



LEE-RUSSELL
COUNCIL OF GOVERNMENTS

1. Applicant Identification

Lee-Russell Council of Governments (LRCOG)
2207 Gateway Drive
Opelika, AL 36801-6834

2. Website URL

LRCOG - www.lrcog.com
City of Opelika – www.opelika-al.gov
Russell County – www.rcala.com

3. Funding Requested

- a. Assessment Grant Type: Assessment Coalition
- b. Federal Funds Requested: \$1,500,000

4. Locations

Non-lead members:

City of Opelika

- a) City: Opelika
- b) County: Lee County
- c) State: Alabama

Russell County

- a) Cities: Hurtsboro, Hatchechubbee, Ladonia, Phenix City
- b) County: Russell
- c) State: Alabama

All geographic boundaries:

- a) Cities: Auburn, Beulah, Bleacher, Gold Hill, Loachapoka, Marvyn, Opelika, Salem, Smiths Station, Cottonton, Crawford, Creek Stand, Fort Mitchell, Glennville, Hatchechubbee, Hurtsboro, Holy Trinity, Ladonia, Phenix City, Pittsview, Rutherford, Seale, Uchee
- b) Counties: Lee County and Russell County
- c) State: Alabama

5. Coalition Members' Target Areas and Priority Site Information

Target areas do not overlap, and are in at least three distinct municipalities or jurisdictions.

Target Areas:

LRCOG (lead), Phenix City Target Area

City of Opelika (non-lead), Downtown Opelika Target Area

Russell County (non-lead), Russell County Target Area – Census Tracts CT311 and CT312, which encompass the towns of Hurtsboro, Hatchechubbee, Seale, Rutherford, Pittsview, Glenview, Cottonton, Holy Trinity, and Fort Mitchell

Mayor Ron Anders, Jr., Chairman **Lisa Sandt**, Executive Director

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Priority Sites:

City of Opelika

Priority Site 1 (Downtown Opelika Target Area):

Former Leshner Mill
1534 First Avenue
Opelika, AL 36801

LRCOG

Priority Site 2 (Phenix City Target Area):

The Coulter Building
1501 5th Avenue
Phenix City, AL 36867

Priority Site 3 (Phenix City Target Area)

Phenix Saw Works
1116 Broad Street
Phenix City, AL 36867

Russell County

Priority Site 4 (Russell County Target Area):

Former Walker Williams Lumber Mill
695 Alabama Highway 26
Hatchechubbee, AL 36858

Priority Site 5 (Russell County Target Area)

Former Snack Shop Gas Station
Northeast Corner of State Highway 26 and Main Street (Highway 51)
Hurtsboro, AL 36860

6 Contacts

a. Project Director

David Robison, AICP, Planning and Economic Development Director
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2207 Gateway Drive, Opelika, AL 36801

b. Chief Executive/Highest Ranking Elected Official

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7. Population

Phenix City: 11,537

City of Opelika: 11,966

Russell County Target Area: 5,405

8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	6
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).	3
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.	5
The reuse of the priority site(s) will incorporate energy efficiency measures.	5
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	5
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority sites within the target areas.	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. Letter from the State or Tribal Environmental Authority

See attached.

10. Releasing Copies of Applications

Not applicable.

Mayor Ron Anders, Jr., Chairman Lisa Sandt, Executive Director

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ADEM SUPPORT LETTER

EDWARD F. POOLOS
DIRECTOR

JEFFERY W. KITCHENS
DEPUTY DIRECTOR



KAY IVEY
GOVERNOR

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

January 12, 2026

Mr. David Robison, AICP
Planning and Economic Development Director
Lee-Russell Council of Governments
2207 Gateway Drive
Opelika AL 36801-6834
drobison@lrcog.com

RE: Brownfields Assessment/Coalition Grant Support

Dear Mr. Robison:

The Alabama Department of Environmental Management (ADEM) is pleased to support the Lee-Russell Council of Governments (LRCOG) in your pursuit of a FY26 Brownfields Assessment/Coalition Grant from the U.S. Environmental Protection Agency (EPA).

We understand that LRCOG provides a wide range of high-quality services to Lee and Russell Counties, and Council members such as the cities of Opelika, Auburn and Phenix City. LRCOG manages programs, promotes collaborative efforts, develops grants and serves as a clearinghouse to administer and attract millions of dollars of federal, state and local funds to your area. LRCOG 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 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 assessments (offered on a first come/first served basis, subject to fund availability).

We wish you and the residents of the LRCOG community success in the pursuit of your grant. Please let us know if we can be of further assistance. For any questions regarding this letter, please contact Crystal L. Collins at 334-279-3067 or via email at ccollins@adem.alabama.gov.

Sincerely,

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

Crystal L. Collins, Chief
Redevelopment Unit
Land Division
Alabama Department of Environmental Management



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

Decatur Office
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Coastal Office
1615 South Broad Street
Mobile, AL 36605
(251) 450-3400
(251) 479-2593 (FAX)

NARRATIVE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Coalition Members, Target Areas, and Brownfields; 1.a. Coalition Members:

A coalition of three eligible government entities has been formed to apply for an EPA Brownfields Assessment Coalition Grant. The Lee-Russell Council of Governments (LRCOG) will serve as the **Lead Coalition Member**, with the **City of Opelika, Alabama** (municipal government) and **Russell County, Alabama** (county government) as non-lead members. Both non-lead members are located in economically disadvantaged areas within Alabama's Black Belt, a region with persistent poverty that limits local government's capacity to independently apply for and manage complex grants. Due to limited administrative staff, technical expertise, and financial resources, neither Opelika nor Russell County has previously applied for an EPA Brownfields Assessment Grant. They lack the necessary resources to manage the intricacies of federal grant administration and environmental projects independently, underscoring the need for LRCOG's leadership.

In contrast, LRCOG is well-equipped to lead this coalition, with proven administrative and financial resources necessary for effective grant management. Our mission is explicitly focused on "bringing funding to the area through grants" and "developing resources for economic and community development." With LRCOG's support, this coalition provides Opelika and Russell County access to brownfield funding that would otherwise remain unattainable, enabling them to tackle critical brownfield sites within their communities and support regional revitalization goals.

1.b. Overview of Brownfield Challenges and Description of Target Areas:

Located along the Alabama-Georgia border in the east-central part of Alabama, the coalition's **geographic boundary** encompasses the full county limits of **Lee and Russell Counties**, covering approximately 1,261 square miles with a combined population of 241,959. These counties, located in Alabama's economically distressed Black Belt, have historically relied on agriculture and manufacturing. The area's economic decline, triggered by late 20th and early 21st-century industrial closures, has led to widespread job losses, abandoned properties, and the creation of brownfields. From 1998 to 2024, Opelika, Phenix City and surrounding local areas have experienced plant closings and layoffs impacting over 5,370 workers.¹ This substantial job loss has had a severe effect on the populations living in the geographic boundary, leading to economic decline in certain portions of these two counties.

The LRCOG has identified three of the most impacted areas within Opelika, Phenix City, and Russell County as target areas. The geographic boundaries of these target areas align with the jurisdictional limits of each respective government. The target areas for this brownfield project are as follows:

The **Opelika Target Area (OTA)**, commonly known as Downtown Opelika, includes four census tracts (CT411.01, CT413, CT414, CT416). The OTA is generally bound by Highway 14 to the northwest, I-85 to the southeast, Airport Road to the west, and Ridge Road to the northeast. The downtown area (CT413) is very irregular in shape but is roughly bordered by Flora Avenue and Oak Bowery Road to the west, Waverly Parkway to the north, and North 5th Street to the northeast. Historically, the OTA was Opelika's industrial center, anchored by two major textile mills—Leshner and Pepperell—which operated from the early 1900s until their closure in 2006. These mills employed over 1,600 people and were the main economic driver in Opelika's economy. The mills' presence spurred development in surrounding areas, such as the historic Mill Village neighborhood, and fostered growth in banks, restaurants, shops, and other supporting businesses. The closure of the mills marked a major economic setback, leading to widespread business closures and creating numerous brownfields across the OTA. The mill sites and many surrounding businesses have been vacant for years, becoming dilapidated and visually blighting the community. The mill closings and the subsequent economic decline has had severe social impacts, with **poverty affecting nearly one-third of the OTA's population**, and a **per capita income that is 81% below the national average**.² This grant will prioritize brownfield assessments in the OTA, aiming to clear blighted sites and lay the groundwork for economic recovery and community revitalization.

The **Phenix City Target Area (PCTA)** encompasses four contiguous census tracts (CT302, CT303, CT307, and CT308) in the City's core. The PCTA is bordered by the Georgia state line and the Chattahoochee Riverfront to the east, 28th Street to the north, the entrance of Johnsville Road to the south, and several connecting streets to the west that include Ingersol Avenue, 25th Avenue, 22nd Avenue, 23rd Court, and the southern portion of Brickyard Road. This area has a unique mix of challenges and opportunities. Historically, the PCTA faced extreme crime, becoming infamous as a hub for the Dixie Mafia syndicate, which eroded the social and economic fabric of the community. In addition, the collapse of local manufacturing in the late 20th century led to mass job losses, business closures, and widespread disinvestment in the community. These dual forces of organized crime and industrial decline devastated the PCTA, leading to the abandonment of key urban infrastructure and creating numerous brownfield sites. Today, the area continues to struggle, **with 42% of residents living below the poverty level**.³ An inventory of the PCTA identified over 25 abandoned businesses and significant brownfield sites that pose health risks to residents and threaten the Chattahoochee River, which has recently emerged as a potential driver for tourism and economic growth. This grant will enable the coalition to assess these hazardous sites for potential remediation, directly addressing urgent public health and safety concerns.

¹ Alabama WARN List

² US Census Bureau, American Community Survey, 2018-2022

³ US Census Bureau, American Community Survey, 2018-2022

By transforming blighted areas, the coalition will create safer, cleaner spaces, laying the groundwork for a strategic revitalization plan that leverages the Chattahoochee River as an anchor for sustainable economic growth and the restoration of community pride in Phenix City.

The Russell County Target Area (RCTA) covers two expansive rural census tracts, CT311 and CT312, comprising over two-thirds of the county. This target area is bordered by Barbour County to the south, the Chattahoochee River and census tracts 309.3, 309.4, and 309.5 to the east, Bullock and Macon County to the west, and census tract 310 to the north which roughly follows County Road 22 along its southern boundary. The RCTA includes eight struggling towns—Hurtsboro, Hatchechubbee, Seale, Rutherford, Pittsview, Glenview, Cottonton, and Holy Trinity—as well as historic Fort Mitchell, which was the starting point of the historic Trail of Tears. For decades, the RCTA has faced severe economic decline due to business closures, including a major lumber mill that once supported much of the local population. Population loss is alarming, with a 17.85% decrease from 2000 to 2010 and a further 7.81% decline from 2010 to 2020, leaving the area sparsely populated and economically vulnerable. The labor force participation rate is just 49.2%, almost 30% below the national average, while poverty affects 22.3% of residents.

The RCTA is burdened by brownfield sites that compromise public health, stall development, and deepen poverty. This grant will enable vital assessment and remediation efforts to convert these blighted properties into community assets, driving public health enhancements, job creation, and economic revival. By restoring these historic yet underserved communities, the coalition aims to stabilize the local economy, safeguard vulnerable residents, and honor Russell County’s cultural heritage. This initiative is essential to breaking the cycle of decline in the RCTA, establishing a foundation for sustainable growth and resilience.

1.c. Description of the Priority Brownfield Sites: LRCOG collaborated extensively with our coalition partners to identify priority sites within the target areas. These sites were selected based on multiple factors: importance to the community, impact on sensitive populations, redevelopment potential, human health and environmental risks, visibility and blight, and alignment with the goals outlined in our 2021–2026 Comprehensive Economic Development Strategy (CEDs). Priority sites in disadvantaged census tracts were chosen specifically to maximize economic and environmental benefits for underserved communities, where revitalization efforts are most needed.

A preliminary inventory was conducted between August and September 2024, focusing on properties with evident environmental concerns linked to past industrial or commercial uses. We also reviewed a brownfield inventory prepared by the Alabama Department of Environmental Management (ADEM) Redevelopment Section. While these inventories did not cover all potential sites, it identified key locations for initial assessment and redevelopment. Once awarded the EPA Brownfields Coalition Assessment Grant, LRCOG plans to undertake a comprehensive inventory across the target areas, estimated to include over 100 additional sites that could benefit from this grant project. The table below provides an overview of the brownfield sites identified in the target areas, followed by a description of the selected priority sites, all situated within disadvantaged census tracts as identified by CEJST.

Target Area	Overview of Inventoried Brownfield Sites
City of Opelika (OTA)	22 sites, including 8 former industrial properties, 5 gas stations, 4 auto repair shops, and 5 vacant buildings potentially containing asbestos.
City of Phenix City (PCTA)	17 sites, including 5 former industrial properties, 7 gas stations, 1 lumber company, 1 auto repair shop, 1 auto paint shop, and 2 buildings potentially containing asbestos.
Russell County CTs 311 and 312 (RCTA)	36 sites, including 3 former industrial properties, 1 wood treating facility, 12 gas stations, 11 former industrial sites, 3 commercial facilities and 6 vacant buildings potentially containing asbestos.

Priority Site #1: Former Leshner Mill (*in the OTA*) — The former Leshner Mill, located at 1534 First Avenue in Opelika, was once a vital community hub and economic anchor for the community. The 8.85-acre property comprises two parcels bordered by commercial properties to the north and east and residential housing to the south and west, separated by a railroad. While most structures have been demolished, two dilapidated buildings remain, along with a 1.4-acre retention pond at the northeast end of the site. Surrounding the mill is a densely populated area of “mill housing,” originally built for mill workers and their families, placing residents in close proximity to the property’s environmental risks. In 2023 ADEM conducted limited Phase I and Phase II Environmental Site Assessments (ESAs) through the state brownfield program, identifying contaminants, including arsenic, chromium, and lead in the soil, and volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) in the groundwater. Further investigation is needed to delineate contamination sources, as concentrations are likely higher in certain areas, posing potential health risks to nearby residents. Additionally, the remaining buildings likely contain asbestos, which, if friable, could contaminate surrounding properties. The Leshner Mill site has attracted redevelopment interest from a local developer, which envisions its integration into a broader revitalization plan. However, existing contamination issues have hindered progress and will continue to be a deterrent until remediation is completed. Addressing these hazards will not only protect residents but also unlock significant redevelopment potential, making it a top priority for assessment and cleanup within the coalition’s target areas. Pepperell Mill about a mile away is undergoing a 125M mixed use development points to the potential successful reuse of this site as well.

Priority Site #2: The Coulter Building, (in the PCTA) — The Coulter Building, located at 1501 5th Avenue in downtown Phenix City encompasses approximately 0.3 acres. The two-story brick building is a significant historic landmark with deep community ties. This site was once the law office of Alabama Attorney General Albert Patterson, who was assassinated there in 1954 by the Dixie Mafia after vowing to end organized crime in the city. This tragic event left a lasting mark on the community, inspiring books, movies, and a historic marker and statue in Patterson's honor. Now over 70 years old, the Coulter Building likely contains asbestos, contributing to its prolonged vacancy of over 20 years. Although boarded up, deteriorating openings could allow friable asbestos to escape, posing a health risk to the surrounding community. This is in an area of town where there is a high probability of UST still ground that could cause vapor intrusion of petroleum contaminants into this building and neighboring sites. Due to its redevelopment interest as well as historical and community significance, Phenix City is prioritizing the assessment and remediation of the Coulter Building to address these hazards, making way for redevelopment as a mixed-use facility. Restoring this site would not only eliminate environmental and health risks but also honor its historical significance and contribute to the economic revitalization of downtown Phenix City.

Priority Site # 3: Phenix Saw Works, (in the PCTA) — This priority site, located at 1116 Broad Street in Phenix City, operated as a small engine repair business for over 50 years. This 0.53-acre property includes an 8,000 sq. ft. building, previously used for shop and office space, which fronts Broad Street and extends eastward to the Chattahoochee River and the riverwalk recreational trail. The site is within the designated five-block Lively Entertainment District, a key area for planned redevelopment. There is concern that petroleum and solvent contaminants from past engine repair activities may be present on the property. Phenix City prioritizes this site for assessment and reuse to facilitate its vision for redevelopment: transforming the western portion into a brewery and the eastern portion into greenspace connected to the riverwalk. This project would enhance the Lively Entertainment District, promote economic growth, and improve community access to recreational spaces along the Chattahoochee River.

Priority Site #4: Former Walker Williams Lumber Mill in Hatchechubbee (in the RCTA) — Located at 695 Alabama Highway 26, less than 500 feet from the center of the town of Hatchechubbee, the former Walker Williams Lumber Mill spans 15 acres and includes 14 buildings of varying sizes. Established in 1970, this mill once employed approximately 50 people before ceasing operations in 2000. During its operation, the facility treated wood with chemicals, likely contaminating the local soil and groundwater with pentachlorophenol and other pollutants. This site is a high priority for Russell County due to its economic significance and the potential environmental impact on Hatchechubbee Creek, located less than a half mile topographically down-gradient of the site. As a tributary to the Chattahoochee River—a major regional water resource and the site of the Rush South Whitewater Park—contamination in this stream could directly impact downstream water quality and recreational use. Russell County envisions redeveloping the site into a commerce park and technology hub, providing sustainable employment opportunities for residents and revitalizing the community.

Priority Site #5: Former Snack Shop Gas Station in Hurtsboro (in the RCTA) — Located at the northeast corner of State Highway 26 and Main Street (Highway 51), this former gas station and convenience store is a highly visible deteriorating site at one of Hurtsboro's four main entry points. With a rusted, partially collapsed canopy, the site is a major eyesore in the community. However, the brick structure remains intact and holds potential for redevelopment without demolition. The environmental concerns primarily stem from its historical use as a gas station, which may have led to **petroleum and lead contamination**. These contaminants could be present in the soil and potentially leach into groundwater, posing a risk to water quality. Assessment funding through this grant would enable crucial testing to confirm and delineate any contamination. Addressing these environmental concerns would allow for redevelopment, transforming this blighted property into a community asset and enhancing the appeal to Hurtsboro's gateway.

1.d. Identifying Additional Sites: LRCOG is committed to assessing at least two sites per target area if this grant is funded, with an established Memorandum of Agreement (MOA) detailing the coalition's site selection process before any funds are expended. After completing assessments of the initial priority sites, LRCOG will proceed to additional sites within each target area's inventory. Our logical plan to identify additional sites not currently included in our existing inventory will start with a thorough review of historical land use records, tax assessments, and environmental reports to pinpoint properties with potential contamination concerns. A Brownfield Advisory Committee (BAC) will be formed to help facilitate the grant, and BAC members will collaborate with local government agencies and community members to gather insights on properties that may have previously housed industrial or commercial activities. Additionally, community engagement sessions will be held to allow residents to report and suggest sites with suspected environmental issues, ensuring a comprehensive inventory of potential brownfield locations.

To ensure a strategic and community-focused approach, prioritization criteria will be developed by the BAC. The BAC will prioritize sites based on potential health risks, environmental impact, developer interest, site accessibility, and the community benefits of potential redevelopment. The BAC will work closely with community members, particularly those in underserved areas, to gather input and refine site prioritization. Additional insights will be drawn from EPA Region 4's Technical Assistance to Brownfields (TAB) provider and the Delta Institute's Brownfield Marketability Scoring Tool. LRCOG's plan to identify additional sites and the proposed prioritization criteria will ensure that the prioritization of additional sites aligns with community needs and promotes sustainable redevelopment that directly benefits

disadvantaged communities within each target area.

Revitalization of the Target Area; 1.e. Reuse Strategy and Alignment with Revitalization Plans: The table below outlines the reuse strategy for each priority site and demonstrates how each reuse plan aligns with local land use, revitalization goals, and community priorities. Each strategy supports key goals from LRCOG’s Comprehensive Economic Development Strategy (CEDS) and aligns with specific objectives in associated coalition member strategic plans.

TA /Site	Proposed Reuse	Priority Goal in CEDS	Alignment with Revitalization Plans
Opelika (OTA) – Former Leshner Mill	Redevelopment into a mixed-use space with retail and affordable housing	Priority Goal 3: Healthy Communities	Redeveloping the Former Leshner Mill into a mixed-use space aligns with CEDS to support affordable housing and local shopping access, meeting community needs for healthy and accessible living spaces.
Phenix City (PCTA) – Coulter Building	Redevelopment into mixed-use office and retail space	Priority Goal 3 and 4: Healthy Communities Cultural, Recreation, and Environmental Resources	The mixed-use redevelopment of the historic Coulter Building aligns with CEDS Objective 1, Priority Goal 4, which emphasizes promoting local history and culture. It also supports Phenix City’s Vision Plan 2022, which prioritizes the adaptive reuse of historic buildings for community access and cultural enrichment.
Phenix City (PCTA) – Phenix Saw Works	Redevelopment into a brewery and greenspace along the riverwalk	Priority Goal 3 and 4: Healthy Communities Cultural, Recreation, and Environmental Resources	Redeveloping Phenix Saw Works into a brewery with greenspace and riverwalk access aligns with CEDS Objective 1, Priority Goal 4, which promotes local culture and community engagement. This strategy also aligns with Phenix City’s Vision Plan to enhance the Lively Entertainment District and expand riverwalk amenities.
Russell County (RCTA) – Former Walker Williams Lumber Mill in Hatchechubbee	Commerce and Technology Office Park	Priority Goal 5: Implement strategies and best practices to create and improve regional economic resiliency	Redevelopment of the Former Walker Williams Lumber Mill into a Commerce and Technology Park aligns with CEDS Objective 1 of Priority 5, focusing on economic resilience and local job creation. This strategy supports Russell County’s objectives to attract businesses and foster sustainable employment opportunities.
Russell County (RCTA) – Former Snack Shop Gas Station in Hurtsboro	Restaurant or grocery store	Priority Goal 3: Healthy Communities	Transforming the former gas station site into a restaurant or grocery store aligns with CEDS Goal 3 by enhancing local access to essential services and improving Hurtsboro’s community appeal at a primary entry point, supporting revitalization and community well-being.

1.f. Outcomes and Benefits of Reuse Strategy: According to the Federal Register⁴, all of the target areas are considered urban, with the exception of Hatchechubbee. The proposed redevelopment projects will deliver significant economic, social, and environmental benefits tailored to the needs of each target area. By removing contaminants and revitalizing underutilized properties, these projects will directly stimulate economic growth, improve public health, increase resilience, and support the long-term sustainability of underserved communities. The anticipated outcomes are as follows:

Stimulate Economic Development: Former Leshner Mill (OTA): Redeveloping this site into a mixed-use space with retail and 45 affordable housing units⁵ will create 35–70 construction jobs and 50–75 permanent jobs in retail, housing management, and office spaces. This project could generate \$500,000 in annual property and sales tax revenue based upon what is projected at the nearby Pepperell Mill redevelopment project currently underway. These revenues will contribute directly to Opelika’s local economy and address the critical need for affordable housing. Coulter Building (Phenix City): Transforming this historic building into a mixed-use site with office and retail spaces will create 40–60 construction jobs and 25–50 permanent jobs, revitalizing downtown Phenix City. The building is expected to add \$200,000 in annual tax revenue, which will support city services and further economic revitalization in this historically significant area.⁶ Phenix Saw Works (PCTA): Redevelopment into a brewery and greenspace along the riverwalk will create 10–30⁷ permanent jobs, enhance tourism, and attract new businesses to the district. This site will serve as a key connector for the riverwalk, boosting foot traffic and local spending. Walker Williams Lumber Mill (RCTA): Repurposing this site as a Commerce and Technology Office Park is projected to create 80–100 long-term jobs in sectors such as technology and professional services, with an additional 100 construction jobs. This project will also generate approximately \$300,000 in annual tax revenue, bolstering Russell County’s economic base.⁸ Snack Shop Gas Station (RCTA): Redevelopment as a convenience store or restaurant will create 15–20 permanent jobs, with 25–30 temporary construction jobs, transforming an eyesore into an active commercial site and enhancing Hurtsboro’s primary gateway. **Creation and Enhancement of Recreational and Green Spaces:** Phenix Saw Works (PCTA): The eastern portion of this property will be converted into greenspace with direct access to the Chattahoochee River, aligning with Phenix City’s plan to expand recreational areas and enhance public access to the river. This greenway will serve as an essential

⁴ Federal Register :: 2020 Census Qualifying Urban Areas and Final Criteria Clarifications

⁵ HUD, "Affordable Housing and Brownfield Redevelopment," HUD User (2017)

⁶ Urban Land Institute. The Economics of Place: The Value of Building Communities Around People. ULI, 2015

⁷ Brewers Association. Economic Impact of Craft Breweries in the United States

⁸ U.S. Economic Development Administration. Economic Impact Analysis for Business and Technology Parks

recreational asset, attracting residents and tourists alike, and supporting local wellness and environmental initiatives. **Former Leshner Mill (OTA):** Plans include community gathering areas and green spaces within the mixed-use development, adding much-needed recreational spaces for residents in this underserved area. These areas will foster community engagement, improve livability, and provide outdoor gathering spaces for residents.

Climate Adaptation, Mitigation, and Resilience: Russell County Projects (including Walker Williams Lumber Mill & the Former Snack Shop Gas Station): All redevelopment in Russell County will adhere to the 2015 International Energy Conservation Code (IECC), ensuring reduced water and energy usage. Water-efficient fixtures will decrease water consumption by 15%, monitored through pre- and post-installation metrics, which will enhance resilience to droughts and water scarcity challenges. **Coulter Building (PCTA):** Compliance with the 2021 IECC standards for the Coulter Building will include upgrades to insulation, HVAC, and lighting systems. These measures are expected to reduce the building's carbon footprint by an estimated 20 metric tons of CO₂ annually, supporting Phenix City's climate mitigation goals and reducing operational costs.⁹

Incorporation of Renewable Energy and Energy Efficiency Measures: Coulter Building (PCTA): Plans to explore rooftop solar installations align with Phenix City's renewable energy initiatives, while energy-efficient lighting and modern HVAC systems will reduce energy consumption and operational costs. The project is expected to serve as a model for sustainable development in historic preservation. **Former Leshner Mill (OTA):** This project will incorporate energy-efficient building materials and appliances, designed to meet IECC standards and minimize greenhouse gas emissions. These measures not only lower energy costs but also advance Opelika's goals for sustainable, affordable housing. This grant will empower the coalition to protect public health, increase climate adaptability, and foster economic opportunity, meeting EPA priorities and supporting a healthier, more resilient future for the region.

Strategy for Leveraging Resources; 1.g. Resources Needed for Site Reuse:

Our coalition has access to multiple funding sources that will complement this Coalition Assessment Grant, enhancing the feasibility and impact of our reuse strategies at priority sites. These funds will provide essential support for both the assessment and remediation phases, helping to stimulate additional investments and drive site redevelopment forward. Resources needed for Site Reuse include:

- **LRCOG Revolving Loan Fund (RLF):** The LRCOG RLF provides accessible, low-interest loans to for-profit businesses in Lee and Russell Counties, supporting start-up and expanding small to medium-sized businesses. This fund can bridge financial gaps for projects involving land, building acquisition, renovations, and equipment purchases. By working in partnership with private lenders, the RLF finances up to 40% of a project's total cost, with loan terms up to 15 years for land and buildings. This resource will complement the brownfield grant by supporting redevelopment at priority sites, attracting private sector investment, and promoting job creation.
- **Federal Department of Transportation Grant.** Phenix City received a Reconnecting Communities & Neighborhoods (RCN) Grant of \$352,000 to help plan redevelopment on Highway 280, the main thoroughfare coming into the city.
- **ADEM Targeted Brownfields Assessment (TBA) Funding:** ADEM has already allocated TBA funds to conduct a Phase I and limited Phase II ESA at the Leshner Mill, helping to identify initial contamination concerns. ADEM remains a committed resource and can provide additional assessment funds for other sites within our target areas as needed. This ongoing support will allow us to extend our assessment capabilities, accelerating the cleanup process.
- **ADEM Revolving Loan Fund:** This fund offers low-interest loans to governmental entities on a competitive basis for the remediation of contaminated sites. To be eligible, the applicants must own the properties. The negotiated loans generally have a 10-year payback period.
- **Community Development Block Grants (CDBG):** CDBG funding, aimed at preventing or clearing slum and blight, can be applied to all priority sites. These grants will be instrumental in addressing environmental concerns at blighted properties, preparing them for redevelopment. This funding aligns with our goals and will further stimulate revitalization at these locations.
- **Main Street Façade Grants for Opelika and Phenix City:** Opelika and Phenix City have secured Main Street Façade grants, specifically designated for improvements in the target areas. These grants will support exterior restoration at sites like the Coulter Building, preserving historic character while preparing the property for reuse. By leveraging façade grants alongside Coalition Assessment funding, we can enhance the visual appeal and structural integrity of these properties, increasing their attractiveness for private investment.
- **Alabama Department of Economic and Community Affairs (ADECA) Enterprise Zone Tax Incentives:** ADECA provides tax incentives for projects within designated Enterprise Zones, which cover parts of our target areas. These incentives reduce costs for construction materials, machinery, and equipment, supporting the redevelopment of properties in economically distressed areas. Enterprise Zone benefits will encourage private sector participation by lowering development costs, especially at priority sites like the Former Walker Williams Lumber Mill.
- **Black Belt Region Infrastructure Funding:** The Black Belt region has received **\$1.6 million** to address infrastructure and basic health needs, a resource that aligns directly with our reuse goals. For example, Hurtsboro's Storm Water Collection System Improvement project has been awarded over **\$387,000** to mitigate flooding, a critical infrastructure enhancement that will support redevelopment by reducing site risks. These funds will complement this grant by addressing foundational needs that facilitate safe, resilient redevelopment.

⁹American Council for an Energy-Efficient Economy, *The Energy Efficiency Impact Report*

These funding sources will strengthen our ability to carry out site assessments, remediation, and redevelopment, supporting our broader goal of revitalizing the target areas. By combining this brownfield grant with these resources, we will enhance the financial feasibility of each project, attract further investment, and ensure sustainable outcomes.

1.h. Use of Existing Infrastructure: Each target site is located within a developed area already serviced by essential infrastructure, including roads, water, sewer, and electricity, provided by municipal or county systems. This existing infrastructure will facilitate the swift reuse of priority sites, supporting project goals without requiring additional installations. Leveraging this infrastructure will reduce project costs and accelerate redevelopment, allowing resources to focus on remediation and revitalization. If additional infrastructure needs arise during redevelopment, we will secure funding from federal, state, local, and private sources—including CDBG, Tax Increment Financing (TIF), public-private partnerships, and grant programs—to ensure comprehensive support for sustainable site reuse.

1. COMMUNITY NEED AND COMMUNITY ENGAGEMENT; Community Need; 2.a. The Community’s Need for Funding: The communities within the target areas of Phenix City, Opelika, and Russell County are marked by high poverty rates, low household incomes, and small populations, severely limiting their ability to secure other funding sources for environmental assessment, remediation, and subsequent reuse. These communities are effectively cut off from the financial resources needed to address contamination at brownfield sites, which has left long-standing environmental hazards unaddressed and perpetuated cycles of economic decline and public health risks.

Small Population and Low-Income Indicators ¹⁰					
Metric	Phenix City (PCTA)	Opelika (OTA)	CTs 311 & 312 RCTA	Alabama	USA
Population	11,496	13,351	5,373	5,157,699	340,110,988
Low-Income	61%	59%	40%	38%	30%
Low Food Access	3.27%	14.6%	56.0%	24.5%	22.2%
Unemployment Rate	11%	5%	3%	2.9%	4.3%
Median Household Income	\$26,675	\$33,760	\$47,360	\$62,027	\$78,538
Poverty below 100% FPL	39.3%	30.6%	11.91%	15.6%	12.4%
Per Capita Income	\$20,909	\$24,422	\$25,293	\$34,834	\$43,228

For example, the RCTA has experienced significant population loss, with a 7.81% decrease over the last decade following an even sharper decline of 17.85% in the previous decade. The PCTA lost 7.8% and 6.44% of its population for the same period. This ongoing exodus of residents has eroded the

tax base, leaving the target areas with dramatically reduced capacity to generate revenue for public projects. Additionally, Phenix City and Opelika face economic stagnation, compounded by substantial poverty rates. In the Phenix City target area, the poverty rate stands at an alarming 42.1%, more than triple the national average of 12.5% and almost three times Alabama’s statewide rate of 15.7%. Median household incomes across these areas are strikingly low: \$26,675 in Phenix City, \$33,760 in Opelika, and \$47,360 in Russell County, all well below the national average of \$75,149. These income levels highlight the severe economic hardship faced by these communities, where residents struggle to meet basic needs, making it even more challenging to address costly environmental cleanups. These economic challenges are compounded by high unemployment rates and food access issues, which underscore the profound need for external funding. The PCTA reports an 11% unemployment rate, nearly double the national average, while the RCTA suffers from low food access rates of 56%, more than double the national rate of 22.2%. These indicators of economic hardship are not just statistics; they reflect real limitations on these communities’ capacity to self-fund assessment and remediation efforts. Phenix City, Opelika, and Russell County are, by all measures, under-resourced and disadvantaged, with no realistic ability to pursue brownfield redevelopment without significant external assistance. This EPA brownfields grant represents the only viable path forward to initiate site assessments, conduct necessary remediation, and unlock the potential for revitalization in these areas. This funding would catalyze the environmental cleanup and economic renewal these communities desperately need. By enabling assessments at key brownfield sites, the grant will not only address immediate environmental and health risks but also pave the way for new economic opportunities, improved public health, and enhanced quality of life for residents in the TAs who are unable to fund environmental work independently.

2.b. Health or Welfare of Sensitive Populations: Our target areas are home to substantial populations of highly sensitive groups, whose health and welfare are directly threatened by environmental contamination and socioeconomic challenges. As illustrated in the table below, each target area has significant concentrations of low-income individuals, children, seniors, and individuals with disabilities, all of whom are more vulnerable to the adverse effects of pollution and environmental degradation. The severity of these risks is compounded by the high levels of poverty and other socioeconomic barriers that limit these populations’ access to healthcare, safe housing, and environmental protections.

The Former Leshner Mill is in a predominantly low-income area where 59% of residents live below the poverty line, and it poses significant environmental risks due to contaminants identified in preliminary assessments, including arsenic, chromium, and volatile organic compounds (VOCs). Redevelopment of this site into a mixed-use space with retail and affordable housing will directly benefit the 61% low-income population and 9% child population in Opelika by removing

¹⁰ Source: US Census, 2021: ACS 5-Year Estimates Data Profiles

hazardous substances and creating affordable housing units. This project will provide stable housing for low-income families, many of whom have limited access to safe, quality housing. Additionally, the introduction of retail amenities will improve access to essential services and job opportunities, addressing socioeconomic needs that directly impact public health and welfare. The redevelopment of the Coulter Building in Phenix City, where 61% of residents are low-income and 75% are people of color into a mixed-use space with offices and retail shops, will create jobs and providing

Sensitive Populations in the Target Areas ¹¹					
Metric	Phenix City	Opelika	Russell County CTs 311 & 312	Alabama	USA
Population with a Disability	17.6%	18.1%	19.1%	16.2%	13.0%
Low-Income	61%	59%	40%	38%	30%
Under 5	9%	8%	4%	6%	5%
Over 65	14%	17%	22%	17.4%	16.8%
Less than High School Education	18.7%	19%	14.4%	13%	11%
Unemployment	11%	5%	2%	6%	6%
Violent Crime	505	415.6	505	479.9	386.5

safe, accessible services in a high-poverty area. Cleaning up and reusing this site will reduce environmental risks associated with asbestos exposure, benefiting the local elderly population (14%) and children under five (9%), who are particularly vulnerable to respiratory issues associated with such contaminants. This reuse will help address health disparities that have historically impacted residents of color and low-income families. The Phenix Saw Works site is adjacent to sensitive populations that include 11% unemployed individuals and a significant percentage of people of color (75%). This site's previous use as a small engine repair facility likely left petroleum and solvent contaminants that pose risks to nearby residents. The City's reuse strategy for this site involves transforming it into a brewery and green space, with a new connection to the riverwalk, which will provide residents with much-needed recreational space and safe, green areas. This greenspace development will be particularly beneficial for the 9% of children and 14% of seniors in the area, groups most at risk from environmental contaminants, and who will benefit from safe, accessible outdoor areas. The Former Walker Williams Lumber Mill in Russell County, where 48% of residents are people of color, 22% are over 65, and 20.1% have disabilities, poses significant contamination risks from wood treatment chemicals affecting soil and groundwater. Redeveloping this site into a Commerce and Technology Office Park will create jobs and boost economic stability in a high-poverty, high-unemployment area. Assessment and cleanup planning funded by this grant will lead to remediation and redevelopment to protect vulnerable populations from exposure while providing accessible employment opportunities, fostering economic inclusion and revitalization in the community. In Hurtsboro, where 22.3% of residents live below the poverty line and rely on groundwater for their drinking water, contamination from petroleum and lead at the Former Snack Shop Gas Station may pose a serious health risk. Redeveloping this site into a restaurant or grocery store will create jobs and provide essential services in an underserved community.

High crime rates add an additional layer of complexity to the welfare of these communities. The violent crime rates in both Opelika and Phenix City are approximately twice the national average (528.8 in Phenix City and 467.5 in Opelika, compared to the national average of 416), which has contributed to significant disinvestment in these areas. This disinvestment perpetuates cycles of neglect and increases the number of brownfields, as properties become abandoned and fall into disrepair. By facilitating the cleanup of brownfield sites, this grant will stimulate reinvestment, which is anticipated to improve safety and reduce crime by revitalizing blighted areas and providing economic opportunities.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Our three target areas face severe health disparities, with significantly elevated rates of diseases that could be linked to environmental contamination of our brownfields. This EPA Brownfields grant will enable efforts that directly identify and reduce these risks, supporting the health and welfare of these vulnerable communities. Alabama ranks as the second most unhealthy state in the nation, with low life expectancy and high rates of chronic conditions, and the target areas exemplify these challenges. Phenix City's asthma rate (12.9%) and COPD rate (13.2%) are up to 30% higher than the national averages, placing an extra burden on children, the elderly, and low-income residents who are most vulnerable to respiratory issues. With funding from this grant, assessments and cleanups at sites like the Coulter Building and Phenix Saw Works will mitigate exposure to respiratory hazards like asbestos and PAHs, directly lowering these health risks.

Lung cancer rates in the target areas are notably high: 66.2 per 100,000 in Phenix City and 62.9 in Russell County, both well above the national rate of 54. Identification and reduction of contaminants, particularly at the Coulter Building, Phenix Saw Works, and Walker Williams Lumber Mill will help reduce the carcinogenic risks associated with these brownfields, directly addressing a critical public health threat. Low birth weight, often associated with toxic exposure, is a critical concern in Phenix City and the RCTAs, with rates reaching 10.8%, well above the national average of 8.3%. High infant mortality, frequently linked to birth defects, underscores the vulnerability of this community, as infant mortality rates in the PCTA and the RCTA exceed both state and national averages. Known contaminants, such as petroleum-related compounds and potential industrial pollutants, have been identified as contaminants of concern at sites within the Phenix City and RCTA target area, posing clear risks to maternal and child health.

¹¹ US Census, 2021: ACS 5-Year Estimates Data Profiles; *per rate per 1,000; Federal Bureau of Investigation, FBI Uniform Crime Reports. *rate per 100,000

Although birth defect data is not available at the census tract level, county-level data for Russell County (which includes Phenix City) shows that the birth defect death rate is 125.8% higher than the state rate (7.0 per 1,000 vs. 3.1 per 1,000)¹³, highlighting the elevated health risks associated with these exposures. This grant will fund essential environmental assessments and cleanups to mitigate contaminant exposure, helping to protect vulnerable populations, particularly mothers and infants, from harmful health impacts associated with these hazardous substances. Additionally, 36.5% of Phenix City’s population and 30.3% of Opelika’s report poor general health, far above the national average of 12.7%. Redevelopment of the Former Walker Williams Lumber Mill into a Commerce and Technology Office Park will create jobs and economic stability, addressing socioeconomic determinants of health. The grant-funded environmental cleanup will make this redevelopment possible, directly benefiting residents currently suffering from the impacts of contamination.

Incidences of Disease and Adverse Health Conditions ¹²					
Health Metrics	Phenix City	Opelika	Russell County CTs 311 & 312	Alabama	United States
Obesity	48.3%	35.2%	35.0%	34.1%	30.1%
Diabetes	15.0%	10.7%	11.3%	10.5%	9.9%
Asthma	12.9%	11.5%	11.5%	10.5%	9.9%
Infant Mortality	9.0%	7.0%	9.0%	8.0%	5.7%
Low Birth Weight	10.8%	9.6%	10.8%	10.5%	8.3%
Cancer Lung	66.2	44.6	62.9	60.1	54.0
COPD	13.2%	10.6%	11.0%	8.7%	6.8%
Poor General Health	36.5%	30.3%	29.2%	14.6%	12.7%

2.d. Economically Impoverished/Disproportionately Impacted Populations: The target areas in Phenix City, Opelika, and Russell County are situated within Alabama’s Black Belt region, historically recognized as one of the most underserved and environmentally burdened areas in the United States. The Black Belt is home to several communities in urgent need of federal investment to improve air and water quality, public health, and sanitation infrastructure. The PCTA ranks in the 95th percentile nationally for low life expectancy, highlighting severe health disparities that stem from chronic environmental and socioeconomic stressors. Both PCTA and OTA have a very high percentage of underground storage tanks present, which pose significant risks of soil and groundwater contamination—a critical concern for communities already struggling with safe water access. Both the RTCA and PCTA have had past drinking water violations reflecting a consistent failure to meet safe water standards and an ongoing threat to community health. These statistics reveal stark environmental health inequities that disproportionately impact the target areas’ vulnerable populations. Furthermore, the social and economic burdens in these areas are profound. In the PCTA, the rate for low-income households is a very high 61%. High unemployment plagues this community, with the PCTA having the highest rate between the three target areas at 11% percentile nationally. The economic hardship in RCTA is compounded by its designation as a “persistent poverty county,”¹⁴ with generational poverty that limits local capacity to address environmental and health risks independently. These indicators reflect that these communities have limited resources to mitigate environmental hazards, making external intervention through this grant crucial.

The region’s compounded challenges of poverty, and environmental neglect create a greater burden for people living in the target areas to overcome. Without federal funding, these communities cannot assess and remediate the contaminated brownfield sites that continue to threaten public health. This grant will provide essential support to address groundwater contamination risks, improve air quality, ensure safe drinking water, and directly tackle the environmental hazards that have plagued this region for decades. By empowering the community to address these environmental threats, this grant will be a vital step toward restoring health and resilience in Alabama’s Black Belt.

Redevelopment in the target areas will advance the condition of economically impoverished and disproportionately impacted populations by addressing contaminants and creating opportunities that directly benefit these target areas that disproportionately share the negative environmental consequences. Each site’s reuse strategy has been developed to enhance community well-being, address specific health threats, and promote local economic stability. Redevelopment of the former Leshner Mill will provide affordable housing and retail options, addressing contaminants like arsenic and lead identified by ADEM. By integrating affordable housing within the community, the project reduces pressure on existing housing, offering sustainable living options that allow low-income residents to remain in their neighborhoods. Transforming the former Phenix Saw Works into greenspace and riverwalk access is intended to serve as a public resource that is accessible to all residents, particularly benefiting those who have limited recreational options. By creating a public space rather than a high-cost development, the project promotes physical and mental health benefits for residents without increasing housing costs, thus avoiding the risk of pushing residents out. The Coulter Building will be repurposed into mixed-use space, preserving local history and providing jobs while eliminating asbestos risks linked to high lung disease rates in Phenix City. The project’s focus on affordable commercial spaces and community-oriented services ensures that the benefits of redevelopment are accessible to all income levels, of rapid inflation in property values that could otherwise threaten affordability for existing residents. This redevelopment will act as a community anchor, stabilizing the local economy and supporting long-time residents. The Walker Williams

¹² SparkMap. Community Health Needs Assessments
¹³ https://www.alabamapublichealth.gov/healthstats/assets/113causes_2019.pdf
¹⁴ <https://mtgis-portal.geo.census.gov/arcgis/apps/mapviewer>

Lumber Mill will be converted into a Commerce and Technology Office Park, addressing contamination near Hatchchubbee’s center and creating higher-paying jobs in this rural community and reducing poverty. This project empowers residents by offering quality employment opportunities close to home. Finally, redeveloping the former Snack Shop Gas Station into a grocery store or restaurant will remove a blighted structure and provide fresh food access in this food desert. By filling a gap in essential services rather than introducing high-cost development, the project strengthens local quality of life, reduces the need for residents to travel for necessities, and improves local economic resilience. The addition of a community-centered business aligns with residents' needs and is unlikely to raise property values to levels that could displace current residents. If remediation is needed based on assessment from this grant, it will result in protecting the local water quality, addressing critical health disparities while improving access to healthy food in the community.

Each site’s redevelopment addresses the issues faced in each respective target area by removing harmful contaminants, improving public health, and strengthening the local economy—all while prioritizing existing residents to prevent displacement. This grant will help build safer, healthier, and more resilient communities in Alabama’s Black Belt, directly benefiting those most economically impoverished and disproportionately impacted people living there.

Community Engagement; 2.e. Project Involvement & 2.f. Project Roles: The LRCOG and coalition members have engaged a diverse group of local organizations and community-based groups to ensure that project decisions reflect the needs and priorities of affected residents. Each non-lead coalition member will serve on the Brownfields Advisory Committee (BAC), ensuring they remain fully engaged, informed, and able to influence key project decisions aligned with community goals. Each partner will play a specific role in site selection, cleanup/reuse planning, and supporting robust community engagement and helping to shape the project’s outcomes.

Name of Organization & Entity’s Mission	Point of Contact (name & email)	Specific Involvement in The Project or Assistance Provided
Alabama Department of Economic and Community Affairs / <i>Economic growth and community development</i>	Kenneth Boswell kenneth.boswell@adeca.alabama.gov	ADECA will coordinate their resources and provide training and technical assistance to members of the target communities to maximize the impact of brownfield assessment and cleanup efforts. <i>(All Target Areas)</i>
Greater Mt. Zion Baptist Church / <i>Spiritual growth and community support</i>	Noble Williams church@gmzbaptistchurch.com	Serve on the BAC, facilitate public communication, provide meeting space, and ensure local residents are actively engaged in discussions on site selection, cleanup, and reuse. <i>(PCTA)</i>
Russell County Historical Commission / <i>Preserve and promote Russell County's history</i>	Naomi Elliot [REDACTED]	Serve on the BAC, provide input and technical support on historical preservation of buildings (like the Coulter Building) <i>(RCTA and PCTA)</i>
Central Alabama Works / <i>Workforce development and job alignment</i>	Gindi Prutzman gprutzman@centralalabamaworks.com	Align workforce development efforts with project needs, preparing local residents for employment in roles created through brownfield redevelopment. <i>(All Target Areas)</i>
East Alabama Chamber of Commerce / <i>Business support and economic growth</i>	Melissa Guantt melissa@ealcc.com	Assist in identifying sites and conducting outreach to underserved communities, integrating community priorities into project planning, and ensuring local businesses are considered in site reuse plans. <i>(PCTA)</i>
TriRivers Waterway Development Association	Phillip Clayton pclayton@eufaulachamber.com	TriRivers Waterway Development Association (TRWDA) is a not-for-profit whose sole mission is to promote the Chattahoochee River system. It will help promote ecotourism to redeveloped brownfield sites, such as those being redeveloped on the riverfront. <i>(PCTA)</i>
Opelika Chamber of Commerce / <i>Business support and economic growth</i>	Ali Rauch ali@opelikachamber.com	Support outreach to underserved communities in Opelika, obtaining community feedback on site selection and reuse, and fostering local business engagement in redevelopment efforts. <i>(OTA)</i>
AIDT / <i>Workforce training and job development</i>	Ed Castille, ecastille@aidt.edu	Provide technical training to prepare local residents for jobs in brownfield cleanup and redevelopment, ensuring that remediation benefits local workers. <i>(All Target Areas)</i>
Alabama Brownfields Association / <i>Brownfield remediation and regulatory support</i>	Chey-enne Kilpatrick admin@albfa.org	Assist in promoting economic revitalization, site reuse, restoration, remediation, financial and regulatory incentives, legislative advocacy, and real estate resources. <i>(All Target Areas)</i>

2.g. Incorporating Community Input: LRCOG is committed to fostering active community participation, incorporating local voices into decision-making, and ensuring accessible, transparent communication throughout the project. To facilitate this, LRCOG will organize inclusive outreach events and form a BAC composed of community representatives, business leaders, neighborhood organizations, and citizen groups from each target area. This committee will provide a

direct platform for community input on site prioritization, project planning, and redevelopment options. To keep the community well-informed and engaged, LRCOG and coalition members will host semi-annual community meetings to share project updates and solicit ongoing feedback. These meetings will include presentations on project progress, opportunities for community members to express concerns and suggest priorities, and interactive sessions where residents can weigh in on site-specific decisions. Meeting outcomes and decisions will be documented and made publicly available, demonstrating transparency and accountability.

Understanding the importance of flexible engagement options, LRCOG will provide alternative means of participation. Zoom meetings will be available to ensure accessibility for those who cannot attend in person, and meetings will be recorded for later viewing, allowing residents to stay informed at their convenience. In addition to English, progress updates will be provided in Spanish, given that 6.4% of Opelika, 5.3% of Phenix City, and 0.9% of Russell County’s populations are Spanish speaking. Project updates, meeting announcements, and brownfield-related information will be widely shared via multiple channels. These include public flyers, handouts at outreach events, postings on both cities’ websites, and social media pages (e.g., Facebook). An email mailing list will allow community members to receive regular updates, invitations to meetings, and event notifications. Each email will include a link to a feedback form, enabling community members to share their input. Feedback received will be reviewed and responded to within one week, showing responsiveness to community concerns. Physical document repositories will be established at the Opelika, Phenix City, Hatchechubbee, and Hurtsboro libraries, ensuring that all project materials, including updates and reports, are available for residents who may not have internet access. Additionally, all materials will be translated into multiple languages via Google Translate to accommodate diverse linguistic needs.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS; Description of Tasks/Activities and Outputs: LRCOG will prioritize the sites in the target areas before assisting others. We will leverage our extensive in-house expertise in grant management, planning, and economic development, along with partner resources, to enhance the EPA grant funds and stimulate redevelopment in our jurisdiction. We have already taken proactive steps to demonstrate our commitment to effective use of brownfield funds by soliciting dedicated and experienced coalition members and committing our own resources to the effort. No health monitoring activities are planned as part of this brownfields project at this time, but the need for such activities will be evaluated based on the findings of planned environmental assessments. *Sections 3.a.i, 3.a.ii, 3.a.iii, and 3.a.iv* have been consolidated in the following table:

Task 1: Program Management	
a. Project Implementation	b. Anticipated Project Schedule
Grant oversight and correspondence with EPA	Ongoing throughout project
Develop and monitor the Grant Work Plan	Quarter 1 (Q1), updated as needed
Finalize scope and terms with environmental professional selected through a federally-compliant selection process; Kickoff Meeting with Project Partners and contractors to finalize agreements, and discuss roles and expectations	Q1
ACRES updates	At the end of each month, and as needed
Financial tracking and reports	At the end of each month, annual reports
Annual reports	Q4, Q8, Q12, Q16
Final report	Q16
Attend two brownfield conferences	Q1 and Q5
c. Task/Activity Lead: LRCOG with reporting assistance from Qualified Environmental Professional (QEP)	
d. Outputs: Grant Work Plan, 16 quarterly reports, 4 FFR reports, 4 MBE/WBE reports, 1 final report, ACRES updates	
Task 2: Site Inventory and Community Outreach	
a. Project Implementation	b. Anticipated Project Schedule
Update our Community Involvement Plan	Q1, updated as needed
Hold meetings with partners to review sites, environmental records, reuse potential, developer interest, and goals alignment	As needed
Site inventory, selection, and prioritization	Q1, updated monthly
Attend community meetings	Q1, Q2, more as needed
Prepare community educational materials (press releases, flyers/mailers)	As needed
Website and social media work	Website and social media account integration established in Q1, updated as needed
Collect and respond to community feedback	Continuously as needed
c. Task/Activity Lead: Brownfields Advisory Committee (includes LRCOG staff)	
d. Outputs: Brownfields Project website (update), 6 community meetings, 5 press releases, 5 flyers, site inventory	
Task 3: Phase I and Phase II Environmental Site Assessments (ESAs)	
a. Project Implementation	b. Anticipated Project Schedule
Create Quality Assurance Project Plan (QAPP)	Q1
Conduct 29 Phase I ESAs (5 Priority Sites plus 17 additional sites)	Begin after site inventory is approved by the BAC. Priority Sites completed by Q4. Additional sites completed throughout the project and completed by Q14.
Conduct 18 Phase II ESAs and 7 Phase III ESAs (with SAPs)	Begin after a Phase I is completed. Priority Sites completed by Q4. Additional sites completed throughout the project. All completed by Q15.

c. Task/Activity Lead: QEP with LRCOG oversight	
d. Outputs: 1 QAPP, 29 Phase I ESAs, 18 Phase II ESAs, 7 Phase III ESAs (includes SAPs).	
Task 4: Planning	
a. Project Implementation	b. Anticipated Project Schedule
Identify cleanup options and costs	Begin after a Phase II is completed. Priority sites completed by Q5. All completed by Q16.
Develop 5 Analysis of Brownfields Cleanup Alternatives (ABCAs)	Begin after cleanup identification is completed. Priority sites completed by Q6. All completed by Q16.
Create 1 Revitalization Plan, 1 Equitable Development Plan, 1 Site Reuse Plan, 1 Infrastructure Evaluation	Begin after assessment and ABCA is completed and may include eligible reuse planning, infrastructure evaluation, or site disposition strategy. All activities completed by mid-Q15.
c. Task/Activity Lead: ABCAs = QEP with LRCOG oversight / Planning= LRCOG Staff with QEP support	
d. Outputs: 5 ABCAs, 1 Brownfield Revitalization Plan, 1 Equitable Development Activities, 1 Infrastructure Evaluation Plan, 1 Site Reuse Vision.	

3.e. Cost Estimates: Cost estimates for this project were developed based on a comprehensive assessment of LRCOG community-specific needs, and our review of past brownfield grant applications for similar projects. This approach ensures that the estimates are realistic, account for potential contingencies, and align with the project's objectives. Cost estimates for implementing the tasks anticipated to be associated with this project are presented in the table below, followed by a detailed explanation of how the costs were derived.

Budget Categories		Program Management	Community Outreach	Phase I & II ESAs	Planning	Total
Direct Costs	Personnel	\$60,000	\$42,750	-	-\$45,000	\$147,750
	Fringe Benefits	-	-	-	-	--
	Travel	\$13,600	-	-	-	\$13,600
	Supplies	-	\$2,200	-	-	\$2,200
	Contractual	\$49,000	\$29,750	\$1,035,500	\$220,000	\$1,334,250
	Construction	-	-	-	-	-
	Other-Conference Reg. Fees	\$2,200 ¹	-	-	-	\$2,200
Total Direct Costs		\$124,800	\$74,700	\$1,035,500	\$265,000	\$1,500,000
Total Indirect Costs		-	-	-	-	-
Total Budget		\$124,800	\$74,700	\$1,035,500	\$265,000	\$1,500,000

Task 1: Program Management: \$124,800
Personnel Costs: 800 hours x \$75/hour = \$60,000; *Travel Costs:* Per staff cost at \$1,700/conference, includes flight (\$500), hotel (\$300/night for 3 nights), per diem (\$100/day for 3 days), x 2 staff x 4 conferences, total of \$13,600. *Contractual Costs:* 280 hours x \$175/hour = \$49,000.

Task 2: Community Outreach: \$74,700
Personnel Costs: 570 hours x \$75/hour = \$42,750; *Supplies Costs:* BSC/community meeting presentation materials = \$2,200; *Contractual Costs:* 170 hours x \$175/hour = \$29,750.

Task 3: Phase I & II ESAs: \$1,035,000 (69% of the total project funds)
Contractual Costs: Generic QAPP= \$6,000. 29 Phase I ESAs at avg. cost of \$5,000 ea. (includes lien search back to 1980, Property Eligibility Determination and AAI Checklist) = \$145,000. 18 Phase II ESAs at avg of \$33,000 ea. = \$594,000 (includes SAPs). 7 Phase III ESAs at avg cost of \$41,500 ea. = \$290,500.

Task 4: Planning \$265,000
Personnel Costs: Planned Reuse activities include 1 Site Reuse Assessment = \$45,000 (600 hrs. x \$75/hr). *Contractual Costs* 1 Brownfield Revitalization Plan = \$75,000. 1 Equitable Development = \$75,000. 1 Infrastructure Evaluation= \$45,000; 5 ABCAs at \$5,000 ea. = \$25,000. ¹*Other* Budget Category includes brownfield conference registration fees (8 x \$275 per conf. = \$2,200).

3.f. Plan to Measure and Evaluate Environmental Progress and Results: The LRCOG will oversee rigorous tracking and evaluation of each Coalition Target Area project. Upon grant award, LRCOG will finalize a workplan with the EPA Project Officer, outlining all project outputs, timelines, and costs. Each month, LRCOG will review progress against this workplan, monitor budget alignment, and address any delays with corrective actions involving the BAC and coalition members as needed. LRCOG will require the environmental professional to provide a monthly schedule of milestones, budgets, and deliverables, ensuring ongoing accountability. Additionally, LRCOG will use the EPA ACRES system to track project outcomes for each site, guaranteeing transparency and the ability to measure impacts. To keep the community informed, LRCOG will post quarterly updates on its website detailing project progress, outputs, and environmental benefits.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE; *Programmatic Capability, 4.a.; Organizational Capacity; 4.b. Organizational Structure; 4.c. Description of Key Staff:* LRCOG, as the lead coalition member, has demonstrated strong programmatic capacity through its organizational capacity, structure, staffing expertise, and resource acquisition, making it well suited to manage the EPA Brownfields Assessment Coalition Grant. With a proven track record in managing complex, multi-million-dollar grants, LRCOG has demonstrated the ability to oversee programmatic, financial, and administrative aspects of these programs with precision. Since 2012, LRCOG has managed over \$10 million in state and federal grants, all completed on time and in compliance with stringent federal standards. Notably,

LRCOG led the \$500,000 Russell County COVID-19 relief effort, efficiently distributing resources to low-income and marginalized groups, earning recognition by state and local agencies. Through these efforts, LRCOG has built a robust grant management infrastructure and is adept at applying detailed tracking, financial reporting, and oversight to ensure program success. As the lead agency, LRCOG will serve as the primary fiscal and administrative agent for the coalition, coordinating directly with EPA and coalition members. This centralized structure enables streamlined communication, accountability, and timely grant management. The coalition will operate under a clear governance model that includes a Memorandum of Understanding (MOU) between LRCOG and each member entity, formalizing the decision-making structure and ensuring that all coalition members actively participate in funding decisions. This approach leverages LRCOG’s administrative strengths while empowering local governments—Opelika, Phenix City, and Russell County—to lead community engagement and outreach efforts directly within impacted communities, ensuring that grant benefits are equitably distributed across each target area.

David Robison, AICP, LRCOG’s Director of Economic Development, will serve as Project Director. David holds a Master of Public Administration and a Master of Community Planning from Auburn University, complementing his technical expertise in urban systems like GIS and strategic planning. With over 17 years of experience in economic development and brownfield project management, David has successfully managed complex projects and facilitated community development initiatives across the public and private sectors. David has administered over \$3.1 million in grant-funded projects, including transportation infrastructure and downtown revitalization efforts. Lisa Sandt, LRCOG’s Executive Director, brings over 26 years of experience with the Council, having overseen millions in grant funding for regional projects. Lisa has over 32 years of implementing and administering community and economic development programs and grants for private and public sectors. Under her leadership, LRCOG has expanded its services to encompass over 63 programs, addressing the needs of citizens and businesses in Lee and Russell Counties. As an alternate project director, Ms. Sandt’s strategic insight will be invaluable in maintaining project momentum and addressing emerging challenges. Van Vanoy, LRCOG’s Director of Finance, brings over 34 years of experience in financial oversight of governmental accounting and auditing experience. Van held various accounting and directors’ positions at school boards in Georgia and Alabama prior to Lee-Russell. He oversees the organization’s financial operations, including budgeting, financial reporting, and compliance with federal and state regulations. His expertise in grant budgeting and cost management will guarantee accurate financial reporting and accountability.

4.d. Acquiring Additional Resources: As previously stated in the Threshold Criteria, a QEP has already been selected in compliance with 2 CFR Part 200 and 2 CFR Part 1500, 40 CFR Part 33, and other EPA procurement guideline requirements. If additional resources are needed, LRCOG already has a process in place for acquiring additional expertise and resources required to successfully complete this project. This proactive approach ensures that technical expertise is readily available, accelerating the project timeline and optimizing resource allocation. LRCOG is committed to supporting local workforce development through this grant. The coalition will prioritize local hiring practices and plans to engage community workforce organizations, such as Central Alabama Works, to connect residents to employment and training opportunities in brownfields assessment and redevelopment. This strategy not only strengthens community ties but also builds a skilled, local workforce capable of sustaining redevelopment efforts beyond the life of the grant.

Past Performance and Accomplishments; 4.f. Has Not Received an EPA Brownfields Grant (1) Purpose and Accomplishments & 2) Compliance with Grant Requirements: LRCOG has never been the recipient of an EPA brownfields grant. LRCOG successfully manages multiple grant programs under numerous agencies. All grants managed by LRCOG have been completed in accordance with the grant requirements and within the specified timelines. These grants were also completed in compliance with work plans, schedules, terms, and conditions as required by each grantor. The expected results were achieved. The table below provides the requested details for LRCOG’s three most recent grants.

Program	Purpose and Accomplishments
Community Development Block Grant CARES Act (\$500,000)	Russell County COVID Community Development Block Grant Funding was provided to help minimize the impact of COVID-19 on low-income and moderate-income citizens of Russell County by providing funds for food distribution, emergency response equipment, health services, and septic tank installation.
Community Development Block Grant (\$275,000)	City of Phenix City Blight Removal Community Development Block Grant included the demolition of condemned structures in Phenix City on a city-wide level impacting low-moderate income persons living in Phenix City. The project facilitated the removal of structures that are on the commended list. The removal of these homes serves to prevent blight from spreading further, remove dangerous structures, and improve the quality of life in the city. In all, 19 of the identified structures were demolished.
Enhanced Mobility of Seniors & Individuals with Disabilities (\$200,000)	Received Section 5310 funds to provide transportation services for seniors and individuals with disabilities in Lee and Russell Counties. Over 19,473 seniors were transported to and from the senior centers in Auburn, Opelika, Lee, and Russell Counties. Another 4,423 seniors were transported to and from the Phenix City Central Activity Center.

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

THRESHOLD

Threshold Criteria

1. Eligibility of Lead and Non-Lead Coalition Members

- a. Lead Coalition Member: The Lee Russell Council of Governments (LRCOG) is one of twelve regional commissions in the State of Alabama as provided for in Act 1126 of the 1969 Alabama Legislature (document attached). Therefore, LRCOG is an eligible entity to apply for assessment funds under the EPA's Brownfield Program.

Non-lead Coalition Members:

- The City of Opelika, Alabama, is recognized as a General-Purpose Unit of Local Government (2 CFR § 200.1) and is, therefore, eligible for funding.
 - Russell County, Alabama, is recognized as a General-Purpose Unit of Local Government (2 CFR § 200.1) and is, therefore, eligible for funding.
- b. LRCOG, the City of Opelika, and Russell County are not exempt from federal taxation under section 501(c)(4) of the Internal Revenue Code (IRC).

2. Target Areas

Target Areas for the lead member and both non-lead members are identified on the Application Information Sheet as a response to Section 4.B.(5).

3. Non-Lead Member(s) that Never Received an EPA MARC Grant

- a. The City of Opelika has never been awarded an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup Grant.
- b. Russell County has never been awarded an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup Grant.

4. Legal Authority to Expend Grant Funds on Behalf of Non-Lead Coalition Members

- a. LRCOG attests that as the lead member, it has legal authority to expend grant funds on behalf of the non-lead members to conduct the proposed grant activities.
- b. Not Applicable

5. Coalition Agreement

Letters confirming the City of Opelika and Russell County's agreement to participate as coalition partners are attached.

6. Community Involvement

The LRCOG and coalition members have engaged a diverse group of local organizations and community-based groups to ensure that project decisions reflect the needs and priorities of affected residents. Each non-lead coalition member will serve on the Brownfields Advisory Committee (BAC), ensuring they remain fully engaged, informed, and able to influence key project decisions aligned with community goals. Each partner will play a specific role in site selection, cleanup/reuse planning, and supporting robust community engagement and helping to shape the project's outcomes.

Name of Organization & Entity's Mission	Point of Contact (name & email)	Specific Involvement in The Project or Assistance Provided
Alabama Department of Economic and Community Affairs / <i>Economic growth and community development</i>	Kenneth Boswell kenneth.boswell@adeca.alabama.gov	ADECA will coordinate their resources and provide training and technical assistance to members of the target communities to maximize the impact of brownfield assessment and cleanup efforts. <i>(All Target Areas)</i>
Greater Mt. Zion Baptist Church / <i>Spiritual growth and community support</i>	Noble Williams church@gmzbaptistchurch.com	Serve on the BAC, facilitate public communication, provide meeting space, and ensure local residents are actively engaged in discussions on site selection, cleanup, and reuse. <i>(PCTA)</i>
Russell County Historical Commission / <i>Preserve and promote Russell County's history</i>	Naomi Elliot [REDACTED]	Serve on the BAC, provide input and technical support on historical preservation of buildings (like the Coulter Building) <i>(RCTA and PCTA)</i>
Central Alabama Works / <i>Workforce development and job alignment</i>	Gindi Prutzman gprutzman@centralalabamaworks.com	Will align workforce development efforts with project needs, preparing local residents for employment in roles created through brownfield redevelopment. <i>(All Target Areas)</i>
East Alabama Chamber of Commerce / <i>Business support and economic growth</i>	Melissa Guantt melissa@ealcc.com	Will assist in identifying sites and conducting outreach to underserved communities, integrating community priorities into project planning, and ensuring local businesses are considered in site reuse plans. <i>(PCTA)</i>
TriRivers Waterway Development Association	Phillip Clayton pclayton@eufaulachamber.com	TriRivers Waterway Development Association (TRWDA) is a not-for-profit whose sole mission is to promote the Chattahoochee River system. They will help promote ecotourism to redeveloped brownfield sites, such as those being redeveloped on the riverfront. <i>(PCTA)</i>
Opelika Chamber of Commerce / <i>Business support and economic growth</i>	Ali Rauch ali@opelikachamber.com	Will support outreach to underserved communities in Opelika, obtaining community feedback on site selection and reuse, and fostering local business engagement in redevelopment efforts. <i>(OTA)</i>
AIDT / <i>Workforce training and job development</i>	Ed Castille ecastille@aidt.edu	Will provide technical training to prepare local residents for jobs in brownfield cleanup and redevelopment, ensuring that remediation benefits local workers. <i>(All Target Areas)</i>
Alabama Brownfields Association / <i>Brownfield remediation and regulatory support</i>	Chey-enne Kilpatrick, admin@albfa.org	Will assist in promoting economic revitalization, site reuse, restoration, remediation, financial and regulatory incentives, legislative advocacy, and real estate resources. <i>(All Target Areas)</i>

Incorporating Community Input

LRCOG is committed to fostering active community participation, incorporating local voices into decision-making, and ensuring accessible, transparent communication throughout the project. To facilitate this, LRCOG will organize inclusive outreach events and form a **Brownfields Advisory Committee (BAC)** composed of community representatives, business leaders, neighborhood organizations, and citizen groups from each target area. This committee will provide a direct platform for community input on site prioritization, project planning, and redevelopment options. To keep the community well-informed and engaged, LRCOG and coalition members will host **semi-annual community meetings** to share project updates and solicit ongoing feedback. These meetings will include presentations on project progress, opportunities for community members to express concerns and suggest priorities, and interactive sessions where residents can weigh in on site-specific decisions. Meeting outcomes and decisions will be documented and made publicly available, demonstrating transparency and accountability.

Understanding the importance of flexible engagement options, LRCOG will provide alternative means of participation. **Zoom meetings** will be available to ensure accessibility for those who cannot attend in person, and meetings will be recorded for later viewing, allowing residents to stay informed at their convenience. In addition to English, **progress updates will be provided in Spanish**, given that 6.4% of Opelika, 5.3% of Phenix City, and 0.9% of Russell County's population are Spanish-speaking. Project updates, meeting announcements, and brownfield-related information will be widely shared via multiple channels. These include public flyers, handouts at outreach events, postings on both cities' websites, and social media pages (e.g., Facebook). An **email mailing list** will allow community members to receive regular updates, invitations to meetings, and event notifications. Each email will include a link to a feedback form, enabling community members to share their input. Feedback received will be reviewed and responded to within one week, showing responsiveness to community concerns. Physical document repositories will be established at the **Opelika, Phenix City, Hatchechubbee, and Hurtsboro** libraries, ensuring that all project materials, including updates and reports, are available for residents who may not have internet access. Additionally, all materials will be translated into multiple languages via Google Translate to accommodate diverse linguistic needs.

7. Expenditure of Existing Grant Funds

Neither LRCOG, the City of Opelika, or Russell County have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

8. Contractors and Named Subrecipients

• **Contractors:**

LRCOG has selected a contractor under a "dual procurement process" for both grant proposal writing and the services necessary to help LRCOG carry out the grant. LRCOG solicited firms by issuing a Request for Qualifications (RFQ) for Professional Services on March 22, 2024. The RFQ was posted publicly on LRCOG's website and Facebook page. It was posted for 30 days, and qualifications were due on April 21, 2024 by 12 p.m. Two submittals were received by the deadline. A panel of individuals met to review and score/rank the firms based on certain criteria outlined in the RFQ including costs. The panel selected the highest-scoring submittal and awarded the contract to PPM Consultants, Inc. signing a contract with the firm on August 13, 2024. Procurement was conducted in accordance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and EPA procurement guidelines.

A copy of the solicitation documents and the signed executed contract is attached.

• **Named Subrecipients:** Not Applicable