

Narrative Information Sheet

1. **Applicant Identification:** Craig Field Airport and Industrial Authority
P.O. Box 1421
Selma, Alabama 36702

2. **Funding Requested:**
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$556,000

3. **Location:**
 - a. City: Selma
 - b. County: Dallas County
 - c. State: Alabama

4. **Property Information:**
 - **Craig Field Gym Complex Site**
Building 316, Avenue C
Selma, AL 36701

5. **Contacts:**
 - a. Project Director:
James Corrigan
334-412-3154
craigairport@belsouth.net
Building #48 Fifth Street
Selma, AL 36701

 - b. Chief Executive/Highest Ranking Elected Official:
James Corrigan
334-412-3154
craigairport@belsouth.net
Building #48 Fifth Street
Selma, AL 36701

6. **Population:**
Selma, Alabama - 18,429 (2021 American Community Survey 5-Year Estimates Data Profiles, US Census)

7. **Other Factors Checklist:**

<u>Other Factors</u>	<u>Page #</u>
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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 proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	p.3
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. **Releasing copies of Application** – Not applicable. No confidential, privileged or sensitive information is presented in the grant application

NARRATIVE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area:

The City of Selma is located in the heart of Alabama’s Black Belt region just 50 miles west of Montgomery. Selma serves as the county seat of Dallas County and is perched on a high bluff that overlooks the Alabama River. The area’s rich, dark soil is where the Black Belt Region received its original moniker. When the iconic cotton plantations of the South began to appear throughout the area in the 19th century, a significant number of enslaved African Americans were brought in to tend and harvest the crops, giving extra meaning to the name “Black Belt.” Since that time, Selma has played a significant role in the American Civil Rights Movement and is well-known for being the scene of the notorious “Bloody Sunday” attack on civil rights marchers by law enforcement in 1965. In that same year, Martin Luther King Jr. led a famous march that started in Selma and continued all the way to Montgomery.

Selma is one of Alabama’s oldest surviving cities.¹ It is also one of Alabama’s fastest shrinking cities,² with a population decline of more than 11% since 2010.³ Just four miles southeast of Selma is the historical Craig Air Force Base, a former pilot training facility operated by the U.S. Air Force from 1940-1977. The Base was once among the busiest airfields in the country, and it housed a population of approximately 5,000. During its booming operational years, the Base brought bustling activity and prosperity to this community, filling local stores and businesses with crowds of customers. The Base closure in 1977 had a ripple effect that Selma residents can still feel today, more than 40 years later. The City’s economy never recovered from the loss of so many local jobs and so much revenue.⁴ Today, **Selma has a per capita income of just \$19,262⁵, and 56% of the population is considered low income.⁶** The City also has one of the highest crime rates in the entire country.⁷ Blight and dilapidation have become an enormous problem, with abandoned houses and decaying structures riddled throughout the area.⁸ The City’s struggles were further exacerbated when a massive tornado ripped through the community in January 2023. Selma was already struggling with a housing crisis due to so much crumbling infrastructure, and after the tornado blazed a trail a destruction, hundreds of people were displaced.⁹ Porches and roofs have been ripped from buildings. The tornado flung trees into people’s bedrooms and living rooms. Tree trunks can still be seen jaggedly protruding from windows. The Selma community is clearly feeling the devastating impact of brownfield challenges through prolonged issues of poverty, unemployment, a housing crisis, stunted economic development, and rampant crime. The White House Environmental Justice Advisory Council’s Justice40 Initiative identified Alabama’s Black Belt region as an Environmental Justice Community that needs a “whole of government” approach to address the need for federal investments to improve air and water quality, and basic health services.¹⁰

Our Target Area for this cleanup application is the former Craig Air Force Base, which is now known as Craig Field Airport and Industrial Complex (Craig Field). The facility is now a civilian-run airport owned and operated by Craig Field Airport and Industrial Authority (CFAIA). Spanning 1,790 acres, Craig Field is located within Census Tract 01047957301 and is bordered by Highway 80 to the northeast, County Road 145 to the south, and State Route 41 to the west. Like much of Selma, Craig Field has become a hollow shell of what it once was. Roofs are collapsing, buildings are falling apart, and the bustling base

¹ [Selma: One Of The Oldest Surviving Cities In Alabama \(onlyinyourstate.com\)](https://www.onlyinyourstate.com/alabama/selma-one-of-the-oldest-surviving-cities-in-alabama/)

² [Selma remains fastest shrinking city in Alabama | News | selmasun.com](https://selmasun.com/news/selma-remains-fastest-shrinking-city-in-alabama/)

³ [U.S. Census Bureau QuickFacts: Selma city, Alabama](https://www.census.gov/quickfacts/selma-city-alabama)

⁴ [EXTRA: Craig Air Force Base: 40 Years Later - Alabama News](https://www.alabamianews.com/news/extra-craig-air-force-base-40-years-later)

⁵ US Census, ACS, 2021 5 Year Estimates

⁶ EJ Screen Report for City of Selma

⁷ [Selma, AL Crime Rates and Statistics - NeighborhoodScout](https://neighborhoodscout.com/crime-rates/selma-al)

⁸ [Dilapidated Houses & Neglected Property Remain a Problem in Selma - Alabama News](https://selmasun.com/news/dilapidated-houses-neglected-property-remain-a-problem-in-selma)

⁹ [Selma struggles to solve biggest post-tornado crisis: Housing | News | selmasun.com](https://selmasun.com/news/selma-struggles-to-solve-biggest-post-tornado-crisis-housing)

¹⁰ “Justice40 Climate and Economic Justice Screening Tool & Executive Order 12898 Revisions, Interim Final Recommendations.” White House Environmental Justice Advisory Council. May 13, 2021. pp21-22.

that was the lifeblood of Selma’s once vivacious character, is now crumbling. It is adjacent to some of the poorest and most underserved neighborhoods in the City, with a **99% minority population and a per capita income of just \$15,597 within a ½-mile radius of Craig Field** (almost 20% less than the City’s already low per capita income).¹¹ In the years since CFAIA obtained control of Craig Field in 1977, various businesses have leased some of the building on the Flight Line and in the Industrial Complex, but precious few remain today because they could not creatively overcome the gruesome scene of blight and decay just outside their windows. CFAIA plans to redevelop a 0.5-acre parcel referred to as the Gym Complex Site. This site will be redeveloped as recreational greenspace, a reuse strategy that will eliminate unsafe eyesores in close proximity to residential communities; remove environmental contaminants that are endangering nearby sensitive populations; and promote healthier lifestyles for the disadvantaged target community in Selma.

ii Description of Proposed Brownfield Site(s):

The Craig Field office is located at Building 48 Fifth Street, approximately four miles southeast of Selma on the former Craig Air Force Base. The airport is outfitted with three large, usable hangars, 62 acres of concrete airplane parking, and an 8,000-foot runway capable of holding both commercial and cargo aircraft. On the property, former military housing units have been converted to a residential neighborhood called Pine Glen, and the Bruce K Craig Elementary School is still operational, now serving as a civilian-run county school.

Our Gym Complex Site consists of a 0.5-acre parcel of land at the southwest entrance to Pine Glen. Situated on this site is a historical gymnasium (Building 316) that was once used as a recreational facility by former base personnel. A Phase I ESA was completed at the Gym Complex in September 2021, and a Phase II ESA was completed in 2022, documenting the presence of asbestos-containing materials (ACM) in building materials. This structure has met a devastatingly grim fate. The roof of the former gym is entirely collapsed, and crumbled roofing materials that likely contain ACM are covering the floors. Located adjacent to the residential community, Pine Glen, the former gym is not secured and presents a grave danger for curious children living and attending school nearby who may easily wander inside and get hurt. In addition to the lack of structural integrity posing a safety threat of its own, there is a significant danger of exposure to friable asbestos that may blow into nearby neighborhoods due to the dilapidated conditions.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans:

For the Gym Complex Site, CFAIA has analyzed multiple reuse strategies. Based on input from the community and the site’s proximity to the Pine Glen neighborhood and Bruce K Craig Elementary, we have determined that this property is well positioned for development as recreational greenspace that the neighboring communities can enjoy.

The public (including underserved communities) and project partners are fully on board with our reuse strategy and have been a part of the planning process through outreach meetings and extensive coordination with the City of Selma during the development of their *Comprehensive Community Master Plan*. Community visioning sessions were held by the City during the development of this Plan, and input from the community indicates that more greenspaces, community gardens, and playgrounds are among the top priorities of City residents. Selma’s *Comprehensive Community Master Plan* specifically lists expansion and development at Craig Field as a priority goal. Dilapidated base structures are a danger to children living and attending school nearby, and they are a stark reminder of loss for older generations. Redevelopment as greenspace will result in the removal of blight that lingers in this neighborhood, it will be a beacon of positive change for the community, and it will encourage improvements to the physical and mental wellbeing of the city’s disadvantaged populations by promoting active, healthier lifestyles.

ii. Outcomes and Benefits of Reuse Strategy:

Cleanup of the Gym Complex Site and development as greenspace will have numerous outcomes and benefits for the community. By improving the appearance of this run-down area, neighboring property

¹¹ EJ Screen ACS Summary Report – ½-mile radius around Craig Field

values are expected to increase, and more developers will be attracted to the area, opening up employment opportunities for local residents. Impressive health impacts have also been linked to these outdoor recreational spaces, such as improved cognitive development and functioning, reduced severity of attention deficit disorders, reduction in obesity, improved overall health outcomes for those suffering from chronic and acute health conditions, and positive effects on mental health. Current safety hazards that are putting young children and families at risk will be removed through this reuse, and active, healthy lifestyles will be nurtured and encouraged.

This grant will also significantly improve local climate mitigation capacity. Greenspaces are very beneficial to the environment because they filter dust and pollutants from the air, offer shade and help to keep urban areas cool, and prevent soil from eroding into waterways. Other greenspace advantages include helping regulate air quality and climate by reducing energy consumption by countering the warming effects of paved surfaces, recharging groundwater supplies and protecting lakes and streams from polluted runoff. The proposed redevelopment will also reduce carbon emissions because it will provide a park-like destination within walking distance of local neighborhoods, eliminating the need to drive long distances to enjoy such places.

c. Strategy for Leveraging Resources:

i. Resources Needed for Site Characterization:

Site characterization has been completed at the Gym Complex Site, including a Phase I and Phase II ESA. The level of assessment is expected to be sufficient for cleanup to begin; however, if additional characterization is needed, CFAIA will seek assistance from Alabama Department of Environmental Management (ADEM) Section 128(a) funding program. ADEM has indicated in their Support Letter that such funds are available on a first-come/first-serve basis, and CFAIA will request such funding should additional assessment be necessary.

ii. Resources Needed for Site Remediation:

CFAIA anticipates that EPA funding requested in this application will be sufficient to complete the cleanup of the Gym Complex Site. Cost estimates were prepared with input from an environmental professional with extensive experience in brownfields cleanup projects. These costs were presented in draft versions of Analysis of Brownfields Cleanup Alternatives (ABCA) that has been recently updated (in October 2023) for the Gym Complex Site to reflect current market rates.

iii. Resources Needed for Site Reuse:

To complete the reuse of the Craig Field Gym Complex Site, CFAIA plans to contact the following organizations for greenspace development assistance: Land and Water Conservation Fund; Department of Agriculture Community Facilities Grant Program; HUD Community Development Block Grant (CDBG) program and the National Park Service Rivers, Trails, and Assistance program. In addition, CFAIA will seek funding through the Alabama Department of Economic and Community Affairs (ADECA), which offers Enterprise Zone tax incentives for the purchases of construction-related materials, machinery and equipment used in development projects, and Dallas County is considered an Enterprise Zone. Congress is also pursuing billions in funding to improve infrastructure and basic health needs in the Black Belt Region, which is another avenue of funding that could enhance CFAIA's reuse strategies.

iv. Use of Existing Infrastructure: Sufficient infrastructure, including power, utilities, water and sewer, is already present to support the anticipated redevelopment at the Gym Complex Site. No other infrastructure is anticipated to be necessary for new development at Craig Field.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: Selma is a small community of 18,429 that is rapidly getting smaller, losing over 11% of its population since 2010.¹² A key factor in our population decline is a lack of high-paying jobs in the local community. With a low **per capita income that is just over half the**

¹² [U.S. Census Bureau QuickFacts: Selma city, Alabama](#)

national average and a high poverty rate that is more than twice the national average, our community is facing real challenges with poverty and **low income**. The **unemployment rate in Selma is more than three times the national average**, and the rate of SNAP food benefits is **nearly three times the national average**. Loss of considerable revenue when Craig Air Force Base closed in 1977, along with the closing of

Economic Indicators	Selma	Dallas County	Alabama	US
Per Capita Income ^a	\$19,262	\$20,747	\$30,457	\$37,637
Poverty Rate ^a	29.41%	24.31%	15.79%	12.63%
Unemployment Rate	12% ^b	9% ^b	2.3% ^a	3.8% ^a
SNAP Food Benefits Rate ^a	36%	36%	15.2%	12.6%
^a US Census, ACS, 2021 5 Year Estimates				
^b EJ Screen Report				

other businesses that catered to Base personnel, created a significant economic deficit in the City that continues to be a major issue today. The derelict conditions at Craig Field have caused more than 20 revenue-generating opportunities for commercial development to fall through in the past 6 years alone, creating significant budget shortfalls. These are the reasons why CFAIA and the local community has an inability to fund environmental remediation at the Gym Complex Site. The former base structure is not only an eyesore, but also a current environmental and safety hazard. CFAIA’s reuse strategies will alleviate environmental and safety concerns and provide a recreational greenspace that encourages active, healthy lifestyles.

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

As shown in the following table, sensitive populations including children, minorities, women, the disabled, the obese, and those suffering from poor health, abound in our target community. The health and welfare of these sensitive populations in Selma is largely influenced by poverty, food insecurity, crime, and limited access to health resources. The City has a violent crime rate of 911 per 100,000, compared to the US at 416 per 100,000.¹³ Selma has a property crime rate of 5,423 per 100,000, compared to the country’s rate of 2,466 per 100,000.⁹ In addition, 27.2% of City residents are experiencing food insecurity, which is **nearly three times** the rate seen in the U.S. (10.2%).¹⁴ The City has only 74 mental health professionals per 100,000 people, compared to 296/100,000 in the U.S.¹⁵, and there are only 34 dentists per 100,000 people in Selma, which is **less than half the national rate** of 72/100,000.¹⁶ Development of the Gym Complex Site as greenspace will contribute to positive impacts for the sensitive populations living here by creating an outdoor recreational area that encourages physical activity. Fresh air, sunshine, and exercise all help to improve blood pressure and heart rates, strengthen the immune system, and reduce obesity rates. The availability of this recreational

Sensitive Populations	Selma	Dallas County	Alabama	US
Children ^a	24.0%	24.0%	22.5%	22.5%
Black Minority ^a	84%	71%	27%	13%
Female ^a	56%	54%	51%	51%
Disabled ^a	18%	19%	16%	13%
Obesity ^b	42%	42%	32%	29%
Poor Health	32% ^d	29% ^c	20% ^c	16% ^c
^a Source: US Census, ACS, 2021 5 Year Estimates				
^b Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion. 2021. Source geography: County				
^c Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Accessed via the PLACES Data Portal. 2021. Source geography: Tract				
^d Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Accessed via the PLACES Data Portal. 2019. Source geography: Tract				

¹³ FBI Uniform Crime Reports. Additional analysis by the National Archive of Criminal Justice Data. 2015-17.

¹⁴ Feeding America. 2020.

¹⁵ Centers for Medicare and Medicaid Services, [CMS - National Plan and Provider Enumeration System \(NPPES\)](#). Accessed via [County Health Rankings](#). 2022.

¹⁶ US Dept. of Health & Human Services, Health Resources & Services Admin, HRSA - Area Health Resource File. 2021.

greenspace directly adjacent to residential communities will provide significant benefits to the physical and mental wellbeing of those suffering from overall poor health in the community. In addition, this grant will reduce the number of derelict properties in the community that tend to attract criminal activity. This grant will also address poverty by aiding CFAIA in their pursuit of new business development at Craig Field. The removal of dilapidated structures will help attract more commercial and industrial facilities to CFAIA’s industrial complex, resulting in the creation of new job opportunities for Selma residents and thereby increasing the socioeconomic status of the community. Poverty is a driving factor in limited access to health services, food insecurity, and even crime rates; therefore, addressing socioeconomic status will create improvements in these welfare issues as well.

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

Adverse Health Conditions	Selma	Dallas County	AL	US
Cancer Incidence Rate ^a	467.4	468.8	440.7	442.3
Heart Disease Mortality Rate ^b	143.5	143.5	83.7	91.5
Birth Defect Occurrence ^c	0.31%	0.26%	0.26%	-
Asthma Prevalence ^d	11.8%	11.80%	10.4%	9.7%
COPD Prevalence ^d	10.1%	10.1%	8.3%	6.4%
Low Birth Weight ^e	14.0%	14.0%	10.4%	8.2%

^a State Cancer Profiles. 2014-18. Rate per 100,000.
^b Center for Disease Control & Prevention, CDC, National Vital Statistics System. Accessed via CDC WONDER 2016-20. Rate per 100,000.
^c Alabama Department of Public Health – total number of birth defects/total population
^d Center for Disease Control & Prevention, Behavioral Risk Factor Surveillance System. 2019
^eUniversity of Wisconsin Population Health Institute, County Health Rankings. 2014-2020. Source geography: County

Dallas County is ranked one of the least healthy counties in Alabama.¹⁷ Prolonged exposure to hazardous substances like those found at Craig Field poses a significantly increased risk for many dangerous health conditions that are plaguing the entire Selma community. Asbestos exposure is documented to be a potential root cause of certain types of cancer, as well as COPD, and numerous breathing conditions, such as asthma, may be exacerbated by inhalation of microscopic asbestos fibers. This hazardous material is documented to be present at our brownfield site. Given the dilapidated condition of the former base structure, there is a real danger for contaminants, such as friable asbestos, to blow into neighboring areas, further increasing the risks to the community. Asthma, COPD, and cancer can all be seen at increased rates in the Selma community, compared to the state and nation. Evidence has also surfaced that lead exposure can contribute to an increased mortality rate from cardiovascular disease,¹⁸ and Selma’s heart disease mortality rate is more than 1.5 times the national rate. Pregnant women and infants are at heightened risk for many detrimental health consequences that can be linked to environmental hazards, and Selma has an increased rate of birth defects and low birth weight compared to both the county and the state. Abatement of the ACM at our Gym Complex Site will reduce the risks of cancer and other adverse health conditions that impact the lungs and heart, helping to ensure the future safety of the sensitive populations living in Selma.

¹⁷ [Dallas County, Alabama | County Health Rankings & Roadmaps](#)

¹⁸ [Lead and heart disease: An underappreciated link? - Harvard Health](#)

(3) Environmental Justice:

(a) Identification of Environmental Justice Issues:

Based on the statistics demonstrated in the table to the right, the Climate & Economic Justice Screening Tool (CEJST) has identified Census Tract 01047957300 (where Craig Field is located) as disadvantaged. This disadvantaged community is struggling with numerous environmental justice issues. The population living within a 0.5-mile radius of Craig Field are above the 85th percentile in both the State and Country for RMP Facility Proximity, Lead Paint, Traffic Proximity, and Wastewater Discharge. They are also in the 95th State percentile for people of color, the 90th State percentile for those with less than a high school education, and the 91st State percentile for people suffering from asthma. The creation and proliferation of health disparities in communities is largely driven by these environmental and economic conditions. Disproportionate and adverse impacts of environmental justice issues in our target community are evidenced by Selma’s struggle with low income, high unemployment, limited access to health services, and poor overall health.

CEJST Data for Census Tract 01047957300	
Variable	Percentile
Low Income	97 th
Projected Flood Risk	93 rd
Energy Cost	98 th
Asthma	93 rd
Diabetes	96 th
Low Life Expectancy	96 th
Transportation Barriers	92 nd

Environmental Justice Issues – ½ Mile Radius of Craig Field		
Variable	State %tile	US %tile
EJ Index for RMP Facility Proximity	90	91
EJ Index for Lead Paint	89	86
EJ Index for Traffic Proximity	87	78
EJ Index for Wastewater Discharge	97	97
People of Color Population	95	96
Population with Less Than A High School Education	90	89
Asthma	91	93

Source: EJ Screen Report 0.5-mile radius around Craig Field

(b) Advancing Environmental Justice: This grant and the reuse strategy for the Gym Complex Site will promote environmental justice among underserved populations in our target community by removing environmental hazards that have been long-standing threats to our community, which will help to alleviate the health disparities that are evident throughout the area. It will promote healthier lifestyles by creating recreational greenspace that encourages exercise and physical activity.

Displacement is a phenomenon that has been indirectly linked to greenspace development. As greenspaces are created, neighboring property values typically increase, and more new developments are drawn into the area, which can further increase the cost of living for residents. CFAIA has a plan in place to minimize the displacement of our impoverished community. We will work closely with the City of Selma to encourage and support their efforts to protect low-income populations. In the City’s *Comprehensive Community Master Plan*, affordable housing is a top priority and something the City is taking steps to establish. To compliment these efforts, CFAIA is partnering with Advanced ATC, Inc. to pioneer a remote aviation control tower at Craig Field. Advanced ATC anticipates the creation of 28 new jobs in the first year, with an annual payroll budget of \$3.1 million. Those numbers are projected to grow, reaching 119 job opportunities and an annual payroll of \$8 million within just five years.¹⁹ Our plans to increase job opportunities at Craig Field that will pay comfortable, livable wages, coupled with the City’s plans to promote and create safe, affordable housing, will minimize the displacement of our struggling populations. In fact, we plan to improve the socioeconomic status of our community, not drive them away.

¹⁹ [Pioneering remote aviation control tower landing at Selma airport \(madeinalabama.com\)](https://www.madeinalabama.com/news/pioneering-remote-aviation-control-tower-landing-at-selma-airport)

b. Community Engagement

i. Project Involvement & ii. Project Roles: Local organizations that will be involved in the cleanup project for the Gym Complex Site are detailed below:

Name of Org	Point of Contact	Specific Involvement/Assistance Provided
Pine Glen Homeowners Association	Stephen Smith [REDACTED]	Community Outreach, cleanup and redevelopment planning
Selma/Dallas County Economic Development Authority	Wayne Vardaman vardaman@selmaeda.com	Future Redevelopment Planning of Craig Field and the industrial complex
Goodwyn Mills & Cawood	Michelle Conway michelle.conway@gmcnetwork.com	Redevelopment planning and implementation assistance

iii. Incorporating Community Input: CFAIA has taken strong steps to ensure meaningful community engagement for this project. After analyzing options to communicate progress with the community, we have found that the best way to ensure that information is shared with the public is to hold community meetings during the regularly scheduled meetings of the Pine Glen Homeowners Association. This provides an already-established meeting structure and schedule, as well as a meeting location that is nearby to both the Gym Complex Site, allowing the community to see the condition of the site up close and get a good feel for how well it is positioned for redevelopment. We have already begun holding community meetings that focus on the Craig Field cleanup. The first meeting was in October 2019, and representatives from ADEM were in attendance to describe the first phase of the assessment and cleanup process. CFAIA staff then detailed plans for obtaining EPA Targeted Brownfields Assessment Grant funding. A second meeting was held in October 2020 via Zoom due to COVID-19 concerns; a third meeting was held in November 2021, as a hybrid in-person and Zoom meeting; and a fourth meeting was held on November 12, 2022. Finally, a fifth meeting was held on October 14, 2023. These meetings were held to discuss plans to obtain EPA Brownfields Cleanup Grant funding subsequent to the assessments completed at Craig Field. These meetings were advertised through social media and local newspapers. As required by the grant guidelines, notification was given regarding the intent to submit this cleanup grant application. An overview of how the brownfields program and potential benefits to the community were discussed, along with the environmental impacts and planned redevelopment of the Gym Complex Site. The meetings drew local residents and partners. Concerns regarding the impacted sites and the safety hazards posed by the sites were discussed openly, and the interest level for cleanup and redevelopment was high. The meetings were advertised in advance, and a draft of the ABCA/grant proposal was available for review. No objections to the projects were raised, and we are confident we have full community support for the cleanup and redevelopment of the Gym Complex.

Once the grant is awarded, an additional meeting will be held prior to scheduling of remediation activities, which will be advertised through the previously used effective methods. We will also offer the community meeting virtually as an alternative to in-person community engagement. Regular updates will be posted on the Craig Field website and social media pages as the project progresses. A suggestion box will be installed at the airport, and community input surveys will be distributed to local residents. Community involvement coordinators will ensure comments are captured, recorded, and followed up with in order to ensure that the community is involved throughout the cleanup process.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

A draft ABCA was developed for the Gym Complex Site, presenting several cleanup alternatives which are summarized below.

Demolition Debris Containing ACM: Due to the dilapidated condition of Building 316 at the Gym Complex Site, it is not practical or safe to abate ACM from the building prior to demolition. The best method of abating the buildings will be determined in consultation with the demolition contractors during

the bidding and planning process, but until that that time comes, it is assumed the building will be demolished first using wet methods and the ACM materials will be segregated into stockpiles. If new suspect ACM is encountered during demolition, it will be segregated and sampled to confirm the absence or presence of ACM. Materials that do not contain ACM will be disposed at a Construction and Demolition (C&D) landfill. Materials that do contain ACM will be disposed of at a Subtitle D landfill.

b. Description of Tasks/Activities and Outputs

The cleanup grant guidelines for this section requests that (i) Project Implementation; (ii) Anticipated Project Schedule; (iii) Task Activity/Lead; and (iv) Outputs be addressed. We have addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, the schedule for completion, who will lead task efforts, and the anticipated outputs. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*.

i. Project Implementation	ii. Anticipated Project Schedule	iii. Task Activity/Lead	iv. Outputs
TASK 1. Project Management/Administrative			
Execute Cooperative Agreement	30 days after award	Applicant	Executed Cooperative Agreement, grant management oversight, contract with an EP, 1 EPA kickoff meeting, 12 quarterly reports in ACRES database, 3 annual DBE reports, closeout documents
Grant Management	Continuous	Applicant	
Prepare EPA Progress Reports	Quarterly	Applicant & EP	
Travel to Brownfield Conference	Year 1	Applicant	
Kickoff Mtg with EPA and BAC	60 days after award	Applicant	
Final Closeout	30 days after grant closeout	Applicant & EP	
TASK 2. Community Involvement			
Draft CIP	30 days after award	Applicant & EP	1 CIP; 3 meetings/minutes
Community Mtgs.	Quarters (Q) 1, 4, and 5	Applicant & EP	
TASK 3. Cleanup Planning			
ADEM VCP Mtg. and VCP Enrollment	Q2	Applicant & EP	1 SSQAPP, 1 Final ABCA, 2 meetings with ADEM/minutes, 1 bid specification document, selected subcontractor contract documents, 1 ADEM VCP acceptance
Site-Specific QAPP	Q1	EP	
Final ABCA	Q2	EP	
Begin Planning for Building Demolition	Q2	Applicant & EP	
Prepare Bid Documents for ACM Abatement/Demolition	Q2	EP	
ACM Abatement/Demolition Contractor Selection	Q2	Applicant	
TASK 4. Cleanup Activities			
Building Demolition	Q4	EP	Demolition of buildings, lab reports, final VCP Cleanup Report, ADEM letter of concurrence
Confirmation sampling of demo waste piles for ACM/LBP	Q4	EP & Contractor	
Submit ADEM VCP Cleanup Plan	Q6	EP	
Remove demo waste piles	Q6	EP	
Cleanup Report Preparation	Q7	EP & Contractor	
VCP Letter of Concurrence	Q8	EP	

c. **Cost Estimates:** The anticipated budget for the tasks described above are provided below:

Cost Estimates						
Budget Categories		Project Tasks (\$)				Total
		Project Management/Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel					
	Travel	\$3,500 ¹				\$3,500
	Equipment					
	Supplies					
	Contractual	\$22,500 ²	\$6,000 ³	\$5,000 ⁴	\$48,000 ⁵	\$81,500
	Construction				\$436,000 ⁶	\$436,000
	Other			\$35,000 ⁷		\$35,000
Total Direct Costs		\$26,000	\$6,000	\$40,000	\$484,000	\$556,000
Indirect Costs						
Total Budget <i>(Total Direct Costs+ Indirect Costs)</i>		\$26,000	\$6,000	\$40,000	\$484,000	\$556,000
Federal Funding Details						
¹ CFAIA Executive Director and Grants Director travel expenses for attendance at one BF conference: \$3,500 (no labor, only conf. fee, travel/expenses)						
² EP to assist with project mgmt/reporting: \$150/hr x 150 hrs. = \$22,500						
³ EP to assist with CI plan and meeting attendance: \$150/hr x 40 hrs. = \$6,000						
⁴ SSQAPP = \$5,000						
⁵ EP preparation of construction bid documents, final cleanup plan, VCP documents, oversight of cleanup activities = \$150/hr x ~320 hrs. = \$48,000						
⁶ ACM Abatement via Demolition = \$436,000						
⁷ ADEM VCP Fees = \$35,000						

d. **Plan to Measure and Evaluate Environmental Progress and Results:** Outputs, results, and eventual outcomes of the cleanup of the Gym Complex will be clearly identified in the project work plan. They will be carefully tracked and will be reported in the quarterly progress reports submitted to the EPA Project Officer via the EPA ACRES database. Our mechanism for tracking progress includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; and regular communications between project team members via email and phone. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures will be implemented to get the project back on track. These may include meetings with the EP, contractors, ADEM, and EPA to establish root causes and corrective actions. Key tasks and outputs to ensure the desired environmental results are achieved within the 4-year grant window are presented in the table in *Section 3.b* above.

Anticipated outcomes from the cleanup include liability protection via the ADEM VCP; alignment of EPA funding objectives with redevelopment; removal of blight; reduction or elimination of future contaminant exposure; and the return of sites to productive use that promotes healthy lifestyles. These outcomes align well with EPA strategic plan objectives.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capacity

i. Organizational Structure, and ii. Description of Key Staff: CFAIA staff have a solid track record in the preparation, coordination, oversight, and monitoring of federal grants issued by the USDA and FAA. James Corrigan, CFAIA Executive Director, will be managing and directing the project for both the Gym Complex Site. As a retired US Air Force Colonel, Mr. Corrigan has significant planning and leadership experience as a squadron, group, and wing commander. Mr. Corrigan also served as a Captain at Delta Air Lines and has more than 40 years of flying and aviation experience that gives him a unique understanding

of Craig Field’s layout, functionality, and business model, which is an invaluable asset to redevelopment and reuse planning. Assisting Mr. Corrigan on these projects will be Audrey Adamson, who serves as CFRAIA’s grant director and manages compliance of all grant programs. In addition, Kimberly Walker-Crowe is CFAIA’s administrative assistant responsible for handling bookkeeping and financial reporting, and she will provide financial oversight for this grant program, separately from the other personnel managing cleanup tasks. This team has extensive experience managing the complexities of an operational airport and industrial complex. They have an impressive track record in oversight of several federal grants that will allow them to successfully manage this cleanup grant.

iii. Acquiring Additional Resources: The primary additional resource necessary to this project will be a qualified environmental professional (EP) who is experienced with the EPA Brownfields Cleanup Grant process and ADEM’s Brownfield program and Voluntary Cleanup Program (VCP). The EP, procured by CFAIA in accordance with state and federal guidelines, will be responsible for preparing the final ABCA/cleanup plans, QAPP, Brownfield/VCP application; bid specifications; overseeing site work; conducting sampling during remediation activities; executing waste manifests as an authorized agent of CFAIA; ensuring all quality control objectives are met; and preparing all reports. The EP will also be responsible for preparing all programmatic reports and updating the ACRES database. The EP will coordinate abatement contractors, Subtitle D landfills, hazardous waste transporters, and laboratories. CFAIA will oversee the EP.

CFAIA has plans in place to promote strong labor practices and local hiring/procurement in all of our projects. This cleanup and redevelopment of the Gym Complex will be no different. We will utilize local workers whenever possible throughout the lifecycle of this cleanup project, with local contractors and subcontractors procured for the project whenever this option is available and feasible.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: CFAIA currently has a FY23 EPA Brownfield Cleanup Grant that was awarded to clean up a separate site at Craig Field – the Flight Line.

(1) Accomplishments: CFAIA’s FY23 EPA Brownfield Cleanup Grant for the Flight Line was awarded in the Spring of 2023 (4B-02D60323-0). This is a brand new grant, and CFAIA has only recently received approval of the workplan. A cooperative agreement was executed on October 24, 2023, which will enable cleanup activities to begin very soon. So far, the primary output is a final workplan that has been approved by the EPA and the execution of a Cooperative Agreement between CFAIA and the EPA. Since this Brownfield Cleanup Grant is so new and CFAIA has not been able officially kick off the project, we have also included information about other grants that demonstrate CFAIA’s extensive experience in managing federal grants and programs:

Program	Awarded	Amount	Purpose and Accomplishments
USDA RBDG	2019	\$185,809	Project was used to remove 12 dilapidated building foundations Project completed and grant was successfully closed out in July 2020
FAA	2019	\$690,640	Project was used to rehabilitate the runway Project completed and grant was successfully closed out in May 2020
USDA RBDG	2022	\$200,000	Project for repairing a road on the Flight Line Project is ongoing

(2) Compliance with Grant Requirements: CFAIA’s FY23 EPA Brownfield Cleanup Grant has a period of performance from July 1, 2023 to October 1, 2027. CFAIA has outlined a plan in the workplan to expend all grant funds well before the end of the grant’s period of performance in October 2027. Remediation efforts are anticipated to begin early 2024. Each of the other grants discussed above were completed in accordance with the grant requirements and in a timely manner. The grants were also completed in compliance with work plans, schedules, terms, and conditions as required by the terms of each grantor.

Award of this cleanup grant represents a significant next step in bringing needed change to our community through the creation of greenspace. We appreciate your consideration of our proposal.

THRESHOLD CRITERIA

THRESHOLD CRITERIA FOR CRAIG FIELD GYM COMPLEX, CRAIG FIELD AIRPORT AND INDUSTRIAL AUTHORITY IN SELMA, ALABAMA

1. Applicant Eligibility: Craig Field Airport and Industrial Authority (CFAIA) is a quasi-governmental public agency (Articles of Incorporation are attached), and therefore, is an eligible entity to receive an EPA Brownfields Cleanup grant.

2. Previously awarded Cleanup Grants: CFAIA's Gym Complex Site has never received an EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds: CFAIA has never received an EPA Brownfields Multipurpose Grant.

4. Site Ownership: CFAIA is the sole deed owner of the target site proposed for funding under this grant application. CFAIA acquired parcel number 1505212003002000 (**Craig Field Gym Complex Site**) on October 11, 2021 (Quitclaim Deed is attached).

5. Basic Site Information:

- (a) Name of the site: Craig Field Gym Complex Site
- (b) Address of the site: Building 316 Avenue C, Selma, AL 36701
- (c) Current owner of the site: Craig Field Airport and Industrial Authority

6. Status and History of Contamination at the Site:

- a) Type of Contamination: Hazardous substances

- b) Operational History and Current Use: Historically, the Craig Field Gym Complex (situated on 0.5 acres of land at the southwest entrance to the Pine Glen neighborhood) was a part of the former Craig Air Force Base. This base was operated by the U.S. Army Air Force from 1940-1977. During this time, the Gym Complex was used as a recreational area by base personnel. After the base closed, this complex was deeded to the Alabama Law Enforcement Agency, who later deeded it to Dallas County, Alabama. Dallas County deeded the property to CFAIA in 2021. Currently, there is a historical gym situated on this parcel that is severely dilapidated and vacant. The roof of this structure is completely collapsed, and the blighted conditions present a grave risk to children living and attending school nearby who may wandering into the building and get hurt.

- c) Environmental concerns:
 - Building Materials: Asbestos-containing materials (ACM)

- d) How Site Became Contaminated, Nature and Extent of Contamination: A Phase II ESA confirmed asbestos-containing materials (ACM) and lead-based paint (LBP) in the historical gym structure. This building was constructed by the Air Force in 1940, prior to the 1978 federal ban of ACM and LBP in building materials. Due to the dilapidated condition of the building, there is a risk for asbestos to become friable and blow into adjacent areas.

7. Brownfields Site Definition:

The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications: CFAIA has conducted environmental assessments at the site to determine environmental conditions. These assessments include:

- ASTM E1527-13 Phase I ESA prepared on September 15, 2021
- ASTM E1903-19-equivalent Phase II ESA prepared on November 21, 2022.

9. Site Characterization:

The Alabama Department of Environmental Management (ADEM) operates a Voluntary Cleanup Program (VCP). Fee driven, the VCP attempts to facilitate rapid movement of the project through the regulatory process. The program allows for the assessment and remediation of contaminated sites and grants certain liability protections, including protection from third party lawsuits, to those non-responsible entities wishing to redevelop brownfield sites. In this case, CFAIA would apply as a non-responsible party since they did not cause the impacts. The liability protections are fully transferable to any non-responsible party who may purchase the site provided all land use controls are adequately maintained. If deemed eligible, the applicant submits a review fee and will be responsible for site assessment and cleanup. Upon successful completion of cleanup activities, ADEM will issue a Letter of Concurrence which grants the applicant the full liability protections cited in the Act.

While CFAIA will likely enroll the Gym Complex Site in the ADEM VCP if the liability protections prove to be advantageous to CFAIA, doing so requires a significant Application Fee for the agency to even determine eligibility, and other significant fees to review site characterization reports and to approve remediation plans. It is a process, with fees due at every step, and premature to enroll the site at this time. While the CFAIA is fully confident that the site will be eligible because it meets all of the CERCLA/Petroleum Liability conditions described in detail in Item 12 below, ADEM will make the final eligibility determination after the site is formally enrolled, anticipated to incur in late 2024. Note that the VCP program is *voluntary*, entry is not required by ADEM to begin remediation, and a Qualified Environmental Professional (QEP), as defined in 40 CFR 312, has certified that there is a sufficient level of site characterization from the Phase II ESA performed for the remediation work to begin on the site.

Also, the EPA Cleanup Grant guidelines ask that the State Environmental Authority provide an indication that there is a sufficient level of site characterization from the site assessment for remediation work to begin, or if additional site assessment is needed, or that this data be obtained by June 15, 2024. Since CFAIA has not entered the VCP yet, ADEM has not been provided such reports for review to make this determination. However, ADEM has confirmed that the site is eligible to submit an application for the VCP program in their support letter (see attached). It is unlikely that ADEM will require the additional sampling, and a QEP, has certified that there is a sufficient level of site characterization from the Phase II ESA performed for the remediation work to begin on the site.

10. Enforcement or Other Actions:

There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including CFAIA) for the hazardous substances at the site, or any liens.

11. Sites Requiring a Property-Specific Determination:

This site does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites:

CFAIA meets the requirements for asserting an affirmative defense to CERCLA liability through bona fide prospective purchaser liability protection at the Craig Field Gym Complex. Sections i. and ii. do not apply to this site.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

For land parcel number 1505212003002000 (the Gym Complex), CFAIA asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection and demonstrates compliance with the following requirements.

- CFAIA acquired title to the Gym Complex on October 11, 2021.
- The applicant conducted an all appropriate inquiry (AAI) investigation prior to acquiring the property by conducting a Phase I ESA All Appropriate Inquiry in compliance with ASTM E1527-13. The report was dated September 15, 2021, and was conducted within 6 months prior to site acquisition. The Phase I ESA was conducted by an environmental professional (Tetra Tech).
- CFAIA is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.
- CFAIA did not arrange for the disposal of hazardous substances before it acquired the site.
- CFAIA has and will exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site.
- CFAIA will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- CFAIA will provide full cooperation, assistance, and access to authorized persons.
- CFAIA will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- CFAIA will not impede performance of a response action or natural resource restoration.

(a) Information on the Property Acquisition

The following is information on the property acquisition.

- (i) CFAIA acquired ownership by voluntary purchase.
- (ii) CFAIA acquired the property on October 11, 2021.
- (iii) CFAIA is the sole owner by fee simple purchase.
- (iv) The property was purchased from Dallas County, Alabama.
- (v) CFAIA does not have, nor has had, a familial, contractual, corporate, or financial relationship or affiliation with any prior owner, operator, or other potentially responsible party of the property, including the entity from which the property was acquired.

(b) Pre-Purchase Inquiry

- (i) CFAIA conducted a ASTM E1527-13 Phase I ESA on September 15, 2021 prior to taking ownership.
- (ii) The ASTM E1527-13 Phase I ESA was completed by an environmental professional, Tetra Tech, under contract to the EPA under their Targeted Brownfield Assessment funding.
- (iii) The ASTM E1527-13 Phase I ESA was completed within 180 days prior to CFAIA's acquisition of the property in order to take advantage of the bona fide prospective purchaser provision.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

Any disposal of hazardous substances at the site occurred before CFAIA acquired the property. CFAIA did not cause or contribute to any release of hazardous substances at the site. CFAIA has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Since CFAIA acquired ownership of the property, it has been vacant and unused. CFAIA has no relationship to prior users.

(e) Continuing Obligations

- (i) As a vacant and unused building, there is no known activity at the property and none that would release hazardous substances.
- (ii) To prevent any threatened future release, CFAIA has committed to land use plans that limit the types of activity permitted at the property to those that do not require the use of hazardous materials. All construction materials used in renovations will be free of known hazardous substances.
- (iii) To prevent or limit exposure to any previously released hazardous substances, CFAIA inspects the grounds on a periodic basis.

CFAIA affirms its commitment to:

- (i) Comply with any land use restrictions and not impede the effectiveness or integrity of an institutional controls;
- (ii) Assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) Provide all legally required notices.

13. Cleanup Authority and Oversight Structure:

a. Describe how CFAIA will oversee the cleanup at the site(s). CFAIA plans to enter the ADEM VCP to secure formal regulatory approvals, expedite document reviews, and obtain transferrable liability protections should this be determined to be advantageous. A draft ABCA that presented several cleanup alternatives to address the impacted soil and groundwater at the site was developed, and the final report will consist of a full Voluntary Cleanup Plan for ADEM approval. The ADEM Air Division requires that notification be provided prior to demolition of commercial structures, and such notification will be provided. CFAIA will retained a Qualified Environmental Professional (QEP) with experience in the EPA brownfields cleanup and ADEM procedures to assist with these efforts, grant management and

reporting. CFAIA personnel are experienced in overseeing contractors and professional service firms and will manage the selected firm and process throughout the grant period. Our procurement process will follow standard procurement procedures and comply with the fair and open competitive process outlined in 2 CFR Part 200 and 2 CFR Part 1500, the EPA's November 2022 Best Practice Guide for Procuring Services, Supplies and Equipment Under EPA Assistance Agreements and applicable portions of 40 CFR 33, among others.

b. Cleanup response activities: CFAIA already owns the Craig Field Gym Complex, and access to other properties will not be required. However, an additional community meeting will be held prior to conducting remediation activities to inform area residents of the remediation activities and to address any concerns that may be raised. Five public meetings have already been held to announce the project.

14. Community Notification:

CFAIA provided the community with notice of our intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft application. Details are provided below.

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): On October 14, 2023, CFAIA held a community meeting and allowed the community an opportunity to comment on the draft application, and the attached draft ABCA.

b. Community Notification Ad: CFAIA provided public notification on October 7, 2023, advertising CFAIA's intent to apply for this cleanup grant, and for the community meeting scheduled and conducted on October 14, 2023. This follows other meetings announced and completed in prior years. The methods of community notification that were employed for this grant application are as follows:

- Community meeting notification advertised in the Selma Times Journal on October 7, 2023.

c. Public Meeting: The latest public meeting to discuss the cleanup grant proposal was held at the Pine Glen Homeowners Community Center at Craig Field on October 14, 2023 at 9:00 am. No persons with limited English proficiency or disabilities were in attendance but would have been accommodated as needed. A copy of the draft grant application and the draft ABCA was presented, along with instructions on where the documents can be reviewed prior to submittal of the proposal. Meeting minutes (which include a summary of questions asked and answered) and a sign-in sheet are provided as attachments.

d. Submission of Community Notification Documents: A copy of the newspaper ad demonstrates solicitation for comments, meeting minutes (which include a summary of questions asked and answered), a sign in sheet, and a copy of the draft ABCA are attached. The meeting was open to all, with no pre-registration.

15. Contractors and Named Subrecipients:

Contractors:

Not applicable. CFAIA has not yet procured a contractor to assist in the implementation of this cleanup grant funding. If awarded this funding, CFAIA will follow all standard procurement procedures and comply with the fair and open competitive process outlined in 2 CFR § 200.319, 2 CFR § 200.320, 2 CFR § 1500.10 and 40 CFR Part 33. CFAIA will describe the process used to choose our selected contractor and how that process complied with all procurement procedures when we submit our final workplan for the award.

ADEM SUPPORT LETTER



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 2, 2023

Mr. James M. Corrigan Executive Director
Craig Field Airport and Industrial Authority (CFAIA)
P.O. Box 1321
Selma, AL 36702

RE: Support Letter, Craig Field Gym Complex, FY2024 EPA Brownfields Cleanup Grant

Dear Mr. Corrigan:

I am in receipt of your request for a letter of support and technical assistance associated with Craig Field Airport and Industrial Authority's (CFAIA) pursuit of a FY2024 Brownfields Cleanup Grant from the U.S. Environmental Protection Agency (EPA) for the referenced site. The Alabama Department of Environmental Management (ADEM) looks forward to supporting your efforts for the exciting redevelopment plans being proposed.

ADEM understands that historically, the Craig Field Gym Complex Site (situated on 0.5 acres of land at the southwest entrance to the Pine Glen neighborhood) was a part of the former Craig Air Force Base. This base was operated by the U.S. Army Air Force from 1940-1977. During this time, the Gym Complex was used as a recreational area by base personnel. After the base closed, this complex was deeded to the Alabama Law Enforcement Agency, who later deeded it to Dallas County, Alabama. Dallas County deeded the property to CFAIA in 2021. Currently, there is a historical gym situated on this parcel that is severely dilapidated and vacant. The roof of this structure is completely collapsed and presents a grave risk to children living and attending school nearby who may wander into the building and get hurt. A Phase II ESA confirmed ACM in the historical gym structure. This building was constructed by the Air Force in 1940, prior to the 1978 federal ban of ACM and LBP in building materials. Due to the dilapidated condition of the structures, there is a risk for asbestos to become friable and blow into adjacent areas. We understand that due to the dilapidated condition of the onsite buildings, it may not be practical or safe to abate ACM by typical in-situ techniques, and that CFAIA will likely demolish the structures. ACM materials will be segregated into stockpiles. Materials that do not contain ACM will be disposed at a Construction and Demolition (C&D) landfill. Materials that do contain ACM will be disposed of at a Subtitle D landfill.

ADEM understands that once remediation is complete, CFAIA plans to utilize the Gym Complex Site as recreational greenspace for the neighboring Pine Glenn community to enjoy, a reuse strategy that will have far-reaching benefits for the health and wellbeing of Selma's disadvantaged populations.



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ADEM Voluntary Cleanup Program: The Department understands that the new EPA Cleanup Grant guidelines ask that the State Environmental Authority affirm that the site is eligible for enrollment in a Voluntary Cleanup Plan (VCP) and that a sufficient level of site characterization has been completed for remediation work to begin. While CFAIA has stated that you will likely enroll the site in the VCP, you are not quite ready to take that step until some additional funding is in place. Please note that while we encourage enrollment in the VCP, it is not required that you do so prior to beginning remediation. ADEM has determined that the Gym Complex site is indeed eligible for the Voluntary Cleanup Program. We will review site assessment data to determine if additional site characterization is needed to approve any cleanup plans you intend to submit to us as you work towards securing a Letter of Concurrence from our Department. We can work with you to expedite review of the existing assessment data and a cleanup plan, as well as options to combine such documents into single reports to streamline approvals so you can get started on cleanup next fall should the cleanup grant be awarded. Further, at this time, the Department sees no reason that you could not begin remedial efforts immediately using your existing assessment data while you pursue the grant and entry into the VCP. If you decide to enter the VCP in the near future, we will work with you to ensure prompt review of any additional site characterization data you choose to obtain so it is completed by June 15, 2024 as requested by the EPA guidelines.

CFAIA has also requested potential technical assistance from ADEM on the project that might include additional sampling, public outreach/visioning sessions, and assistance with entering into the VCP. Upon request, the Department will be happy to discuss available assistance as the project and specific needs develop.

ADEM looks forward to supporting your efforts for the exciting redevelopment plans being proposed. We wish you and the residents of the community success in the pursuit of funds to make this redevelopment a reality. 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 horizontal line.

Crystal Collins, Chief
Redevelopment Unit
Land Division