

IV.D. Narrative Information Sheet

1. Applicant Identification

Logan County Economic Development Corporation
100 College Avenue, Walker Hall
Sterling, CO 80751

2. Funding Requested

- a. Assessment Grant Type: Community-Wide
- b. Federal Funds Requested: Total funds requested is \$500,000.00.

3. Location

- a) City: Sterling
- b) County: Logan County
- c) State: Colorado

4. Target Area and Priority Site Information

Target Areas: West Main, Downtown, Southwest, and Northeast
Census Tract Numbers: 08075966102, 08075966101, 08075966200, 08075966300

Addresses of Priority Sites:

West Main

- 220 S. 3rd Avenue (Trillium Site)
- 111 and 115 S 3rd Ave (Former Fastenal/Nick's Liquor)
- 126 W Main Street (Old Mi Ranchito/Future Subway)
- 403 W Main Street (Former Stinkers Gas Station)

Downtown

- 133 N 4th Street (Troy's Auto)
- 104 Poplar Street (All Area Transmission)
- 40.62236, -103.20644 (UP Rail Yard Area)

Southwest

- 19735 Factory Street (Sugar Factory)

Northeast

- 40.629030, -103.191504 (Former City Power Plant)
- 20687 Riverside Drive (Former Beef Plant and Dog Food Factory)

5. Contacts

Project Director and Chief Executive/Highest Ranking Elected Official: Trae Miller, Executive Director, Logan County Economic Development Corporation, (970)520-1283, traem@sterling-logan.com, 121 South 4th Street, Sterling, CO 80751.

6. Population

Area Population for the City of Sterling: 13,735, Target Area (7,860)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	

The priority brownfield 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).	X
The priority site(s) is in a federally designated flood plain.	X
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	X
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The proposed project will improve climate adaptation/mitigation capacity and resilience to protect residents and community investments.	X
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B. for priority site(s) within the target area(s).	X
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority

Included is a letter for the Colorado Department of Public Health and Environment.

9. Releasing Copies of Applications

Not applicable

Sincerely,



Trae Miller – Executive Director, LCEDC

November 6, 2023

Christina Wilson
Environmental Protection Agency
Region 8 Brownfield's Program
1595 Wynkoop Street (EPR-B)
Denver, Colorado 80202-1129

Via email - Wilson.Christina@epa.gov

RE: Logan County Economic Development - Community-Wide Assessment Grant

Dear Ms. Wilson:

I'm writing to express our support of the Logan County Economic Development Corporation (LCEDC) Community-Wide Assessment Grant proposal. Like many rural communities in Colorado, Logan County has faced multiple challenges in recent years due to a combination of factors including declining population, high poverty rates, and low growth in wages and economic activity.

Over the past seven years, Logan County has worked with Colorado Department of Public Health and Environment (the department) as well as with the U.S. Environmental Protection Agency (EPA) Targeted Brownfields Assessment (TBA) programs to complete Phase I and II Environmental Site Assessments (ESAs). These ESAs have been used to provide prospective purchasers and Logan County a better understanding of the potential contamination issues at select Brownfield properties in Sterling and Logan County, Colorado.

Logan County has implemented several tools to facilitate redevelopment of the downtown core of Sterling, Colorado, including a TBA at the former Woolworth building. This historic structure was vacant for over 40 years. With the TBA, LCEDC was able to work with History Colorado and get the property into hands for redevelopment. The project is now working on completion of second floor residential units and a first-floor restaurant.

Despite Logan County's recent successes, there continues to be limiting resources for the completion of assessment, cleanup, and redevelopment of multiple brownfield properties within the County. The activities outlined in the assessment grant proposal would supplement the efforts made by Logan County to date and ultimately improve their ability to position unused properties for sale and redevelopment. In summary, we feel the proposed project is a vital component of the overall efforts being made to revitalize not only the target properties outlined in the proposal but additional properties in the

County. For these reasons, the department fully supports the Logan County proposal and looks forward to supporting their efforts pending a successful proposal.

If additional resources are necessary after completion of activities outlined in the application, the department can provide funding for Brownfield cleanup through the Colorado Brownfields Revolving Loan Fund and the State of Colorado Brownfields grant (H.B. 1306) program. Furthermore, Colorado's Voluntary Cleanup Program provides a mechanism to remediate contaminated sites and provide State approval of the cleanup. Finally, Colorado tax credits for remediation of contaminated land that can provide additional resources for both local governments and/or private developers. CDPHE has informed Logan County of these resources and can assist with application process if requested.

Sincerely,



Kathleen Knox
Superfund/Brownfields Project Manager
Hazardous Materials and Waste Management Division

cc: Trae Miller, Logan County Economic Development Corporation



Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Logan County (County) is in northeastern Colorado. The County includes generally smaller rural communities, with the Town of Sterling being the County seat and maintaining the largest population, 13,102 in 2022 (US Census). Interstate 76 (I-76) and the South Platte River generally divide the County into a northwestern and a southeastern portion. The discovery of gold in the Colorado mountains made the Overland Trail, a branch of the Oregon Trail, the most heavily traveled road in the country by miners, fur traders, and settlers. The South Platte River section of the Overland Trail brought thousands of brave and adventurous people across the unmarked prairie and through Logan County and Sterling.

With the advancement of the Union Pacific Railroad in 1881, the offer of 80 acres of land for right-of-way was made to railroad officials who accepted bringing the railroad to Sterling. As a result, the Town of Sterling was incorporated in 1884 and became the County seat of the newly formed Logan County in 1887.

During the 1900s, the County generally consisted of agricultural and ranching uses. Farmers grew corn, wheat and hay, and sugar beet. **Like most communities in eastern Colorado, Logan County has experienced the economic highs and lows related to sugar beet production which peaked in the 1950s.** The Great Western Sugar Company constructed a sugar beet plant in the City of Sterling and at one point maintained a sugar beet dump in the Town of Proctor.

From the 1950s, many **Logan County community populations decreased and, as a result, many businesses and industries closed, leaving some communities modern day ghost towns.** In the early 2000s, the County saw some economic investment with construction of the Peetz Table Wind Complex west of the Town of Peetz. The first phase of construction became the largest wind farm in Colorado upon completion in 2001. With over a Gigawatt of installed wind generation, plus multiple community scale solar facilities, **renewable energy is a strong contributor to the local economy through tax base and jobs;** however, there is more work to be done to make the renewable industry a significant economic driver. Additional efforts have tried to grow the industry. Northeastern Junior College developed a premier training program focused on renewables, allowing graduates to go straight into the career fields of Wind Technician, Industrial Technician, and Maintenance.

Another factor further affecting the Logan County economy is flooding potential since many of the communities in Logan County are relatively flat and along the South Platte River. The Town of Sterling, experienced significant flooding in 2013 (FEMA Declaration, DR-4145-DR).

Today, Logan County remains an agricultural and ranching community, which is increasingly impacted by the changing environment and available water resources. **The ongoing economic distress in many of the communities, in particular the City of Sterling, is visually apparent in the dozens of inventoried vacant structures and properties left behind as population has moved away to the Denver Front Range.** Many vacant properties are associated with potential and known contamination from previous industrial and agricultural uses, which represent concerns due to demographic makeup of sensitive populations within the City of Sterling. (see 2.a.ii). The combination of shrinking populations, low property values, and declining tax revenues and poverty (13%) have made it difficult for Logan County communities, to attract new residents and quality jobs. This is why **Logan County Economic Development Corporation (LCEDC), a non-profit economic development agency,** seeks funds for critical Brownfield assessment and cleanup/reuse planning. The primary goal is to identify and quantify environmental contamination within the City of Sterling core, consisting of the former sugar beet plant to downtown and extending to priority sites (the LCEDC Sterling Target Area [TA] for this project), which

includes Logan County Census Tracts 08075966102, 08075966101, 08075966200 and 08075966300. An initial survey has identified an initial 10 priority sites within a 2.25 square mile area. The goal of the work to be completed by the grant is to better understand environmental liabilities associated with these priority sites, identify additional sites for assessment and community input, and to develop and reenergize existing community-driven reuse strategies. **The brownfield assessment project is an essential starting point for LCEDC and will help revitalize the economy, create new jobs, provide affordable housing options, and lead to a more resilient community through the installation of improved infrastructure through the redevelopment.**

ii. Description of the Priority Brownfields Site(s)

The LCEDC Sterling TA consists of the following census tracts: 08075966102, 08075966101, 08075966200, and 08075966300. Priority sites in each census tract were identified based on development interests, historic environmental contamination, and community needs. These sites provide representative examples of the numerous brownfield sites throughout each census tract. Revitalization of these properties will be paired with developers and projects to bring jobs and economic stimulation to the area. Overall, 10 priority sites have been identified a description and potential reuse of two of them are discussed here.

Downtown (Census Tract: 08075966200) The UP Rail Yard Area is a large area located on the eastern end of Main Street. The property is a vacant area that has historically served as rail car storage and was improved by various rail tracks and two buildings. With the large unknown of the environmental contaminants, the site will need to have a Phase I Environmental Site Assessment (ESA) and Phase II ESA and potentially asbestos and lead-based paint assessments. **Reuse Concept:** Proposed reuse of the area might include an extension of Earl D. Franklin Jr. Park with a splash pad. Something that the City of Sterling is lacking is recreational spaces, and the addition of a new park adjacent to Main Street could offer residents a place to gather for concerts, farmers markets and other community events.

Southwest (Census Tract 08075966300) The Historical Sugar Beet Factory was built in November 1905 and was closed in 1985. The Sugar Beet Factory includes several buildings: Factory Manager's House, Fire House Building, Quality Assurance Building, and Main Factory Building (to name a few). Previous environmental assessments included Phase I and II ESAs completed through the Targeted Brownfields Assessment program. The Phase I ESA revealed lead-based paint and asbestos-containing material represent a business environmental risk. In addition, a hazardous building materials survey has also been completed which has identified asbestos and lead-based paint throughout various buildings. Other contaminants might include petroleum hydrocarbons and asbestos mixed with soil. **Reuse Concept:** The Historical Sugar Beet property has been considered for reuse which might include agricultural processing or feed manufacture and potentially light manufacturing.

iii. Identifying Additional Sites

Beyond the priority sites identified in 1.a.ii, LCEDC will add a page to the LCEDC website (<https://sterling-logan.com/>) to provide details about the grant and include a means for those individuals that are potentially interested in a property to apply to the LCEDC to use grant funds for assessment. In addition, to aid applicants in using the website, community outreach events will be held by LCEDC to provide details about the grant with local stakeholders and residents. LCEDC will also complete a windshield survey of the LCEDC Sterling TA to look for other sites that would be good additions to the program. The methods for which new sites are prioritized as they are added to the list shall include the following: 1. The ability of the sites reuse to catalyze employment opportunities. 2. The reuse benefits to traditionally underserved populations. 3. Is the site located near a current priority site and therefore represents an opportunity for larger targeted reuse that would catalyze the area for outside investment. 4. Is the site in downtown Sterling where building and façade improvement grants are available.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The assessment, cleanup and reuse of properties in the LCEDC Sterling TA aligns with reuse plans. In 2018, the City of Sterling updated their *Master Plan (Plan)* that included the LCEDC Sterling TA. The Plan details efforts made by the City of Sterling to engage residents to understand the city’s needs and desires, past revitalization efforts, and current ideas regarding the future of downtown Sterling. As part of the outreach, a **“Heart of Sterling” map was developed from collected input, with the largest cluster identifying portions of the LCEDC Sterling TA as the “Heart of Sterling.”** Key goals of the Master Plan are to attain balance and appropriate distribution of land uses, promote a pattern of growth emanating from the City of Sterling’s core, pursue annexation of existing residential subdivisions adjacent to city limits and served by city services, diversify land uses and promote quality design with the City of Sterling’s historic downtown, and create walkable, pedestrian-friendly neighborhood centers to shape new growth and development. Many key goals identified relate to the LCEDC Sterling TA of this grant application. **The Sterling Urban Renewal Authority (SURA) has also developed two grants to support property redevelopment Downtown. These grants can be used for façade and building improvements.** The City of Sterling and SURA will both serve as assets to this proposed project, especially regarding community engagement efforts and aligning reuse strategies with evolving community needs. Many priority sites in the LCEDC Sterling TA are suitable for mixed-use commercial, residential, and recreation redevelopment.

ii. Outcomes and Benefits of Reuse Strategy

The proposed project will provide environmental due diligence, cleanup planning, and reuse planning services necessary to position priority properties and other sites for sale or redevelopment. These activities will accommodate new investments by stimulating the availability of other funds and resources, creating new jobs, and increasing tax revenue by adding new business to the LCEDC Sterling TA. **It is estimated that greater than 40 jobs and increased tax revenue generate from the redeveloping the LCEDC Sterling TA.** Each priority property has confirmed or perceived environmental concerns that represent significant roadblocks for redevelopment/reuse. Once assessed, and if necessary, cleaned up (possibly through subsequent EPA Cleanup Grants or RLF), redevelopment and reuse of the site have the potential to bring jobs, taxes revenue and needed resources (parks and infrastructure improvements).

Infrastructure will improve through redeveloping priority properties and the LCEDC Sterling TA. Updating infrastructure will build resilience to a changing climate; reusing and redeveloping old infrastructure (dating back to the 1950s and 60s) can be designed to comply with green infrastructure practices and be adaptable to manage more intense storms. **Logan County and the City of Sterling are leaders in renewable energy and believe this market can create jobs. The former sugar beet property includes 151 acres of land, some of which is vacant, which means the land could be used for solar.** Another alternative development related to the former sugar beet project is using the site as a large ground source heat pump facility that could be used to provide heating and cooling to commercial buildings in Downtown, allowing them to transition from using petroleum hydrocarbons as the heating source.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Assessment and redevelopment projects proposed in this brownfield assessment project require public and private investment. The LCEDC Sterling TA is associated with a **state-designated Tax Increment District (TIF)**, which captures the tax value increment over time with an area as a pool of money accessible for capital improvements exclusively within the Tax Increment District. Locally and in the City of Sterling various tax credits and improvement grants can be used specifically within the LCEDC

Sterling TA. All sites are in designated **Enterprise Zone**, and the **Colorado Department of Public Health and Environment (CDPHE)** can offer revolving loan funds and tax credits for cleanup of the priority sites and other brownfields. The Colorado Historical Foundation created the **Colorado Historical Foundation Revolving Loan Fund** to leverage resources available to preserve Colorado’s historical buildings. LCEDC will work with community partners, the City of Sterling, and SURA to identify potential developers and investors willing to support ended redevelopment concepts or other suitable revitalization projects. The City of Sterling is also eligible for grants and loans from the **US Department of Agriculture, Community Facilities Program**, which is applicable to health and recreation projects or, if necessary, for brownfields.

ii. Use of Existing Infrastructure

Inside the TAs, aging, but sufficient infrastructure exists, including utilities and historical buildings. LCEDC and the City of Sterling are experienced with leveraging TIF programs to fund additional infrastructure improvements. This funding will be used to promote sustainable redevelopment. In many cases, the ability to reuse the existing infrastructure will occur, but a focus will be made to develop multi-model transportation corridors to improve mobility in the LCEDC Sterling TA, as well as designing resilient infrastructure to address a changing climate.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

In addition to being small, the City of Sterling is rural and isolated from the Colorado Front Range corridor causing a population decline. From 2010 to 2020 the population of Sterling, where the LCEDC Sterling TA is located, decreased by 7%¹ and has a poverty rate of 13%, greater than that of the State of Colorado (10.3%). In addition to higher-than-average poverty the tax revenue for the City of Sterling in which where the LCEDC Sterling TA is located is only \$1,427,176. **The anticipated revenue for the City of Sterling is expected to be \$19,150,323 and expenditures to be \$21,132,055 for the year 2024² equaling a deficiency of \$1,981,732 leaving no resources of assessment or reuse planning.**

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The LCEDC Sterling TA has a significant population of persons vulnerable to environmental injustice and who often have limited ability to influence environmental decision-making. This population includes residents aged 65 and older, those living in mobile homes or group quarters, residents who rent, people with disabilities, residents who are not English proficient and community members without internet access. **Other community-wide health and welfare issues include lack of recreational parks, houses built pre-1980, proximity to airports, impaired surface water, and high estimated cancer prevalence (CDC Environmental Justice Index Explorer).** Additionally, diabetes and heart disease rates in Logan County are higher than state average (CDPHE Composite Selected Health Outcome Dataset [County]). Brownfields funding will catalyze communication directly from sensitive populations. Their feedback will guide reuse decision-making. The funding can reduce the threats to the health and welfare of the community as it relates to the community wide issues through environmental assessments and remediation of contaminated properties.

¹ United States Census Bureau, City of Sterling July 1, 2022

² Adopted 2024 Budget, City of Sterling

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

EJ Index Health Indicators	Percentile in State
Heart Disease	91
Persons with Disabilities	84
Cancer	83
Asthma	68
Low Life Expectancy	65

The population within the LCEDC Sterling TA is in the 65th to 91st percentiles for all the health indicators identified by EJ Screen. Brownfields funding at the Priority Sites will contribute to improving overall health conditions by completing environmental assessments to identify sources of contamination, removing environmental harms, and building recreational parks, and green, flood-resilient infrastructure.

(3) Environmental Justice

a) Identification of Environmental Justice Issues

The EJ Screen tool generally identifies the population to be impacted by the Brownfield funding as an older, low-income population impacted by proximity to a Risk Management Program (RMP) site, wastewater discharge, and underground storage tanks. CEJEST identifies the West Main priority sites, census tract 08075966100, as disadvantaged due to low income and the percent of people ages 25 years or older whose high school education is less than a high school diploma. These sensitive populations are vulnerable to environmental injustice and often have limited ability to influence environmental decision making which makes them more susceptible to health and welfare issues because of environmental contamination.

EJ Index Categories	Percentile in State
RMP Proximity	95
Wastewater Discharge	94
USTs	92
% Pre-1960 Housing	87
Low Income	75
Over Age 65	69

b) Advancing Environmental Justice

This grant will advance environmental justice through community outreach and engaging with sensitive populations, guiding reuse and redevelopment plans. The reuse strategy/projected site reuse(s) will help make the LCEDC Sterling TA a healthier place to live through environmental assessments and remediation and the redevelopment of currently unused properties for commercial, residential, recreational use. The reuse strategy will also make the LCEDC Sterling TA a healthier and safer place to live through the redevelopment of old infrastructure into new, sustainable, green infrastructure.

b. Community Engagement

i. Project Involvement

LCEDC works with several local and regional public and private organizations. LCEDC is committed to ensuring community and partner stakeholders are identified and a systematic approach is implemented to address brownfields with sustainable reuses that best serve our community vision. LCEDC will partner with the following local organizations/entities/groups to ensure that activities completed with grant funding incorporate our community's needs and allow for sustainable and ecologically responsible growth.

ii. Project Roles

Organization/ Entity/Group/Contact and Involvement or Assistance	Organization/ Entity/Group/Contact and Involvement or Assistance
Sterling Urban Renewal Authority (SURA): Ryan Etl – Board Chair - Provide community outreach and are a partner in Brownfield redevelopment	City of Sterling: Kevin Blankenship – Assist in site selection, permitting needs and rezoning assistance for redevelopment.
Northeastern Junior College: Lisa Lefevre – VP of	Colorado Workforce Centers: Locally: Tami Roth

Finance (also on LCEDC Board) - Represents many residents in the population being targeted by the grant; can assist with community engagement of persons living in group quarters.	State/Regional: Dawn Robards - Provides community outreach for those in need of a job and would represent residents that would benefit from the grant.
Sterling Regional Med Center: Ned Resch – CEO (also on LCEDC Board) - Represents many residents being targeted by the grant; can assist with community engagement and encourage involvement.	Logan County Chamber of Commerce: Caitlin Baseggio – Ex Dir. (LCEDC Board) - Provides community outreach for business and civic community growth.
Energy Resource Center: Howard Brooks – CEO - Provides community outreach and partner for advocating energy efficiency in low-income households.	Carbon America and Sterling Ethanol Carbon Sequestration: John Brown – Provides community outreach and partner for advocating for a greener economy.
Sterling Community Fund: John Chapdelaine - Provides community outreach and partner for advocating to make Logan County a more attractive place to live.	Sterling Lion’s Club: Tim Edgar – Club President - Provides community outreach and partner for advocating for understanding humanitarian needs and community involvement.
RE-1 Valley School District: Marty Foster – Superintendent - Represents many residents in the population being targeted by the grant; can assist with community engagement and encourage involvement.	Cooperative Ministries: Shelly Greenwood – Provides community outreach through assistance to combat homelessness and food insecurities; can assist with community engagement and encourage involvement of low-income and disabled persons.
CSU Regional Engagement Center: Tim Stahley – Executive Director - Provides community outreach to develop youth’s skills and support community goals.	----

iii. Incorporating Community Input

As part of our grant award, LCEDC will incorporate community input through: 1) Assist the public in understanding and contributing to the decision-making process during project planning, assessment phases, and cleanup; 2) Give the public accessible, accurate, and timely information as the grant program moves forward; 3) Ensure adequate time and opportunity for community and community groups to give feedback and participate, and for that input to be considered; 4) Reflect community concerns, questions, and information needs; and 5) Respect, consider, and include public input. LCEDC, with help from a qualified environmental professional (QEP), will develop a written Community Involvement Plan to document and formalize the process to share information and seek public input for decision-making. Input will be sought on site selection, project planning, and cleanup/reuse planning. The public will be given ample opportunity to participate in prioritization and planning processes. LCEDC will use various strategies to communicate with the public including maintaining a page on the LCEDC website and a point of contact available to answer questions from community members. LCEDC will prepare and distribute news releases, fact sheets, newsletters, and social medial updates, describing project information and upcoming events. For residents without internet, LCEDC will release paper copies of relevant documents, such as surveys sent to residents and announcements to local newspapers and radio. LCEDC will host a booth at annual festivals, workshops, luncheons, and roundtables to engage and inform community members.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task descriptions, cost allocations, schedules, task leads, and outputs are listed below:

<p>Task 1: Redevelopment Planning</p> <p>i. Project Implementation</p> <ul style="list-style-type: none"> EPA-Funded tasks/activities: Non-EPA grant resources needed to carry out tasks/activities, if applicable: <p>Brownfields inventory list and development of a database (refreshed annually). Develop one area-wide Brownfields Revitalization Plan (BRP) and Community Involvement Plan using the brownfields inventory and community input. Conduct four public meetings per year for the LCEDC Sterling Targe Area to assess community needs and priorities for redevelopment. Work completed in Task 1 will aid in the prioritization of brownfield sites for work discussed in Task 3 and 4. Cost Allocations: <i>Personnel</i> = Community outreach (10 Hours @\$60.60 (includes fringe)/hour = \$6,060) <i>Contractual</i> = (300 Hours @\$190.00 = \$57,000), Site inventory database with three annual updates a BRP, and CIP and associated public meetings for the LCEDC Sterling TA, <i>Personnel</i> = (100 Hours @\$60.60 (includes fringe)/hour = \$6,060), <i>Contractual</i> = (375 hours @\$210/hour = \$78,750), <i>Supplies</i> = \$2,130.</p> <p>ii. Anticipated Project Schedule: beginning 2nd Quarter of Year 1 – prepare the revised brownfields inventory database. Years 1 and 2 – prepare BRP</p> <p>iii. Task Lead: LCEDC, project partners, and QEP support</p> <p>iv. Outputs: Brownfields inventory list with priority sites and publicly available property and environmental data. BRP and CIP for LCEDC Sterling TA. Social Media posts, Newsletters, Newspaper and Radio ads.</p>
<p>Task 2: Environmental Assessments</p> <p>i. Project Implementation: This task will begin with site access agreements and property eligibility determinations. Sites will be identified using the updated brownfields inventory (Task 1). Community input will inform site selection at additional, nonpriority sites (Task 1 and 4). The QEP will submit a Programmatic Quality Assurance Project Plan (QAPP) and site-specific Sampling Analysis Plans (SAPs) to EPA before any environmental sampling under this task. Phase I ESAs, Phase II ESAs and hazardous building materials surveys may be completed as part of this task. Cost Allocations: <i>Contractual</i> – 13 Phase I ESAs (\$3,500 to \$5,500 each; average \$4,000 each), 6 Phase II ESAs (\$20,000-\$40,000 each; average of \$31,020 each). Project-specific QAPP (\$10,000) SAPs (\$4,000).</p> <p>ii. Anticipated Project Schedule: Beginning 2nd Quarter of Year 1 then ongoing, Years 1-4.</p> <p>iii. Task Lead: LCEDC, QEP support</p> <p>iv. Outputs: Access agreements and property determinations. 15 Phase I ESAs following ASTM E1527-13. Programmatic QAPP and associated site-specific QAPPs. Six Phase II ESAs following current ASTM and regulatory standards. Phase IIs may include Hazardous building material surveys. Assessments will be tracked/reported in Assessment, Cleanup, and Redevelopment Exchange System (ACRES) and reports.</p>
<p>Task 3: Cleanup Planning</p> <p>i. Project Implementation: Analysis of Brownfield Cleanup Alternatives (ABCA) and as needed Voluntary Cleanup Applications under Colorado Department of Public Health and the Environment. Sites will be selected based on results from Task 1 and Task 2. Cost Allocations: <i>Contractual</i> – 4 ABCA plans and/or Voluntary Cleanup Applications (\$10,000 each).</p> <p>ii. Anticipated Project Schedule: Beginning Year 2 then ongoing.</p> <p>iii. Task Lead: QEPs; may incorporate local/state regulatory departments for resources and approvals.</p> <p>iv. Outputs: Four ABCA Plans and/or VCUPs.</p>
<p>Task 4: Community Outreach</p> <p>i. Project Implementation: Community outreach for the brownfields program will be incorporated into multiple community-wide and LCEDC meetings per year. These will allow updates and education for the brownfields program and for community input for brownfields tasks and redevelopment. Information gathered from the community outreach meetings will be integrated into planning for Task 1-Task 3. Cost Allocations: <i>Supplies</i>- \$500 for print materials, public notifications, and advertising. <i>Personnel</i> - (40 Hours @ \$60.60 (includes fridge)/hour = \$2,424), <i>Contractual</i> – QEP participation at public meetings (97.5 @ \$200/hour = \$19,500).</p>

ii. Anticipated Project Schedule: Ongoing, Years 1 through 4.
iii. Task Lead: LCEDC with QEP Support
iv. Outputs: Community outreach for 4 quarterly meetings per year (16 total meetings).
Task 5: Programmatic Administration
i. Project Implementation: Management, execution and administration of grant and cooperative agreement. Procurement of QEP. Travel for two staff to attend brownfield-related conferences (the National Brownfields Training Conference and the Colorado Brownfields Conference). Cost Allocations: Programmatic Administration, <i>Travel</i> – food, lodging, and transportation for staff (\$5,608). <i>Personnel</i> – (80 Hours @ \$60.60 (includes fridge)/hour = \$4,848), <i>Contractual</i> =(25 Hours @ \$200/hour = \$5,000).
ii. Anticipated Project Schedule: Ongoing, Years 1 through 4. Procurement of QEP 1 st Quarter of Year 1
iii. Task Lead: LCEDC
iv. Outputs: 16 EPA quarterly reports, minority-owned/women-owned business enterprises (MBE/WBE) forms, ACRES database, and other support necessary to maintain compliance with EPA cooperative agreement terms and conditions. Qualifications based selection of QEP. Travel to the National Brownfield Training Conference and/or other training.

b. Cost Estimates

Cost estimates are included in the budget table below. Please note that cost allocations or unit costs for each task are included in the task table in the previous section (Section 3a).

Budget Categories		Project Tasks (\$)					Total
		TASK 1 Inventory and Redevelopment Planning	TASK 2 Environmental Assessments	TASK 3 Cleanup Planning	Task 4 Community Outreach	TASK 5 Programmatic Administration	
Direct Costs	Personnel	\$12,120	-	-	\$2,424	\$4,848	\$19,392
	Fringe Benefits	-	-	-	-	-	-
	Travel	-	-	-	-	\$5,608	\$5,608
	Equipment	-	-	-	-	-	-
	Supplies	\$2,130	-	-	\$500	-	\$2,630
	Contractual	\$135,750	\$272,120	\$40,000	\$19,500	\$5,000-	\$472,370
	Other	-	-	-	-	-	-
Total Direct Costs		\$150,000	\$272,120	\$40,000	\$22,424	\$15,456	\$500,000
Total Indirect Costs		-	-	-	-	-	-
Total Budget		\$150,000	\$272,120	\$40,000	\$22,424	\$15,456	\$500,000

c. Plan to Measure and Evaluate Environmental Progress and Results

An EPA-approved work plan will guide project results. LCEDC will evaluate progress based on milestones identified in the work plan to keep tasks on track for completion. LCEDC will document Phase I and II ESAs, ABCAs, and voluntary cleanup applications made to the CDPHE funded by the grant and the number of sites that are successfully redeveloped. All outcomes will also be tracked in EPA’s ACRES system with quarterly reporting to EPA. We will also document community engagement events, planning,

stakeholder meetings, jobs created, acres of greenspace created, improved outcomes for disadvantaged portions of our community, and the reuse of sites and structures. At the conclusion of the 4-year grant period, a report summarizing the projects will be prepared and transmitted to EPA.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity

LCEDC has the organizational capacity to carry out the programmatic and financial requirements of the grant as demonstrated by LCEDC’s previous experience administering grants as detailed below in Section 4.b.i. Mr. Trae Miller’s years of experience managing various grants, which evolved into working with partner agencies and organizations to deliver economic and business development. In addition to the executive director’s experience with grants, LCEDC will through the proper open procurement process select a QEP that has previous experience with grant administration, and familiarity with the financial requirements related to brownfields and assessment grants. The QEP will assist with quarterly, annual, and final reporting and tracking of finances that are required to be reported to the EPA as part of assessment grant administration.

ii. Organizational Structure

The LCEDC executive director will oversee the day-to-day operation and will be responsible of the contracted QEP. The LCEDC will be responsible for ASAP drawdowns and the fiscal management. As noted above the LCEDC will select a qualified QEP to meet the required programmatic objectives. LCEDC will work with the EPA Project Officer and the QEP to implement countermeasures, such as reevaluation of management strategies to resume the project schedule and meet workplan milestones should delays or obstacles be encountered.

iii. Description of Key Staff

LCEDC will manage all activities under the grant. LCEDC’s leadership team (one Executive Director, four Board Officers, and ten Board of Directors) includes staff with diversified industry and management experience in real estate, construction, telecommunications, project management, finance, operations, and small business. The leadership team includes representatives from the private sector, as well as the Sterling City Council, Logan County Board of County Commissioners, and SURA. LCEDC is led by Trae Miller. Mr. Miller has 9 years of experience as the Executive Director of the LCEDC and has extensive experience successfully managing grants including United States Department of Agriculture (USDA) Rural Business Development Grants (RBDG), EPA Targeted Brownfields Assessments (TBA) Grants, and Colorado Department of Local Affairs Grants. Linda Merkl, Northeast Colorado Association of Local Governments Grant Navigator – Ms. Merkl is the former Vice President of Academic Affairs at Northeastern Junior College. Ms. Merkl has previous experience assisting LCEDC with grant programs, requirements, review, etc., and would assist LCEDC as such with this Grant. Elizabeth Bernal, Rural Communities Assistance Corporation – LCEDC is under a 3-year agreement (through September of 2024) with the Rural Communities Assistance Corporation for assistance with economic development programs and projects. Ms. Bernal will assist LCEDC with grant administration, community engagement, and other related work. Mariyah Pope, Sterling Urban Renewal Authority – Ms. Pope is the Staff Executive Director of the SURA. LCEDC will have direct overlap working with Ms. Pope on SURA programming and potential funding resources for sites and redevelopment activities. George Good, City Public Works Director – Mr. Good is a former building inspector and lumber yard manager. Mr. Good is experienced in and can assist with asbestos remediation and training.

iv. Acquiring Additional Resources

LCEDC will follow a procurement system for consultants and contractors that ensures compliance with

all local, state, and federal laws and regulations. LCEDC will work with KSU TAB to prepare a Request for Proposals (RFP), advertise the RFP, review proposals, and reach consensus on the selection of an environmental consultant/contractor and planning firms.

b. Past Performance and Accomplishments

i. Has Not Received and EPA Brownfields Grant but has Received other Federal or Non-Federal Assistance Agreements

(1) Accomplishments

LCEDC has received and successfully implemented a variety of grants over the last 8 years. LCEDC has been successful in managing these grants and achieving desired results for the community as described below. The grants LCEDC has received have not been eligible to be tracked in ACRES.

EPA TBA Grants (2016 and 2022; \$50,000) the 2016 grant was used to perform Phase I and Phase II ESA at Woolworth historic building which enabled redevelopment of the building and will result in over \$1,000,000 of capital investment into the building for adaptive reuse. The 2022 grant was used to perform Phase I and Phase II ESA at historic Sugar Factory property where heaviest industrial activity took place; the structure has been vacant and unused for approximately 40 years and grant funding is informing LCEDC of issues and allowing progress to be made toward redevelopment.

USDA RBDG (2021-2023) successful report and market analysis for wheat straw processing opportunities as part of the biomass development opportunities movement. Results from the analysis created multiple conversations with potential project developers and end users that can create jobs and bring value to the community.

CO Department of Local Affairs Grants (2018, 2021, and 2023; \$62,577, \$155,000, and \$56,000) the 2018 grant provided funding for the adaptive reuse of a vacant and underutilized property into coworking space. The 2021 grant provided funds to expand the coworking facility to accommodate more users. The 2023 grant provided funding for regional entrepreneurial program and competition. 28 businesses applied and \$30,000 of prize funds were awarded to support growing businesses in the region. Nearly 100 community members attended a live competition pitch event.

(2) Compliance with Grant Requirements

EPA TBA Grants – The 2016 grant was used in compliance with the workplan for the grant, within the agreed upon schedule, and the redevelopment of the Woolworth building is underway. The 2022 grant is currently being used in compliance with the workplan for the grant, is on schedule, and is already proving valuable for the end users interested in the property.

USDA RBDG – The grant was used in compliance with the workplan. The deadline was extended, with proper notice given to the granting agency, due to contractor staffing issue. The deadline was extended by working closely with the USDA grant manager within 90 days of grant expiration. As milestones were shifted, the LCEDC was proactive in requesting the extension to ensure the grant stayed in full compliance. The project has since been completed within the extended deadline and the final report with USDA is scheduled for December 5, 2023.

CO Department of Local Affairs Grants – All three grants were used in compliance with the workplans for each of the grants and within the required deadlines. The CO Department of Local Affairs completed a review of the work completed and verified that the work was satisfactory.

Threshold Criteria Documentation

Logan County, Colorado FY24 Community-Wide Assessment Brownfields Grant

1. Applicant Eligibility

a. Applicant Type: The Logan County Economic Development Corporation (LCEDC) is a 501 C 3 not-for-profit corporation formed in 2001 to expand the economic base of Logan County, Colorado.

b. Exempt from Taxation Under 501(c) (4) of Internal Revenue Code: No

2. Community Involvement

LCEDC recognizes the importance of engaging the community to facilitate decision-making and project success. In 2018, the City of Sterling updated their Master Plan (Plan) that included the LCEDC Sterling Target Area for this Brownfields funding. The Plan details efforts made by the City of Sterling to engage with residents to better understand the needs and desires of the city, past revitalization efforts and current ideas regarding the future of downtown Sterling.

The Sterling Master Plan Update process was based on the belief that community input and consensus are necessary to develop a plan that is appropriate and reflective of Sterling's unique culture and situation. That input and consensus helped to create community support and ownership to help see the Plan through adoption and implementation. Nearly one thousand community members contributed to the Plan, through numerous events and activities. The following provides an overview of the techniques, activities, and events utilized throughout the planning process to involve a full and representative cross-section of the Sterling community and will be utilized for this Grant.

Online Tools: Online tools, such as the LCEDC website, digital news letters, and social media, will be continually updated throughout the 4-year period to provide background information, notice of and results from upcoming projects, and any other relevant documents generated through the process. Websites and social media for the LCEDC and other stakeholder groups will describe cleanup efforts, promote engagement opportunities, and showcase opportunities for community input.

Local Newspapers, Bulletins, and Radio: LCEDC will utilize the local newspapers and radio stations as well as work with the local junior college, school district, and hospital to post notices of community engagement opportunities. Notices will include contact information for an individual involved with the Grant to field any questions a community member may have and mitigate any concerns to encourage attendance.

Sugar Beet Days Booth: The Sugar Beet Days Festival is an annual festival held in downtown Sterling annually which brings thousands of individuals into the City. LCEDC will host a booth at the Sugar Beet Days Festival to engage residents and inform them about upcoming Grant projects. LCEDC will be able to get feedback and suggestions to help guide environmental assessment, environmental remediation, reuse, and redevelopment activities.

Community Survey: LCEDC will work with local groups to assist in the development and distribution of community surveys. Paper copies of surveys will be printed in both English and Spanish and mailed to households, businesses, and P.O. boxes. In addition to the paper survey, an online version of the survey will be posted on relevant websites for digital access.

Community Workshops: Community workshops were utilized when completing the Master Plan update and were successful at engaging the community, most notably a workshop to gain a consensus from the community on what they wanted to see in the Master Plan. LCEDC will utilize community workshops to help determine the greatest concerns and needs to guide the funding.

Student Workshops: Like the community workshops, student workshops were successful as part of the Master Plan update. LCEDC will utilize community workshops to help determine the greatest concerns, wants, and needs from students' perspectives, to guide the Grant funding.

Senior Luncheon: LCEDC will invite senior citizens to attend luncheons to give them an opportunity to share their thoughts and provide input. Sterling is an older City with an older population which is identified as a sensitive group in Sterling. LCEDC understands the technology barrier communicating with senior citizens and luncheons will ensure their input is received.

Business Roundtable: Small businesses\owners play a large role in local community groups and community engagement. LCEDC recognizes the important role these leaders have in the community and as such will organize business roundtables to give them the opportunity to share their thoughts and provide their input.

LCEDC recognizes that it is essential to include community residents and stakeholders throughout all phases of project planning and implementation. A Community Involvement Plan (CIP) will be developed to formalize, plan and implement brownfields activities. Our local business community is active, and our residents have a rich history of involvement with economic development, environmental challenges, affordable housing, and health issues.

Other planned community outreach and engagement tools and efforts include but are not limited to 1. Identification of partners to help provide educational programming on project and assessment activities to the community throughout the process; and 2. development of educational experiences such as pop-up outdoor classroom space, designated overlooks areas for community members to see various aspects of the project, informational signage content to educate visitors about ongoing projects.

As part of our grant award, LCEDC will incorporate community input through: 1. Assist the public in understanding and contributing to the decision-making process during project planning, assessment phases and cleanup; 2. Give the public accessible, accurate, timely, and understandable information about the project as the grant program moves forward; 3. Ensure adequate time and opportunity for the community and community groups to provide informed and meaningful participation and for that input to be considered; 4. Reflect community concerns, questions, and information needs; and 5. Respect and fully consider and include public input. These proposed outreach tools are appropriate for the community, as they were successfully used to communicate with the community through the Master Plan development process.

3. Expenditure of Existing Grant Funds

The LCEDC does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. Contractors and Named Sub-Recipients

Not Applicable. The LCEDC will procure contractor(s), as necessary, following stringent procurement requirements as provided in 2 CFR § 200.319(b). Contractor(s) will be selected in compliance with fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500. Additionally, no subrecipients have been selected.