



## Narrative Information Sheet

### 1. Applicant Identification

The City of Pueblo, Colorado. The address is 1 City Hall Place, Pueblo, CO, 81003.

### 2. Funding Requested

Funding request: Multipurpose, One million dollars, \$1,000,000.

### 3. Location

City of Pueblo, Pueblo County, State of Colorado

### 4. Target Area and Priority Site Information

Target areas are: Y Zone: Downtown, Eastside and Bessemer neighborhoods. Census tracts Downtown Pueblo Census Tract 08101003500, Eastside Census Tracts 08101000800, 08101001000, 08101001100, 08101001200 and Bessemer Census Tracts 08101002000, 08101002100, 08101002200, 08101002300

The address of the Priority Sites: #1 El Centro Del Quinto Sol, 609 E. 6<sup>th</sup> St, Pueblo, Co 81001, #2 Steelworks Museum of the West, Headquarters Site, 225 Canal Street, Pueblo, CO 81003 #3 Black Hills 5&6 Power Plant, 105 S. Victoria Street, Pueblo, CO 81003 #4 State Land Board, 11 small parcels downtown, no address.

### 5. Contacts

*Project Director:* Scott Hobson, Acting Director for Planning and Community Development, 211 E.D. St, Pueblo, CO, 81003, 7190553-2244, shobson@pueblo.us.

*Chief Elected Official:* Honorable Mayor Nicolas Gradisar, 1 City Hall Place, Pueblo, CO, 81003. 719-553-2627 ngradisar@pueblo.us

### 6. Population

The Pueblo, CO, 2020 Census population is 111, 876.

### 7. Other Factors

Other Factors	Page#
Community Population is 10,000 or less	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory	NA
The priority brownfield sites(s) is impacted by mine scarred-land	NA
The priority site is adjacent to a body of water	1
The priority site is in a federally designated flood plain	1
The reuse of the priority site will facilitate renewable energy from wind, solar, or geothermal energy	3
The reuse of the priority site will incorporate energy efficiency measures	5
The reuse strategy or project reuse of the priority site considered climate adaptation and/ or mitigation measures	5
At least 20% of the overall project budget will be spent on eligible site reuse/area wide planning activities, as described in Section I.B. for priority brownfields sites within the target area.	3, 8
The target area is located within a community on which a coal fired power plan has recently closed (2012 or later) or is closing.	4

8. Letter from State or Tribal Environmental Authority  
See attached
9. Releasing Copies of Applications  
Not applicable

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

### **a. Target Area and Brownfield**

#### **i. Overview of the Brownfield Challenges and Description of Target Area**

The City of Pueblo, “Steel City”, population 111,876 and the geographic boundary of this application, is 1.5 hours south of Denver and was first settled by Native Americans near the confluence of the Arkansas River and Fountain Creek. A mix of Anglos and New Mexicans arrived in 1844 and founded the city in 1870. Pueblo is now 52% Latinx, the largest percentage of any city in Colorado with a population over 100,000. Pueblo became Colorado’s largest industrial city but was nearly shattered by The Great Flood in 1921; the commercial district was devastated and over 100 lives were lost. The city benefited from steel booms, which fueled the growth of steel related industries including smelters, coal fired power plants, and rail roads, as “Watch Our Smoke” became a catch phrase marketed nationally to attract workers. In 1982, a steel crash resulted in a depression with effects that still harm the local economy. Puebloans suffer from persistent poverty and poor health outcomes, disproportionately affecting the Latinx population concentrated in the Bessemer and Eastside neighborhoods. Since Pueblo’s founding, Latinx residents were relegated to ‘barrios’ on the edge of town and downwind of the steel mill and other smelters, which caused negative economic and health outcomes. This project’s Target Area is referred to as the “Y-Zone” for its shape on a map, and includes the neighborhoods of Eastside, Bessemer, and Downtown, all are in Qualifying Census Tracts that have suffered a century of underinvestment. They have some of the highest levels of poverty in the county – and have predominantly Black and Indigenous Peoples of Color (BIPOC) populations. Demographic data shows high unemployment and racial and ethnic residential segregation are disproportionately high for Pueblo. This USEPA Brownfield award will build off Pueblo’s previous Community-wide Assessment (CWA) grant (FY2020, BF95809310-0) by focusing on predominantly Latinx neighborhoods to promote economic development, alleviate blight, and address systemic poverty through the investigation and cleanup of suspected contaminated sites. Tackling the inventorying, investigation, planning and clean-up of Brownfield will trigger investment, reinvigorating these neighborhoods and reversing environmental justice conditions that have lingered for too long. Three historically significant places are in the Y-Zone, lovingly referred to by locals as the Hearts of Pueblo:

Pueblo’s Eastside is east of Fountain Creek, and associated floodplain, and surrounded by railroad tracks and Interstate and highway infrastructure that challenge the mobility of people and goods. The neighborhood encompasses a culturally rich and diverse community with approximately 13,660 residents in 4,882 households, and a small commercial enclave. Although all races are represented in this neighborhood, the ethnicity of residents is 68.17% Hispanic. The Eastside is the *Heart of Hispanic/Chicano Heritage*, memorialized with a community mural now being landmarked by the City. In 2012, Colorado Preservation Inc. named Pueblo’s Eastside as an ‘Endangered Place’ due to the deterioration of historic buildings. About 33% of Eastside residents live in poverty; 100 percent of school children are on the free- and reduced-cost lunch program.

The Bessemer neighborhood started as a community of workers at the Colorado Coal and Iron Co., now EVRAZ. Nestled snugly against the massive stacks and stoves of the old steel Mill, the Bessemer neighborhood is known as the *Heart of Steel History*, with 6,116 diverse residents. It is located south of the Arkansas River and west to the edge of Lake Minnequa, adjacent to the Colorado Smelter Superfund site. The neighborhood has lost about 50% of its population since 1960. The Northern Avenue Corridor, the neighborhood’s business district, has many vacant buildings. Bessemer hosts Pueblo’s only National Landmark site, the Steelworks Museum of the West, a partner in this grant.

Pueblo’s Downtown, the *Heart of Commerce*, benefited from a Brownfield Inventory, Brownfield Area-wide Plan, and multiple Phase I ESAs during a prior grant. The City will

follow up for Phase II work, cleanup planning, and continued dialogue with the power utility plant site. The Downtown area is approximately 0.5mi west of Interstate 25, abuts a railroad track on the west, and has a 13-block north-south span from 13<sup>th</sup> Street to 1<sup>st</sup> Street.

ii. Description of the Priority Brownfield Sites.

**Priority Site #1:** El Centro del Quinto Sol, the Eastside neighborhood's only community center, at 609 E. 6<sup>th</sup> Street, Pueblo, CO, 81001 has been identified as the project's priority cleanup site. Its gym is a remnant of the old Fountain School built in 1904, combined with a newer architecturally compatible addition. The site also has a popular skate park and open-air space with various monuments to the Chicano civil rights movement. The City plans to upgrade services which will require substantial asbestos abatement throughout the building. Other potential Brownfield sites in the Eastside neighborhood include historical commercial sites like gas stations, dry cleaners and automotive repair sites and abandoned houses and storefronts with asbestos.

**Priority Site #2:** The former headquarters of the steel plant in Bessemer, now a National Historic Landmark site and home to the Steel Works History Museum, includes a three-story vacant, historical 1904 building. The building requires extensive renovation for reuse (possibly affordable housing) including asbestos abatement and mitigation of other hazardous building materials. A USEPA targeted Brownfield assessment project completed Phase II work at the site (circa 2014) and this award will be used to complete clean-up planning. Other priority Brownfield sites in Bessemer include an underutilized commercial corridor along Northern Ave, with vacant storefronts, gas stations, dry cleaners and car repair facilities.

**Priority Site #3 and #4:** Pueblo's Downtown was the beneficiary of a FY2020 CWA grant, where over 60 Brownfield were identified. Based on information obtained in that study, the City will advance two Priority Sites; 1) the former Black Hills Energy Plant 5 & 6 Priority site (#3) had a Brownfield Area-wide plan completed under the FY2020 CWA grant, and, in collaboration with the utility, is being advanced for reuse; and 2) the State Land Board Priority site (#4), that had Phase I ESAs completed under the FY2020 CWA grant, all of which have Recognized Environmental Conditions (RECs) associated with abandoned railroad property, preventing consolidation and redevelopment by adjoining owners.

iii. Identifying Additional Sites

A Brownfield inventory was conducted in the Downtown portion of the Target Area under the prior FY2020 CWA grant, which identified over 60 Brownfield sites. Additionally, a Brownfield inventory is planned for the Bessemer neighborhood, and Area-wide plans are proposed for the Eastside and Bessemer neighborhoods. The Brownfield Advisory Committee (BAC), created under the FY2020 CWA grant, will engage landowners in bringing forward additional sites in the Target Area. City staff participates in weekly development reviews and will discuss opportunities with developers, throughout the geographic boundary of this grant. Criteria will be used to prioritize additional sites considering such factors as whether the site is located in an underserved community or disadvantaged census tract, and other factors to be developed by the BAC.

**b. Revitalization of the Target Area**

i. Overall Plan for Revitalization

Beginning in the 1960s, in the geographical area of Pueblo called the Y-Zone, revitalization plans have evolved for the three neighborhoods of the Target Areas (i.e., Eastside, Bessemer and Downtown). The Downtown Framework Plan, prepared in 1984 focused on alleviating blight, creating a new convention center, additional senior housing, and additions to the Historic Arkansas Riverwalk Project. The City, with community members, also created neighborhood plans for the Eastside and Bessemer neighborhoods. According to the *Eastside Revitalization Plan*, adopted by the Pueblo Urban Renewal Authority (PURA) in 2009, revitalization goals include infill development, increased opportunity for affordable

housing, commercial mixed-use development, and parks and open spaces to stimulate a safe and walkable urban environment.

From 2009-11 the City conducted three historic context and building surveys in the Eastside neighborhood and identified properties eligible for federal historic tax credits to assist in redevelopment. Additionally, according to a 2004 neighborhood plan adopted by City Council, the neighborhood committee aims to rehabilitate existing housing as well as develop infill housing on scattered sites. For the Bessemer neighborhood, the City has conducted a historic context analysis and preservation plan as part of a larger citywide study.

In Downtown, as part of the work completed in the prior FY2020 CWA grant, a Brownfield Inventory identified potential Brownfield sites, and a Brownfield Area-wide Plan was completed for the former Black Hills Energy Plant 5 & 6 site, including a public meeting. These stakeholder-driven, consultant-assisted plans have been adopted by the City and support its focus on land use and revitalization. They also reflect the needs of underserved, primarily Latinx, residents' priorities vetted through focused ideation. Adaptive reuse of existing buildings, especially those that can pair with Federal Historic Tax credits, a key strategy identified in the previous plans to remediate blight. The multipurpose grant will align with these previous efforts, by focusing assessment and cleanup in historically underserved neighborhoods.

ii. Outcomes and Benefits of Overall Plan for Revitalization

The result of five years of attention, study, and redevelopment from the City, EPA, State and Local agencies in concert and informed by local residents have determined that the reuse of existing historic buildings for housing and supported uses, as well as the assemblage of difficult to arrange properties, is critical in the Target Areas. The cleanup of the El Centro site will enhance and expand offerings at the Eastside's only community center. Cleanup planning at the City's only national historic landmark site will retain the steel heritage in the Bessemer neighborhood. Reuse of the Plant 5 & 6 site, and consolidation of the Land Board properties will foster redevelopment and retain a key historic structure. The Area Wide plans will result in a citizen informed strategy to remedy vacant commercial properties and blight at the Eastside and Bessemer neighborhoods.

Reuse of existing infrastructure and the limiting of urban sprawl will conserve precious water resources and minimize the potential for wildfires in rural areas to adversely affect sensitive populations that are less easily mitigated than in the urban core. Revitalization of existing structures will create step-up housing options to keep residents in their chosen neighborhoods. By maintaining the urban core, fewer vehicle miles traveled will result in reductions of greenhouse gases.

In 2017, the City adopted a committing to 100 percent renewable energy in its operations by 2035 and a culture of sustainability is growing in Pueblo. The city has the only fully solar powered steel mill in the world, and the adjacent Bessemer Target Area neighborhood is a focus of this grant. Reuse of existing historic buildings will have priority, eliminating waste to landfills. For redevelopment projects assisted by this grant, the City will encourage LEED certified redevelopment and C-Pace funding for deployment of rooftop solar arrays.

**c. Strategy for Leveraging Resources**

i. Resources Needed for Site Reuse

The City has shown it can gain access to other funding resources when leveraging US EPA funds, as it did at a former church by spending \$1Million to remediate the burned and condemned site based on the cleanup planning done under the FY 2020 CWA grant. The City has other resources to leverage public-private partnerships, including \$37Million of unrestricted funds in reserve and an additional \$20Million available that could be used.

The Eastside and Downtown Target Areas are in a Pueblo Urban Renewal Project area and can access Tax Increment Funding. The Bessemer neighborhood is undergoing

urban renewal project designation in 2024. The Bessemer and Eastside neighborhoods are in Opportunity-Zones designated as QOZ and can access tax benefits for development. The City has access to the Colorado State Historic Fund for rehabilitation of historic buildings. The City has demonstrable success utilizing the Colorado Department of Public Health and Environment (CDPHE) Brownfield funding programs.

ii. Use of Existing Infrastructure

All project target areas are within the City of Pueblo's core service area, which is fully developed. Consequently, all redevelopment advised by this project deliverable will make use of existing infrastructure including streets, water, sewer, utilities, and broadband. The existing infrastructure has sufficient capacity to allow redevelopment in the Target Area.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

i. The Community's Need for Funding

The U.S. Census Bureau data from 2020 showed the poverty rate in the city to be 24.4%. It is the highest poverty rate for any city with 100,000 or more residents in Colorado. All census tracts covered in the Target Area are considered low to moderate income and most of the census tracts are Qualified Census Tracts, creating budgetary stress on the City.

Pueblo is experiencing rising levels of homelessness, which directly affects the financial resources available to address issues in the Target Areas. Since 2020, the City of Pueblo has spent \$3.4 Million dollars addressing issues related to unhoused people in the City, resulting in part from the downturn of economic conditions in the target areas.

Beyond homelessness, the City provides general funds and CDBG support to non-profit agencies in the area. According to the Colorado Department of Local Affairs Colorado Assessed Values Manual for 2004 to 2018, the City of Pueblo's total assessed valuation is about 50% less than the statewide average. This disparity coupled with the amount of resources the City already allocates to these underserved neighborhoods, limits the property tax the City can generate, placing it at an economic disadvantage compared to other communities in Colorado (DOLA.) Pueblo is also feeling the effects of the closing of the Comanche coal fired power plant.

ii. Threats to Sensitive Population

(1) Health or Welfare of Sensitive Populations

The Y-Zone Target Area neighborhoods are home to a vulnerable, aging population where seniors make up 20% of the population for Downtown, 14% for Bessemer, and 15% for the Eastside. Additionally, these neighborhoods are home to a significant low-income population of 70%, 61%, and 54% respectively. Most residents are people of color: 49%, 55%, and 48%, respectively.

The Climate and Economic Justice Screening Tool shows the population of all three Target Areas score high for their proximity to Superfund sites: Downtown is ranked 97th in the state and 94th in national percentiles; Bessemer is in the 99th percentile state-wide and 96th nationally; and the Eastside is in the 93rd percentile state-wide and 90th nationally. All of the census tracts in the Y-Zone Target area are considered disadvantaged.

According to EJ Screen, the census tracts in the Downtown, Bessemer and Eastside neighborhoods have historically high barriers to home loans, lack of green space, and homes that are more likely to have lead-based paint. In these neighborhoods, people reside in households where income is less than or equal to twice the federal poverty level.

Much of the impoverished conditions of the sensitive population in these neighborhoods can be attributed to historical underinvestment and environmental neglect in these communities of color, who are disproportionately impacted by persistent poverty, a struggling economy, and unhealthy quality of life due to various environmental and social factors.

Pueblo qualifies as an area of Persistent Poverty having had consistently greater than or equal to 20 percent of the population living in poverty during the 30-year period

preceding November 15, 2021. Consistent with OMB’s Interim Guidance for the Justice 40 Initiative, Pueblo also meets the definition of a Historically Disadvantaged Community. Of the 54 census tracts in Pueblo, 28 are Areas of Persistent Poverty.

Conducting the Area-wide Planning, Brownfield inventories, and Phase I and II assessments and cleanup planning described in this grant will serve to create a roadmap for development that will foster businesses, which will in turn result in increased employment opportunities and enhanced economic well-being, establish more affordable housing, and re-develop empty plots and vacant real estate for mixed-use redevelopment. The reversal of economic distress will result in higher employment, less poverty, and the creation of a vibrant community filled with businesses that serve its residents.

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

Table 1 demonstrates how residents in the three Target Areas have higher incidences of disease and adverse health conditions compared to the county and state, including low life expectancy, heart disease, asthma, cancer (Downtown), and persons with disabilities. Effectively, several social determinants to health disproportionately impact the Target Areas.

**Table 1. Health Indicators in Target Area (EJ Screen, 2023)**

Indicator	Health Value			State Percentile			US Percentile			State Avg.	US Avg.
	Downtown	Bessemer	Eastside	Downtown	Bessemer	Eastside	Downtown	Bessemer	Eastside		
Low Life Expectancy	24.0%	26.0%	24.0%	93	97	93	86	93	86	18.0%	20.0%
Heart Disease	7.8%	7.1%	6.4%	96	92	85	80	71	56	4.8%	6.1%
Asthma	11.1%	11.3%	11.4%	93	94	96	81	84	85	9.9%	10.0%
Cancer	6.2%	5.6%	4.9%	57	46	26	48	27	22	5.9%	6.1%
Disabled	33.9%	23.8%	21.7%	99	97	95	99	93	90	11.4%	13.4%

Other factors that threaten residents’ welfare, ranking in significantly higher percentiles than the state and national levels, include exposure to toxic releases to air, diesel particulate matter, traffic proximity, lead paint, hazardous waste proximity, and wastewater discharge, among others. Due to their limited access to such information, many of these residents may not be aware that such exposures can cause birth defects, brain, and developmental delays in children as well as other diseases as listed above to at-risk disabled seniors and to the whole community. Planning, assessing, and cleaning up Brownfield in these neighborhoods will result in improvements to the health of these sensitive populations by removing hazards, addressing legacy contamination, and improving the economy.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

A cornerstone of the Mayor’s vision for Pueblo is to reduce inequities across the city. He has reckoned with the truth about a century of underinvestment in the Target Areas and the legacy of harm caused by neglect.

The creation of a *Pueblo Modern Historic Context* in 2014, mapped the mid-century struggle of Latinx populations as well as their achievements and a preservation planned laid out additional steps to fill the gap of understanding systemic racism and redlining from the public and private sector. Rather than turn away, City Staff have turned toward what the neighborhood historian, Deborah Espinoza, has called the “hard history” and projects like this one seek to understand and redress past inequities with time, effort, and resources.

BIPOC communities in the Target Area are located directly adjacent to an operating steel mill, a superfund site, and other industrial sites.

(b) Advancing Environmental Justice

The City’s leadership is committed to developing solutions and approaches by extensive listening and generating potential solutions that are not just *convenient* for City departments, but also meaningful to citizens. The City is focusing on neighborhoods that have predominately Latinx populations that have seen severe disinvestment from industrial businesses. The cleanup of El Centro will expand offerings at the community center and amenities inside the Eastside neighborhood allowing people to stay where they are. Planning projects along Northern Avenue, Bessemer’s main commercial corridor, will help address high vacancy, promote reuse of significant historic buildings important to the community, and potentially alleviate blight, while stimulating reuses and new housing projects to allow people of all backgrounds and economic levels to stay in their neighborhoods. The BAC and two area wide plans in the neighborhoods will make sure citizen voices are heard and plans reflect community input. Brownfield Inventories, Phase I and II assessments, and cleanup planning will help make sites rehab ready and assist developers to get neighborhood commercial locations back into service.

**b. Community Engagement**

**i. Prior/Ongoing Community Involvement**

In 2022, Pueblo was one of 13 cities in the world that participated in Innovation and Civic Engagement Trainings provided by the Bloomberg Center for Public Innovation at Johns Hopkins University. The 11-person team participated in year-long training, coaching, and consulting to the city leaders of Pueblo. Robust community engagement using the learned civic engagement model, will help ensure that inequities, historic and current, are reduced.

The City has already engaged 10 partners in their BAC, most of which will continue with this grant. New partners will be engaged to ensure representation in the new geographic boundary including residents in the acreage not included in the previous study; owners of area businesses; the neighborhood organization BEGIN, which formed in response to the cleanup activity at the Smelter Superfund site in Bessemer; the Eastside Action Committee to better connect with the Latinx community; the Bessemer Association for Neighborhood Development Bessemer (BAND), a critical element in the on-going revitalization efforts envisioned for the neighborhood’s public spaces and infrastructure.

Name of Organization/Entity/Group	Point of Contact (Name & Email)	Specific Involvement in the Project or Assistance Provided
BEGIN Neighborhood Association	Pam Kocman [REDACTED]	Serve on the BAC, engage citizens and business owners in the target areas
Latino Chamber of Commerce	Duane Nava, Director DuaneN@pueblolatinochmaber.com	Serve on the BAC, engage citizens and business owners in the target areas
Steelworks Museum of the West	Christina Trujillo, Executive Director christina.trujillo@steelworks.us	Serve on the BAC, represent Priority Site
State Historic Preservation office/Pueblo Historic Preservation Commission	Sara Doll, Outreach Specialist sara.doll@state.co.us	Serve on BAC and advise on historic structure preservation.



Pueblo Department of Public Health and Environment (PDPHE)	Katie Davis, Deputy Director katie.davis@puelocounty.org	Serve on the BAC and advise on community engagement
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Pending funding, a subset of the 2004 Eastside Action Committee membership – the culture keepers – will be asked to participate in a project advisory board. The City’s Office of Diversity, Equity, and Inclusion will also be involved to ensure equitable solutions for census tracts designated as underserved communities, and for ongoing engagement and collaboration with the public and relevant stakeholders including people that are historically the hardest ones to access.

ii. Project Involvement – and – iii. Project Roles

Building on past success and community engagement during the FY2020 CWA grant, we will reengage the BAC, but will also add new local organizations that better represent the residents in the Target Area.

iv. Incorporating Community Input

The City will utilize the Public Information Officer (PIO) and Planning Department to tailor meetings to the most effective ways to reach citizens, especially sensitive populations, by hosting meetings at times and in locations convenient to residents and owners. Most Latinx residents are 3<sup>rd</sup> to 5<sup>th</sup> generation and speak English as the primary language; however, Spanish language resources will be on-hand for all materials and translators for meetings and the materials will be provided via a quarterly newsletter update to community partners and added to the project website.

No less than five community ideation sessions, two associated with Area Wide Plans in Eastside and Bessemer will be held. At least one additional session will focus on the Downtown project area to reach out to business owners and the properties in the previous Brownfield inventory. The civic engagement phase will start with an orientation meeting and end with a wrap-up public meeting. Comments received during public meetings will be reviewed by the BAC and incorporated as applicable.

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

**a. Description of Tasks/Activities and Outputs**

<b>Task/Activity: Grant Administration</b>
<p><b>i. Project Implementation:</b> Oversight and supervision of the grant. Activities include procuring the Qualified Environmental Professional (QEP), conducting regular meetings with the QEP and US EPA, reporting to the City Council and Administration, output tracking, Assessment Cleanup Redevelopment Exchange System (ACRES) database entries, financial tracking, eligibility determinations, review reports, review of Disadvantage Business Enterprise (DBE) allocations, quarterly program reports to US EPA, a final comprehensive report, and attending EPA Brownfield conferences and related workshops.</p>
<p><b>ii. Anticipated Project Schedule:</b> This activity will be initiated at project inception. QEP selection will occur within three (3) months of securing the Cooperative Agreement. Other activities will occur concurrently throughout the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.</p>
<p><b>iv. Output:</b> Outputs for this Task will include documentation of QEP selection, completion of bi-monthly meetings with US EPA representatives throughout the grant period (30 meetings), quarterly meeting notes from presentations to the City Council (20), documentation of Outputs for all Tasks, financial tracking summary prepared for each US</p>

EPA meeting (30), eligibility determinations (estimated at 30), percent of contract allocated to DBEs, ACRES reporting, and a final report.
<b>Task/Activity: Brownfield Inventory</b>
<b>i. Project Implementation:</b> A Brownfield Inventory will be prepared for the Bessemer area.
<b>ii. Anticipated Project Schedule:</b> The Brownfield Inventory for the Bessemer Area will be completed within six months of QEP selection. Additional Inventories, if determined needed by the Brownfield Advisory Committee, will be conducted.
<b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.
<b>iv. Output:</b> Output for this task will be a comprehensive Brownfield Inventory for the Bessemer Area produced using the Brownfield Inventory Tool (BiT) or similar resource.
<b>Task/Activity: Community Engagement</b>
<b>i. Project Implementation:</b> Build on the City’s past success and target the underserved and low income neighborhoods. The Project Director will work with the residents living in the Y-Zone neighborhoods, public utilities, non profits, and others to create a comprehensive Brownfield Advisory Committee to engage and solicit comments and ideas. Two area wide plans will be conducted with the first two years to develop strategies for redevelopment and to engage residents and the media.
<b>ii. Anticipated Project Schedule:</b> This Task will be initiated within three (3) months of completion of Consultant selection and continue throughout the grant period. The Stakeholder and Bi-lingual strategy groups will have their first meetings within six (6) months of QEP selection.
<b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, PIO, Community Development Department, City/County and State Health Departments, and QEP.
<b>iv. Output:</b> Outputs for this task will include a list of Stakeholder Group members, documentation from 19 quarterly stakeholder meetings and five (5) public meetings, a list of bilingual strategy group members, and a bilingual communication plan.
<b>Task/Activity: Re-Use/Area-Wide Planning</b>
<b>i. Project Implementation:</b> Brownfield re-use/area-wide planning will be conducted in the two (2) Target Areas, Eastside and Bessemer. Public meetings specific to each Target Area will be conducted.
<b>ii. Anticipated Project Schedule:</b> The planning projects will be prioritized and the first one will be initiated within the first year of the grant and completed by the end of the first grant year. The second project will be initiated by the end of year 1 of the grant and completed by the end of year 2.
<b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.
<b>iv. Output:</b> Outputs will be the two Re-use/Area Wide Plans and documentation of at least two public meetings specific to the planning process.
<b>Task/Activity: Environmental Assessments</b>

<p><b>i. Project Implementation:</b> The City will conduct at least one Phase I and one Phase II Environmental Site Assessments (ESAs) and Hazardous Materials surveys on eligible Priority Sites. All work will be conducted under the QEP’s approved Quality Assurance Project Plan (QAPP) and site-specific Sampling and Analysis Plans (SAPs) where applicable, and consistent with All Appropriate Inquiry (AAI) and with CDPHE’s Voluntary Cleanup Program (VCP) or other applicable statutes (e.g., asbestos, lead-based paint, etc.).</p>
<p><b>ii. Anticipated Project Schedule:</b> Assessments will be initiated throughout the grant based on Brownfield Advisory Committee recommendations, site eligibility, and priorities developed by the City during the Inventory and Brownfield Planning tasks.</p>
<p><b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.</p>
<p><b>iv. Output:</b> Outputs will include the approved QAPP, at least 14 Phase I ESAs, at least six (6) Phase II ESAs (including the SAPs), four (4) hazardous material surveys, and eligibility determinations for each site that is considered.</p>
<p><b>Task/Activity: Cleanup Planning</b></p>
<p><b>i. Project Implementation:</b> The City will conduct cleanup planning on at least one (1) site, likely starting with the El Centro Priority Site which may also include the development of an Analysis of Brownfield Cleanup Alternatives (ABCA). The cleanup plan(s) will be consistent with the CDPHE requirements and submitted for regulatory approval.</p>
<p><b>ii. Anticipated Project Schedule:</b> A cleanup plan for at least one (1) eligible Priority Site will be prepared by the end of the first year after QEP selection to allow for sufficient time for environmental assessments. Other clean-up plans will be prepared as needed throughout the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.</p>
<p><b>iv. Output:</b> Outputs will consist of at least one (1) approved cleanup plan.</p>
<p><b>Task/Activity: Cleanup</b></p>
<p><b>i. Project Implementation:</b> The City will clean up at least one (1) Priority Site which is owned by the City and identified as the El Centro site. After CDPHE and US EPA approve the cleanup plan, the City will prepare specifications and conduct Contractor bidding. This task will also include on-site supervision of the cleanup and completion reporting by the QEP.</p>
<p><b>ii. Anticipated Project Schedule:</b> The cleanup will occur after the assessment and cleanup planning tasks have been conducted, likely in year 2 after the QEP selection.</p>
<p><b>iii. Task/Activity Lead:</b> City Planning and Community Development Department Director, Senior City Planner, and QEP.</p>
<p><b>iv. Output:</b> Outputs to include bidding documents, completion report, and CDPHE approval for at least one cleanup.</p>

**b. Cost Estimates**

**Task 1 – Grant Administration: \$40,000:** The City will rely on the QEP for eligible programmatic tasks and will be providing grant administration. Costs for travel to at least three National Brownfield Conferences or other training are included.

**Task 2 – Brownfield Inventory: \$15,000:** The QEP is anticipated to prepare one (1) Brownfield Inventory for the Bessemer area and certain adjoining areas at a total cost of \$15,000.

**Task 3 – Community Engagement: \$37,000:** The City will rely on the QEP to lead this Task, with in-kind support from the City PIO, Community Development and Health Departments. It is anticipated that the QEP will lead a total of 19 Stakeholder group meetings at \$1,000/each and a total of five (5) public meetings at \$ 3,000/each. One bilingual communication plan will be prepared at a cost of \$3,000.

**Task 4 – Re-Use/Area-Wide Planning: \$200,000:** The QEP will lead this Task completing at least two (2) Re-Use Plans for the Target Areas of Eastside and Bessemer. A total of 20% of the grant is allocated to this task and it is estimated that \$100,000 will be allocated to each plan.

**Task 5 – Environmental Assessment: \$400,000:** The QEP will lead this task. It is anticipated that \$400,000 will be allocated to this task accounting for up to 14 Phase I ESAs at an average cost of \$5,000/each, one (1) QAPP at a cost of \$10,000, six (6) Phase II ESAs (including the SAPs) at an average cost of \$40,000/each and four (4) hazardous materials surveys at an average cost of \$20,000/each.

**Task 6 – Clean-Up Planning: \$10,000:** The QEP will lead this Task conducting cleanup planning on at least one (1) site for an average cost of \$10,000.

**Task 6 – Clean-Up: \$298,000:** The QEP will lead this task conducting cleanup on at least one (1) site. A total of \$298,000 is allocated to the cleanup task, which will include preparation of specifications, Contractor bidding, cleanup, project supervision, and completion reporting following CDPHE requirements.

Budget Categories		Project Tasks (\$)							Total
		Grant Administration	Brownfield Inventory	Community Engagement	Re-Use / Area Wide Planning	Environmental Assessment	Cleanup Planning	Cleanup	
Direct Costs	Personnel	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fringe Benefits	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Travel	\$ 6,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,000
	Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Supplies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Contractual	\$34,000	\$15,000	\$37,000	\$200,000	\$400,000	\$10,000	\$298,000	\$994,000
	Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Other	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Direct Costs		\$ 40,000	\$ 15,000	\$ 37,000	\$ 200,000	\$ 400,000	\$ 10,000	\$ 298,000	\$1,000,000
Indirect Costs		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**c. Plan to Measure and Evaluate Progress and Results**

The City is committed to maintaining strong collaboration across all EPA Brownfield grant-funded activities, emphasizing close monitoring of essential performance indicators and employment outcomes. The designated QEP will create and sustain a detailed project schedule outlining key goals, budget distribution, and deliverables. Regular monthly updates will be compiled to track the project's progress, shared with the EPA via the ACRES database. Should there be any deviation from pre-set benchmarks or timelines, joint meetings involving the EPA, City, and the QEP will be organized to address challenges, find solutions, and strategize on necessary adjustments to realign the project with its objectives. Early attention will be given to inventory and planning tasks to evaluate potential additional capacities in the Target Areas and other encompassed communities within the geographic boundary of the grant. Additionally, the City will oversee project advancements by gathering documentation from all contractors and consultants, sharing this data with the EPA through regular quarterly meetings, reports, and ongoing

correspondence. The collected information and benchmark tracking will be assessed at the BAC meetings and communicated through public media.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **a. Programmatic Capability**

###### **i. Organizational Capacity – and – ii. Organizational Structure – and – iii. Description of Key Staff**

The management team will meet monthly throughout the period of performance to ensure consistent progress toward goals and accountability to schedule, work plan, and budget. Meeting agendas will include updates on each project, and discussions of problems encountered and solutions (including resources). The Project manager will ensure that the team has the resources necessary to successfully complete the work plan. The Finance Department assists with all financial reporting for the quarterly and close out reports and the Mayor's Office and PIO will assist with public outreach and disseminating information.

Pueblo's Planning and Community Development Department will conduct the work of this project. The department is led by Acting Director Scott Hobson who has experience in environmental assessment and cleanup projects dating back to 1998. Mr. Hobson has experience on both Brownfield and Superfund projects and is an experienced project manager. He will serve as a conduit to the Mayor and City Council.

Wade Broadhead, Senior Planner will serve as project manager. Mr. Broadhead has 11 years with the City of Pueblo and served as Planning Director of Florence Colorado for 6 years. Previously, Mr. Broadhead worked with a USEPA Coalition assessment grant in Fremont County. As the project manager for the recent CWA grant in Pueblo, Mr. Broadhead attended the 2023 Brownfield Conference. He will develop the work plan and oversee its implementation; oversee the QEP procurement process; perform program management and reporting; lead the community involvement process and convene and lead the management team. Grant Compliance Manager Kayleigh McKenzie has bachelor's degree in accounting and specific training for her position.

The City will engage a QEP in accordance with the City's purchasing policies and all relevant federal statutes and regulations and the City's cooperative agreement with the EPA. The contracted QEP will lead the environmental assessments, remedial planning and reuse planning tasks; and will support City Staff in community outreach; Brownfield inventory and prioritization; and programmatic management. The City's PIO and others in the Office of the Mayor will assist as needed, especially for community engagement tasks.

###### **iv. Acquiring Additional Resources**

In addition to the QEP, the Project team has engaged project partners with subject matter expertise in areas of public health, urban renewal, historic preservation, real estate, economic development, and community outreach and more. The City does not anticipate any subrecipients for this project.

##### **b. Past Performance and Accomplishments**

###### **i. Currently Has or Previously Received an EPA Brownfield Grant**

Pueblo recently completed a community-wide assessment with a \$300,000 EPA award.

(1) Accomplishments

The prior CWA grant had major successes including the completion of 14 Phase I and 3 Phase II projects and clean-up planning for 3 sites. Cleanup planning was a conduit to receiving a FY2023 \$1Million EPA Brownfield Cleanup grant for the defunct Keating Middle School. The City utilized cleanup planning and assessments of 2 other large vacant buildings that posed public health hazards (Spann Elementary School and brunt down church) that are now being demolished and redeveloped for housing. An area-wide plan was prepared for the closure of Black Hills Power #5 and #6 power plant, engaging the local utility company and identified action steps needed for the City to potentially take ownership. Environmental assessments led to the sale of St. Patrick's Church, a local historic landmark. to a developer for housing. The City conducted two (2) public meetings and convened 5 BAC committee meetings. The team presented at the Colorado Municipal League Conference and the Colorado Housing Conference to share their Brownfield experience. City staff attended the national Brownfield Training Conference in 2023.

(2) Compliance with Grant Requirements

The City's recent CWA grant has finished all appropriate reporting on time; all funds were properly expended on eligible activities and all activities identified in the Work Plan were completed. Data has been uploaded to ACRES and 13 quarterly reports were submitted to the US EPA. The community-wide assessment was managed by Wade Broadhead under the supervision of Scott Hobson, both are key staff for this proposal.

**IV.F. Leveraging**

Funding made available from Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and Executive Order 12890, Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations has been secured and utilized to right some wrongs in Pueblo's red-lined communities. This project will also leverage a significant amount of administrative in-kind support from City staff. The Planning Director Hobson will contribute ~\$36,480 dollars in expertise to this effort (480 hrs @ \$76.00/hr). The Senior Planner will contribute ~\$69,120 dollars of expertise (1440 hrs @ 48.00/hr).

## US EPA Brownfields Grant, Multipurpose

### Threshold Criteria

1. The City of Pueblo, Colorado is a Home Rule Municipality incorporated in 1870.
2. The Planning Department together with the Mayor's Office and Public information officer (PIO) will work with partners such as the Pueblo County Health Department, Pueblo Urban Renewal Authority (PURA) and neighborhood organizations to inform and involve the community. In addition to leveraging the resources we developed during our FY 2020 Brownfield Community-wide Assessment grant, we will be engaging local Latinx community organizations to reach the new Target Areas that are the focus of this application. The FY2020 Community Wide Assessment conducted 12 phase 1 assessments, and provided clean up planning for three major sites, one of which was able to secure a \$1 million dollar clean up grant in 2023. The Brownfields Advisory Committee met regularly, and an Area Wide Plan was executed for the Black Hill #5 & 6 site, a closed power plant on the city's Riverwalk. The plan started a dialogue with the city about the utility leaving the site and potential reuses. We will conduct two area wide plans at the beginning of the grant and reconvene the Brownfields Advisory Committee (BAC) to share information with the community. Though most residents are not primary Spanish speakers, translation resources will be available on demand from the City of Pueblo. The project will conduct a kickoff city wide meeting at the start of the project and that meeting will be advertised via social and traditional media, TV, and bulletin boards to reach audiences. City Staff maintain a good relationship with local print and radio and television media and will utilize all channels to advertise meetings as well as hold them in locations, and during times that are convenient to citizens. The Mayor's Office and Planning Department maintain continual relationships with neighborhood and citizens groups and the project will use existing relationships to determine the best way to conduct public input and informational dissemination. The program will produce quarterly project updates made to the BAC and uploaded to the project website which will be continued from the previous CWA effort.

Target areas are: Y Zone: Downtown, Eastside and Bessemer neighborhoods. Census tracts Downtown Pueblo Census Tract 08101003500, Eastside Census Tracts 08101000800, 08101001000, 08101001100, 08101001200 and Bessemer Census Tracts 08101002000, 08101002100, 08101002200, 08101002300

3. The City owns the El Centro Del Quinto Sol community center property, and it is located at 609 E. 6<sup>th</sup> Street, Pueblo, CO, 81001. It was acquired by The City of Pueblo from Pueblo City Schools District 60 in 1972 according to the deed. The site has been owned since then and managed as part of the parks and recreation department. El Centro is located in the Eastside neighborhood in the Target

Area of the grant. Its renovation has been limited due to the presence of asbestos containing materials. The 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.

4. The City of Pueblo will conduct one cleanup at the priority site of El Centro Community Center (discussed on page 2 of the application), and at least one Phase II environmental site assessment (discussed on page 8 of the application). Plans for revitalization of the Y-zone have been developed starting in the 1960s. This project will augment earlier efforts with two Area Wide Plans for both the Eastside and Bessemer neighborhoods within the Y-zone Target Area early in the project (discussed on page 9 of the application).
5. As of October 1, 2023, 99.61% of the existing FY 2020 Brownfield community-wide assessment grant had been spent. The City has spent well over 70% of our budget for the existing grant. The Closeout report draft has been submitted to the EPA project manager and the project should be closed by the end of November 2023.
6. Not applicable. The City will not be awarding any money to sub recipients.





**COLORADO**  
Department of Public  
Health & Environment

November 6, 2023

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

Via email - [Wilson.Christina@epa.gov](mailto:Wilson.Christina@epa.gov)

RE: City of Pueblo - Multipurpose Grant Proposal for the City of Pueblo, Pueblo County, Colorado

Dear Ms. Wilson:

For the last 17 years, the Colorado Department of Public Health and Environment has worked in close cooperation with the City of Pueblo and Pueblo County on Brownfield related issues. The City of Pueblo has prioritized three major redevelopment zones, all of which are in Justice40 Communities, which are facing extreme shortages of affordable housing and homelessness. The housing issue combined with adjacent dilapidated and blighted commercial districts, has greatly affected these once vibrant areas of Pueblo. Redevelopment spurred by remediation of environmental concerns, to spur adjacent development and interest, is evident at the Pueblo River Walk portion of downtown Pueblo. As part of the ongoing cooperation between the City of Pueblo and CDPHE, I am writing to express our support of the City of Pueblo's FY2024 Brownfields Multipurpose Grant proposal.

The properties in this project are eligible and have some limited assessment data. The City of Pueblo has engaged the services of a Qualified Environmental Professional (QEP) in their previous and recently closed EPA Assessment Grant to ensure there is sufficient site characterization work carrying over to this potential award. The State of Colorado is also available to assist the City of Pueblo in conducting Phase 2 Assessments on these properties where needed. Review of the information submitted by the City of Pueblo indicated that site data, while limited, was sufficient to apply and be approved to the Voluntary Cleanup Program in the future when the time is appropriate.

Pending a successful proposal by the City of Pueblo, CDPHE has additional resources to assist completion of the activities outlined in the proposal. These resources range from technical and planning resources to financial resources to assist with cleanup. CDPHE has informed the City of Pueblo of the availability of these resources and can assist with the application process if requested.

In closing, I want to again express the department's support for the City of Pueblo's proposal. CDPHE looks forward to continuing our longstanding partnership with both the City of Pueblo and Pueblo County to effect redevelopment and revitalization of brownfields properties in this region of Colorado.

If you have any questions, please contact me at [mark.rudolph@state.co.us](mailto:mark.rudolph@state.co.us) or (303) 916-2179.

Sincerely,

Mark Rudolph  
CDPHE Superfund Project Manager and Brownfields Coordinator  
Hazardous Materials and Waste Management Division

