

Mission West Community Development Partners

FY24 BROWNFIELDS ASSESSMENT GRANT Narrative Information Sheet

1. Applicant Identification:

Mission West Community Development Partners 407 Main Street Southwest Ronan, Montana 59864

2. Funding Requested:

a. <u>Assessment Grant Type:</u> Community-wide b. Federal Funds Requested: \$500,000

- 3. <u>Location:</u> The geographic area to be served by the Assessment Grant is Lake, Sanders, and Mineral Counties in Montana. Key communities (towns and cities) include Moiese, Polson, Pablo, Ronan, and St. Ignatius in Lake County; Thompson Falls in Sanders County; Haugan and Superior in Mineral County. Portions of this area have fee and allotted lands on the Flathead Indian Reservation.
- 4. <u>Target Area and Priority Site Information</u>: The target areas for this grant application will be (1) properties on the Clark Fork River and its tributaries, and (2) tourist/travel corridors to Glacier National Park. Priority sites featured in the application are listed below.

Site Name	Address	City, State, Zip	
Riley Creek Mill	116-acre parcel on Highway 200 at eastern edge of Thompson Falls, Montana. Coordinates of the approximate center of the property are 47.5878°N, 115.3239°W.	Thompson Falls, MT, 59873	
Milwaukee Trail Former Fuel Oil Facility	40-acre parcel on Big Creek Road one quarter mile northwest of Haugan, Montana in Section 27 of Township 19 North, Range 30 West. Coordinates of the approximate center of the property are 47.3844°N, 114.4044°W	Haugan, MT, 59867	
Moiese Mercantile	64620 Montana Highway 212	Charlo, MT, 59824	

[Census tracts corresponding with the target areas are 3008900-0202, -0100, and 3008994-0300 (Clark Fork River through Sanders County); 3006196-4600 and -4500 (Interstate 90 through Mineral County); and 3004794-0305, -0400, -0500, and -0600 (U.S. Highway 93 through the Flathead Indian Reservation). These census tracts are *larger* than the cities/towns within them.]

5. Contacts

a. Project Director:

Name: Brenna O'Sullivan-Fulks, Community Economic Development Director

Phone Number: (406) 676-5914

Email Address: brenna.fulks@missionwestcdp.org

Mailing Address: 407 Main Street SW, Ronan, MT 59864

b. Chief Executive/Highest Ranking Elected Official:

Name: Jan Tusik, Executive Director Phone Number: (406) 676-5905

Email Address: jan.tusick@missionwestcdp.org

Mailing Address: 407 Main Street SW, Ronan, MT 59864

6. Population

Priority sites are in the following towns:

Priority Site	rity Site Town Town Population		Census Track Population	
Riley Creek Mill	Thompson Falls	1,445	6,054	
Milwaukee Trail Fuel Oil Facility*	Haugan	47	1,916	
Moiese Mercantile**	Charlo***	345	4,571	

^{*}Adjacent to the Olympian Trail on a Rails-to-Trails network.

^{**}Near entrance to the Bison Range.

^{***}Charlo is the nearest town with census data. Approximately 200,000 visitors per year pass by the Moiese Mercantile to enter the Bison Range.

7. Other Factors Checklist

Other Factor	Page #
Community population is 10,000 or less.	4 (all towns in our service area have less than 5,200 people)
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	3, 4, 5
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water.	1, 2, 3
The priority site(s) is in a federally designated flood plain	3 and 9
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
> 30% spent on eligible planning activities	
The target area(s) in a community where a coal-fired power plant has recently closed	

8. <u>Letter from the State or Tribal Environmental Authority:</u>

See attached letters from the State Environmental Authority (Montana Department of Environmental Quality) and the Tribal Environmental Authority (Natural Resources Department of the Confederated Salish and Kootenai Tribes).

9. Releasing Copies of Applications: Not Applicable



October 31, 2023

Ms. Jan Tusick
Executive Director
Mission West Community Development Partners
407 Main St SW
Ronan, MT 59864

RE: Letter of Acknowledgment: Mission West Community Development Partners' Application for a Brownfields Assessment Grant

Dear Ms. Tusick:

I am writing to express Montana Department of Environmental Quality's (DEQ's) support for Mission West Community Development Partners' efforts to obtain a U.S. Environmental Protection Agency Brownfields Assessment Grant.

I understand that the assessment funds will be used to assess hazardous substance and petroleum contaminated sites in Lake, Mineral, and Sanders Counties. DEQ understands that this funding is essential to Mission West Community Development Partners' efforts in redeveloping Brownfields properties in these areas. DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about brownfield sites, please contact Colleen Owen at (406) 755-8954 or COwen@mt.gov.

Sincerely,

—pocusigned by: Amy Strinmets

Amy Steinmetz, Administrator

DEQ Waste Management & Remediation Division

ec: Colleen Owen; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; cowen@mt.gov
Jason Seyler; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; jseyler@mt.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a.i. Overview of Brownfield Challenges and Description of Target Area: Mission West Community Development Partners (MWCDP) requests a \$500,000 Assessment Grant as a tool to promote infill development and reduce blight. Our geographical service area includes steep former logging and mining lands within Lake, Mineral, and Sanders Counties, Montana (MT), and agricultural valley bottoms within the Flathead Indian Reservation. The area includes scenic tourist routes along the Mission Mountains (first tribally-managed wilderness area in the US) and Flathead Lake (the largest natural freshwater lake in The West) toward Glacier National Park, as well as under-developed recreation assets such as the Bison Range; a site key to saving American bison from extinction.

Our service area is sparsely populated, with only eight incorporated communities in a footprint of 5,500 square miles. Our communities have high poverty rates stemming from the near disappearance of logging and mining in 1990s and early 2000s. Our main streets have vacant storefronts, and entrances to key communities are blighted with abandoned sawmills or former fueling stations. With lack of spare income for home maintenance and new construction, these communities have an unmet need for safe affordable housing. Low housing availability led to list prices increasing 237% since the start of the pandemic, causing some to leave in search of an affordable home. The resulting labor shortage is a headwind for our local economy. Our entire service area consists of disadvantaged census tracts, as listed in CEJST, with high poverty rates and additional burdens [see Section 2] faced by many in our Native American population.

Target areas where we believe brownfields revitalization could have the most positive impact include riverfront properties on the Clark Fork River and its tributaries, and tourist/travel corridors to Glacier National Park. The tourist corridors include the only interstate in Western Montana (I-90), the main north-south route through the Reservation (US Hwy 93), and State Highways that connect the two routes and pass the Bison Range. Blight along these tourist corridors is a missed opportunity. In 2022, tourists visiting Glacier National Park spent nearly \$370 million, but very little of that was in our service area. Our Brownfields target areas include the following census tracts: 3008900-0202, -0100, and 3008994-0300 (Clark Fork River through Sanders County); 3006196-4600 and -4500 (I-90 through Mineral County); and 3004794-0305, -0400, -0500, and -0600 (Hwy 93 through the Reservation). An Assessment Grant would be a key tool to support infill, retain our workforce, and fortify the economy. By subsidizing due diligence and cleanup planning on idle or blighted sites, we would increase certainty for investors (public and private) and facilitate productive site reuse.

1.a.ii. Description of the Priority Brownfield Site(s): Brownfields sites in our target areas of riverfront property in the Clark Fork River drainage and tourist/travel routes as described above include 47 State Superfund (CECRA) sites, 28 redevelopable petroleum leak sites inventoried by the Montana Department of Environmental Quality (DEQ), 9 additional problematic mine sites, and dozens of blighted buildings. Sizes range from a 116-acre waterfront former sawmill site to individual city lots (typically 15,000 square feet). Environmental concerns include petroleum fuels at underground tank sites, methane and pentachlorophenol at sawmills, metals and fuel oil at an abandoned former rail property, and asbestos or lead-based paint in blighted buildings.

We selected the following three priority sites within our target areas: a large former wood products facility on the Clark Fork River, a former train fueling depot on a rails-to-trails route along the St. Regis River, and a blighted former gas station adjacent to the entrance to the Bison Range. Details are provided below, including size, current and past land use, current condition, known or potential environmental issues, and why each site is a priority.

The 116-acre former Riley Creek Mill is an historic sawmill that closed in 1996. The property has 3,500 feet of frontage on the Clark Fork River, and is at the eastern entrance to Thompson Falls, MT. The property is currently idle. All buildings have been removed apart from an office building built in 1970. Potential contaminants include asbestos and lead-based paint in building materials, petroleum and wood treatment chemicals in the subsurface. The property is large, with excellent views and access, and proximity to ongoing development and schools.

The Milwaukee Trail Fuel Oil Facility (Milwaukee Trail site) in Haugan, MT is a 22-acre property located across the Olympian Trail from the St. Regis River, a tributary to the Clark Fork River. Historically, locomotives fueled at the site after going over a high pass between Montana and Idaho. The property is currently idle and undergoing partial cleanup. One aboveground fuel tank on-site remains on site; but all structures have been removed. Known environmental issues include fuel oil, cadmium, lead, and mercury. Cleanup is addressing a fuel oil pit, but other fueling areas remain to be addressed prior to site reuse. This site is situated in pocket of recreation-focused development near a campground, historic Forest Service cabins and dormitories, and along the edge of a rails-to-trails corridor. The site could be reused for relatively affordable housing for those employed by recreational businesses.

Moiese Mercantile is a 1.4 acre blighted former fueling station adjacent to the Bison Range within the Reservation. The property is frequently passed by tourists traveling along Hwy 212. Potential contaminants at the former fuel station include asbestos in floor tile and roofing, and petroleum in groundwater. Blight at sites like this can make tourists wary of stopping and spending money on the Reservation. Improving this priority site would help tourism grow.

1.a.iii. Identifying Additional Sites: We collaborated with DEQ Brownfields Program staff, queried online lists of facilities, and reached out to community leaders to form a preliminary Sites Inventory. As outlined in Section 1.a.ii above, this inventory includes a wide range of additional sites that could be assessed after our priority sites: 47 State Superfund sites, including uncontrolled dumps, junk vehicle areas, former maintenance facilities, former logging company properties, and abandoned mines; 28 redevelopable petroleum leak sites; 9 more State-listed problem mine sites; and dozens of blighted buildings. The extent of blighted buildings is connected to persistent poverty and lack of resources for maintenance and new construction. Our entire three-county footprint consists of disadvantaged census tracts, and our plan to identify brownfields sites with greatest potential positive impact is to (A) update the Sites Inventory annually, (B) discuss the inventory with community partners listed in Section 2.b including tribal stakeholders, (C) prioritize large properties on waterfronts and tourist corridors, and (D) after identifying additional highimpact properties, contact landowners and accept new sites based on owner permission or request. 1.b.i. Reuse Strategy and Alignment with Revitalization Plans: Our overall strategy for brownfields redevelopment is to promote infill housing, improved access to recreational areas, and improve the appeal of tourist corridors. Reuse strategies specific to each priority site are listed below, including connection to community revitalization plans.

At Riley Creek Mill, the reuse strategy is to work through Thompson Falls-based Sanders County Community Development Corp. to inventory assets of the site and neighborhood, quantify on-site environmental liabilities, and recommend a cleanup approach. From this effort, we plan to collaborate with the site owner and a developer to extend nearby infrastructure to the property. Ultimate reuse would be as a residential neighborhood. Reuse of the former mill is supported by Goal #5 of the 2022-2027 regional Comprehensive Economic Development Strategy (CEDS) document, which is to *increase the use of pre-existing commercial and industrial properties*. Additional supply of residences would help resolve a problem documented in the 2021 Sanders

County Housing Needs Study, which found employees in >93% of businesses have difficulty finding housing.

Housing redevelopment at the Milwaukee Trail site would offer excellent recreational access (Olympian Trail, accessible camping, historical Forest Service cabins and dormitories, St. Regis River). Reuse of this former industrial property supports CEDS Goal #5 listed above, and the mission of the nonprofit Mineral County Rails to Trails to increase trail awareness and use.

Blight reduction at Moiese Mercantile supports the Public Use Goals of the 2019 Bison Range Plan, and the Tribes' CEDS document that asks stakeholders to *Promote Culturally Appropriate Tourism on the Reservation*. In our role as the Certified Regional Development Corporation for our area, we will collaborate with cities, counties, the Tribes, and property-specific stakeholders to ensure the Assessment Grant serves community priorities.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Our strategy of focusing on infill housing, improved recreation access, and reduced blight on brownfields sites will have economic benefits, will promote greenspace, and will increase the flood resilience of communities in our territory. Residential development at Riley Creek Mill will increase housing supply, thereby promoting housing affordability, which will help retain working age residents necessary for the health of small businesses. This riverfront redevelopment effort will also mitigate flood risk at the upstream edge of Thompson Falls. Flood risk in our area increases with climate change, as abrupt spring temperature rise at high elevations causes rapid snowmelt.

At the Milwaukee Trail site, conversion of this vacant industrial facility to housing along the rail-to-trail route will improve use of the trail. This trail is part of the envisioned Great American Rail Trail projected to bring \$16 Million in annual spending throughout Montana. In addition, new housing would be relatively energy efficient compared to our current aging housing stock.

Reduced blight at the Moiese Mercantile near the Bison Range will increase tourism-related income locally and promote overall economic growth, while increasing awareness of the Tribal role in bison conservation. Our brownfields program would promote a virtuous cycle, where property reuse supports economic growth, which in turn drives additional community investments.

1.c.i. Resources Needed for Site Reuse: MWCDP has programs that bring the following resources to community projects: Big Sky Trust Fund grants, Montana Community Grant Fund, Community Development Block Grant (CDBG) funding for public infrastructure, USDA Rural Microentrepreneur Assistance and Rural Community Development Initiative grants, a Revolving Loan Fund that provides gap financing for economic development, and DNRC Reclamation grants.

Completion of environmental due diligence and cleanup planning with an EPA Assessment Grant would stimulate private investment in our tax incentive zones, including the Tax Increment Financing district in Polson, the Resort District in St. Regis, and our Opportunity Zones which cover Mineral County and the western part of the Flathead Indian Reservation.

The Assessment Grant would also stimulate access to additional funding. At the Riley Creek Mill priority site, clarity on environmental cleanup needs would encourage private investment. At the Milwaukee Trail site, grant funds for improvements to the regional rails-to-trails network proximal to the site include the Federal Highway Trust Fund resources through the State of Montana Recreational Trails Program. Resources for cleanup of Moiese Mercantile include the Montana Petroleum Tank Release Compensation Fund that has a \$1 Million per-site maximum.

1.c.ii. Use of Existing Infrastructure: An Assessment Grant will facilitate use of existing infrastructure at our priority sites and in our Target Area corridors. At the former Moiese Mercantile, assessment and cleanup alternatives analysis will facilitate reuse of existing buildings to provide the only tourist stop at the infrastructure-rich Bison Range. This reuse would support a

higher volume of tourists to the campground, roads, interpretive installations, and trails on the Bison Range. At Riley Creek Mill, environmental assessment and cleanup planning would support reuse of existing utilities including water, electric, natural gas, and wastewater service from the former mill. Reuse of the Milwaukee Trail site would be infill that supports the existing trail, ties to existing access roads including the adjacent I-90 exit, and draws from existing overhead electrical service that runs between the site and the river.

Additional infrastructure needs or upgrades include expanded parking to support greater visitation to the Bison Range, extension of roads and utility mains through Riley Creek Mill for residential infill, and water/wastewater service for residential reuse of the Milwaukee Trail site. For upgrades at the Bison Range, we will collaborate with the Tribes, who have recently been awarded two large compensation packages (for water rights and federal land mismanagement, respectively) and are looking to invest in culturally relevant projects such as bison conservation. At Riley Creek Mill, we anticipate multiple stages of infrastructure extension onto the property using a combination of the Montana Board of Investments (BOI) Infrastructure Loan Program and private developer funding. Redevelopment would begin along Hwy 200 and extend toward the river. At the Milwaukee Trail site, we would help developers negotiate public incentives including CDBG funding and BOI subsidized Infrastructure Loans.

2. Community Need and Community Engagement

2.a.i. The Community's Need for Funding: Two of the three counties within our service area have less than 5 people per square mile, and all towns have less than 5,200 residents. Populations in the closest towns to our priority sites include 1,551 in Thompson Falls, 756 in Superior near the Haugan exit, and 309 people in Dixon near the Bison Range.

Demographic indicators point to the disadvantaged nature of our area. The 2021 unemployment rate in towns of Arlee, Dixon, Pablo, and Superior were more than double the US unemployment rate. The unemployment rate in Hot Springs (14.2%) was over three times the US rate. We also have high rates of poverty; approximately 50% in Pablo, and over 20% for all families living with children in our three-county service area. The Reservation part of our service area experiences persistent poverty as defined in the grant guidelines, with long-standing poverty rates of 22.9% in 1990, 23.6% in 2010, and 2021 estimate of 20.2%. The median household income in our territory falls as low as \$19,659 in Hot Springs, only 1/3 of the Montana median.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: Brownfields affect the health and welfare of youth, minorities, low-income communities, pregnant women, and other sensitive populations in our target areas. Our region has an increasing elderly population with limited access to senior living facilities, birth rates exceeding the state's average, and low health care access in communities that experience persistent poverty. On the Reservation, over 30% of the population is Native American. In the towns of Arlee and Pablo, the Native American population is 60.6% and 64.3%, respectively.

Our communities experiencing high poverty rates are at greater risk of exposure to pollutants from blighted properties. According to the EPA's EJScreen, the western part of the Reservation has a lead paint supplemental index in the 86th percentile of US communities. Blight can exacerbate desperation caused by isolation and poverty. As described in the 2020 report *Suicide Clusters in Montana Native American Youth*, there was a suicide cluster in 2018 on the Reservation. The report states that suicide risk factors contributing to this tragedy included isolation, discrimination, and historical trauma. Through brownfields assessment and redevelopment, we seek to combat a cycle of desperation. Instead of vacant spaces for vandalism and drug use with potential exposure to lead, we seek to create affordable infill housing (Riley Creek Mill), improve the economy through

increased tourism and access to recreation (Milwaukee Trail site), and support cultural awareness at the Bison Range (Moiese Mercantile at its entrance).

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: Contaminants on brownfields sites are a significant health concern for area residents. Mineral, Sanders, and Lake each exceed the 90th percentile of US communities for EJScreen cancer rating. According to the National Cancer Institute 2016-2020 database, cancer incidence among Native Americans, at 582 per 100,000, is higher than among white people (453 per 100,000) in Sanders County. According to a 2019 Montana Cancer Control Program study, the lung cancer death rate among Montana Native Americans is the highest of any race, with a rate of 91 per 100,000 compared to 45 per 100,000 for white residents of Montana. Native Americans on the Flathead Indian Reservation also experience elevated rates of colorectal and kidney cancer. According to the 2021 Overview of Asthma in Montana, the occurrence of asthma among Native Americans in Montana (14%) is also elevated compared white persons (9.5%). Similar results were reported for Native American children in Montana (8.8%) compared to white children (6.2%).

In target areas, petroleum releases can cause benzene exposure, and if not mitigated properly, benzene inhalation can cause leukemia. Numerous buildings identified throughout our target areas are contaminated with asbestos include potential issues at Moiese Mercantile and Riley Creek Mill. Asbestos causes mesothelioma and lung cancer. Concentrations of heavy metals such as lead and cadmium (known carcinogens), and mercury have also been identified. Assessment grant resources will support testing and determine where these contaminants occur, to what degree, and will support cleanup planning to protect our residents from these health threats.

(3A) Identification of Environmental Justice Issues: Our area is a frontier community and suffers from environmental injustices unique to our history. Our region encompasses native homelands of the Confederated Salish & Kootenai Tribes (CSKT) and has predominantly remained rural with 89.3% of the population residing in rural low-income areas. Mineral and Sanders counties are identified as disadvantaged and Lake County includes six disadvantaged tracts. Our priority sites are located within these undeserved communities. Regional issues impacting the expansion and sustainability of development in our communities and endangering our health include blighted buildings and adverse effects from contaminants in aging housing inventory.

Sanders County ranks in the 83rd percentile nationally for frequency of homes with no kitchen or indoor plumbing. A recent study of environmental racism by EPA's National Center for Environmental Assessment found people in poverty living in inadequate housing had approximately 1.3 times more exposure to air particulates than people living above the poverty line. Homes in Sanders County also rank in the 89th percentile of US communities for risk of fire and flood impacts within the next 30 years. Our communities face extreme weather conditions in winter and are prone to isolation and unsafe travel conditions. This dynamic of small populations in remote areas decreases our ability to participate in decisions that shape our lives, reduces our access to development capital, and leaves many of our residents struggling financially in conditions that can be prone to contaminant exposure. The economic damage these brownfields sites inflict can lead to disinvestment in surrounding structures. Poor maintenance can then cause elevated exposure to lead in paint and asbestos from building materials that otherwise would remain intact.

(3B) Advancing Environmental Justice: With an Assessment Grant, we would seek to increase public engagement regarding reuse of brownfields sites, and set the stage for future cleanups and less risk of contaminant exposure. Our proposed outreach strategy would place special emphasis on providing a voice for our Tribal collaborators, and on reaching isolated low-income

communities. When we facilitate risk reduction and reuse at the Moiese Mercantile adjacent to the Bison Range, we will bolster Native pride and further enhance the tourism corridor. We will actively encourage our target area communities to participate in selection of sites for evaluation, to review and fine-tune proposed testing, and to help determine which cleanup options best meet community needs. When we are successful, we would see communities with a variety of housing options that meet local income ranges, less risk of contaminant exposure, increased recreation access, and improved travel corridors that attract tourism and economic development.

2.b. Community Engagement

2.b.i. Project Involvement and Project Roles: Each project involves community partners committed to the reuse of our brownfields sites. Partners are listed in the table below.

Partner Name	Point of Contact	Role in the Project
CSKT Natural	Maryrose Morigeau	Collaborate so that Mission West addresses Fee
Resources Dept.	Maryrose.morigeau@cskt.org	Land, while CSKT addresses Tribal Land.
Mineral County	Emily Park	Nonprofit who will market the program and
Econ. Development	Emily.park@montana.edu	provide expertise on reuse of mill sites.
Sanders County	Ray Brown	Be a local government and developer liaison for
Community	ray@sanderscountycdc.com	reuse of Riley Creek Mill.
Development Corp.		
Sanders County	Lisa Fried de Reyes	Advocate for affordable housing and increased
Community Housing	scchotfed@gmail.com	housing volume, including largescale reuse of
Org., Inc.		Riley Creek Mill.
Missoula Org. of	Dwight Easton (Public Affairs Dir.)	Educate members about availability of funds for
Realtors	deaston@missoularealestate.com	due diligence, recommend brownfields sites.
City of Ronan,	Dan Miller	Identify blighted buildings and former locations
Emergency Services	publicworks@cityofronan.org	of potential improper chemical use or storage.

Each representative has strong community ties and access to resources beneficial to our work with the Brownfields Program. With the help of CSKT interfacing in the Reservation community, we can identify the most important assessment sites, and communicate findings and next steps. We are currently collaborating with the CSKT on the Moiese Mercantile site, meeting face-to-face with the Natural Resource Program, sharing inventoried sites, and discussing priorities.

2.b.iii. Incorporating Community Input: Community engagement has been, and will continue to be, a foundation for our organization. Quarterly meetings will be held with our Board of Directors and committees as facilitated via staff communications. These meetings will consist of member representatives from local cities and counties as well as the private sector. Program highlights will be included on our social media outlets and in our annual report. MWCDP leads and maintains a Comprehensive Economic Development Strategy for our region, which requires community outreach seeking input on various economic and community development needs, including brownfields redevelopment. Announcements for public meetings will be included in local media sources (Valley Journal, Char Koosta News) and our social media outlets. We will continue to meet with landowners of sites selected for assessments. The purpose of the meetings will be to gain an understanding of the owner's current needs and to determine how best to use brownfields funds to meet redevelopment goals. We will follow up with the landowner after the Phase I/Phase II reports to discuss findings and the next steps for cleanup and site reuse.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs. Project Implementation (i), Anticipated Project Schedule (ii), Task/Activity Lead (iii), and Outputs (iv) are described below by-task.

- **Task 1. Program Management** Implementation and Lead: MWCDP's Economic Development Director (ED Director) will be responsible for grant management, oversight of the cooperative agreement, and coordination with project partners and EPA; The ED Director will submit quarterly reports and site-specific information in ACRES and will procure a QEP. *Schedule*: A Cooperative Agreement will be completed with EPA as soon as possible (4 months) following award, QEP procurement within 3 months of completed Cooperative Agreement, grant management throughout the 3-year period. *Outputs:* 1 Cooperative Agreement, 1 RFP issued, 1 QEP contract, 12 quarterly reports, 12 site-specific entries in ACRES.
- Task 2. Community Outreach Implementation and Lead: The Director will also lead the development of a Community Involvement Plan (CIP) and will conduct stakeholder meetings for each site that receives Phase II assessment funding, including meeting with the Tribal Brownfields Coordinator in our service area, with Commissioners in each of our 3 service area counties, and with local leaders in our largest communities (Ronan and Thompson Falls). The QEP will review and edit the CIP and provide technical materials and in-person consultation for stakeholder meetings. *Schedule*: Outreach will be initiated following procurement of a QEP and will continue through the 3-year grant period. *Outputs*: 1 CIP, 9 fact sheets and 9 stakeholder meetings.
- Task 3. Site Assessment Implementation and Lead: MWCDP will lead site selection and prioritization, with input from the QEP and partners identified in Section 2.b. We will obtain site access agreements and eligibility determinations prior to initiating work on each site. Prior to onsite work, the QEP will write a Quality Assurance Project Plan (QAPP) that addresses all requirements of the EPA Region 8 Quality Assurance Document Review Crosswalk. Due to technical expertise, the QEP will lead Phase I and II assessments.

We will complete ASTM-compliant Phase I Environmental Site Assessments (ESAs) to identify Recognized Environmental Conditions (RECs). After discussion with each site owner about Phase II data needs, we will prepare Sampling and Analysis Plans (SAPs) and conduct ASTM-compliant Phase II ESAs to evaluate the extent and severity of contamination. All onsite activities will be performed in accordance with applicable EPA rules and regulations, grant requirements, and guidelines from the Montana DEQ. *Schedule*: The QEP will write a programmatic QAPP and Building Materials Sampling Guide within 3 months of contract and will complete Phase I ESAs on priority sites within the first 6 months after signing the cooperative agreement. QEP will complete Phase I and II ESAs at eligible sites until 3 months remain in the grant, allowing time for budget reconciliation, ACRES updates, and final reporting. *Outputs*: 11 site access agreements, 11 eligibility forms, 6 ASTM-compliant Phase I ESA reports, 9 EPA-approved SAPs, 9 Health & Safety Plans, and 9 ASTM-compliant Phase II ESA reports.

Task 4. Cleanup & Reuse Planning – Implementation and Lead: Drawing on their scientific and engineering expertise, the QEP will perform cleanup planning at our three priority sites (Riley Creek Mill, the Milwaukee Trail site, and the Moiese Mercantile). At the Riley Creek Mill and Moiese Mercantile, the QEP will prepare a cleanup alternatives analysis with cost estimates and will prepare bid specifications for cleanup. We anticipate that building materials abatement will be the primary cleanup planning for the Riley Creek Mill and Moiese Mercantile. Cleanup planning at all three priority sites would include contamination from former fuel tanks. Additional cleanup planning for the Riley Creek Mill would include potential wood treatment chemicals underlying soil and groundwater. The QEP will also lead reuse planning sessions to identify preferred redevelopment opportunities for the Milwaukee Trail and Moiese Mercantile priority sites. Schedule: This task would be initiated toward the end of Year 1 and completed with stakeholder

review/comment by the end of Year 2 to allow applications for cleanup funding, where warranted. *Outputs*: 3 analyses of cleanup alternatives, 2 bid specifications for cleanup.

3.b. Cost Estimates. A summary budget table is provided below, followed by description of unit costs used to create the budget.

Budget Categories		Project Tasks (\$)				
		1: Program Management	2: Community Outreach	3: Site Assessment	3: Cleanup & Reuse Planning	Total
D	Personnel	\$21,000	\$12,000	\$5,627	\$6,700	\$45,327
Direct	Fringe Benefits*	\$5,880	\$3,360	\$1,576	\$1,876	\$12,692
	Travel**	\$4,100	\$7,500	\$0	\$0	\$11,600
Costs	No Equipment, Supplies, or Other Costs					
	Contractual	\$2,500	\$33,750	\$328,900	\$46,000	\$411,150
Direct Costs \$33,480 \$56,610 \$336,103 \$54,5				\$54,576	\$480,769	
Indirect Costs***		\$1,340	\$2,264	\$13,444	\$2,183	\$19,231
Total Budget		\$34,820	\$58,874	\$349,547	\$56,759	\$500,000

^{*}Fringe Benefits are 28% of Personnel cost. **Travel is for brownfields-related conferences and community outreach. *** Indirect Costs are 4% of the total budget.

Task 1: Program Management costs (\$34,820, 7% of total) are calculated as follows: Personnel costs of 624.1 hours of Economic Development Director at \$33.65/hour = \$21,000. Fringe Benefits at 28% of Personnel costs = \$5,880. Travel is mileage, lodging, and per diem for one Montana DEQ Brownfields Conference (\$500), plus flight, lodging, and per diem for two National Brownfields Conferences (\$1,800 each). Contractual costs include assisting with quarterly reporting and status updates for each site.

Task 2: Community Outreach and Sites Inventory (\$58,874, 12% of total) is calculated as Personnel costs of 356.6 hours of the Economic Development Director at \$33.65/hour = \$12,000. Fringe Benefits of 28% times Personnel costs = \$3,360. Travel cost of fuel and per diem for 15 trips (\$500 each) to communities throughout the large rural service area = \$7,500. Contractual cost of \$33,750 includes \$950 to assist with a new CIP, stakeholder meetings (\$1,500 each) and fact sheets (\$1,200 each) on all 9 sites that receive Phase II assessments, and \$8,500 for site inventory assistance including collaboration with EPA Region 8, Montana DEQ, and CSKT in our service area, as well as community engagement to prioritize sites.

Task 3: Site Assessment (\$349,547, 70% of total) is for contractual work to produce a programmatic QAPP (\$3,900), a programmatic Building Materials Sampling Guide (\$3,500), 6 Phase I ESAs (average of \$4,000 each; \$25,500 subtotal), 9 Phase II ESAs averaging approximately \$32,889 each (\$296,000 subtotal). The contracted QEP will perform Phase I ESAs for the Riley Creek Mill and Moiese Mercantile priority sites, then four additional Phase I ESAs on inventoried sites. Phase II assessments will occur at 9 sites, including the Riley Creek Mill and Moiese Mercantile priority sites, 2 additional petroleum sites, and 5 additional building materials sites (i.e., testing asbestos and lead-based paint only).

Assumed scope of Phase II assessment at priority sites is as follows. The Riley Creek Mill Phase II will include testing for asbestos, leachable lead, and other hazards in building materials, then a subsurface investigation to evaluate potential fuels, oil, and wood treatment chemicals in soil and groundwater. The Phase II assessment at the Moise Mercantile will include testing for asbestos and lead-based paint in the site building and adjacent debris, and an exploratory investigation for petroleum contamination from historical underground fuel tanks. After priority sites, additional

likely sites in our target areas include the Riverside Post and Pole Plant in St Regis, and multiple state Superfund (CECRA) sites including logging companies and abandoned mines, and numerous petroleum tank sites inventoried by Montana DEQ with redevelopment potential.

Phase II ESA costs include a SAP, fieldwork, laboratory testing, and reporting. Estimated scale of Phase II costs depend on the type and size of each site. Expected average cost for petroleum Phase II assessment will be \$32,889. Building materials testing sites will be relatively low cost (expected average of \$22,000 each), due to affordable laboratory fees (\$9/sample) for asbestos testing, and due to use of rapid field screening for lead in painted surfaces. At the Riley Creek Mill site, we estimate \$55,000 for a Phase II. This cost is the combination of expected averages for petroleum and building materials assessments, minus the cost (\$4,500) for a building materials SAP, because both types of testing will be done under one combined SAP. At the Moiese Mercantile priority site, we estimate \$45,000 consisting of \$6,500 for the SAP, \$32,000 for fieldwork and laboratory analysis, and \$6,500 for the report documenting testing of building materials and former fueling tank investigation.

- Task 4: Cleanup & Reuse Planning (\$56,759, 11% of total) is for our staff to conduct stakeholder engagement (199.1 hours at personnel rate of \$33.65/hour = \$6,700, plus 28% fringe benefit rate = \$1,876) and contractual work to produce Analysis of Brownfields Cleanup Alternatives with cost estimate for each of the three priority sites (\$12,500 each), followed by bid specifications for cleanup (expected average of \$7,750 each). Cleanup planning will include engagement with the site owners to discuss alternatives, select a preferred cleanup approach, and match bid specifications to their cleanup needs. Reuse planning will include identifying preferred redevelopment opportunities for the Milwaukee Trail and Moiese Mercantile priority sites.
- **3.c. Measuring Environmental Results:** MWCDP ED Director Brenna O'Sullivan-Fulks will be responsible for tracking and measuring progress. She will develop a work plan with the EPA project manager that will include anticipated *Outputs* listed above. We believe several positive Outcomes will occur through completion of the project *Outputs*. Effective Program Management (Task 1) will result in compliance with EPA requirements. Community Outreach (Task 2) will result in site owners requesting assessments and public awareness of environmental issues in their communities. Those involved will also recognize the MWCDP Brownfields Program as a resource to address environmental issues with blight removal, which will increase demand for brownfields services and redevelopment opportunities.

Site assessments (Task 3) and cleanup planning (Task 4) will lead to flood mitigation, new, housing and commercial infill at the Riley Creek Mill in Thompon Falls. At the Milwaukee Trail site in Haugan, supplemental cleanup planning will support the cleanup of an UST area, facilitating development of workforce housing and enhancing use of recreational biking trails. At the Moiese Mercantile, cleanup planning will enhance use of the Bison Range, consistent with the goals and objectives of the 2019 Bison Range Plan. Overall project results will align with our goals of supporting blight removal and creating opportunities for new businesses and affordable housing.

4. PROGRAMING CAPABILITY AND PAST PERFORMANCE

4.a.i. Organizational Capacity, ii. Organizational Structure, and iii. Description of Key Staff: MWCDP is well-qualified to manage a Brownfields grant. MWCDP has been a Certified Regional Development Corporation through the state of Montana since 2003, and in 2021 was federally designated as an Economic Development District through the US Economic Development Administration. MWCDP serves a three-county region encompassing Lake, Sanders, and Mineral Counties as well as portions of the Flathead Indian Reservation. Our staff consists of 14 FTE employees. The following key personnel would support the Brownfields grant program. Interim

Executive Director, Jan Tusick has over 30 years of background and experience in agriculture, finance and capitalization, as well as networking and marketing. She is certified through the National Development Council as an Economic Development Finance Professional and has sourced and managed numerous federal, state, and local grants to provide technical assistance and support to business start-ups and expansions throughout the region. Economic Development Director Brenna Fulks has a master's degree in business administration and has been working in Economic Development capacities for over ten years. She has a strong passion for placemaking and downtown revitalization and has secured several grants to support these endeavors. Loan Services Director, John Whitworth has a master's degree in business administration and a deep love for the Mission Valley and the region we serve. He strengthened MWCDP's Revolving Loan Fund through his ability to build community partnerships. MWCDP is governed by our Board of Directors, consisting of 15 members representing our counties, cities, towns, private businesses, and tribal partners. Our Executive Committee is comprised of four officer positions.

4.a.iv. Acquiring Additional Resources: Environmental expertise will be contracted to support Phase I and II assessments, public engagement. marketing, and planning. All contracts for this program will be completed and consistent with MWCDP's procurement policy and competitive procurement standards as outlined in 40 CFR parts 30 or 31. The QEP selection will be overseen by our Brownfield selection committee comprised of staff and board members.

4.b. Past Performance and Accomplishments: (1) Purpose and Accomplishments: Since its inception, MWCDP has successfully managed several federal, state, and local grants with the purpose of improving quality of life and livability within the region. Our regional planning grants currently authored or managed include the following: An EDA Partnership Planning Grant which entails semi-annual reporting and quarterly draws. Certified Regional Development Corporation (CRDC) designation which provides annual application and quarterly draws and reporting. USDA Rural Community Development Initiative funds which provide MWCDP with funds as an intermediary to support the City of Ronan in development of a downtown master plan and economic development strategic plan. Community Development Block Grant (CDBG) funds which support ADA compliance, a commercial kitchen, and an updated community center for the Lake County Fairgrounds.

A core objective of MWCDP is to strengthen the economy through business development. MWCDP supports this goal through providing direct technical assistance to businesses and through our "Expert Network" of service providers. Federal funding that supports this work comes from: USDA RMAP-TA, a Community Development Finance Initiative (CDFI) grant, and USDA RBDG. MWCDP has also managed several Big Sky Trust Fund (BSTF) grants.

MWCDP's Cooperative Development and Food and Agriculture Development Centers manage the following federal grants: USDA Rural Cooperative Development Grant (RCDG) and the Local Food Promotion Grant. In addition to our grant programs, MWCDP has successfully managed our Revolving Loan Fund. The first revolving loan funding was received via CDBG funding. Since then, the loan program has grown to include USDA RMAP, USDA IRP, and EDA RLF.

(2) Compliance with Grant Requirements: MWCDP has maintained an excellent reputation with our funders due to our record of consistently meeting reporting deadlines and requirements. We meet these obligations through teamwork and our internal grant management processes. Each grant is effectively managed by one of our program managers or Center (department) Directors. Our Bookkeeper enters invoices and data into our bookkeeping software so that this information is readily available for review. Grant reporting is completed by program staff and reviewed by our Interim Executive Director to ensure timeliness and accuracy.

Attachment A: Thres	hold Criteria R	Responses	

Threshold Criteria

1) Applicant Eligibility:

Mission West Community Development Partners (MWCDP) is an eligible applicant for an EPA Brownfields Assessment Grant as a 501(c)3 nonprofit organization, and as a qualified community development entity (Certified Regional Development Corporation [CRDC] sanctioned by the State of Montana). The following documentation is provided in Attachment B:

- 1. Certification that MWCDP is the Assumed Business Name of LCCDC
- 2. Certificate of Existence for LCCDC (now MWCDP) from the Montana Secretary of State
- 3. Verification of 501(c)3 nonprofit status from the US Internal Revenue Service
- 4. Current CRDC designation from the Governor of Montana. CRDC renewal period is November-December 2023 for the upcoming three year cycle.

2) Community Involvement:

MWCDP understands the value of community and stakeholder involvement in a brownfields assessment program and has met with the representatives of the Confederated Salish and Kootenai Tribes, brownfields site owners, community planners, and non-profits in preparation for this proposal. MWCDP intends to inform and involve community residents and other stakeholders during the planning and implementation phases of this project. Please see Section 2 in the Narrative for more information on our proposed community engagement efforts.

MWCDP will take the following Community Outreach steps under this grant:

- a) Produce a Community Involvement Plan
- b) Discuss brownfields sites with key stakeholders identified in the regional Comprehensive Economic Development Strategies (CEDS) document
- c) Develop marketing materials for outreach, including a brownfields program brochure and fact sheets for key assessment sites
- d) Attend public meetings at local government (i.e., City Council, County Commissioner, and Tribal Council meetings) to share information about the program
- e) Draw attention to the program on social media and on MWCDP's website
- f) Host lunch and learns open to the public and provide invites to specific businesses
- g) Provide an overview of the program in MWCDP's District Newsletter
- h) Promote the program to our regional partners via our District meetings
- i) Collaborate with Sanders County Community Development, Mineral County Economic Development Corporation, and Sanders County Housing Authority to identify potential projects
- j) Arrange site visits and tours of brownfield redevelopment projects to show the community the positive impact of the program

3) Expenditure of Existing Grant Funds:

Not Applicable. MWCDP does not currently have an EPA Brownfields Assessment Grant.

4) Contractors and Named Subrecipients:

Not Applicable.