



NARRATIVE INFORMATION SHEET
FY22 Community-wide Assessment Grant For States and Tribes
Colorado Department of Public Health and the Environment
RFP NO.: EPA-OLEM-OBLR-21-04

The Colorado Department of Public Health and the Environment (CDPHE) is pleased to submit this proposal for FY22 Community-wide Assessment Grant For States and Tribes. Below we provide the information requested in EPA grant guidelines.

1. Applicant Identification

Name: Colorado Department of Public Health and the Environment
Address: 4300 Cherry Creek Drive S.
 Denver, CO 80246-1530

2. Funding Requested

(a) Grant Type: Community-wide Assessment Grant For States and Tribes
 (b) Federal Funds Requested: \$2,000,000

3. Location

Cities	Counties	State
Cortez	Montezuma	Colorado
Firestone	Weld	Colorado
Longmont	Boulder	Colorado
Lyons	Boulder	Colorado

4. Target Area and Priority Site/property Information

Target Area	City	Census Tract	Priority Brownfield Sites
1	Longmont	134.01; 134.02	11939 Sugarmill Road, Longmont CO 80501 3031 Highway 119, Longmont CO 80504 10000 N 119TH Street, Longmont CO 80501
		133.02	45 - 125 S. Main Street, Longmont CO 80501
	Lyons	136.01	4858 Highland Drive, Lyons CO 80503
		136.01	4651 & 4652 Ute Highway, Lyons CO 80540
2	Cortez	9694	500 S. Market, Cortez CO 81321
		9693.01	275 S. Broadway, Cortez CO 81321
3	Firestone	20.20	3811, 3815 & 3851 Hwy 119, Firestone CO 80504
		20.20	11359 CR 15, Firestone CO 80504



5. Contacts

(a) Project Director:

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(b) Chief Executive/Highest Ranking Elected Official

Name: Jared Polis, Governor
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 Mailing address: 200 E. Colfax Ave., Rm. 136, Denver, CO 80203

6. Population

Target Area 1		
City	Population	Reference
Lyons	2,033	2010 Census
Longmont	94,445	2015-2019 American Community Survey 5-yr data ⁽¹⁾
Target Area 2		
City	Population	Reference
Cortez	8,675	2015-2019 American Community Survey 5-yr data ⁽¹⁾
Target Area 3		
City	Population	Reference
Firestone	16,381	2020 Census

⁽¹⁾ <https://data.census.gov/cedsci/>

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority brownfield site(s) is impacted by mine-scarred land.	NA
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).	2
The priority site(s) is in a federally designated flood plain.	1
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
30% or more of the overall project budget will be spent on eligible site reuse/area-wide planning activities for priority brownfield site(s) within the target area.	NA
The target area(s) is located within a community in which a coal fired power plant closed (2011 or later) or is closing.	NA



8. Letter from the State or Tribal Environmental Authority

Since the applicant is the Colorado Department of Public Health and the Environment (CDPHE), the environmental authority for the State of Colorado, a separate letter has not been included.

9. Releasing Copies of Applications

Not applicable. This application does not contain confidential, privileged, or sensitive information.



12-PAGE GRANT NARRATIVE

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a.i Background Target Area Description: CO, a state since 1876 has a history of cliff dwellers, gold miners, railroad travelers, & homesteaders. But alongside its wealthy ski resort communities & the recent growth of several CO cities & counties at twice the rate of the U.S., are many pockets of stagnation & economic decline of disadvantaged communities with persistent poverty, overlooked when investors were attracted to the Front Range of the Rocky Mountains. This disparity is most visible in second tier cities & rural towns & counties. The three Target Area that are the focus of this grant are prime examples. Not only has the growth & prosperity of CO bypassed them, but because of the hundreds of brownfields in these small communities, they suffer higher unemployment, up to 20.5% poverty (nearly twice the level in CO & 7% higher than in the U.S.), & a lack of affordable housing. Without the capacity to manage brownfield grants on their own, these communities have no way to deal with their brownfield challenges.

Target Areas	EPA		State of CO (CDPHE)			Total # Of Potential Brownfields	Vacant & Underutilized Parcels W/Env Records
	Hazard Waste Generator	Other Sites W/Env Records	USTs/ LUSTs	Voluntary Cleanup Program	Other Sites W/Env Records		
1	604	4,427	565	38	1,333	6,967	1,096
2	40	682	287	0	370	1,903	95
3	324	15,527	605	13	10,712	27,181	3,980
TOTAL	968	20,636	1,457	61	12,415	36,061	5,171

Notes: UST = underground storage tank; LUST = leaking underground storage tank; NA = Not Available

Target Area 1 is a former agricultural area around the cities of **Longmont & Lyons** in Boulder County. Longmont was founded in 1871; economic development was supported by The Great Western Sugar Mill which opened in 1903. The closure of the mill in 1977 & the loss of 700 jobs & closure of the last agricultural business the Butterball turkey plant in 2011 & the loss of 350 jobs, are examples of multiple economic setbacks in the City's history. Despite recent interest from developers, the area around the former sugar mill remains vacant & abandoned; because of releases of asbestos from the structures; it is fenced & no public access is permitted. South Longmont, with a 30% Hispanic a population, has historically suffered due to its proximity to the mill, lack of investment & limited economic growth. In 2013, Longmont's economy was dealt an additional blow from which it has still not recovered when a 1,000-year rain & a 100-year flood in a federally designated flood plain destroyed or damaged 902 homes, 36 businesses, & caused \$150 million damage to roads. **Target Area 2** is comprised of the City of **Cortez** in Montezuma County in SW CO which was founded in 1886 to provide housing for the men working on the tunnels & irrigation ditches required to divert water out of the Dolores River & into Montezuma Valley. Roughly 1/3 of the area is tribal land, 1/3 is federal land (run by the National Park Service, the United States Forest Service & the Bureau of Land Management), & 1/3 private or state/county land & irrigated cropland. Being an older, small & older CO community, Cortez has the 8th lowest income in the state & the 6th highest poverty, it has suffered due to a lack of outside investment over the last 50 years & is believed to have several brownfield properties that are in disrepair & need of renovation. A 2016 survey performed on 6 blocks of commercial buildings found that of the 28 structures examined, 100% were built prior to 1980 so likely have asbestos & lead-based paint; 12 were built prior to 1930. Despite significant historic features, there are no designated historic districts in Cortez, so no protection is available & uncertainty about the safety of older & historic commercial buildings in the urban core are crippling the town & inhibiting growth. **Target Area 3** is comprised of the cities of **Firestone & Evans** in Weld County which lies within the relatively flat eastern portion of CO & has the most active oil & gas wells (21,000) in the state. These two cities have grown up adjacent to one or more highways & while the smaller roads used to bring commerce into their downtown areas, the interstate freeways built in the 1960s bypass all but the largest cities & once thriving businesses in small cities have suffered as a result; many that have gone out of business & there are hundreds of formerly prosperous motels, restaurants & gas stations that are now brownfields. **Firestone**, incorporated in 1908 has seen poorly planned developments constructed in areas near interstates & outside city limits where buildings have deteriorated over time & now represent areas of blight that detract from quality of life & contribute nothing to the economic vitality of the city. There has been > 46% increase in its Hispanic population in the last 10 years & according to the 2020 census this population represents 40% of residents in the City. Unfortunately, affordable housing for these residents is scarce.

1.a.ii. Description of the Priority Brownfield Sites: **TARGET AREA 1 Brownfield Site 1 (Census Tracts 134.01; 134.02), Sugar Mill/STEAM (11939 Sugarmill Road, 3031 Highway 119, & 10000 N 119TH Street, Longmont)** This 236-acre, 52 parcel area contains 5 vacant & 16 underutilized buildings with good redevelopment potential in line with community plans. The Sugar Mill is a priority brownfield because there is believed to be contamination associated with previous industrial activity & existing buildings & industrial equipment; several of the vacant buildings contain asbestos & have experienced significant deterioration. There is also an absence of transportation connectivity to the City of Longmont for motor vehicles, pedestrians & alternative transportation modes. Major railroad tracks are adjoining & traverse the area. **Planned Reuse.** Longmont is currently working with several

developers on about 50% of the sugar mill area. Future plans include pursuit of “agri-based” developments incorporating housing, employment, recreation, commercial, & low-impact industrial. Also, higher density development incorporating environmental sustainability elements including potential use of energy from wastewater treatment processes. The city desires restoration & adaptive reuse of historic sugar factory buildings, connection with downtown Longmont, increased housing stock & eventually commuter rail service.

Brownfield Site 2 (Census Tract 133.02), Transit Center (45 – 125 S. Main Street, Longmont) This 41-acre, 34 parcel area is a priority brownfield which contains 3 vacant & 10 underutilized buildings as well as multiple businesses that likely have environmental releases & contamination. Existing uses include automotive repair, dry cleaners, used car sales & service, marginal commercial uses, a building supply center & an electrical substation as well as a City owned vacant tract (old mobile home site). Buildings in this area are old, in disrepair & likely contain asbestos & lead-based paint. There are also two large undeveloped parcels, one of which has vacant buildings & old privately-owned infrastructure still in place. **Planned Reuse.** The city anticipates an expansion of downtown Longmont into this area in the future. This will include high density/mixed use transit-oriented development (TOD) & construction of a center that supports Bus Rapid Transit & commuter rail service. The city also anticipates activation of development/use along the St. Vrain creek, new sustainable development, & multi-modal center & supporting infrastructure.

Brownfield Site 3(Census Tract 136.01), Shady Acres Mobile Home Park (4858 Highland Drive, Lyons). This privately-owned 6.11- acre property is a priority brownfield because of its desirability for development, & because the abandoned construction equipment, vehicles, & RVs represent a health & safety risk to the public & they are a community eyesore. **Planned Reuse.** The city is planning for redevelopment of this property for commercial/ office, lodging/RV resort, small lot residential, mixed industrial/office. **Outreach.** The city has contacted the owner who intends to sell the property in the near future. The owner is aware of the annexation plans of the city & is interested in development for housing.

Brownfield Site 4 (Census Tract 136.01), Former Longmont Water Treatment Plant/ Gateway Business District (4651 & 4652 Ute Highway, Lyons). This 3.4- acre property near the **St Virain Creek** includes a vacant building owned by a private developer. This property is a priority brownfield because the building is dilapidated, contains asbestos & is unsafe for use. **Planned Reuse.** The city is planning for redevelopment of this property for commercial/office, lodging/RV resort, small lot residential, mixed industrial/office. **Outreach.** The city has contacted the developer/owner who will need to re-zone the property to a Planned Unit Development in the next year. They are interested in mixed-use/commercial/light industrial uses.

TARGET AREA 2 Brownfield Site 5 (Census Tract 9694), Dry Cleaner (500 S. Market, Cortez). This 0.5-acre former dry cleaner property has been vacant for three years. The 9516 SF structure on the property that was constructed in 1958 has graffiti & peeling paint. The interior likely contains asbestos & lead-based paint as well as potential chemical contaminants from the dry cleaner business. **Planned Reuse.** In the past the owner was seeking to remodel to residential use. Either that use or commercial use is acceptable to the city.

Brownfield Site 6 (Census Tract 9693.01), Auto Repair/Gas Station (275 S. Broadway, Cortez). This 0.6-acre property is the former location of an auto repair/gas station business believed to be currently inactive & have an old, in place underground storage tank, possibly leaking. A service garage at the property was constructed in 1958 & likely contains asbestos & lead-based paint. Cars appear to be stored on this property for the adjacent car dealership. **Planned Reuse.** City would like to see the property redeveloped for new commercial/retail use & job creation.

TARGET AREA 3 Brownfield Site 7 (Census Tract 20.20), NW Hwy 119 & I-25 (3811, 3815 & 3851 Hwy 119, Firestone). This 8.8-acre, 3 parcel property is a priority brownfield because it is easily accessible from two different highways & is occupied by a truck stop used for parking of semi-trailer trucks that leak oil, grease & gasoline on unpaved land & with inadequate infrastructure for stormwater drainage. The property also includes a 27,760 square foot hotel constructed in 1973 & an older restaurant both of are dilapidated & in poor condition, likely to contain asbestos & lead-based paint and unlikely to meet current building standards. The properties are located in an unincorporated area adjacent to the Town of Firestone & expansion would likely trigger annexation of the properties into the Town as well as improvements that meet code requirements & development standards. The properties are adjacent to a 100- year flood plain as well as a State park. **Planned Reuse.** It is anticipated that the city will redevelop the property into new commercial uses that include a new loop road to reduce the number of access points onto Highway 119, improve circulation within the properties, provide access to adjacent land locked properties, improve storm drainage, & allow for increased revenue generation & services from the properties. Because of blight factors the property may be considered for a future urban renewal plan area.

Brownfield Site 8 (Census Tract 20.20), Denmore (11359 CR 15, Firestone). This 62-acre property was occupied by a turkey farm between 1962-2013. This is a priority brownfield because it is a large property desirable to developers & contains 25 abandoned structures that likely contain asbestos & lead-based paint. Approximately 22 buildings & sheds also contain poultry excrement, associated poultry operation chemicals & equipment. Overall clean-up of the property will likely require demolition of most or all structures. There are limited water rights for uses other than agriculture. In addition, there are nearby oil & gas facilities that reduce the available land for development due to

setback requirements. **Planned Reuse/Redevelopment.** It is anticipated that the city will redevelop the property for mixed-use with an emphasis on housing. The Firestone Comprehensive Plan shows the property is located within the Growth Boundaries of Firestone. Zoning would occur on the property upon annexation. Because of blight factors the property may be considered as a future urban renewal plan area.

1.b. Revitalization of the Target Area: 1.b.i. Reuse Strategy & Alignment w/Revitalization Plans: All of the planned reuse/redevelopment of the priority brownfield properties identified in Section 1.a.ii are in alignment with existing revitalization plans & priorities of Target Area communities. In **Target Area 1**, proposed redevelopment of the **Sugar Mill/STEAM & Transit Center** brownfield properties in Longmont align with (1) the *Envision Longmont –Multimodal & Comprehensive Plan* (June 2016) which identifies a vision for future redevelopment of Sugar Mill area & multi-modal transportation initiatives, (2) the *Southeast Longmont Urban Renewal Plan* (December 2006) which calls for the elimination of blight & redevelopment of the Sugar Mill & STEAM properties & provides for the use of tax increment proceeds to facilitate redevelopment activity & projects, & (3) the *S.T.E.A.M Conceptual Redevelopment Plan* (2019) which provides the land use/density framework for redevelopment within the STEAM area focusing on science, technology, engineering, arts & maker-space. Redevelopment of the **Transit Center** property also aligns with the *1st & Main Station Transit & Revitalization Plan* which lays forth the land use/development standards & funding strategies to be applied towards infill/redevelopment projects within the transit center area. Redevelopment of the **Shady Acres Mobile Home Park & the Former Water Treatment Plant /Gateway Business District** in Lyons align with the *2010 Lyons Primary Planning Area Master Plan* which provides the land use/revitalization strategy to annex 3 urban enclaves for new employment, housing, & retail which possess redevelopment challenges involving small parcel sizes, access limitations, floodplains, & no sewer service. In **Target Area 2**, proposed redevelopment of the **Dry Cleaners & the Auto Repair/Gas Station** in Cortez align with the *Cortez Comprehensive Plan, 2020 Illustrated Vision, & Land Use Code* which establish the goal to “Expand infill & rehabilitation opportunities within the city limits” with supportive policies relating to zoning flexibility, city-wide inventories, & fundings support for underutilized sites & abandoned brownfields. In **Target Area 3** the proposed redevelopment of the **Truck Stop/Hotel/Restaurant** on HWY 119 & the **Denmore Chicken Farm** in Firestone align with the *Town of Firestone Comprehensive Plan/Master Plan* (2013) which designates the HWY 119 site as Commercial/Office & the Denmore property as Mixed-Use & is a targeted annexation expansion area within the Urban Growth Boundaries that will connect to the regional sports complex, Firestone Trail (current/planned) & existing neighborhoods.

1.b.ii. Outcomes & Benefits of Reuse Strategy: Economic Benefits: The outcomes & benefits of property redevelopment with brownfield assessment grant funding from EPA will be workforce development & creation of > 300 jobs, preservation of historic properties, & promotion of tourism. In Longmont & Firestone, benefits are also likely to include the creation of > 250 affordable housing units.

TA	Brownfield Site	Qty & Type of New Use & Est. # New Jobs
1	Sugar Mill/STEAM	2 vacant bldg. may provide 146,220 SF new Mixed Use and 277 new jobs (527 SF/job). ⁽¹⁾ 2 vacant bldg. will provide 39,248 SF/Comm. or Retail use and 17 to 77 new jobs (1432 -508 SF/job).
1	Transit Center	3 vacant bldg. may provide 9,806 SF new Comm., Retail and/or Indus. use and 7 to 15 new jobs (508 SF/Retail job; 1432 SF/Comm. job, 1767 SF/Indus. job).
2	Dry Cleaner	1 vacant bldg. may provide 6,000 SF of new Retail or Res. use and 4 Retail jobs (1432 SF/job) or 6 Res. units.
2	Auto Repair/Gas Station	1 vacant bldg. may provide 1350 SF of new Retail use and 1 new job (1432 SF/job).
3	NW Hwy 119 & I-25	4 bldg. if renovated or replace may provide 42,933 SF of Retail use and 30 jobs (1432 SF/job).
3	Denmore	Reuse/redevelopment of 62 acres for Res. use will create 250 new housing units. ⁽²⁾

⁽¹⁾ Job estimates based on the USEIA’s most recent employment estimates for industrial, commercial, retail, restaurant & mixed-use spaces. Source: U.S. Energy Information Administration. Table PBA1. Total & means of floorspace, # of workers & hours of operation by building activity. 2016 & 2018 data. ⁽²⁾ Estimates of housing units per acre from 2016 National Association of Home Builders (NAHB) of residential subdivisions (<https://www.nahbclassic.org/generic.aspx?genericContentID=253886&fromGSA=1>).

Non-economic Benefits: The grant will support preservation/creation of up to 200 acres of park, recreation parkway or greenway. This will be located primarily in Target Area 1. Reuse of the priority brownfield site(s) in all Target Areas will include energy-efficient windows & insulation, & potential use of rooftop solar panels. Infill/reuse projects will return vitality to abandoned districts/neighborhoods. Use of renewable energy & energy efficiency will be promoted during redevelopment/reuse of brownfield properties in Target Area communities that may be added after this grant is awarded. **Benefit to EJ Communities:** In part, Target Areas were selected because they represent small EJ communities. Therefore, jobs and housing created will directly benefit EJ communities. In places like Longmont and Lyons where new housing constructed on brownfields will be outside the flood plain the grant will help EJ

communities address climate change concerns. In addition, new businesses in all Target Areas will add to the tax base of these small communities allowing them to provide more community services.

1.c. Strategy for Leveraging Resources: 1.c.i. Resources Needed for Site Reuse: Since the early 2000s, CDPHE has operated a successful Brownfields State Response Program that can provide additional resources for assessment & redevelopment of brownfields sites within the target communities. Following completion of the assessment work outlined in this proposal, priority sites may be eligible for cleanup funding available through CDPHE using three different funds. **State Brownfield Grants** CDPHE receives an annual legislative allocation of \$250,000 to provide brownfields cleanup grants for local governments & non-profits. Applicants must demonstrate they are not responsible for contamination & property reuse will provide a community benefit. Over the last five years CDPHE has provided over \$1.34M of cleanup grants to 15 eligible entities. Administration & oversight of those grants is supported by 128(a) grant funds from EPA. **CO Brownfields Revolving Loan Fund (CBRLF).** The CBRLF maintains approximately \$10M of working capital to provide loans/sub-grants to both public & private entities that meet eligibility requirements. Since 2016, the CBRLF has provided \$9.2M of loans to seven different borrowers. **State Tax Credits for Remediation of Contaminated Land.** In 2014, CDPHE worked to pass a legislative proposal creating a state tax credit for remediation of contaminated land. The credit is transferrable & is available to both taxpayers as well as local governments & non-profits. A total of \$3,000,000 of credits are available annually & the credit has facilitated millions of dollars of environmental cleanup & leveraged billions of private resources for redevelopment & reuse of contaminated properties. Based on a review of tax credit statistics for the period 2014 – 2020, there were 59 approved applicants, \$16,278,101 of tax credits issued, & capital improvements in the amount of \$6,987,277,280. In addition, CDPHE will explore additional potential funding opportunities to support the reuse goals of priority brownfields sites such as the following:

Funding Org.	Known Funding Program	Available Amounts
CO Dept. of Local Affairs	1)Community Development Block Grants 2) CO Mainstreet program	A review of information 2014-2016 suggest DOLA provides 5-10 grants/year that average between \$500-600k each
History CO	Grants for reuse/rehab of historic structures	Typically, \$25,000 or less per grant
CO Division of Oil & Public Safety	1) Underground storage tank assessment/ cleanup fund for post 1988 releases 2) The Petroleum Redevelopment Fund for pre-1988 releases	90 % of site assessment cost up to \$20k, 90% of site characterization costs up to \$30k , & 50% of cleanup cost with a \$500k max.

1.c.ii. Use of Existing Infrastructure: Existing infrastructure including water, electric, sewer, stormwater, streets and fiber optic is present near most of the priority brownfield properties. Some of the properties in Longmont are even adjacent to water and sewer treatment plants and electrical substations. If additional infrastructure is needed as part of redevelopment, it will be factored in to project financing and upgraded as needed. In Firestone funding for such improvements would likely come from private funding or metro district funding.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: 2.a. Community Need: 2.a.i. The Community's Need for Funding: TARGET AREA 1. As shown below the City of Longmont is a mid-sized community & as such has limited financial capacity to incur the cost of environmental assessments over the large area that is covered by brownfields there. The City is effectively “landlocked” being bounded by dedicated open space & other municipal jurisdictions. Thus, more emphasis has been placed on redevelopment or infill development with a significant percentage of available properties having blighted conditions. This grant will allow Longmont to better address environmental conditions of property & buildings & develop public/private partnerships with developers to remedy the issues & initiate redevelopment activity.

Data Type ⁽¹⁾	United States	Colorado	Target Area 1		Target Area 2		Target Area 3	
			Longmont	Lyons	Montezuma County	Cortez	Evans	Firestone
Population	324,697,795	5,610,349	94,445	2,228	26,031	8,675	20,533	14,033
5-year Unemployment Rate	3.4%	2.9%	3.5%	1.70%	2.90%	3.8%	2.5%	2.0%
Population not in Labor Force (age 16+)	36.6%	31.6%	30.2%	32.7%	43.7%	41.0%	26.3%	25.1%
Poverty Rate	13.4%	10.3%	9.6%	4.1%	15.1	20.5%	15.2	3.4%
Median Household Income (dollars)	\$62,843	\$72,331	\$74,242	\$103,533	\$49,470	\$42,271	\$59,527	\$100,288
Per Capita Income (dollars)	\$34,103	\$38,226	\$36,4	\$47,5	\$26,0	\$23,866	\$25,2	\$36,069
Households receiving Social Security Income	5.3%	3.4%	3.1%	1.9%	4.5%	5.6%	3.3%	4.2%

Data Type ⁽¹⁾	United States	Colorado	Target Area 1		Target Area 2		Target Area 3	
			Longmont	Lyons	Montezuma County	Cortez	Evans	Firestone
Households receiving Cash Public Assistance	2.4%	2.0%	2.9%	3.2%	3.6%	4.6%	2.1%	1.4%
Households receiving Food Stamp/SNAP Benefits	11.7%	7.5%	8.5%	3.7%	12.6%	19.1%	12.9%	3.2%
Children/Youth Poverty	18.5%	12.6%	13.4%	0.7%	22.0%	36.3%	21.7%	3.3%
Senior Poverty Rate (age 65+)	9.3%	7.4%	7.6%	0.0%	8.7%	9.4%	11.7%	0.9%

(1)Unless otherwise noted, all data reflect 2015-2019 American Community Survey 5-yr data (obtained from <https://data.census.gov/cedsci/>).
Bold indicates distress factors above or below (depending on factor) national averages. Shaded indicates distress factors above or below (depending on factor) Colorado State averages.

TARGET AREA 2. This grant will help provide much needed funding to the City of Cortez to address vacant, abandoned, underutilized & contaminated property in a way that has never been possible before. Cortez is a small city with a poverty rate of 20.5%. Neither the City nor local landowners have access to sources of funding for assessment, remediation or redevelopment of brownfield sites. Many potential investors interested in 500 S. Market have inquired with the City to redevelop the property but have not to date done any redevelopment or cleanup of the property because there has been no assessment to evaluate the presence or extent of contamination.

TARGET AREA 3. This grant will meet the needs of Firestone, a small community primarily composed of residential units & limited property tax resources to invest in environmental assessment or remediation & subsequent reuse in the Target Area. While an Urban Renewal Authority is in place in Firestone it depends primarily on rebates upon development of properties to pay for incentives or reimburse for services as limited growth & improvements has occurred within the existing urban renewal areas. These properties are currently in unincorporated Weld County but would be annexed into Firestone upon development/redevelopment as encouraged by Weld County Land Use Code & the proximity of the properties to Firestone for services.

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

Many of the Target Area communities have a significantly greater number of sensitive populations than CO or the U.S. including children, seniors, minority (Hispanic, Latinx & American Indian) & low-income residents. This is shown below.

Data Type ⁽¹⁾	United States	Colorado	Target Area 1		Target Area 2		Target Area 3	
			Longmont	Lyons	Montezuma County	Cortez	Evans	Firestone
%Hispanic or Latinx	18.0%	21.5%	25.2%	4.9%	12.50%	19.7%	44.5%	17.9%
%American Indian or Alaska	0.8%	1.0%	0.8%	2.0%	12.3%	7.7%	1.3%	0.3%
Child/Youth Population (age 0-17)	22.6%	22.5%	23.8%	27.5%	21.9%	24.0%	29.1%	29.2%
Senior Population (age 65+)	15.6%	13.8%	14.5%	11.1%	21.5%	18.5%	11.7%	9.0%

(1)Unless otherwise noted, all data reflect 2015-2019 American Community Survey 5-yr data (obtained from <https://data.census.gov/cedsci/>).
Bold indicates distress factors above or below (depending on factor) national averages. Shaded indicates distress factors above or below (depending on factor) CO State averages.

An example of the prevalence of sensitive populations is the 16 schools, nine-day care centers and eight elderly care facilities that are located near the eight brownfield properties identified in Target Areas. In addition, two of these properties are within proximity of homeless shelters and one brownfield is near a center for children & adults with intellectual & developmental disabilities. Because of erratic or poor health care over their lifetime, and underlying health conditions, these individuals can be particularly susceptible to exposure to environmental contaminants.

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

There are significant health disparities in the Target Area communities showing that they suffer a disproportionate share of disease & adverse health conditions when compared to CO & the U.S. Some health concerns are likely associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.

Data Type ⁽¹⁾	United States	Colorado	Target Area 1	Target Area 2	Target Area 3
			Boulder County	Montezuma County	Weld County
Premature Death	5,400	5,900	4,200	8700⁽¹⁾	5,800
Poor or Fair Health	14%	14%	11%	18%	15%

Data Type ⁽¹⁾	United States	Colorado	Target Area 1	Target Area 2	Target Area 3
			Boulder County	Montezuma County	Weld County
Low Birthweight	6%	9%	8%	9%	8%
Adult Smoking	16%	15%	13%	20%	17%
Adult Obesity	26%	22%	14	28%	29%
Teen Births	12	18	7	33	23
Cancer (all)	448.6 ⁽⁴⁾	396.6	384.3	306.5	405.0
Cancer (male, lung)	65.7 ⁽⁴⁾	43.1	31.6	48.3	52.5
Asthma	527.5 ^(2,3)	637.8	439.72	345.97	735.67

(1) years of life lost (2) 2016, American Lung Association (<https://www.lung.org/research/trends-in-lung-disease/asthma-trends-brief/trends-&-burden>) (3) age adjusted hospitalizations per 100,000 (4) per 100,000 from National Cancer Institute (<https://statecancerprofiles.cancer.gov/>) **Bold numbers** = worse health than U.S. *Shaded number* = worse health than **Colorado**

(3) Promoting Environmental Justice:

CDPHE utilized EPA’s EJ Screen tool to evaluate environmental justice issues for the Target Areas. They all are in the upper 30th percentile relative to Colorado, EPA Region 8 (includes 6 western states), and the United States. This means residents in Target Area communities are more significantly impacted than 70% of the population in the areas mentioned for Diesel emissions (Longmont), proximity to hazardous waste facilities (Longmont). Ozone (Longmont and Lyons), lead-based paint (Lyons and Cortez), wastewater discharges (Lyons and Cortez, and particulate matter, risk of cancer due to exposure to air toxics, and respiratory health concerns (Firestone).

The highest **Key EJ Index** scores are for Cortez & include PM2.5, Ozone, Air Toxics Cancer Risk, Diesel PM, Respiratory Hazard, Traffic, Lead Paint Indicator, Superfund Proximity, & Hazardous Waste. The community is flagged by EJ Screen for 10 of the 11 Key EJ Indicators. It is also shown to be high on several **Key Demographic Indicators**. The conclusion is that residents of this community who are a minority, low income & linguistically isolated population with less than a HS education are exposed to conditions that are worse than those for 70 - 86% of the population elsewhere in CO & EPA Region 9.

The highest **Key Environmental Indexes** were in Firestone where NATA Cancer Risk & NATA Respiratory Health Index because of air pollution are in the 95 – 100% meaning that less than 5% of communities in CO, Region 8 or the US have a greater environmental risk of potential exposure to air toxics. Firestone also has very high particulate matter scores, being in the upper 84 to 85 percentiles for CO & Region 8. Firestone, Longmont & Lyons are in the 93rd percentile for ozone compared to CO & the U.S.

Because minority, lower income persons live closer to & are disproportionately impacted by brownfields in the Target Areas, it is anticipated that the assessment & cleanup planning performed with this grant, & subsequent brownfield reuse & redevelopment will help to promote environmental justice in all these areas. In addition, we anticipate assessing additional sites beyond the priority sites discussed in this application. These will be selected and prioritized based on being in an EJ community.

A significant proportion of brownfield redevelopment projects identified by communities in Target Areas 1 & 3 (Firestone, Longmont and Lyons) will involve the construction of new rental & ownership housing. One of the communities has an inclusionary housing ordinance that says new development provides or pay a fee-in-lieu of a minimum percent of units built as affordable product. Development of brownfields for affordable housing would be a major step forward for these communities to protect their vulnerable low-income population and provide equitable opportunities for existing and new residents. In Lyons and Longmont many residents have remained displaced since the 2013 flood disaster which resulted in the destruction of several mobile home parks, displacing a large portion of the vulnerable population. Other benefits may include housing for local workforce, stabilization of housing values, and stimulation of economic investments in neighborhoods. Redevelopment of brownfields over time could lead to the construction of > 300 units for lower income households. Redevelopment in all Target Areas will attract employers bringing higher quality paying jobs, many of which would be available to disadvantaged & lower income persons. In addition, these populations are the most vulnerable to environmental conditions and adverse effects of contamination which means that redevelopment would remediate these conditions making for a healthier environment. Finally, some of the brownfield redevelopment that is planned will incorporate enhanced recreation and public spaces (plaza, parks, open space, etc.) that would be accessible to all populations.

2.b. Community Engagement: 2.b.i. Project Involvement: 2.b.ii. Project Roles:

CDPHE will work with local government partners to establish brownfields advisory committees (BACs) for each of the Target Areas. CDPHE, in partnership with Target Area communities will perform outreach to organizations & individuals to serve as BAC members in each community. Organizations initially targeted for outreach include local chambers of commerce, Department of Local Affairs (DOLA) regional managers, local\county health department, and long-time residents. CDPHE will organize & establish these BACs prior to EPA’s announcement of grant awards. BAC members in each of the Target Areas will perform a variety of functions such as coordinating outreach with

relevant stakeholder groups, integrating local planning with regional plans & economic development efforts, & soliciting direct input from residents & community-based organizations. Each of the Target Area communities is expected to communicate with the public through its website, direct messages to residents & businesses through text or email messages if the person signs up for service, social media (Facebook, NextDoor), press releases to applicable media outlets, & messaging at public meetings or other community special events in which staff & elected officials are able to communicate with attendees by hosting a table or just attending & speaking with guests specifically about a grant related topic.

The following table lists local organizations that will be partners with Target Area communities who will have meaningful involvement in the project & identifies the extent to which partners will be involved in making decisions with respect to site selection, cleanup, & future reuse of the brownfield sites.

TA	Name of Organization/ Entity/ Group	Point of Contact (name, email, phone)	Specific Involvement in the Project or Assistance Provided
1	Longmont Economic Development Partnership (LEDP)	Jessica Erickson, jessica@longmont.org (303)651-0128	Recruitment & deal-making with major employers & industry. Will serve on BAC.
1	Longmont Housing Authority	Andy Collura Andrew.Collura@LongmontColorado.gov (303)651-8581	Will ensure that a reasonable percentage of new housing constructed is affordable and available to disadvantaged & low-income residents. Will serve on BAC.
1	Longmont Downtown Development Authority	Kimberlee McKee, Kimberlee.mckee@longmontCO.gov (303)651-8483	Gathering support of downtown merchants for development projects; post area maintenance/upkeep & planning/conducting public events.
1	Longmont Chamber of Commerce	Scott Cook, scook@longmontchamber.org (303)776-5295	Community support & business support/recruitment. Will serve on BAC.
1	Urban Land Use Institute – CO Chapter	Marianne Eppig, Marianne.eppig@uli.org (216)509-1498	Land development support organization providing redevelopment guidance & attracting prospective developers. Will serve on BAC.
1	CO State University	Jocelyn Hittle, Jocelyn.hittle@COstate.edu	Research university providing consulting & guidance on development of agri-based & sustainable communities with possible partnership on educational/learning opportunities.
2	Cortez School District	Monica Palmquist, Community Health Organizer [REDACTED]	Long-time resident will assist in engagement activities for Hispanic community members & others who may be disaffected or disenfranchised. Will serve on BAC.
2	Cortez Chamber of Commerce	Colton Black, Executive Director colton@cortezchamber.com ; (970)565-3414	Business support, business contacts, event host, pass out flyers, tell others of grant. Will serve on BAC.
3	Carbon Valley Chamber of Commerce	Christina Clark, President info@carbonvalleychamber.com (303)833-5933	Business support, business contacts, event host, pass out flyers, tell others of grant. Will serve on BAC.
3	United Power	Bill Meier, Sr. Community Affairs Rep bmeier@unitedpower.com (303)637-1254	Project meeting room, property history, tell others of grant. Will serve on BAC.
3	Black Hills Energy	Joe Limone, Business Development Account Manager joe.limone@blackhillscorp.com ; (303)929-6128	Property history, tell others of grant. Will serve on BAC.
3	Carbon Valley Parks & Recreation District	Dean Rummel, Executive Director, drummel@cvprd.com ; (303)833-3660	Project meeting room, tell others of grant. Will serve on BAC.
3	Frederick Firestone Fire Protection District	Jeremy Young, Fire Chief jyoung@fffd.us ; (720)484-3362	Project meeting room, tell others of grant, property history.

2.b.iii. Incorporating Community Input: CDPHE will partner with Target Area communities to 1) Conduct Initial kickoff meetings, 2) Hold quarterly progress meetings with local partners, 3) Prepare fact sheets, press releases, postings on CDPHE, CBP & local partners websites, and 4) Convene Bi-annual BAC meetings that will be advertised as public meetings & open to public participation. The BACs for each of the Target Areas will serve as the primary mechanism of soliciting & incorporating community input. Through its Brownfields State Response Program, CDPHE has a long history of engaging local communities to facilitate identification, assessment & remediation of brownfields sites across CO. One of the primary tools CDPHE uses to engage communities is the CO Brownfields Partnership (CBP), a collaboration between CDPHE & Community Builders. CBP operates similar to regional Technical Assistance

for Brownfields (TAG) programs providing educational resources, technical assistance, & financial assistance to support community- based cleanup & redevelopment of Brownfields sites. Recent work has resulted in redevelopment planning assistance to Silverton Colorado, planning & assessment support for Hotchkiss Colorado & funding assistance to local governments & non-profits. To solicit, consider, and respond to input every attempt will be made to respond to questions during meetings & comment cards will be solicited to follow-up if this is not possible. To be responsive to potential concerns about COVID-19, social media & online forums and use of Zoom, Teams and Webex meetings will be used when necessary. CDPHE, Target Area communities and the CBP will consider all community comments received about the project outside of community meetings & respond through the CDPHE website, regional workshops, presentations at conferences, direct community engagement as appropriate. A random sample of comments will be selected for follow-up by telephone to confirm that written response to comments adequately addressed questions & concerns.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS

3.a. Description of Tasks (i. Implementation Activities; ii. Schedule; iii. Leads; & iv. Outputs):

The project has been organized into the following five tasks:

<p>Task 1: Cooperative Agreement (CA) Management, Reporting & Other Eligible Activities</p> <p>i. Implementation: CDPHE will manage all aspects of the project, including coordination with the EPA, Target Area communities, Qualified Environmental Professional(s) (“QEP(s)” or “Consultant(s)”), & other key stakeholders. Reporting will include: 1) Quarterly Progress Reports (QPRs); 2) Property Profiles/ACRES Updates; 3) Annual/Final Disadvantaged Business Enterprise (DBE) & Federal Financial Reports (FFRs); & 4) a Final Performance Report documenting accomplishments, expenditures, outputs, outcomes, & success stories. The CDPHE & local government representatives from Target Areas will attend up to 4 brownfield conferences. Any proposed changes in activities will be discussed with & approved by the EPA.</p> <p>ii. Schedule: It is anticipated that CDPHE will execute a contract with one or more QEP before the 10/1/22 start date of the grant. CDPHE management/reporting will be ongoing throughout the 5-year implementation period. Attendance at a State or Regional Workshop &/or the National Brownfield Conference is anticipated in 2022 & every year thereafter.</p> <p>iii. Leads: This task will be led by CDPHE. The QEP & Target Area communities will assist with reporting activities.</p> <p>iv. Outputs: Agendas/minutes from meetings; 20 QPRs; 5 DBE/FFR Reports; ACRES Updates (ongoing); 1 Final Project Closeout Report; 4 brownfield conferences attended by CDPHE & representatives from Target Areas.</p>
<p>Task 2: Community Outreach, Site Prioritization & Eligibility Determination Requests</p> <p>i. Implementation: A detailed description of the methods for engaging the community is provided in Section 2.b. This task includes preparation of the: 1) fact sheets & press releases; 3) a project webpage (with regular updates); 4) hosting up to 8 Brownfield Advisory Committee (BAC) meetings; & 5) hosting additional public outreach & key stakeholder meetings, as appropriate.</p> <p>ii. Schedule: Fact sheets & the project webpage will be developed during the first quarter (1Q) of the project. A BAC kick-off meeting will be held during the second quarter (2Q) & convened quarterly for the first year, & semi-annually thereafter; other meetings will occur as needed.</p> <p>iii. Leads: The CDPHE will lead this task, with support from the Target Area communities, BAC & Consultant.</p> <p>iv. Outputs: Fact sheets; press releases/articles; webpage content (updated regularly); 8 BAC Meetings (including presentations, agendas, minutes, etc.); other stakeholder meetings/materials. Also includes Prioritization & Site Selection Tech Memos & ED Requests.</p>
<p>Task 3: Brownfield Site Inventory</p> <p>i. Implementation: This task includes engaging Target Area communities in updating the site inventory developed during preparation of the application for this grant. All inventories will be updated throughout the project, & data will be made available to Target Area communities in Geographic Information System (GIS) format most likely through a web map server. Inventory data will be integrated with existing databases to serve as a <u>long-term planning tool that can be used to support revitalization efforts beyond the grant period.</u></p> <p>ii. Schedule: The updated inventory for Target Areas named in this grant will be completed during the first 3 to 6 months (2Q) of the grant & presented to the BAC for prioritization during 3Q. Inventories for Target Areas identified after award of the grant is awarded will be completed during months 7 to 12 (3Q & 4Q). Inventory updates & site selection will continue over the 5-year grant period.</p> <p>iii. Leads: This task will be led by the Consultant(s) & Target Area Communities.</p> <p>iv. Outputs: Up to 8 Brownfield Inventory Data Package; GIS files; tables; & figures for each Target Area for which an inventory is needed.</p>

Identification of Additional Target Areas/Priority Brownfield Sites. It is anticipated that this grant will be utilized for assessment of no fewer than 10 & up to 30 priority brownfield sites. Since only 8 priority brownfield sites are

identified in Section 1.a.ii. additional Target Areas & priority brownfield sites will be identified after grant award with an emphasis on distressed areas especially those known to contain low-income minority populations & “disproportionately impacted (DI) communities”. Colorado’s Environmental Justice Act (HB21-1266) that became law on July 2, 2021, defines DI communities as (1) A census block group . . . where the proportion of households that are low income is greater than 40%, the proportion of households that identify as minority is greater than 40%, or the proportion of households that are housing cost-burdened is greater than 40%. (2) Communities with "a history of environmental racism perpetuated through redlining, anti-indigenous, anti-immigrant, anti-hispanic, or anti-black laws." (3) Communities "where multiple factors, including socioeconomic stressors, disproportionate environmental burdens, vulnerability to environmental degradation, & lack of public participation, may act cumulatively to affect health & the environment & contribute to persistent health disparities." To assist with this work, CDPHE will use an interactive mapping tool called Colorado EnviroScreen that it developed in partnership with CO State University. The tool can identify DI communities.

Task 4: Phase I/II Env. Site Assessments (ESAs) & Regulated Building Material (RBM) Surveys
i. Implementation: Includes completion of up to 30 Phase I ESAs, an average of up to 6 per year in accordance with the AAI Final Rule & ASTM E1527-21 standard & up to 18 Phase II ESAs on both the priority sites identified in Section 1.a.ii as well as on priority brownfield sites that are in other Target Areas that will be identified after award of this grant. At least one priority brownfield site will be assessed in each of the three Target Areas identified in Section 1.a.i. This task also includes preparation of 1) an EPA-approved Quality Assurance Project Plan (QAPP) prior to assessment activities; 2) EPA-approved site-specific Sampling & Analysis Plans (SAPs) & Health & Safety Plans (HASPs) prior to performance of Phase II ESAs/RBM Surveys; & as necessary, 3) completion of National Historic Preservation Action (NHPA) §106 & Endangered Species Act §7(a)(2) requirements to ensure assessments will have no adverse effects.
ii. Schedule: Year 1: QAPP, 4 Phase I ESAs, 1 Phase II ESA, & 2 RBM Surveys. Year 2: 6 Phase I ESAs, 2 Phase II ESAs, & 2 RBM Surveys. Year 3: 8 Phase I ESAs, 2 Phase II ESA, & 2 RBM Survey Year 4: 6 Phase I ESAs, 2 Phase II ESAs, & 2 RBM Surveys. Year 5: 6 Phase I ESAs, 2 Phase II ESA, & 1 RBM Survey
iii. Lead: This task will be led by the Consultant(s) & CDPHE.
iv. Outputs: 1 Master QAPP; 40 ED Forms; 30 Phase I ESAs; 18 Phase II ESAs (including RBM Surveys).
Task 5: Site-Specific Cleanup/Reuse Planning & Area-Wide Planning (AWP)
i. Implementation: Analysis of Brownfield Cleanup Alternatives (ABCAs) &/or site-specific Reuse Plans will be completed for up to 15 sites to help facilitate redevelopment plans/strategies. Up to 10 2 AWP studies will be completed for brownfield-impacted areas prioritized by the BAC. The AWP will identify potential future site uses & strategies to facilitate reuse of existing infrastructure &/or identify potential infrastructure investments needed for alternative future uses.
ii. Schedule: Year 1: 2 ABCA/Site Reuse Plans; 2 AWP Year 2: 3 ABCAs/Site Reuse Plans; 2 AWP Year 3: 3 ABCAs /Site Reuse Plans; 3 AWP Year 4: 3 ABCAs/Site Reuse Plans; 2 AWP; Year 5: 4 ABCAs/Site Reuse Plans; 2 AWP
iii. Lead: The Consultant(s) will lead preparation of ABCAs & Site Reuse Plans under the direction of the CDPHE. The Consultants will lead preparation of AWP under the direction of Target Area communities.
iv. Outputs: 15 ABCAs/Site-Specific Reuse Plans; 9 AWP Studies.

3.b. Cost Estimates: The budget for all tasks uses an average rate of \$125/hr for contractual services & each task includes an average rate of \$60/hr for CDPHE and Target Area Communities [actual rate will be closer to \$70/hr for CDPHE staff labor (\$42/hr personnel costs + \$28/hour fringe costs) & \$50/hr for Target Area community staff labor (\$30/hr personnel costs + \$20/hr fringe costs = \$50/hr)]. **Site Assessment & Cleanup:** ~\$1million (50% of the budget) is allocated to assessment of properties & \$512,500 (26% of the budget) is allocated for cleanup planning.

Task 1 – CA Management, Reporting & Other Eligible Activities: Total Budget = \$67,500
The budget for this task includes \$21,000 for Personnel + Fringe Costs assuming 350 hrs@ \$60/hr (70 hours/year) for CDPHE & Target Area communities to perform grant management & reporting. The budget assumes three-day attendance by CDPHE &/or Target Area communities & includes airfare (\$400/person/conference = \$1,600 total) & hotel, meal, & incidental costs (\$200/person/day/conference = \$2,400 total). Contractual Costs total \$42,500 assuming 340hrs x \$125/hr (68 hours/year) is budgeted for the Consultant(s) to assist with reporting & eligible project management activities.
Task 2: Community Outreach, Site Prioritization & Eligibility Determination (ED): Total Budget= \$85,000
The budget for this task includes \$25,000 for Personnel + Fringe Costs assuming 416 hrs@ \$60/hr (83 hours/year) for CDPHE & Target Area communities to lead community outreach & engagement, work with the BAC + ED. This task also includes a \$60,000 Contractual Services budget assuming 480 hrs x \$125/hr (96 hours/year) for Consultant(s) to assist with community outreach meetings, prepare informational materials, help develop project webpages & perform other community outreach/public involvement activities. This task includes an Expenses budget of \$3,500 (\$700/year) to pay for light refreshment, room & equipment rental, etc. associated with community outreach events.

Task 3- Brownfield Site Inventory: Total Budget = \$252,000
The budget for task includes \$210,000 for Contractual Services assuming completion of 8 brownfield site inventories at a cost of \$30,000 per inventory. This includes conducting review of public records, compilation of data from EPA and CDPHE and County Assessors, desktop review of results, and production of tables and maps. This task also includes \$12,000 for Personnel + Fringe Costs assuming 200 hrs@ \$60/hr for Target Area communities to work with the Consultant(s) on inventory related activities.
Task 4 – Phase I & II ESAs & RBM Surveys: Total Budget = \$1,079,500
The Contractual Services budget for this task is \$1,058,000. It assumes (1) completion of 30 Phase I ESAs [including access agreements & Health & Safety Plans (HASPs)] on priority brownfield sites at an average cost of \$5,000/site (total = \$150,000 total); (2) Preparation of a Quality Assurance Project Plan (QAPP) at a cost of \$8,000; (3) Completion of Phase II ESAs at 18 high priority brownfield sites [including HASPs, Sampling & Analysis Plans (SAPs)] at an average cost of \$50,000/site (total = \$900,000). The budget for Personnel + Fringe Costs is \$21,500 which assumes 358 hrs@ \$60/hr (~72 hours/year) for CDPHE & Target Area communities to work with the Consultant(s) & property owners as assessments are completed.
Task 5 – Site-Specific Cleanup/Reuse Planning & Area-Wide Planning (AWP): Total Budget = \$512,500
Includes a Contractual Services budget totaling \$487,500. The budget assumes completion of ~15 ABCAs/Site-Specific Reuse Plans at an average cost of \$8,500/site (total = \$127,500) & completion of 9 AWP for priority focus areas at a cost of \$40,000 each (total = \$360,000). The budget for this task includes a budget for Personnel + Fringe of \$25,000 assuming 416hrs@ \$60/hr (83 hours/year) for CDPHE & Target Area communities to work with the Consultant(s) & property owners who are doing cleanup planning.

A summary of the overall proposed budget is provided in the following table. No indirect or health monitoring costs are requested.

Budget Categories	Task 1: CA Management & Reporting	Task 2: Community Outreach & Site Inventory/ EDs	Task3: Brownfield Site Inventory	Task 4: Phase I/ II ESAs/ RBM	Task 5: Cleanup & Area Wide Planning	Total
Personnel	\$12,600	\$15,000	\$7,200	\$12,900	\$15,000	\$62,700
Fringe	\$8,400	\$10,000	\$4,800	\$8,600	\$10,000	\$41,800
Travel	\$4,000	\$0	\$0	\$0	\$0	\$4,000
Expenses	\$0	\$3,500	\$0	\$0	\$0	\$3,500
Contractual	\$42,500	\$60,000	\$240,000	\$1,058,000	\$487,500	\$1,888,000
Direct Costs	\$67,500	\$88,500	\$252,000	\$1,079,500	\$512,500	\$2,000,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0
Total Budget	\$67,500	\$88,500	\$252,000	\$1,079,500	\$512,500	\$2,000,000
Estimated # of Sites to Be Assessed		40	160	30/18	15	NA

CA = cooperative agreement; ESA = Environmental Site Assessment; ED = Eligibility Determination; RBM = Regulated Building Material Survey

3.c. Measuring Environmental Results: To ensure completion of all activities within the grant period, the CDPHE will establish a project schedule with milestones as part of our Cooperative Agreement (CA) Work Plan. The status & estimated date of completion of outputs identified in 3.b.i & anticipated short- & long-term outcomes will be tracked & reported to EPA via Quarterly Progress Reports (QPRs), ACRES & the Project Close-Out Report. QPRs will list goals accomplished & activities planned for the next quarter. The deliverables and schedule will be evaluated and any significant deviations in schedule will be discussed with the EPA Project Officer to develop corrective actions. Between meetings & QPRs outputs will be tracked, monitored and reported on a project spreadsheet including: 1) number of potential brownfield sites identified/ prioritized, 2) # of Phase I ESAs, 3) # of Phase II ESAs, 4) # of RAPs, & 5) # of community meetings & success stories. Sites assessed will be linked to parcel data, to allow for efficient tracking & analysis of project outcomes using a web map server. This will also enable the number of parcels & acreage associated with each assessment to be accurately tracked. The following short- & long-term outcomes will be tracked: 1) # of sites cleaned up, 2) # of sites for which property title transfers are facilitated, 3) # of sites & acres of land redeveloped, 4) # of acres of parks/greenspace created, 5) \$ of private investment & other leveraged funding, 6) # of jobs created or retained from redevelopment projects, & 7) increased property value & tax revenue. Individual Target Area communities will be asked to set goals for outputs & outcomes applicable for their communities & measure & report them to CDPHE quarterly to assess progress.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE: 4.a. Programmatic Capability:

4.a.i. Organizational Capacity: CDPHE has approximately 1,350 employees in its main office and lab in Denver and satellite offices in Grand Junction & Pueblo. As the state authority responsible for remediation of environmental hazards pursuant to the Comprehensive Environmental Response, Compensation & Liability Act, 42 U.S.C § 9601 - 9647 (1992) ("CERCLA"), CDPHE has extensive experience managing both Superfund & Brownfields Cooperative Agreements. CDPHE maintains a staff of environmental professionals who meet the requirements of "Qualified Environmental Professionals" as defined in 40 CFR Part 312. CDPHE also maintains accounting & procurement systems compliant with the requirements of 2 CFR, Part 200, Subpart D. CDPHE has the necessary programmatic, administrative and financial systems to successfully manage a broad range of health and environmental programs for the State of CO including successfully managing both Superfund and Brownfield Cooperative Agreements and the Voluntary Cleanup Program (VCUP).

4.a.ii. Organizational Structure: The CDPHE Hazardous Materials & Waste Management Division (HMWMD) established in 1994 has responsibility for covenants & use restrictions, conditional closures, Brownfields, voluntary cleanup, federal facilities, radioactive materials licensees, solid waste, hazardous waste, Superfund, uranium mill tailings, methamphetamine-affected properties. For purposes of this grant, it is expected that a team of environmental professionals from the HMWMD Brownfield Program will be dedicated to grant administration & reporting, management of consultants, performance of necessary public outreach & engagement, & review of completed site assessment & cleanup planning activities & reports. The specific roles of the CDPHE project team responsible for management of the CWA grant will include:

Project Manager (PM). The CDPHE PM will be responsible for direct project activities, preparing & submit Quarterly Progress Reports detailing work accomplished, funds spent, & the project status as well as annual DBE/WBE/MBE & Federal Financial Reports to the EPA Project Officer in a timely manner. The PM will also be responsible for project deliverables, development of project planning & the overview of project strategies. **Assistant PM/Project QA Manager.** The CDPHE Assistant PM/Project QA Manager will be responsible for meeting with consultants to discuss & review analytical results prior to completion of reports, providing technical guidance, providing senior-level review of technical deliverables, overseeing assessment activities to ensure that sampling methodology, sample preservation methods, & COC procedures are being followed, assist in resolving any QA issues with field or laboratory data or procedures. **Public Involvement Manager.** The PI Manager will be responsible for development of a PI Plan for the grant & for working with CDPHE team members, project consultants & Target Area communities to ensure the successful implementation of outreach & engagement activities that both inform & solicit input from stakeholders during grant implementation. A description of the qualifications & experience of the CDPHE personnel who will fill these roles is provided in Section 4.a.iii below.

4.a.iii. Description of Key Staff: **Doug Jamison** will be the PM for this grant. He is the CDPHE Superfund & Brownfields Unit Leader & has over 30 years of experience implementing CERCLA projects ranging from site assessment to remedial action. For the last 11 years, Mr. Jamison has managed the Superfund & Brownfields Unit at CDPHE where his responsibilities have included overseeing implementation of CERCLA response actions at multiple CO Superfund sites, managing a staff of up to ten environmental professionals, & overall budget planning & management of federal & state funds for CERCLA & Brownfields activities in CO, included federal awards totaling over \$100 million. Mr. Jamison will serve as the overall project lead responsible for coordinating with local partners & stakeholders, communicating with the EPA project officer, & ensuring work plan implementation. **Mark Rudolph** will be the Assistant PM for this grant. He is an environmental scientist & QEP with over 25 years of experience managing CERCLA & Brownfields projects & cooperative agreements. Mr. Rudolph currently serves as CDPHE's Brownfields Program Coordination with primary responsibility for implementing activities under CDPHE's Brownfields State Response Program. **Laura Dixon** will serve as the Public Involvement Manager for the grant. She has 10 years of experience providing insightful leadership & data-driven communication strategies to both government & private sector clients. CDPHE also have additional professional staff, experienced with brownfields assessment, remediation & community engagement who will be available to assist on an as-needed basis.

4.a.iv. Acquiring Additional Resources: CDPHE plans to secure the services of a qualified environmental consultant (QEP) to conduct reporting, community outreach and engagement, brownfield site inventories, environmental site assessments, site reuse and cleanup planning, and area wide planning in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 and CO Procurement Code (CRS §24-101-101 et seq. & CRS 24-3-1401 through 24-30-1407). To assist with project implementation, CDPHE will also utilize the City of Longmont as a subrecipient to oversee performance of a QEP on all grant eligible work in Target Area 1 (Longmont and Lyons). This will be a subaward in accordance with item 1 of Appendix A of EPA's Subaward Policy. Both actions will be initiated as soon as the grant is awarded and CDPHE believes it will be ready to start work on October 1, 2022 as soon as funding is available.

4.b. Past Performance & Accomplishments: 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: Over the last two decades, CDPHE has successfully managed multiple Brownfields State Response Program

(128a Grant) & Revolving Loan Fund Grants awarded by EPA. The following table shows the three most recent brownfields grants received by CDPHE.

Grant #	Type	Grant Period	Status	Total Awards	Remaining Funds
RP-96863601	128(a)	10/01/18-09/30/23	Open	\$2,101,893.00	N/A
RP-98898903	128(a)	10/01/13-09/30/18	Closed	\$2,826,980.00	\$272,548.92
RP-98899601	RLF	10/01/03-09/30/18	Closed	\$4,020,000.00	\$0.00

CDPHE has operated a successful Brownfield State Response Program since the early 2000s using funds from the cooperative agreements listed above & previous cooperative agreements. Selected accomplishments include completing dozens of TBAs, providing outreach & technical assistance to communities across CO, maintaining public records, & supporting environmental cleanup at hundreds of sites through CDPHE's state brownfields grant program, revolving loan fund, & voluntary cleanup program. Likewise, in cooperation with our coalition partners, CDPHE has operated one of the most successful brownfields revolving loan funds in the nation. To date, the CO Brownfields Revolving loan fund has capitalized over \$20M of env cleanup projects by providing nearly \$19M in loans & \$2M in sub-grants. These amounts include nearly \$10M of revolved funds. During the performance period for the grants listed above, CDPHE has a demonstrated history of complying with work plans, schedules & timely submittal of quarterly progress reports & other grant deliverable include grant close-out reports. Consistent award of both Brownfields & Superfund Cooperative Agreements demonstrates CDPHE's ability to successfully implement work plans & comply with administrative & programmatic grant conditions.

4.b.i.(1) Accomplishments: Closed EPA 128a Grant (Cooperative Agreement RP-98898903)

- Completed 29 Phase I & II ESA Reports &/or asbestos & lead based paint studies
- Provided brownfield technical assistance to 30 different communities
- Provided education & outreach to 46 different communities including 14 local or regional workshops, 16 webinars, 15 conference presentations, & one state-wide brownfields conference.
- Support administration & marketing of the CO Voluntary Cleanup Program. During the performance period for this CA the VCUP program approved 363 applications, resulting in 4017 acres remediated, creating of 18,405 jobs & construction of 16,639 housing units.
- The grant supported administration of the CO Brownfields Tax Credit. During the performance period for this CA, CDPHE awarded \$10,458,091 of credits to 37 applicants. The amount of leveraged funding, based on the value of capital improvements associated with the tax credit exceeded \$4.8 billion dollars.

Closed EPA RLF Grant (Cooperative Agreement RP-96863601)

- Completed 23 Phase I & II ESA Reports &/or asbestos & lead based paint studies
- Provided brownfield technical assistance to 17 different communities. The CO Brownfield Partnership provided education and outreach to 24 different communities including direct assistance to 18 communities, 7 local or regional workshops, 6 conference presentations, and one networking event to target rural communities.
- Continued administrative support of the CO Voluntary Cleanup Program. During the performance period for this CA the VCUP program approved 236 applications, resulting in 1778 acres remediated, creation of 9762 jobs & construction of 9212 housing units.
- Continued administrative support of the CO Brownfields Tax Credit. During the performance period for this CA, CDPHE awarded \$5,828,010 of credits to 22 applicants. The amount of leveraged funding, based on the value of capital improvements associated with the tax credit was nearly \$2.1 billion dollars.

CDPHE updates the ACRES database on a quarterly basis or more frequently if necessary & believes that these outputs & outcomes are accurately reflected in ACRES at the present time.

4.b.i.(2) Compliance with Grant Requirements: CDPHE completed and is performing all work on previous/current EPA 128a and RLF grants in compliance with all grant requirements.

Open 128A Grant Cooperative Agreement RP-96863601 (10/01/18-09/30/23)

For this cooperative agreement CDPHE is currently in the fourth, year of a five-year grant. To date CPDHE has successfully implemented the grant scope of work, completed regular updates of the ACRES database, & submitted all required quarterly reports. CDPHE expects an additional grant award in federal fiscal year 2022 & is on schedule to expend all grant funds by the anticipated grant close-out date of 09/30/2023.

Closed 128(a) Grant Cooperative Agreement RP-98898903 (10/01/13-09/30/18). Even though funds remained in the grant at the end of the performance period, CDPHE successfully executed all elements of the grant scope of work. A number of factors contributed to unexpended funds at grant close-out. The primary factor was reduced personnel costs due to temporary loss of staff to retirement, & reallocation of staff responsibilities due to increased workloads in the Superfund program. Another factor was the lower than anticipated cost of certain activities as demand for those activities decreased (i.e., meth lab cleanup), & a lower than anticipated level of effort for certain tasks as they neared completion (i.e., development of soil asbestos cleanup regulations & guidance).

THRESHOLD CRITERIA



COLORADO

Department of Public
Health & Environment

December 1, 2021

David Lloyd
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

**SUBJECT: Threshold Criteria for Community Wide Assessment Grant
For States and Tribes**

Dear Mr. Lloyd;

Please accept this letter to demonstrate the commitment of Colorado Department of Public Health and the Environment to act as the fiscal agent and grantee for the Fiscal Year 2022 Brownfields Community Wide Assessment (CWA) Grant for State of Colorado for the following target areas:

- Target Area 1 - Longmont- Lyons (Boulder County)
- Target Area 2 – Cortez (Montezuma County)
- Target Area 3 – Firestone (Weld County)

FY222 Guidelines for Brownfield Assessment Grants (RFP NO.: EPA-OLEM-OBLR-21-04) pages 15 – 17 identifies the following Threshold Criteria:

Threshold Criteria #1 - Applicant Eligibility. The assessment grant guidelines requires that the applicant provide information that demonstrates it is eligible for a CWA Grant in accordance with Section III.A..

Threshold Criteria #2 - Community Involvement. The assessment grant guidelines require the applicant demonstrate how it intends to inform and involve the community and other stakeholders in the planning, implementation and other brownfield assessment activities described in our grant application.

Threshold Criteria #3 – Named Contractors and Subrecipients. The assessment grant guidelines require the applicant to describe the procurement procedures that were followed to hire the contractor(s) that is named in the application, if any, and include information on where and when the Request for Proposals/Request for Qualifications was posted. Alternatively, state 'n/a' or 'not applicable' if a contractor is not named in this application. The applicant must also describe how the named subrecipient, if any, is eligible for a subaward (e.g., is a nonprofit organization or unit of government). Alternatively, state 'n/a' or 'not applicable' if a subrecipient is not named.

Threshold Criteria #4 - Expenditure of Assessment Grant Funds. The assessment grant guidelines require that CDPHE demonstrate that it has expended 70 % of any existing Assessment or Multipurpose Cooperative Agreement they have by October 1, 2021. Alternatively, the applicant can affirm it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

The ability of CDPHE to satisfy these Threshold Criteria is demonstrated on the attachment. CDPHE understands the responsibilities of an EPA brownfield grantee and has the financial and personnel resources to administer a Brownfields CWA grant. We are excited about the opportunity and convinced that this grant would further economic development and environmental cleanup in the State of Colorado.

Sincerely,

A handwritten signature in blue ink that reads "Douglas C. Jamison". The signature is written in a cursive style with a large initial 'D'.

Douglas C. Jamison
Superfund/Brownfields Unit Leader
Hazardous Materials and Waste Management Division

Text in italics is from the USEPA FY22 assessment grant guidelines.

THRESHOLD CRITERIA #1 APPLICANT ELIGIBILITY

From the list of eligible entities in Section III.A., Who Can Apply? indicate your applicant type and provide information that demonstrates how you are an eligible entity for an Assessment Grant.

Response to Criteria #1:

The Colorado Department of Public Health & Environment (CDPHE) will be the grant recipient on behalf of and for the benefit of CDPHE and the target communities. CDPHE is designated as a legal subdivision of the State under § 25-16-101, C.R.S. (2001) with authority to accept grants and participate in the federal Superfund program and is an eligible entity as defined in the Small Business Liability Relief and Brownfields Redevelopment Act.

The CDPHE's Hazardous Materials and Waste Management Division (HMWMD) is the unit of Colorado's State government invested with the authority to remediate environmental hazards pursuant to Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 - 9647 (1992)("CERCLA"). This authority stems from C.R.S. § 25-16-101-310 and, in particular, § 25-16-103. Attachment E is a letter from the CDPHE's legal counsel stating the basis of authority.

Colorado Revised Statutes Section 29-1-202 defines cities as political subdivisions of the State of Colorado and Colorado Case Law addressing this provision specifies that cities are political subdivisions of the State. Longmont, Firestone, Lyons, Cortez and other community partners all are recognized cities in the State of Colorado and are therefore eligible entities as defined in the Small Business Liability Relief and Brownfields Redevelopment Act.

THRESHOLD CRITERIA #2 COMMUNITY INVOLVEMENT

Provide information that demonstrates how you intend to inform and involve the community and other stakeholders in the planning, implementation and other brownfield assessment activities described in your grant application.

Response to Criteria #2:

The following plan for performing community during the 5-year Community Wide Assessment grant is described briefly in Sections 2.b.i., 2.b.ii and 2.b.iii of the 10-page grant Narrative.

The plan for involving local community partners in the project includes (1) Listen to collective voices and hear different and unique opinions; (2) Educate residents on facts, ideas, solutions, and resources for brownfield revitalization; and (3) Establish a Brownfields Advisory Committee (BAC) and encourage them to provide CDPHE with the ideas, interests and concerns expressed by community members of all ages and backgrounds in the four Target Areas. The CDPHE's robust public involvement program will include holding up to 10 community meetings in each Target Areas during the five-year grant including multiple meetings in the communities

of each Target Area to engage stakeholders and leaders; mailings, press releases, website updates; and newspaper articles in local publications. Public information events will ensure outreach efforts include sensitive populations and/or those who live and work in brownfield-impacted areas. As needed to address the need for safe interaction with the public and coronavirus protocol, meetings may be held online using Zoom, Teams or similar.

In addition, CDPHE maintains a robust community involvement program through its Brownfields State Response Program and will incorporate these resources as part of the broader strategy to inform and involve both the target communities and communities across Colorado of the assessment activities outlined in this proposal as well as other brownfields resources. CDPHE currently partners with Community Builders, a non-profit working with local governments to provide community redevelopment training and assistance, to operate the Colorado Brownfields Partnership (CBF). The partnership assists local governments with education, planning, assessment and financing necessary to remediate brownfields sites and facilitate community redevelopment. The CBF maintains a website that provides information about the services provided by the partnership and brownfields resources available through CDPHE.

Efforts will also be made to reach residents without internet access and those who have difficulty reading or do not read English. Social media and online forums will also be used to advertise upcoming meetings. The Coalition and BAC will consider all community comments received about the project and respond, as necessary, through the project website or other appropriate communication. A random number of comments will be selected for follow-up by telephone to confirm that written response to comments adequately addressed questions and concerns. Time permitting every attempt will be made to respond to questions during meetings at the event and comment cards will be solicited to follow-up if this is not possible. Although most project communications will be published in English, the Coalition will provide material in an alternate language (Spanish) if appropriate for residents living within Target Area boundaries. Translation services will be utilized as needed to ensure equal access to project information is provided to non-English speaking groups. In addition, CDPHE's meetings will be ADA-compliant, and all project literature will include a statement that citizens may request alternative formats.

Project Partners

To seek support for this grant application CDPHE contacted the 3 cities that comprise the Target Areas where funds from this CWA grant will be spent. The purpose of this communication was to ask for their support if the grant is awarded. These government partners contacted potential community partners to inform them of the grant and ask for their support. These included community organizations, businesses, property owners, government representatives, environmental groups and community members. Community partners pledged to participate in outreach efforts, volunteer for membership in the BAC, and assist with grant implementation activities, such as site selection and area-wide planning.



THRESHOLD CRITERIA # 3 NAMED CONTRACTORS AND SUBRECIPIENTS

Describe the procurement procedures that were followed to hire the contractor(s) that is named in this application and include information on where and when the Request for Proposals/Request for Qualifications was posted. Alternatively, state 'n/a' or 'not applicable' if a contractor is not named in this application.

No contractor has been procured to assist CDPHE with grant implementation at this time. This criteria is not applicable.

Describe how the named subrecipient is eligible for a subaward (e.g., is a nonprofit organization or unit of government). Alternatively, state 'n/a' or 'not applicable' if a subrecipient is not named.

The only named subrecipient for this grant is the City of Longmont, Colorado. This will be a subaward in accordance with item 1 of *Appendix A of EPA's Subaward Policy* (www.epa.gov/sites/production/files/2020-11/documents/gpi-16-01-subaward-policy_app-a.pdf) which states "Between legally distinct units of government (e.g. a state providing funds to a local government) will in almost all cases be either subawards or intergovernmental agreements under 2 CFR 200.318(e) rather than procurement contracts since governmental units do not provide services on commercial terms." Following award of this grant by EPA to CDPHE, it is anticipated that CDPHE and the City of Longmont will enter into a Memorandum of Agreement (MOA) which will establish the amount and terms and conditions of the subaward.

THRESHOLD CRITERIA # 4 EXPENDITURE OF ASSESSMENT GRANT FUNDS

Current EPA Brownfields Assessment Grant recipients must demonstrate that payment has been received from EPA (also known as 'drawn down') for at least 70% of each Assessment cooperative agreement they have with EPA by October 1, 2020 in order to apply for additional Assessment Grant funding under this solicitation. Alternatively, the applicant must affirm it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

Response to Criteria #4:

CDPHE does not currently have an open USEPA Brownfields Assessment or Multipurpose Grant.

