black Leighton Training School into a local Senior Center, Community Center, and office complex that will create more jobs for the local economy. The proposed work will not result in displacement of residents or businesses in the underserved communities in the Target Areas.

2.b. Community Engagement

2.b.i. Project Involvement & 2.b.ii. Project Roles Each of our Target Areas will be represented by community partners who will have meaningful involvement in the project. The NACOLG has assembled a diverse group of local partners, representing a wide variety of interests and types of assistance, who are invested in the success of this brownfield program and will actively be engaged with NACOLG on this project. Community partners will be involved in making decisions with respect to site selection, cleanup, and future reuse of the brownfield sites, including priority sites, as well as connecting the community to the project.

Name of Organization	Point of Contact (name & email)	Specific Involvement in the Project or Assistance Provided
Muscle Shoals National Heritage Area	Cathy Wood Msaha@una.edu	Input on historic preservation and sustainable reuse strategies in Tuscumbia Target Area
AL Department of Economic and Community Affairs	Kenneth Boswell kenneth.boswell@adeca.alabama.gov	Will attract potential developers to consider redeveloping available brownfield sites and help choose options for future reuse.
Leighton Training School Community Service Org.	Frankie F. Hogan [REDACTED]	Community outreach; Advocate for the revitalization of Leighton Training School; Future reuse strategies.
Wells of Hope	Otis Johnson jjbjenterprises@aol.com	Community outreach; Connect community and sensitive populations to the project.

⁸ ATSDR ToxFAQs CAS# 7439-92-1

⁹ <https://eig.org/distressed-communities/2022-dci-interactive-map>

¹⁰ <https://www.arcgis.com/home/item.html>

¹¹ Sexton et al. 1993

Shoals Chamber of Commerce	Caitlin Holland cholland@shoalschamber.com	Mobilize local businesses and community to support redevelopment.
Moving Leighton Forward in Unison	Angela Jackson angela@mlfiu.com	Community outreach; advocate for the revitalization of Leighton; future reuse strategies.
Main Street Alabama	Mary Helmer mary@mainstreetalabama.org	Nonprofit org. focusing on broad community engagement, and strategies that create jobs, spark new investment, attract visitors, and spur growth.
Haleyville Chamber of Commerce	Mike Evans, President mevans@vicnow.com	Site selection, cleanup, and future use input; Mobilize local businesses and community to support redevelopment.
AIDT	Ed Castille ecastille@aidt.edu	Workforce development: will advise the community of job training resources to meet reuse job opportunities.
Alabama Brownfields Association	Russ Griebel admin@albfa.org	Brownfields education. ADEM negotiation. Resource sharing.

2.b.iii. Incorporating Community Input: Meaningful community input is vital for the success of this brownfield program and such input will be solicited and encouraged from the underserved communities and residents in several ways. NACOLG will facilitate community meetings at least annually, one in each of our Target Areas, to ensure project connectivity throughout the Target Areas. In addition, in the first quarter of the project, NACOLG will host a Brownfields 101 educational session held in a central location. The communities will be invited and encouraged to attend our brownfield meetings through various methods, including city websites, social media, newspapers, and the distribution of flyers. Adjacent property owners of priority brownfield sites will be personally invited to community meetings. An interpreter will be available as needed. A brownfields website will be created to communicate project details and progress. Community input will be encouraged through visioning sessions and collaborative discussions, where we will hear from residents what brownfield sites and reuse strategies are most important to the community. All input from the community will be reviewed and considered by NACOLG. Since we believe the community input received will need a response, the project manager will track the communications to ensure a reply is delivered within a reasonable amount of time (up to 1 week). Answers will be posted on Target Areas' City websites and on NACOLG's. In addition to community meetings, a Brownfields Advisory Committee (BAC) will be formed comprised of community partners, local real estate agents, community organizations, City Council members, planning departments, local business owners, and key stakeholders representing each Target Area. The BAC will meet annually and up to quarterly if needed. The BAC will assist with creation of a Community Involvement Plan (CIP), and assist in site selection, clean up and reuse strategy. If in-person meetings are not advised, or social distancing is required, NACOLG will provide virtual and digital outreach alternatives and adhere to social distancing guidelines.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs: NACOLG will manage the grant by tracking tasks, schedules, costs and outputs by Project Management, Community Outreach, Assessments, and Planning, as presented in the following table.

Task 1: Project Management
<u>i. Project Implementation:</u> NACOLG will be managing this grant. Management tasks will include completing the EPA Grant Application Package (SF424B, 4700B 6600, 5700, etc.); a Work Plan; preparation of quarterly, semi-annual, annual, and final closeout reports; ACRES database reporting; financial reporting, and meetings and communication with EPA. NACOLG has selected a Qualified Environmental Professional (QEP) through a qualifications-based procurement process in compliance with 2 CFR 200, 2 CFR 1500 requirements, and 40 CFR Part 33. The QEP will assist with program management tasks in addition to performing the technical aspects of the project, such as environmental assessments and remediation planning.
<u>ii. Anticipated Project Schedule</u> Cooperative Agreement and Work Plan (1 st Quarter), 1 Kickoff Meeting (1 st Quarter), 2 City personnel at 2 Brownfield Conferences (1 st and 5 th Quarter), 16 Quarterly reports (four per year for the duration of the project), ACRES updates (quarterly or per completed task), annual reports (DBE, FFR), and one final report submitted at the project's conclusion, and post-close out data collection (ACRES).
<u>iii. Task/Activity Lead:</u> NACOLG will lead this task with assistance from the QEP NAN
<u>v. Outputs:</u> Work Plan, 4 MBE/WBE reports, 15 quarterly reports, 1 final report, ACRES database updates, regular drawdowns.
Task 2: Community Outreach
<u>i. Project Implementation:</u> The initial brownfields inventory will be finalized, The QEP will complete Eligibility Determinations for the sites selected for assessment by reviewing environmental records, property records, and historical documentation for prior uses and concerns. GIS will be used to record inventory. Meaningful community input will be implemented by NACOLG, with assistance from the BAC and QEP, which will begin with preparation of a Community Involvement Plan (which will be updated throughout the project period as needed/as appropriate) and an initial community meeting that will serve as a Brownfields 101 educational session for the Target area communities, We will continue to connect and engage the community in our Target Areas, including updating brownfield inventories based on community feedback.

ii. Anticipated Project Schedule: The CIP will be submitted during Quarter 1 of the grant. The GIS-based site inventory will be updated by the 30 th of each month. The BAC will meet at least annually. Community meetings will be held tri-annually, one in each Target Area, not including the kickoff meeting.
iii. Task/Activity Lead(s): NACOLG with BAC and QEP assistance.
iv. Outputs: 4 community meetings; 4 BAC meetings, Eligibility Determinations, Access Agreements, GIS Inventory, CIP, and updates to the brownfields websites.
Task 3: Assessments
i. Project Implementation: The QEP will begin by preparing a Generic Quality Assurance Project Plan (QAPP). Phase I ESAs will be conducted in accordance with EPA’s standard for All Appropriate Inquires (AAI) and the practices in ASTM Standard E1527-21. Phase II ESAs will typically consist of collecting and analyzing soil, groundwater, surface water, and /or suspect asbestos-containing material (ACM) to determine if past uses have impacted the sites.
ii. Anticipated Project Schedule: The Generic QAPP will be completed in Y1, Q1. The 3 priority site Phase Is will be conducted in Y1, Qs 2-4. The three priority Phase IIs will be conducted in Y2, Q1-4. The remaining Phase I ESAs on additional non-priority sites will be conducted in Y2, Q 1-4. If needed, Phase IIIs will also be conducted in Y 3 and 4 Qs 1-2
iii. Task/Activity Lead(s): NACOLG, with support from the QEP.
iv. Outputs: 1 GQAPP, 18 Phase I ESAs, 8 SSQAPPs, 8 Phase II ESAs, 2 Phase IIIs
Task 4: Planning
i. Project Implementation: NACOLG will rely on the QEP to perform cleanup planning activities that may include Analysis of Brownfields Cleanup Alternatives (ABCAs), development of Remedial Action Plans (RAPs) and redevelopment planning. ABCAs for each site will include an analysis of three different remedial alternatives and a cost/benefit analysis for each alternative. We also propose a Market Study be conducted to help determine economically feasible options for the redevelopment of the brownfield sites.
ii. Anticipated Project Schedule Outputs: 4 ABCAs are anticipated following completion of Phase II ESAs in the first two years of the grant. 1 Market Study for market viability of the brownfield sites will be completed by Q8 of the grant.
i.v. Task/Activity Lead(s): QEP

3.b. Cost Estimates*: Below are the anticipated cost estimates for each project task activity.

Budget Categories	Project Tasks (\$)					Totals
	Task 1 Management	Task 2 Outreach	Task 3 Assessments	Task 4 Planning		
Personnel	\$11,000	\$3,300	-	-	-	\$14,300
Fringe Benefits	-	-	-	-	-	-
Travel	\$10,500	-	-	-	-	\$10,500
Equipment	-	-	-	-	-	-
Supplies	-	\$1,100	-	-	-	\$1,100
Contractual	\$24,500	\$17,500	\$387,100	\$45,000	-	\$474,100
Construction	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total Direct Costs	\$46,000	\$21,900	\$387,100	\$45,000	-	\$500,000
Indirect Costs	-	-	-	-	-	-
TOTAL BUDGET	\$46,000	\$21,900	\$387,100	\$45,000	-	\$500,000

Task 1- Program Management Cost Breakdown: Total: \$46,000. NACOLG will charge \$11,000 for Task 1 Personnel (200 hours x \$55 per hour). The travel budget is \$10,500 for two personnel to attend three conferences: Conference registration at \$200/conference x 2 people x 3 conferences = \$1,200; Airfare at \$500/flight x 2 people x 3 conferences = \$3,000; Hotels at \$200/ night x 3 nights x 2 people x 3 conferences = \$3,600. Per Diem at \$150/night x 3 nights x 2 people x 3 conferences = \$2,700. Contractual: \$24,500 budgeted for an average

professional rate of \$175/hour x 140 hours.

Task 2- Community Outreach Cost Breakdown: Total: \$21,900. Contractual: \$17,500 (average professional rate of approximately \$175/hour x 100 hours including CIP preparation), plus meeting preparation by NACOLG (60 hours x \$55 per hour) = \$3,300. Supplies: Community meeting materials = \$1,100.

Task 3- Site Assessments Cost Breakdown: Total: \$387,100. One generic QAPP = \$6,000. 18 Phase I ESAs at \$5,300 each = \$95,400; 8 Phase II ESAs (including SSQAPPs) at \$28,000 each = \$224,000; and 2 Phase IIIs at \$30,850 each = \$61,700.

Task 4- Cleanup Planning Cost Breakdown: Total \$45,000. Contractual: Identification of cleanup options and costs, and completion of 4 ABCAs at \$6,000 each = \$24,000. One Market Study = \$21,000.

*86% of grant funds will be allocated for tasks/activities directly associated with Phase I/II/III assessment and site-specific cleanup planning.

3.c. Plans to Measure and Evaluate Environmental Progress and Results: NACOLG will work in conjunction with the QEP to track, measure, and evaluate progress to ensure expected outputs, outcomes, and results are achieved reasonably, and appropriately. A project work plan with timelines, milestones and project outputs will be developed to facilitate progress is up-to-date. NACOLG, along with the QEP, will track the following: the number of community outreach events with the number of people attending, the number of Phase I, Phase II, and Phase III ESAs (contaminant delineation) completed; the number of ABCAs and cleanup plans completed; the amount of sites and acres of property redevelopment; acreage of greenspace created; the amount of private investment leveraged; the amount of other funding leveraged; number of jobs created/retained from redevelopment projects; increased property/sales tax

revenue generated; and the increase of property values. We will use reporting requirements, such as quarterly reporting, to ensure the project’s outputs and outcomes are on track. Corrective measures will be taken if we see that a project milestone has not been completed on schedule in order to put the project back on track.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE; 4.a. Programmatic Capability

4.a.i. Organizational Capacity, ii. Organizational Structure, and iii. Description of Key Staff: NACOLG will lead this Brownfield project with the support of our knowledgeable team, including our Economic Development Department, Community Development Department, Community Planning Department, and Financial Department. We have extensive experience in redevelopment projects and are equipped with the expertise to successfully manage and carry out the programmatic, administrative, and financial requirements of the project. We can draw from our competent staff to ensure timely and successful expenditure of funds to complete all technical, administrative, and financial requirements of the project and grant. Key staff members with the expertise, qualifications and experience to implement the successful administration of this grant include: Joseph E. Holt, the Director of Planning and Transportation at NACOLG, who will serve as the Project Director. Mr. Holt plans and implements economic and community development projects, grants, planning, and technical assistance programs. Director of Governmental Services, Tiffany Boyd, will serve as backup to the Project Director. She serves as the program coordinator for the five-county region to assist local governments with applications and projects and oversees and coordinates NACOLG’s Revolving Loan Program, and administers CDBG, FEMA, and numerous other projects. Tiffany has been with NACOLG for the last 10 years and holds a Bachelor of Architecture from Mississippi State University. Liese Sasser, Financial Director at NACOLG with degrees in business management and accounting, will assume financial administration and reporting responsibilities.

4. a.iv. Acquiring Additional Resources: While NACOLG has significant experience managing federal funds and bringing resources to our member communities, we elected to proceed with contracting a QEP to assist us with the environmental/technical portions of the brownfield project. The QEP will assist us with certain grant management tasks; inventories, community outreach and grant promotion; environmental assessments, cleanup planning, and other eligible tasks, and compliance with EPA reporting requirements. The QEP was selected through a fair and open competitive process according to the requirements of 2 CFR 200, 40 CFR Part 33, and procurement guidance documents produced by the EPA, and is thoroughly described in the Threshold Document accompanying this application. NACOLG ensured that the selected firm promotes strong labor, diversity, equity and inclusion practices that include Disadvantaged Business Enterprises (DBEs) and local subconsultants/subcontractors on their team. Both price and qualifications were considered in the selection. No subawards are anticipated, but if needed, will comply with EPA’s Subaward Policy.

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;

4.b.ii.(1) Purpose and Accomplishments: NACOLG has extensive experience in managing federal and state grants as a service to our community members, recent examples included below:

Agency/Organization	Amount	Purpose and Accomplishments/Outputs and Outcomes
Alabama Department of Economic and Community Affairs (ADECA) (2022)	\$118,767	For construction of new and resurfacing of existing tennis courts at Rogersville park. Resulted in creation of additional recreational space, and additional exercise opportunities, which helped improve community health as well as drive more residents and sports teams to the park, creating economic gains for local businesses.
Appalachian Regional Commission (ARC) (2023)	\$350,000	For sewer improvements at the Russellville treatment plant. Created new aerators, baffle curtains, piping, and mechanical/electrical upgrades, leading to reduction in energy maintenance expenses, in addition to surface stream water quality improvements by ensuring compliance with NPDES discharge permit requirements.
Economic Development Administration (EDA) (2021)	\$2,500,000	For renovations at the Winfield Intensive Care Unit & Emergency Department to prepare for, respond to, recover from Covid 19. Created ADA-compliant improvements to 60-year-old hospital access points/corridors and negative pressure systems, new treatment and medication rooms, resulting in reduction in Covid infection rate for workers and patients, thus improving health and creating nine jobs.
Community Block Development Grant	\$450,000	For water, sewer, drainage and street Infrastructure improvements at the Ragsdale Public Housing Complex. Resulted in greatly needed improvements for the 165 low-income residents.

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, and terms and conditions as required by the terms and conditions of each grantor. All reporting has been completed on schedule, and the outputs and outcomes have been or are being met as presented in the grant application for each awarding agency.

THRESHOLD CRITERIA FOR COMMUNITY-WIDE ASSESSMENT GRANT
Northwest Alabama Council of Local Governments
FY 2024

1. Applicant Eligibility

- a. The applicant for this EPA Community-Wide Assessment Grant is the Northwest Alabama Council of Local Governments (NACOLG). We are eligible for this EPA Brownfields Community-Wide Area (CWA) Grant as an authorized state planning and development district per a State Act in 1969, and amended in 2011 (See Attachment A).
- b. NACOLG is not a 501(c)(4) organization, but is exempt from Federal taxation.

2. Community Involvement

Meaningful community input is vital for the success of this brownfield program and such input will be solicited and encouraged in several ways. NACOLG will facilitate community meetings at least annually, one in each of our Target Areas, to ensure project connectivity throughout the Target Areas. In addition, in the first quarter of the project, NACOLG will host a Brownfields 101 educational session held in a central location. The communities will be invited and encouraged to attend our brownfield meetings through various methods, including city websites, social media, newspapers, and the distribution of flyers. Adjacent property owners of priority brownfield sites will be personally invited to community meetings. An interpreter will be available as needed. A brownfields website will be created to communicate project details and progress. Community input will be encouraged through visioning sessions and collaborative discussions, where we will hear from residents what brownfield sites and reuse strategies are most important to the community. All input from the community will be reviewed and considered by NACOLG. Since we believe the community input received will need a response, the project manager will track the communications to ensure a reply is delivered within a reasonable amount of time (up to 1 week). Answers will be posted on Target Areas' City websites and on NACOLG's.

In addition to community meetings, a Brownfields Advisory Committee (BAC) will be formed comprised of community partners, local real estate agents, community organizations, City Council members, planning departments, local business owners, and key stakeholders representing each Target Area. The BAC will meet annually and up to quarterly if needed. The BAC will assist with creation of a Community Involvement Plan (CIP), and assist in site selection, clean up and reuse strategy. If in-person meetings are not advised, or social distancing is required, NACLOG will provide virtual and digital outreach alternatives and adhere to social distancing guidelines.

3. Expenditure of Existing Grant Funds

NACOLG does not have an open EPA brownfields assessment grant, and has never received one.

4. Contractors and Named Subrecipients

NACOLG has elected to proceed with selection of an environmental consulting and engineering firm (Contractor) to assist us with preparation the EPA Community-Wide Assessment Grant proposal and to assist with the technical aspects of implementing the grant after it is awarded. In securing a firm, we followed our normal procedures for procuring professional services, EPA procurement procedures and applicable sections of the 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 federal procurement standards. Our process included the following:

- Review of Qualifications (RFQ) documents available posted by other cities, regional councils, nonprofits, etc.
- Creating an RFQ document for our organization and brownfield program needs. The RFQ listed the types of services needed, including assistance with grant writing, environmental experience, and cost, and encouraged inclusion of disadvantaged business entities.

- Advertising the RFQ in *The Times Daily*, a widely-circulated newspaper /online publication that covers our region, which is consistent with our normal practices. The solicitation was left open for 30 days.
- NACOLG received two submittals from interested firms.
- We created a selection committee and evaluation form to review the submittals, and selected the highest scoring firm, PPM Consultants, to assist us.
- We then negotiated a contract with the selected firm, which included cost/fee estimates for projected tasks.

Complete documentation on our procurement process is included as Attachment B.