

November 9, 2023

**1. Applicant Identification:**

City of Northglenn  
11701 Community Center Drive  
Northglenn, CO 80233

**2. Funding Requested:**

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,750,000

**3. Location:**

City of Northglenn, Colorado

**4. Property Information:**

Former Northglenn Recreation Center  
11801 Community Center Drive  
Northglenn, CO 80233

**5. Contacts:**

- a. Project Director  
Eric Ensey  
Senior Planner  
11701 Community Center Drive  
Northglenn, CO 80233  
303.450.8740  
[eensey@northglenn.org](mailto:eensey@northglenn.org)
- b. Chief Executive/Highest Ranking Elected Official:  
Meredith Leighty  
Mayor  
11701 Community Center Drive  
Northglenn, CO 80233  
303.918.1568  
[mleighty@northglenn.org](mailto:mleighty@northglenn.org)

**6. Population:**

Northglenn population: 38,106

**7. Other Factors:**

<b>Provided Information on Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation	3
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).	N/A
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
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	N/A
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.	N/A

**8. Releasing Copies of Applications**

Not Applicable.

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**a. Target Area and Brownfields** *i. Overview of Brownfield Challenges and Description of Target Area:* Northglenn, Colorado sits a few miles north of Denver, just east of the Rocky Mountains. This community of 38,106<sup>1</sup> began as a master planned community, incorporated in 1969. Early visions for the City included self-sufficient neighborhoods where most household needs could be met within a short distance. As such, the first major subdivisions included commercial, industrial, recreational, and school areas, centered on a regional shopping mall. Today, the City is landlocked, and the land within the municipal boundaries is fully developed. Future improvements are dependent upon the City's ability to reclaim vacant and blighted properties and capitalize on infill sites. With increased retail competition in neighboring cities, particularly with big box 'one stop shop' stores, Northglenn's larger commercial developments have deteriorated and become large, blighted areas with aging infrastructure, environmental issues, and under-performing businesses. A cleanup grant will directly assist the City in redeveloping one of the largest brownfields sites in the City, the former Northglenn Recreation Center property (Rec Center/site). This 6.85-acre site is in census tract 85.06 (target area) which abuts Interstate 25 and includes commercial and residential areas with low-income housing just south of the former Rec Center. The site will be transformed into a mixed-used development with affordable and attainable housing options. In 2019, the City secured a developer to develop the property; but soil contaminated with lead and arsenic was identified, the pandemic hit, and the developer withdrew from the project. An EPA cleanup grant will remove a significant barrier for the City to find a developer to bring the community's vision to reality, bringing in housing options and retail that can help meet the neighborhood's needs.

*ii. Description of the Proposed Brownfield Site:* The site initially served as agricultural property in unincorporated Adams County and was later acquired by the Deal Development Company, based in Texas. It was transformed into the Brown Reservoir, an at-grade reservoir enclosed by a six to eight-foot berm. Following the City's acquisition of the property in August 1973, the berm was regraded and in 1975, the Northglenn Rec Center was constructed. Today, the site consists of a 6.85-acre parcel improved with an approximately 40,000 square-foot, former municipal recreation center, located on the western half of the property. The building served as the Rec Center until 2021 when a new facility was built nearby. The eastern half of the property is improved with paved parking and remaining site grounds are improved with landscaped areas and concrete walking paths. In its current state, the site provides little beneficial use to Northglenn residents. As of submittal of this grant application, asbestos abatement of the structure is in final stages of completion, and demolition of the Rec Center building will follow. This is the first vital step toward remediation, and revitalization of the site.

Based on multiple assessments, soils contain lead and arsenic concentrations exceeding the EPA Residential and Industrial Regional Screening Levels (RSLs) and/or the Colorado Department of Public Health and Environment (CDPHE) background concentrations. Contaminated soils appear to be primarily located within the upper eight feet of the soil column. Spatially, arsenic impacts exceeding the CDPHE background concentration of 11 milligrams per kilogram (mg/kg) are spread across the site with concentrations ranging from 11.2 mg/kg to 331 mg/kg<sup>2</sup>. Lead impacts are more localized along the eastern edge of the property and underneath the former Rec Center building, with concentrations between 5.11 mg/kg to 2,120 mg/kg. Based on the data collected from the various investigations, the CDPHE Voluntary Cleanup Program administrator, in consultation with CDPHE's epidemiological risk assessment team, identified alternative site-specific soil cleanup levels of 800 milligrams per kilogram (mg/kg) for lead, and 50 mg/kg for arsenic for residential use, provided any residual soils left in place would be capped by both four feet of clean fill, as well as a warning barrier. The City aims to remediate the site to residential levels, providing potential

---

<sup>1</sup> US Census, Quickfacts, Population Estimates July 2, 2022

<sup>2</sup> Voluntary Cleanup Program Application, Northglenn Civic Center Development, Terracon, 8.28.2023

future developers with site use flexibility. Approximately 18,000 cubic yards of soil contain contaminant concentrations above these new site-specific cleanup levels that will need to be disposed off-site.

**b. Revitalization of the Target Area** *i. Reuse Strategy and Alignment with Revitalization Plans:*

Given that Northglenn is the property owner, the City has played a central role in steering the entire Northglenn Civic Center redevelopment. The Northglenn Civic Center project includes redeveloping a 21-acre site in the heart of Northglenn with a new recreation and senior center, new city hall, and mixed-used development at the former Rec Center site. Our journey began in 2015 with community engagement through festivals, walking audits, newsletters, workshops, and visioning sessions. We announced the community engagement activities through the Northglenn Connection (sent to all residents), sent notices to all neighboring residences and businesses, attended community events, and went to the Northglenn Senior Center for discussions specifically with senior residents. The community has been actively guiding the redevelopment process.

We conducted a comprehensive analysis of various redevelopment alternatives and, with valuable public input, selected a preferred master plan. Following this, we continued to engage with the community to refine the master plan concepts and vision. In 2017, the City Council formally adopted the Northglenn Civic Center Master Plan, which provided a clear vision for the site and offered guidance for its redevelopment. Since the plan's adoption, the City has successfully completed or is currently in the process of executing the first two phases of site development. This includes the construction of a new Recreation Center, Performing Arts Theatre, and Senior Center facility, as well as the commencement of construction of a new City Hall. We have consistently informed the community about the project's progress through our project update website<sup>3</sup> and monthly city newsletters. We always encourage public comments and active interactions.

In 2021, as part of our city comprehensive plan update efforts, we formed a 10-member resident task force to collaborate with the City throughout the planning process. We also engaged residents through mailings, social media, online surveys, and open-ended discussion walls, as well as virtual town hall style meetings. These planning efforts underscored the strategic importance of redeveloping the former Rec Center site and the final updated comprehensive plan was issued in March 2023.

Our intention is to offer a blend of residential units, with a primary emphasis on making affordable and attainable housing options available. This site holds a unique position at the core of our city, and its development would nurture a feeling of attachment and community pride among the residents of Northglenn. The site is part of the Civic Center Master Plan, which is designed to create public gathering spaces and offer a diverse range of functions, breathing life into this piece of land. We want to introduce local retail establishments that cater to the neighborhood's needs, generating employment opportunities and essential services for the community.

*ii. Outcomes and Benefits of Reuse Strategy:* The Former Rec Center site is part of the larger Northglenn Civic Center Master Plan. This plan provides a Master Plan framework for redeveloping the full 21-acre campus. The public sector parts of the plan have been or are in the process of being implemented, including the new 87,000 square-foot community center housing the recreation center, senior center, and community theater. The new 32,000 square-foot City Hall building is under construction and will be the first municipal building in Colorado to achieve the CORE Green Building certification from the International Living Future Institute. The building will be "Net Zero" for carbon emissions and include rooftop solar.<sup>4</sup> The proposed reuse of the former Rec Center site is estimated to create 122 multi-family units, 34 townhomes, 19

---

<sup>3</sup> [https://www.northglenn.org/government/project\\_updates/index.php](https://www.northglenn.org/government/project_updates/index.php)

<sup>4</sup> [https://www.northglenn.org/government/project\\_updates/new\\_City\\_hall.php](https://www.northglenn.org/government/project_updates/new_City_hall.php)



live/work units, and 17,600 square feet of commercial/retail space.<sup>5</sup> Affordable and attainable housing options will be available. The Civic Center Master Plan also incorporates flexible spaces such as a parkway and festival street at the site.

Due to the City's meticulous planning for this redevelopment, associated expenses have been thoroughly accounted for. As an illustration, the anticipated cost of the new City Hall stands at \$33.78 million, with funding derived from the 0.5% sales tax and the 4% Special Marijuana Tax, both earmarked exclusively for capital projects<sup>6</sup>. After improvements are completed, the annual cash flows attributed to the privately-owned improvements will contribute about \$950,000 in taxes. These will be unencumbered and available for future capital projects. The most recent appraisal in 2020 estimated the property value at \$2.1 million which could provide additional revenue through land sales to developers. Additional TIF revenue may also be realized.

According to the National Oceanic and Atmospheric Administration (NOAA)<sup>7</sup>, ongoing severe droughts are anticipated to persist, exacerbating water resource loss in the western US. The City is taking an aggressive and proactive stance by leading the way in the adoption of climate adaptation and mitigation strategies, exemplified by the recent introduction of the CORE Green Building Certification for the new City Hall building. Achieving this certification requires a 50% reduction in water consumption and a complete ban on potable water for irrigation. The City plans to request developers to help meet its sustainability goals outlined in the Northglenn Sustainability Plan Update – 2022, including a 25% reduction in potable water use by 2030. We will incorporate sustainability into the selection criteria for the developer RFP. The City intends to apply low-impact development best management practices on the portions of the redevelopment under City ownership including bioretention planters, xeriscaping, tree trenches, and permeable pavement. In addition to reducing water use, the City will request incorporation of energy efficiency measures throughout the redevelopment.

**c. Strategy for Leveraging Resources** *i. Resources Needed for Site Characterization, ii. Resources Needed for Site Remediation, iii. Resources Needed for Site Reuse:* To date, about \$1.5 million has been spent at the site for environmental assessment, asbestos abatement, and demolition activities. Funding has come from the City and Northglenn’s FY15 EPA Brownfields Assessment grant. For this cleanup grant application, the City is not requesting funds for personnel, project management, cleanup oversight, or community outreach funds, as it intends to cover those costs in-kind.

Name of Resource	i. Assessment ii. Remediation iii. Reuse	Secured or Unsecured	Additional Details or Information About the Resource
<i>City of Northglenn</i>	Assessment	Unsecured	In the event additional assessment is necessary, the City will evaluate covering the costs.
<i>EPA TBA</i>	Assessment	Unsecured	If additional assessment is needed, the City may apply for a Targeted Brownfields Assessment through EPA.
<i>City of Northglenn</i>	Remediation	Partially Secured: letter attached	The City will contribute about \$200,000 for construction oversight costs, final ABCA, cleanup report and materials management plan. The City will also cover the costs associate with filing an Environmental Use Restriction on the property.
<i>CO Brownfields RLF</i>	Remediation	Unsecured	If additional cleanup not covered by grant funds is needed, the City will consider an RLF loan.

<sup>5</sup> Northglenn-CCPT Housing – Site Plan. March 1, 2022. Available upon request from City.

<sup>6</sup> [https://www.northglenn.org/government/project\\_updates/new\\_City\\_hall.php](https://www.northglenn.org/government/project_updates/new_City_hall.php)

<sup>7</sup> NOAA, Cooperative Institute for Satellite Earth System Studies. <https://statesummaries.ncics.org/chapter/co/>

CDPHE's Brownfields Tax Credit Program (SB 14-073)	Remediation	Secured: letter attached	Qualifying environmental remediation costs are eligible for a 40% credit on the first \$750,000. The City met with CDPHE prior to submitting its Voluntary Cleanup Plan and will apply for tax credits for activities not funded with EPA grant funds.
Tax Increment Financing	Reuse	NA	The site is in Northglenn's Urban Renewal Area #1. TIF funds are available for redevelopment activities.
Enterprise Zone Tax Credits	Reuse	NA	Enterprise zone tax credits can be claimed by businesses that purchase new equipment, or train or hire new employees.

**iv. Use of Existing Infrastructure:** The cleanup of contaminated soils at the site will facilitate the reuse of existing infrastructure. The site has an existing sidewalk along Civic Center Drive. Additional trunk infrastructure was needed for the full redevelopment project. The Northglenn Urban Renewal Authority funded \$9.9 million in trunk infrastructure, including water, sanitary sewer, a public road, and regional detention and water quality for the full Northglenn Civic Center Redevelopment, including the former Rec Center site. The site's strategic central location is within the community, grants easy access to other infrastructure, including broadband connectivity. Any further infrastructure requirements will be financed by the developer.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need** *i. The Community's Need for Funding:* The City of Northglenn is facing a challenge in securing financial resources for the remediation efforts at the former Rec Center site. When the initial master planning was undertaken for the Civic Center Redevelopment, there was no allocation for expenses related to soil cleanup since contamination had not yet been discovered. Unfortunately, the additional \$2.7 million required to complete this cleanup is beyond the City's financial capacity.

Northglenn is among the more affordable parts of Denver's inner-ring suburbs. Home sales and property values are less in Northglenn than surrounding comparable suburbs and Denver<sup>8</sup>, providing less property tax income to the City. The median household income in Northglenn is nearly \$15,000 less than those living in Denver and less than Adams County and Colorado as a whole.

	Census Tract 85.06	Northglenn	Denver	Adams County	Colorado
<b>Median Household Income<sup>9</sup></b>	\$42,619	\$73,163	\$88,213	\$73,817	\$75,231

It's also important to consider the cost of living in Northglenn, which is indicated by a cost-of-living index of 121.5<sup>10</sup>. This index exceeds Colorado's index of 120 and the U.S. base average of 100. The index is calculated based on a national average of 100, with values below 100 signifying a lower cost of living compared to the U.S. average, and figures above 100 indicating a higher cost of living. Additionally, it's noteworthy that census tract 85.06, where the site is located, has the lowest median household income in Northglenn.

*ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations:* The former Rec Center is situated in census tract 85.06, which has been officially **recognized as disadvantaged** according to the Climate and Economic Justice Screening Tool (CEJST). This designation is attributed to several socioeconomic factors, including elevated housing costs, insufficient access to indoor plumbing, and falling within the 75th percentile for low income. Additionally, the tract qualifies as disadvantaged due to its placement in the 91st percentile for both low life expectancy and low income. According to EJScreen, 14.8% of the population in the census tract are persons with disabilities while the state average is 11.4% and the national average is 13.4%.

<sup>8</sup> Comprehensive Housing Needs Assessment, City of Northglenn, September 2022

<sup>9</sup> US Census, Quickfacts, Population Estimates July 2, 2022

<sup>10</sup>bestplaces.net/city/Colorado/northglenn



Our sensitive population is our low-income population and our Hispanic population. As indicated in Section 2.a.i, residents within this census tract earn approximately **60% less than their counterparts** in the City of Northglenn, and even less in comparison to residents elsewhere in the region and the state. Remarkably, census tract 85.06 is in the **92nd percentile for low income** in the state and the 85th percentile nationally<sup>11</sup>. Within the target census tract, 30% of the population is Hispanic and 19% of the population primarily speaks a language other than English, further compounding existing health and welfare challenges<sup>12</sup>. The census tract is also in the 95<sup>th</sup>-100<sup>th</sup> percentile for housing burden meaning that households are “both earning less than 80% of Housing and Urban Development’s Area Median Family Income and are spending more than 30% of their income on housing costs<sup>11</sup>.”

	Census Tract 85.06 <sup>11</sup>	Northglenn	Adams County	Colorado	US
Population <sup>13</sup>	6,249	38,106	527,575	5,839,926	333,287,557
Hispanic <sup>14</sup>	30%	34.8%	42.4%	22.5%	19.1%
Persons under 18 years <sup>14</sup>	26%	23.6%	24.5%	20.8%	21.7%

The site as it currently sits does not provide job opportunities, affordable housing, or any other local amenities. The redevelopment will truly embrace the live/work/play philosophy with over 150 residential units, including affordable and attainable units, and the redevelopment will create 17,600 square feet of commercial/retail space which will in turn provide new jobs opportunities.

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

Census tract 85.06 is in the 90-95th percentile compared to the US for low life expectancy. Multiple factors could contribute to this, including potential exposure to contaminants. Asbestos is a contaminant of concern at the site and is currently being addressed through abatement. Adams County has a statistically higher number of asthma emergency department visits than the statewide rate with a rate of 42.21 per 10,000 people for Adams County and 28.64 per 10,000 people for Colorado. This is also the second highest county rate in the state. Lead and arsenic in soil are the contaminants of concern found at the site being addressed with the grant application. Lead is a probable human carcinogen<sup>17</sup> and the Department of Health and Human Services (DHHS) and EPA have determined that inorganic arsenic, the kind found at the Former Rec Center site, is a known carcinogen<sup>18</sup>. Adams County has a higher overall cancer rate than 75% of the other counties in Colorado and is ranked the 3<sup>rd</sup> highest county in Colorado for bladder cancer.<sup>16</sup> Abating the building and cleaning up the contaminated soils at the site will reduce potential exposures to asbestos, lead, and arsenic, thereby lowering the risks for individuals who already face shortened life expectancies and limited financial resources.

Location <sup>14</sup>	Life Expectancy
Census Tract 85.06	73
Northglenn	76
Adams County	80
Colorado <sup>15</sup>	80.5

Adverse Health Affect <sup>16</sup>	Adams County	Colorado
Cancer	397.4	391.7
Liver Cancer	9.8	7.2
Bladder Cancer	18.0	17.7
Lung Cancer	48.5	38.3
*All races, sexes, and ages. 2016-2020. Incidence rate is cases per 100,000		

<sup>11</sup>EJScreen

<sup>12</sup>US Census

<sup>13</sup> US Census, QuickFacts, Population Estimates July 2, 2022

<sup>14</sup> Census tract, city, and county data from EJScreen Health Disparities, Low Life Expectancy

<sup>15</sup> CDPHE Open Data: [data-cdphe.opendata.arcgis.com/datasets/478db6943682474a91d1e321006c8ee6\\_37/about](https://data-cdphe.opendata.arcgis.com/datasets/478db6943682474a91d1e321006c8ee6_37/about)

<sup>16</sup> NIH National Cancer Institute, State Cancer Profiles, Incidence Rates Tables: <https://statecancerprofiles.cancer.gov/incidencerates/index.php>

<sup>17</sup> ATSDR ToxFAQs for Lead: <https://www.nceh.nih.gov/ToxFAQs/ToxFAQsDetails.aspx?faqid=93&toxid=22>

<sup>18</sup> ATSDR ToxFAQs for Arsenic: <https://www.atsdr.cdc.gov/toxfaqs/tfacts2.pdf>

**(3) Environmental Justice (a) Identification of Environmental Justice Issues:**

Census tract 85.06 is identified as disadvantaged according to CJEST. The residents in this census tract are low income and have low life expectancy rates [see Section 2.a.ii (1) and (2)], and then must deal with inequitable environmental exposures. The site is in an ozone 8-hour non-attainment zone<sup>19</sup>, abuts a busy interstate highway, and ranks high in both state and national percentiles for multiple environmental justice indices as show in the table. Failure to redevelop the site will result in a deteriorating eyesore, compounding the challenges faced by an already burdened community.

EJ Index*	State Percentile	National Percentile
Particulate Matter	95	82
Diesel Particulate Matter	92	87
Air Toxics Cancer Risk	92	81
Toxic Releases to Air	92	87
Traffic Proximity	93	85
RMP Facility Proximity	90	83
Wastewater Discharge	95	89

\* Source: EJScreen for census tract 85.06

**(b) Advancing Environmental Justice:** The cleanup and revitalization of the site will promote environmental justice through several avenues. First, it will remove exposures to contaminants. Next, it will expand access to sustainable housing options, introducing townhouses and multifamily units that encompass affordable and attainable residences. Enhanced access to safe and healthy housing elevates overall living standards. Additionally, the redevelopment will foster economic opportunities by attracting new businesses, consequently generating fresh job prospects. The City will set a precedent with its new City Hall CORE Green Building and will work with a developer committed to integrating environmentally sustainable practices into the redevelopment. This not only mitigates the environmental footprint of the project but also fosters long-term sustainability, resulting in reduced energy costs for both residents and businesses, consequently alleviating the financial strain on low-income households. Importantly, no residents or businesses will face displacement throughout the cleanup and redevelopment of the site.

**b. Community Engagement i. Project Involvement ii. Project Roles**

Name of entity	Point of contact	Specific involvement in the project or assistance provided
Northglenn Urban Renewal Authority	Allison Moeding, Executive Director: <a href="mailto:amoeding@northglenn.org">amoeding@northglenn.org</a>	Member of developer selection committee. Provide financial incentives for site redevelopment. Assist with funds for remediation cost overruns if needed.
AC-REP (Adams County Regional Economic Partnership)	Lisa Hough, President & CEO: <a href="mailto:lisa.hough@ac-rep.org">lisa.hough@ac-rep.org</a>	Notify members of development RFP and opportunities for business expansion or relocation to the new development.
Adams County Economic Development	Lucas Workman, Economic Development Manager: <a href="mailto:lworkman@adcogov.org">lworkman@adcogov.org</a>	Promote redevelopment to businesses regionally to locate in the new development.
Adams County Health Department	Brian Hlavacek, Environmental Health Division Director: <a href="mailto:bhlavacek@adcogov.org">bhlavacek@adcogov.org</a>	Member of developer selection committee. Be available for questions from community regarding potential health concerns related to the cleanup and redevelopment.
Reserve at Northglenn	Gus Rosales <a href="mailto:grosales@secpropres.com">grosales@secpropres.com</a>	Neighboring Apartment and Townhome Complexes: Disseminate information to residents about public meetings, cleanup activities, and provide contact information for any concerns.
Heritage at Stone Mtn. Apts.	Nikki Griswold, Manager <a href="mailto:manager@heritageatstonemountain.com">manager@heritageatstonemountain.com</a>	
Carrick Bend	Christina Oxford, Manager <a href="mailto:carrickbendmgr@greystar.com">carrickbendmgr@greystar.com</a>	

<sup>19</sup> EJScreen Non-Attainment Area Ozone 8-hour for Northglenn, CO





<i>First Parkview Townhomes</i>	Bill Bradford, Manager <a href="mailto:bill@cmsincorp.net">bill@cmsincorp.net</a>	
<i>Adams County Workforce &amp; Business Center</i>	Jodie Kammerzell Workforce & Business Center <a href="mailto:jkammerzell@adcogov.org">jkammerzell@adcogov.org</a>	Help recruit employees for new or expanded businesses at the site.
<i>City of Northglenn Economic Development</i>	Allison Moeding, Director of Economic Development: <a href="mailto:amoeding@northglenn.org">amoeding@northglenn.org</a>	Member of developer selection committee. Promote opportunities to developers and solicit local and regional businesses to locate in the development.

*iii. Incorporating Community Input:* Beginning in 2015, the Northglenn community was highly engaged and involved throughout the Civic Center Master Plan process. From informal one-on-one conversations at events such as the Pirate Fest, to a planning commission walking audit, to a community workshop, to formal video-recorded City Council meetings that encompassed group discussions on the intricacies of the plan. In fact, the final Master Plan is a result of the collaboration and extensive input received throughout the process. Specific to the Former Rec Center portion of the Master Plan, several City Council meetings have focused on how to modify the master plan and address the contamination found at the site. The public was encouraged to ask questions and provide comments. Then the feedback was incorporated into the final document.

For this grant application, we held an in-person meeting on November 1, 2023, to discuss the cleanup plan (ABCA) and EPA brownfields grant application. Northglenn presented to the residents in attendance and answered questions about sampling conducted on other parts of the Civic Center Redevelopment and whether the funding requested from EPA is enough to cover the cleanup costs. We plan to host two public meetings throughout the life of the grant and will announce these meetings through our key community partners listed above in Section 2.b.i., the City’s website, social media, and direct invites to the adjacent businesses and residential facilities. At the first meeting we will discuss the cleanup plan, solicit feedback, address concerns, explain environmental impacts and provide a schedule. If any questions cannot be answered at the meeting, the City will put the question and answer on the website and reach out to the person that asked the question to ensure all questions are appropriately answered. We also have our email address on our website and encourage residents to reach out. The second meeting will occur after the cleanup is complete to share the details and outcomes of the cleanup as well as next steps. We will develop a project fact sheet with contact information for distribution to the public at the first meeting and via the City’s web page, social media, and to key community partners. Meetings will be held in person and virtually to garner a wider audience. We use RingCentral to broadcast our meetings and still allow public participation. The City has a contract with a language interpretation company that provide translation services as needed. All community outreach activities will be reported in the quarterly progress reports.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Proposed Cleanup Plan:** The objectives of the proposed remedial actions are to eliminate human exposure risks from lead and/or arsenic in soils; and upon completion of the actions, the site would be available for redevelopment for use by the greater community. In September 2023, Northglenn submitted a Voluntary Cleanup Plan (VCUP) to CDPHE, which was approved October 23, 2023. This comprehensive plan outlines specific remedial measures aimed at mitigating and reducing both short-term and long-term exposures to contaminants present at the site. The site consultant estimated approximately 41,400 cubic yards of soil with lead and/or arsenic concentrations exceeding the EPA Regional Screening Levels (RSLs) or the CDPHE’s average background levels. These impacts appear to be primarily concentrated within the upper 8 feet of the soil column. The draft ABCA identified various alternatives for cleanup, and were measured against five criteria: effectiveness, implementability, cost, reasonableness, and resilience against extreme weather events. Of the cleanup alternatives considered, the selected remedial action includes targeted soil excavation, stabilization, and disposal, administrative and engineering controls, and a soil



management plan. In collaboration with the CDPHE’s epidemiologist and Voluntary Cleanup and Redevelopment Program administrator, a site-specific remediation cleanup standard was established, specifying 800 mg/kg for lead and 50 mg/kg for arsenic. The numeric model, constructed from historical investigation data, identified roughly 18,000 cubic yards of soil exceeding these site-specific cleanup levels.

The cleanup plan includes soil excavation activities involving the removal and subsequent stabilization, of lead-contaminated soil exceeding the Toxicity Characteristic Leaching Procedure (TCLP) standard of 5 mg/L. Bench testing will be completed to select the most appropriate agent for stabilization of the soils exceeding TCLP levels. Stabilization will occur in stockpiles with regular representative soil sampling to confirm the waste has been effectively rendered characteristically non-hazardous. A 10-point composite sample will be collected for a maximum of 5,000 cubic yards and submitted for lab analysis for TCLP lead. Soils above the site-specific cleanup levels of 800 mg/kg for lead but below the TCLP level and soils above 50 mg/kg for arsenic will be excavated and properly disposed. Confirmation sampling will be conducted at one 10-point composite per 10,000 square feet of excavation area. The samples will be analyzed in the lab for total arsenic, total lead, and TCLP lead. Additional excavation will be completed, if necessary, based on the confirmation soil sample results. All soils will be disposed of at a RCRA Class D Landfill.

On-site soils exceeding EPA RSLs, but below the site-specific cleanup levels that are not excavated as part of the remedial excavations and disposal, will be addressed using administrative and engineering controls. After excavation and off-site disposal, a warning barrier consisting of a geo-grid or similar material will be placed over areas where residual soils exceed EPA RSLs. Then clean fill will be brought in to create a four-foot-thick cap over the warning barrier. An environmental use restriction will then be implemented, allowing for residential use of the entire site while prohibiting sub-grade construction. This will include details for adhering to the approved Materials Management Plan. A No Action Determination request will then be submitted to CDPHE. To protect nearby residents during the cleanup, the site will be fenced, and a dust control plan will be prepared and implemented. The dust control plan will identify measures to prevent contaminated particulate matter from becoming airborne, including wetting or using dust control agents.

**b. Description of Tasks/Activities and Outputs:** The task described herein is the only task that will be funded by the brownfields cleanup grant. The City of Northglenn requests \$2,750,000 of EPA brownfield grant funding to complete the cleanup.

<b><i>Programmatic*</i></b>
<i>i. Project Implementation:</i> program management, EPA reporting, fiscal grant management, procure remediation contractor
<i>ii. Anticipated Project Schedule:</i> This work will be spread across the timeline of this grant.
<i>iii. Task/Activity Lead:</i> City
<i>iv. Outputs:</i> Up to 16 quarterly reports, annual financial and MBE/WBE/DBE reports, ACRES updates, final report
<b><i>Community Outreach*</i></b>
<i>i. Project Implementation:</i> Two public meetings: one before cleanup and one after cleanup
<i>ii. Anticipated Project Schedule:</i> The first meeting will be conducted within two months of signing the cooperative agreement. Northglenn intends to expedite the cleanup so it can take advantage of CDPHE’s Colorado Brownfields Tax Credit Program, which sunsets at the end of 2024. The second meeting will take place after the cleanup is conducted and a No Further Action letter is received from CDPHE (estimated spring/summer 2025).
<i>iii. Task/Activity Lead:</i> City
<i>iv. Outputs:</i> Public meeting records from two meetings, outreach materials
<b><i>Cleanup – only task primarily funded with EPA grant funds.</i></b>



<i>i. Project Implementation:</i> Coordination with CDPHE. Finalize ABCA.* Develop Quality Assurance Project Plan (QAPP)* and submit for EPA approval. Excavation, stabilization, and disposal of soil, installation of warning barrier, bringing in clean fill, re-grading.
<i>ii. Anticipated Project Schedule:</i> Updated ABCA and QAPP will be submitted to EPA within 2 months of award. Physical cleanup will be completed by the end of 2024.
<i>iii. Task/Activity Lead:</i> Remediation Contractor
<i>iv. Outputs:</i> 1 final ABCA*, 1 QAPP, 1 No Further Action letter, quantity (tons) of soils removed, square footage of warning barrier, final cleanup report*, 1 environmental use restriction, 1 Materials Management Plan*.

\*The City will cover in-kind costs for programmatic activities, community outreach, costs of qualified environmental professional oversight, final ABCA, QAPP, final cleanup report, and Materials Management Plan.

**c. Cost Estimates:** The City is only requesting grant funds for the physical cleanup at the site. Cleanup costs were determined by the City based on current market rates for services and cost estimates from the consultant used for assessment activities and remediation contractors. Excavation and disposal activities include mobilization, erosion control permitting, excavation, transportation, and disposal of wastes. For soils exceeding TCLP, stabilization is also included. We also included a cost contingency, bringing the excavation and disposal estimate to **\$1,010,000**. Site restoration costs include re-grading the site, water, the warning barrier, importing and placing clean fill, and post construction stabilization. With a cost contingency, the estimate for site restoration came to **\$1,740,000** for a total cleanup estimate of **\$2,750,000**.

Budget Categories	Project Tasks	
	Cleanup	Total
Construction	\$2,750,000	\$2,750,000
Total Direct Costs	\$2,750,000	\$2,750,000
<b>Total Budget</b>		<b>\$2,750,000</b>

**d. Plan to Measure and Evaluate Environmental Progress and Results:** During the grant period, the City will track project outputs, outcomes, and other results in its quarterly reports and ACRES. We will have regularly scheduled project meetings as a means to track progress and to identify potential problems and address them in a timely manner. After the grant period, we will continue to track outputs and outcomes of the redevelopment and leveraging. Outputs are identified by task in the table in 3.b. Outcomes will include the number of acres ready for redevelopment, number of jobs created, number of housing units created, amount of contaminant reduction, increase in the City’s tax base and increase in property value.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** *i. Organizational Structure* *ii. Description of Key Staff:* The City of Northglenn operates a Council-Manager style of government. The Mayor oversees the legislative functions of the City, and the City Manager administers the city’s government including the Northglenn Planning & Development Department which will oversee and manage all activities under the EPA Brownfields Cleanup grant. This organizational structure allows for checks and balances. This grant will be managed by Brook Svoboda, Director of Planning & Development, Eric Ensey, Senior Planner, and JoAnn Koenig, Accounting Manager. This team works together often and has a seamless process to ensure all funding requirements are met for a variety of funding mechanisms.

Mr. Svoboda will provide program administrator oversight. His BS degree in Environmental Policy & Assessment along with 28 years of Planning & Development and CIP experience, including multiple soil remediation projects with Colorado Mountain Mining Communities, and his 12 years with the Northglenn Planning & Development Department, provide him the perfect skill set particular to this project. Eric Ensey, Senior Planner, will oversee the day-to-day project management tasks associated with grant administration including ACRES site data input and quarterly reporting. Mr. Ensey has a Master of Urban and Regional



Planning Degree from the University of Colorado – Denver, with 23 years of planning experience. He has been involved with the Northglenn Civic Center Redevelopment from its onset and understands the nuances associated with it. He will be assisted by JoAnn Koenig, the City’s accounting manager. Ms. Koenig has a BS in Accounting from the University of Phoenix and 40 years in financial management, with roughly 18 of those years directly managing grant accounting functions. She has been with the City for about 5 years and managed the financial aspects of Northglenn’s brownfields assessment grant for 2019 and 2020. She submitted reimbursement requests and handled all federal reporting requirements. In the event of staff turnover, our accounting team of four can cover the financial responsibilities associated with the grant. The planning department has a team of six staff that can cover programmatic responsibilities.

*iii. Acquiring Additional Resources:* The City has enlisted the services of an experienced environmental professional through a contractual agreement, and the use of grant funds will not cover these particular services. We will draft bid specifications for a remediation contractor and ensure compliance with all federal procurement regulations in selecting a qualified contractor for the project. The chosen remediation contractor will also be mandated to adhere to federal Davis-Bacon requirements. The site is enrolled in CDPHE’s Voluntary Cleanup Program providing cleanup oversight.

**b. Past Performance and Accomplishments** *i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments:* The City of Northglenn received two FY15 EPA Brownfields Assessment Grants; \$200,000 for hazardous substances assessment and \$200,000 for petroleum assessment. The City contributed \$38,539.33 of in-kind time throughout the life of the grants for programmatic and property-owner outreach activities.

Both grants primarily focused on the West 104<sup>th</sup> Corridor, an area of commercial development. With grant funds, Northglenn completed 8 Phase I Environmental Site Assessment (ESAs), a Quality Assurance Project Plan, 2 Phase II ESAs, 2 remediation and reuse plans, 1 architectural building assessment and area-wide planning activities. Outputs and outcomes are accurately depicted in EPA’s ACRES database. Additional outputs and outcomes included:

- Redevelopment of an old, mostly vacant, bank property which is now 92% leased and the property now includes new senior housing. Private investment: \$5.97 million/Public investment: \$450,000;
- Reuse of a vacant ‘box-store’ into a new Arby’s, SaveALot Grocery, and Auto Zone fulfillment center creating nearly 200 jobs. \$3.2 million in new infrastructure and total project investment of \$15 million;
- Relocation of a Starbucks, retaining 25 jobs. Private investment: \$250,000/Public investment: \$22,500. Old building now houses a Dutch Brothers Coffee Shop; and
- New sports complex resulting in 10 new jobs and 5 jobs retained. Private investment: \$5 million/Public investment: \$1.5 million.

*(2) Compliance with Grant Requirements:* The grant period ended in September 2020 and both grants have been closed out. Northglenn spent \$191,447.53 (95.72%) of the hazardous substance assessment grant funds and \$94,775.03 (47.39%) of the petroleum assessment grant funds. Northglenn requested and was provided two grant extensions. We requested these extensions to continue our search for eligible petroleum sites. However, most petroleum brownfields sites we targeted were not eligible due to their eligibility for reimbursement through the Colorado Division of Oil & Public Safety Petroleum Storage Tank Fund, leaving us with unused petroleum funds. For the hazardous substance and petroleum funds we spent, all results are properly reflected in ACRES including properties and acres ready for reuse, leveraged jobs, and leveraged funding. Quarterly and MBE/WBE reports were completed on time (quarterly and semi-annually for MBE/WBE) as well as annual reporting requirements and the final report.



11701 Community Center Drive  
Northglenn, Colorado 80233  
Phone (303) 451-8326

---

November 9, 2023

Ms. Jennifer Benz EPA  
Region 8  
1595 Wynkoop St. EPR-B  
Denver, CO 80202

RE: FY24 City of Northglenn EPA Brownfields Cleanup Grant Application  
Northglenn Cleanup Funding Contribution

Dear Ms. Benz,

The City of Northglenn is submitting a grant application for an FY24 EPA Brownfields Cleanup grant in the amount of \$2,750,000. This funding is specifically for construction costs associated with the excavation and off-site disposal of contaminated soils as well as site regrading, importing clean fill, and post construction stabilization.

The City will contribute the additional funding needed for programmatic activities, community outreach, costs of qualified environmental professional oversight, final ABCA, QAPP, final cleanup report, and the materials management plan. At this time, we estimate those costs to be around \$200,000.

Thank you for your time and consideration in reviewing our cleanup grant application. Please feel free to reach out to me at [hgeyer@northglenn.org](mailto:hgeyer@northglenn.org) or 303.450.8709 if you need any additional information regarding our commitment to contribute funding to this project.

Sincerely,

A handwritten signature in black ink that reads "Heather Geyer". The signature is fluid and cursive, with the first name being the most prominent.

Heather Geyer  
City Manager

November 2, 2023

Ms. Jennifer Benz EPA  
Region 8  
1595 Wynkoop St. EPR-B  
Denver, CO 80202

RE: Northglenn Civic Center – 11801 Community Center Drive; Northglenn, CO

Dear Ms. Benz:

The Colorado Department of Public Health and Environment (the Department) has been working closely with the City of Northglenn on the remediation and redevelopment plans for their former Recreation Center site. The Department understands the City is applying for an FY24 EPA Brownfields Cleanup Grant. As requested in EPA's Request for Applications, the Department affirms that the former Rec Center site:

- i. Is eligible to be enrolled in the [State/Tribal] voluntary response program;
- ii. Is currently enrolled in the state's Voluntary Cleanup Program (VCUP);
- iii. Has had a sufficient level of site characterization from the environmental site assessment(s) performed to date for the remediation work to begin on the site(s).

The Department approved the City's VCUP application on October 23, 2023. As part of their redevelopment plans, they will be removing metals contaminated soil cover from the site and replacing those soils with "clean" soils. To assist them with some of their remediation costs, Northglenn has enrolled in VCUP, making them eligible for up to \$575,000 in Colorado Brownfield Tax Credits, and will be issued once the remediation has been complete. The Department supports Northglenn's project, as it will eliminate a large amount of soil contamination and redevelop the property to a higher and better use in the future.

If you have any questions, please contact me at [Fonda.Apostolopoulos@state.co.us](mailto:Fonda.Apostolopoulos@state.co.us) or (303) 692-3411.



Fonda Apostolopoulos  
Voluntary Cleanup Program Coordinator

## Threshold Criteria

1. **Applicant Eligibility:** As an incorporated city, the city of Northglenn is eligible for funding.
2. **Previously Awarded Cleanup Grants:** The site has not received funding from a previously awarded EPA brownfields cleanup grant.
3. **Expenditure of Existing Multipurpose Grant Funds:** The City of Northglenn does not have an open EPA brownfields multipurpose grant.
4. **Site Ownership:** The City of Northglenn is the sole owner of the site.
5. **Basic Site Information:**
  - a. Site Name: Former Northglenn Recreation Center
  - b. Site Address: 11801 Community Center Drive, Northglenn, CO 80233
6. **Status and History of Contamination at the Site:**
  - a. Hazardous Substances or Petroleum Contamination: hazardous substances
  - b. Operational History and Current Use: The site initially served as agricultural property in unincorporated Adams County and was later acquired by the Deal Development Company, based in Texas. It was transformed into the Brown Reservoir, an at-grade reservoir enclosed by a six to eight-foot berm. Following the city's acquisition of the property in August 1973, the berm was regraded and in 1975, the Northglenn Recreation Center was constructed. Today, the site consists of a 6.85-acre parcel improved with an approximately 40,000 square-foot, former municipal recreation center, located on the western half of the property. The building served as the Rec Center until 2021 when a new facility was built nearby. The eastern half of the property is improved with paved parking and remaining site grounds are improved with landscaped areas and concrete walking paths. As of submittal of this grant application, asbestos abatement of the structure is in final stages of completion, and demolition of the Rec Center building will follow. This is the first vital step toward remediation, and revitalization of the site.
  - c. Environmental Concerns: Arsenic and lead in soils are the contaminants of concern at the site.
  - d. How Site became Contaminated: The property and surrounding land were used for agricultural purposes. The property was owned by Deal Development Company (known previously as Kaiser Aetna Texas) and used as a reservoir. **Attachment 1** is a Preliminary Plat dated February 5, 1973 showing the reservoir and berms. The berm appears to be between 4 to 8 feet high. Deal Development Company conveyed the property to Northglenn on August 24, 1973. In a letter dated March 4, 1974 (**Attachment 2**), the City Administrator states the reservoir was the Brown Reservoir and the dam was going to impact the development of Broadway Street (now Community Center Drive). The letter indicates that the dam needed to be removed due to the steep grade it created for the road. As the letter states, this eliminated the need for fill to be brought in from an off-site location. The City did

not bring any fill to the site demonstrating that any contamination on site was there prior to the city owning it.

Spatially, arsenic impacts exceeding the Colorado background concentration of 11 milligrams per kilogram (mg/kg) are spread across the site with concentrations ranging from 11.2 mg/kg to 331 mg/kg<sup>1</sup>. Lead impacts are more localized along the eastern edge of the property and underneath the former Rec Center building, with concentrations between 5.11 mg/kg to 2,120 mg/kg. Based on the data collected from the various investigations, the Colorado Department of Public Health & Environment (CDPHE) Voluntary Cleanup Program administrator, in consultation with CDPHE's epidemiological risk assessment team, identified alternative site-specific soil cleanup levels of 800 milligrams per kilogram (mg/kg) for lead, and 50 mg/kg for arsenic for residential use, provided any residual soils left in place would be capped by both four feet of clean fill, as well as a warning barrier. Approximately 18,000 cubic yards of soil contain contaminant concentrations above these new site-specific cleanup levels that will need to be disposed off-site.

7. **Brownfields Site Definition:** The Northglenn Former Rec Center site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.
8. **Environmental Assessment:** The site has been fully characterized. Below is a list of all assessment activities conducted at the site.
  - Phase I Environmental Site Assessment (December 17, 2018, CTL Thompson)
  - Phase II Environmental Assessment Report (December 30, 2019, Ayres Associates)
  - Limited Phase II Environmental Site Assessment Report (November 20, 2020, CTL Thompson)
  - Limited Site Investigation Report (October 25, 2021, Terracon)
  - Asbestos Inspection Report (August 10, 2022, Terracon)
  - Asbestos Abatement Work Plan (August 19, 2022, Terracon)
  - Phase I Environmental Site Assessment (September 22, 2022, Terracon)
  - Limited Phase II Site Assessment Field Activities (July-September 2022, Terracon)
9. **Site Characterization:** b. A letter from CDPHE is attached.
10. **Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to the site.
11. **Sites Requiring a Property-Specific Determination:** The site does not require a property-specific determination.

---

<sup>1</sup> Voluntary Cleanup Program Application, Northglenn Civic Center Development, Terracon, 8.28.2023

**12. Threshold Criteria Related to CERCLA/Petroleum Liability:** The site is contaminated with hazardous substances.

- a. Property Ownership:
  - ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability (1) *Publicly Owned Brownfields Sites Acquired Prior to January 11, 2002*
    - (a) Property Acquisition: The property was conveyed to the city from the Deal Development Company, a Texas based company, on August 24, 1973 (*Attachment 3*).
    - (b) Property Acquisition Date: August 24, 1973
    - (c) The disposal of hazardous substances at the site occurred before the City acquired the property.
    - (d) The City has not caused or contributed to any release of hazardous substances at the site.
    - (e) The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**13. Cleanup Authority and Oversight Structure:**

- a. Cleanup Oversight: The City of Northglenn is enrolled in CDPHE's VCUP program. The VCUP Plan was approved by CDPHE on October 23, 2023.
- b. No access to adjacent properties will be necessary to conduct the cleanup, perform confirmation sampling, or to monitor offsite migration. To protect nearby residents during the cleanup, the site will be fenced, and a dust control plan will be prepared and implemented. The dust control plan will identify recommend measures to prevent contaminated particulate matter from becoming airborne, including wetting or using dust control agents.

**14. Community Notification:**

- a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): The draft ABCA is attached as *Attachment 4*.
- b. Community Notification Ad: A copy of the community notification ad as published in the local newspaper is attached as *Attachment 5*, as well as the meeting notification from the City's website.
- c. Public Meeting: A public meeting was held on Wednesday, November 1, 2023 at 4pm at city hall to discuss the draft application and consider public comments. The following items are attached at *Attachment 6*.
  - Meeting sign-in sheet
  - Meeting notes
  - Summary of comments received with the City's response to those comments.
- d. Submission of Community Notification Documents: All community notification documents are attached as described above.

**15. Contractors and Named Subrecipients:** Not Applicable.