



November 13, 2023

1. Applicant Identification:

International Sonoran Desert Alliance
38 N. Plaza Street
PO Box 687
Ajo, AZ 85321

2. Funding Requested:

- a. Assessment Grant Type: Community-Wide
- b. Federal Funds Requested: \$500,000

3. Location:

International Sonoran Desert Alliance service area (10,500 square miles) in Arizona. Includes western Districts of the Tohono O’odham Nation, parts of Pinal, Yuma, and Maricopa Counties.

4. Target Area and Priority Site Information:

Target Areas

- Ajo, Arizona
- Gila Bend, Arizona
- Pisinemo District (census tract 04019941100, census data is not available for specific Tohono O’odham Nation Districts. This census tract is for the western half of the Nation which includes the Pisinemo District)

Priority Sites

- Former New Cornelia Hospital, 520 West Indian Village Road, Ajo, AZ 85321
- Stout Hotel, 113 East Pima, Gila Bend, AZ 85337
- San Manual Catholic Church Former School, Indian Rte 28, Pisinemo, AZ 85634

5. Contacts:

- a. & b. Project Director & Chief Executive

Aaron Cooper
Executive Director
38 N. Plaza Street
PO Box 687
Ajo, AZ 85321
520.387.3570
aaron@isdanet.org

- 6. Population:** ISDA: 16,597¹
 Target Area 1: Ajo, Arizona: 3,039²
 Target Area 2: Gila Bend, Arizona: 1,955³
 Target Area 3: Pisinemo District census tract 04019941100): 2,679⁴

7. Other Factors:

Provided Information on Other Factors	Page #
Community population is 10,000 or less.	5
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1
The priority site(s) is impacted by mine-scarred land.	1
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.	3,4
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	3,4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <u>Section I.B.</u> , for priority site(s) within the target area(s).	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. Letter from State of Arizona:

Attached

9. Releasing Copies of Applications:

Not Applicable

¹ EJ Screen – Draw an Area Tool

² US Census Bureau 2021 American Community Survey 5-Year Estimates

³ US Census Bureau 2021 American Community Survey 5-Year Estimates

⁴ EJ Screen Community Report Census Tract 04019941100



Katie Hobbs
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Karen Peters
Cabinet Executive Officer
Executive Deputy Director

October 30, 2023

Aaron Cooper
Executive Director
International Sonoran Desert Alliance
38 N. Plaza Street
Ajo, AZ 85321

Re: International Sonoran Desert Alliance (ISDA) - Brownfields Assessment Grant Support
Letter

Dear Mr. Cooper,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for the International Sonoran Desert Alliance (ISDA) for the Brownfields Assessment Grant (FY24) application to the Environmental Protection Agency (EPA) for the assessment of hazardous substances in and around the western Pima County area.

The target areas for the grant application include the towns of Ajo and Gila Bend, as well as the Picinimo District on the Tohono O'odham Nation. This will include conducting property inventories, planning, and Phase I and/or Phase II Environmental Site Assessments in those communities. ISDA has a proven track record of utilizing federal funds to help revitalize these rural communities and eventually provide needed economic benefits to our state.

This grant will allow these communities to continue to support environmental justice, climate adaptation and resilience, high-quality jobs, strong labor practices, and equitable workforce pathways, which are EPA priorities for this grant cycle.

Sincerely,

Travis Barnum

Travis Barnum, Brownfields Coordinator
Waste Program Division

Phoenix Office

1110 W. Washington St. | Phoenix, AZ 85007
602-771-2300

Southern Regional Office

400 W. Congress St. | Suite 433 | Tucson, AZ 85701
520-628-6733

azdeq.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields *i. Overview of Brownfield Challenges & Description of Target Area:*

The International Sonoran Desert Alliance (ISDA), a tri-national 501c3 organization, is applying for a \$500,000 EPA brownfields community wide assessment grant to address brownfields sites in the Northern Sonoran Desert. ISDA is an alliance of peoples from three Nations: the Tohono O'odham Nation, Mexico, and the United States. ISDA's US footprint area is about 10,500 square miles along the US/Mexico border that includes the Tohono O'odham Nation, Organ Pipe Cactus National Monument, Cabeza Prieta National Wildlife Refuge, Sonoran Desert National Monument, and the Barry M. Goldwater Airforce Range. The geographic area for this grant is the entire area served by ISDA, with an estimated population of about 16,597¹ with three distinct target areas: the unincorporated town of Ajo, the town of Gila Bend, and the Pisinemo District of the Tohono O'odham Nation. These areas are located within Western Pima and Southwestern Maricopa Counties and a shared struggle is overcoming the blight associated with the high poverty rate. Forty-five percent or greater (>45%)² of the population within Western Pima County alone have reported income below the poverty level. These target areas were selected by ISDA because we believe that without public funding the vulnerable structures will continue to deteriorate, which will increase the overall blighted conditions.

Ajo: Ajo is an isolated town, 40 miles from the Mexican border and has a long history of mining. In Ajo, housing was segregated by ethnicity and status. Anglos who oversaw mine operations were offered numerous styles and locations of homes in a master planned townsite, while Mexican laborers were offered a single choice within the "Mexican Town" and Native American workers were provided housing in the "Indian Village". Both towns were closest to the mine pit and destroyed after mining operations shuttered.³ The community of Ajo represents the negative impact resulting from the "Boom to Bust" economic cycle and associated mine scarred land. Ajo was a mining company town until the mid-1980s when the mine and smelter closed. The mine owned 80-90% of the property in Ajo⁴; the homes, the stores, the schools, and the hospital. The mine also employed most of the local residents. Unless they could afford to purchase their home from the mining company, they were forced to vacate causing a sharp population decline in the 1980s. The lack of employment and workforce housing caused a mass exodus, the community deteriorated and today is spotted with brownfields sites. This blight dis-incentivizes economic investment in the area, which perpetuates the elevated unemployment and poverty rates.

Gila Bend: Gila Bend, in Southwestern Maricopa County, owes its existence to its strategic location as a transportation crossroads connecting California and eastern destinations through the southern Arizona trails, rails, and roads. Its prosperity peaked from the early 1900s to the 1970s, serving as a popular rest stop for travelers due to its position halfway between Tucson and Yuma. The construction of Interstate 8 in the 1970s and the decline in passenger rail travel significantly impacted the community's travel-centric economy. Today, while Interstate 8 runs along the outskirts of Gila Bend, the town sees fewer travelers due to its declining state, no longer serving as the prominent stop it once was however, the rise in "Small Town Tourism" is a significant opportunity for Gila Bend. In 2022, Americans spent \$933 billion on domestic tourism (2% up on last year and growing)⁵. Appealing to tourists will transform Gila Bend's local economy and saving the Stout Hotel will be a significant benefit to Gila Bend as it will be the centerpiece around which other historic downtown buildings will be restored.

Pisinemo District, Tohono O'odham Nation: The Tohono O'odham Nation's documented history dates to 1535 in New Spain, encompassing regions in Mexico and much of the modern-day U.S. Southwest. In the 1800s, they cultivated the land that now constitutes their reservation. The Tohono O'odham reservation was officially established in 1917, attracting residents to the Pisinemo District during the 1900s with the construction of a mission school and the presence of a trading post. Today, the Pisinemo District has many vacant homes and buildings due to the lack of economic opportunity outside of being employed by the District.⁶ The District would like to create a downtown plaza to serve as a "makers space" and to do that, buildings need to be assessed before they can be renovated. The goal being the transformation of the former church school building into a community facility offering meeting space as well as lodging for visiting service groups.

ii. Description of the Priority Brownfield Site(s): Brownfields sites in our target areas range from a small former gas station in Gila Bend to the expansive 29,000 square foot former New Cornelia Hospital. There are 23 known water dischargers and 42 brownfields sites⁷ in our target areas. We estimate our target areas has at least another

¹ EJScreen 'Draw an Area' Community Report

² Pima County Geographic Information Systems, March 2023

³ Depot Park Design Plan, 2012.

<https://static1.squarespace.com/static/5e0144fd0435dd177bb77d3b/t/61428fabfcc5b43c92a3123a/1631752114090/Depot+Park+Conway+School+plan.pdf>

⁴ Ajo Community Comprehensive Plan, Pima County Board of Supervisors, 2001

⁵ <https://saveyour.town/survey-of-rural-challenges-2023-results/>

⁶ Sonoran Biosphere Regional Collective Branding Draft Report, March 2022, Stanley Cruz, Pisinemo District Chairman.

⁷ EJScreen

20 brownfields sites and likely more. Our top three priority sites are described below. For each site, grant funding is crucial to make a more informed decision on reuse strategies.

Former New Cornelia Hospital, Ajo: The hospital was built by the Phelps-Dodge mining company in 1919 and operated for nearly 70 years, closing soon after the mine shut down in 1985. This property was identified by the community as a place of historic importance. The owner passed away and the property is currently held up in federal tax court. Unless we act, it is unlikely any developments will occur on the property. ISDA purchased and redeveloped two other places of community importance, the former Curley School campus and town square plaza, and is interested in redeveloping the hospital. But due to its age and deterioration, ISDA is concerned about the potential for asbestos, lead, other hazardous substances, and petroleum products.

Stout Hotel, Gila Bend: Stout’s Hotel was built in 1916 with several additions through 1927. Multiple fires between 1976 and 1997 left only the most recent hotel building, former café, and the ruins of outbuildings. The existing 13,000 square foot building is a two-story building that included 26 guest rooms, “club rooms” on the second floor, a post office, café, and a pool hall in the basement. Gila Bend obtained ownership of the property in 2017 to preserve and redevelop it. A feasibility and architectural study was conducted in 2018. Community consensus was that the building should serve a variety of uses, similar to historic uses with a hotel and café, not the least being the center piece of historic downtown Gila Bend’s transformation. ISDA recognizes that the town of Gila Bend lacks the resources to accomplish the goal and that leveraging the grant funds to assess the property to better understand the costs associated with abatement and any other necessary hazardous material cleanup.

Former Church School, Pisinemo District: The San Jose Catholic Church includes the primary church buildings plus several other campus buildings. The Pisinemo District is interested in transforming the former church school into the center of a plaza operating as a community gathering space. The District envisions the property with a “ramada theme” to present a strong visual representation of togetherness, sense of community, and convening. The renovated school building would serve as an educational center and lodging for visiting service groups such as mobile healthcare services.⁸ This building would be the catalyst to transform into the heart of the community. The church campus turned community plaza would enhance the community’s pride of place. To accomplish this goal, a building materials assessment is required to evaluate the buildings’ condition and feasibility for redevelopment. Given its age, the likelihood of the presence of hazardous materials or conditions is high.

iii. Identifying Additional Sites: In addition to our top three priority sites, we have identified the sites in the table below as priorities.

Site Name, Location	Past Uses	Potential Contamination	Potential Future Use/Additional Information
Guest House Inn, Ajo	Bed & Breakfast	Asbestos, lead, heavy metal and PCB containing equipment (light switches, etc.)	Local clinic purchased. Potential housing for medical residency staff and/or workforce housing
Cornelia Hotel, Ajo	Hotel	Asbestos, lead, heavy metals, PCB containing equipment, haz. materials (light switches, boilers),	Boutique hotel, event center
Owl Café, Gila Bend	Restaurant	Asbestos, lead, septic system, oil water separators	Café. Next to the Stout Hotel.
Standard Station Gas Station, Gila Bend	Gas station and garage	Petroleum, lead, asbestos, heavy metal & PCB containing equipment	Site is across the street from the Stout Hotel
Machine Shop, Gila Bend	Machine Shop	Petroleum, solvents, asbestos, heavy metal & PCB containing equipment	Located in same corridor as Stout Hotel
El Coronado Motel, Gila Bend	Motel	Asbestos, lead, heavy metal and PCB containing equipment, hazardous materials	Potential housing

ISDA will lead community outreach activities to identify additional sites. We will conduct community meetings, meet with elected officials, and our partners identified in section 2.b. Community meetings will be hosted in a format with large scale maps where residents can place flags on the map to identify the locations of brownfields sites. Most of our communities, particularly on the Tohono O’odham Nation, have unnamed roads. Sites will be prioritized by redevelopment plans/potential, owner participation, impact on the community, if it is in a disadvantaged area as defined by the Community Environmental Justice Screening Tool (CEJST), and the health and welfare impacts of the site on the community. The steering committee will develop the final ranking criteria. We will keep our inventory with ranking criteria in an excel spreadsheet.

b. Revitalization of the Target Area *i. Reuse Strategy and Alignment with Revitalization Plans:* Our three priority sites were selected due to each community’s desire to redevelop these properties, the high-profile

⁸ Sonoran Desert Biosphere Region Collective Branding DRAFT Report - Summary and Notes March 2022
International Sonoran Desert Alliance FY24 EPA Brownfields Assessment Grant Application

locations of these sites (Stout Hotel is on the main street in Gila Bend. The New Cornelia Hospital sits atop a hill, visible from everywhere in Ajo. The hospital is a treasured building deeply imbued with shared community memories. A likely usage profile would be to establish a nursing home or other supportive senior housing facility to empower more of the senior community to age in place safely. The closest nursing home facility to Ajo is 90 miles away in Buckeye, AZ. An Ajo-based grassroots organization, Eldercare 85321, has been conducting surveys and building a case of support for increased resources for seniors in the Ajo area. This momentum could translate into strong advocacy for a supportive housing establishment for seniors. The church school is in the middle of the community), and the potential for contaminant exposure. The reuse strategy for our three priority sites is unique and will be fully defined through planning and outreach activities. Pima County's Economic Development Strategy⁹ for environmentally sustainable redevelopment will be the basis for the hotel in Ajo. We have engaged the assistance of the Center for Creative Land Recycling (CCLR), an EPA Technical Assistance to Brownfields contractor, to work with us to develop a site reuse assessment with a market study and financial analysis to determine a sustainable reuse. ISDA is currently working with multiple communities and organizations in its service area on the Sonoran Desert Biosphere Region Comprehensive Economic Development Strategy (CEDS). Once the CEDS is in its final stages and the region has determined its top needs and priorities, CCLR is going to complete a feasibility study of the top three potential reuses of the hospital. ISDA will then take these to the communities and conduct a series of community outreach events to help determine the highest and best use of the hospital. Additionally, Ajo is not incorporated, located in the middle of the Sonoran Desert and a border community. It is not ideally suited for developers, so ISDA acts as a development organization. For example, ISDA purchased Ajo's Town Plaza and Curley School and now operates the Sonoran Desert Inn and Conference Center, the Curley School apartments, and is the landlord for all the tenants in the Plaza. ISDA's proven success will transform the hospital for a sustainable use and continuation of the community's revitalization.

During development of the Stout Hotel feasibility study¹⁰, Gila Bend worked with community members to determine their vision for the old hotel. The consensus was the building should serve a variety of uses in general alignment with its history. Conceptual uses include a tourist center focusing on downtown historic buildings; a soda fountain to highlight the town's first local refrigeration unit for making ice; a conference center boutique lodging accommodation. The Stout Hotel is envisioned as the heart of Gila Bend's community revitalization.

The Pisinemo District wants to create a central plaza that recreates their historic sense of outdoor communal space. The District envisions renovating the old church school building to incorporate sleeping accommodations, a communal kitchen, and a gathering area¹¹. They envision building a ramada (shade structure with a roof and no walls) and kiosks as an homage to historical outdoor gathering spaces.

ii. Outcomes and Benefits of Reuse Strategy: The redevelopment of our target sites will spur economic activity and will not displace any residents or businesses. Redeveloping the former Pisinemo District church school into a communal gathering place for community and other service groups, will allow visitors meeting space as well as overnight lodging. Currently, there are no lodging accommodations in the Pisinemo District. Most importantly, this redevelopment will encourage communal gathering and enhance community pride. The Stout Hotel in Gila Bend will once again be a traveler's destination, bringing visitors off the interstate. The assessment grant will help create 17,000¹² square feet of space for redevelopment. The former New Cornelia Hospital will bring construction work to the small town of Ajo and allow for 26,566¹³ square feet of space to be redeveloped.

People of the Sonoran Desert understand the effect climate change is having on their daily lives. Redeveloping buildings like the former New Cornelia Hospital and Stout Hotel, which need many outdated building components replaced, provides an opportunity to incorporate water and energy saving measures. Electric bills can become cost prohibitive in summer due to the oppressive heat. Updating building features with energy efficient components lowers energy use and cost. For example, the U.S. Department of Energy estimates that replacing windows can lower costs up to 13%; replacing lighting can lower costs up to 75%; Replacing HVAC systems can lower costs up to 40%.¹⁴ Modern energy efficient units can lower energy costs and extend building use into the summer months. To realize these upgrades, the buildings must first be assessed and remediated of hazardous materials. Water saving measures go hand in hand with modernizing energy efficiency. Increased energy efficiency in combination with new source development such as solar works cooperatively with water

⁹ Pima County Economic Development Strategy 2023-2026, April 2023

¹⁰ A Feasibility Study of Stout's Hotel, Gila Bend, Arizona, Motley Design Group, June 2018

¹¹ As discussed in the Sonoran Biosphere Region Collective Branding Draft Report, March 2022

¹² Pima County Geographic Information Systems Parcel Search, <https://gis.pima.gov/maps/landbase/parsrch.htm>

¹³ Pima County Geographic Information Systems Parcel Search, <https://gis.pima.gov/maps/landbase/parsrch.htm>

¹⁴ <https://www.energy.gov/sites/prod/files/2017/03/f34/qtr-2015-chapter5.pdf>

conservation land use and renovation designs. In the paragraph below we discuss the communities' progress towards solar power scale generation and distributed use.

Gila Bend has created a Solar Field Overlay Zone¹⁵ to encourage distributed solar power for individual homes and businesses, as well as attract utility scale solar generation to serve the greater ISDA area. The community recognized eliminating blighted properties alone is not sufficient to secure its future. Climate resiliency must also be included in its long-term planning. In 2011, a Spanish solar power developer acquired several acres of agricultural land near Gila Bend. Developing this land for utility scale solar power generation did not displace residents but has increased the availability of renewable power for use throughout the ISDA area. Gila Bend is proud that the nearby Solana Generating Station, a solar utility scale power plant, was completed in 2013. When commissioned, it was the largest parabolic trough plant in the world, and the first U.S. solar plant with molten salt thermal energy storage. The project can produce up to 280 megawatts (MW) gross, supplied by two 140 MW gross (125 MW net) steam turbine generators: enough electricity to meet the needs of approximately 70,000 homes and reduce emission of roughly 475,000 tons of CO₂ every year.¹⁶ Gila Bend is committed to incorporating green energy solutions to all its projects. It does so through planning and zoning regulations. It prioritizes local economic growth, via the City's economic development plans, to reduce the need for residents to make long commutes for employment. Living and working within Gila Bend increases the quality of life as well as reduces energy use and greenhouse gas emissions.

c. Strategy for Leveraging Resources *i. Resources Needed for Site Reuse:* If additional assessment is needed at sites beyond what our grant funding can provide, we will apply for targeted brownfields assessments through Arizona Department of Environmental Quality (ADEQ) or the EPA. For abatement, ADEQ will be used as a resource through its abatement program. If the property owner is a non-profit or local government, as is the case with the Stout Hotel and the Pisinemo District's former church campus, the site may be eligible. ISDA will also consider applying for additional EPA brownfields assessment funds as well as cleanup and revolving loan funds. ISDA may also seek EPA Environmental Justice grant funding for blight reduction efforts including brownfields assessment and cleanup.

The Stout Hotel feasibility study provided potential funding sources for redevelopment including SHPO Historic Preservation Fund Grants, HUD grants, USDA grants, and USDOT grants. Also available are funds from the Arizona Community Foundation and state tax incentives. For Tohono O'odham Nation sites, we can assist them in applying for their own EPA MARC brownfields assessment and cleanup funding. An additional potential funding source is the Freeport-McMoRan Foundation. Freeport-McMoRan owns the mine and mining company that helped Ajo thrive and then led to its downfall. Freeport-McMoRan has taken an active role in financially helping Ajo with specific projects that benefit the community, and we would seek their assistance with brownfields redevelopment. For our entire region, we will also evaluate the resources of the University of Arizona's new WEST Environmental Justice Center, an EPA Environmental Justice Thriving Communities Technical Assistance Center. The University was awarded \$10 million to spend in three years and will have more information available on its direct service programs in early 2024.

ii. Use of Existing Infrastructure: Existing infrastructure in the target areas includes solar power as well as traditional electric, natural gas, and treated water and sanitary sewer infrastructure. Each of our priority sites has access to these services. The onsite buildings will also be reused. Access to broadband is not readily available in this region and is needed to sustain new businesses, residents, and visitors. Statewide, Gila Bend is in the 90th percentile, Ajo is in the 92nd percentile, and the western Tohono O'odham Districts are in the 97th percentile for lack of broadband access.¹⁷ ISDA will work with the target area communities and the Arizona Commerce Authority, through its Broadband Development Program and the U.S. Department of Agriculture (USDA) to develop a roadmap for broadband service. When additional infrastructure is needed, ultimately the property owner will be responsible, but ISDA will use its network of resources to assist in seeking outside funding if available.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need *i. The Community's Need for Funding:* The communities ISDA serves have little funding for assessment or cleanup of brownfields. Ajo, even though a town of 3,000, is unincorporated and Gila Bend only has a population of 1,955. The Pisinemo District has 748 District members living on the Reservation. As shown below, the median household income for Ajo lags Pima County and is nearly half that of Arizona. In Gila Bend, the median household income is \$34,000 less than Maricopa County and \$32,000 less than Arizona. The Tohono O'odham Nation median income is \$30,362. Poverty rates range from 16.1% to 48.8%.

¹⁵ Gila Bend General Plan 2026 Update, February 2017. <https://www.gilabendaz.org/DocumentCenter/View/462/Town-Of-Gila-Bend-General-Plan-2026?bidId=>

¹⁶ U.S. Department of Energy <https://solarpaces.nrel.gov/project/solana-generating-station>

¹⁷ EJSscreen

Demographic Comparison ¹⁸						
	Ajo	Gila Bend	Tohono O’odham Nation ¹⁹	Pima County	Maricopa County	Arizona
Population	3,039	1,955	7,361	1,043,433	4,496,588	7,151,502
Median Household Income	\$38,181	\$42,022	\$30,362	\$60,667	\$76,247	\$74,568
Poverty	16.1%	36.3%	48.8%	14.6%	7.9%	12.5%
Unemployment ²⁰	10%	3%	38%	6%	5%	4.0% ²¹

ii. *Threats to Sensitive Populations* (1) Health or Welfare of Sensitive Populations: Our sensitive populations include our Hispanic and Native American residents, those living in poverty, those without a high school degree, and those that may not speak fluent English. There is dire need in our region and the data shows it all too clearly.

Demographic Comparison ²²						
	Ajo	Gila Bend	Tohono O’odham Nation ²³	Pima County	Maricopa County	Arizona
Hispanic	46.4%	70.0%	3.8%	35.7%	30.1%	30.7%
Native American	6.1%	8.0%	91.6%	3.3%	1.9%	4.5%
Poverty	16.1%	36.3%	48.8%	14.6%	7.9%	12.5%
Language other than English spoken at home	23.3%	65.8%	26.1%	26.1%	26.2%	26.2%
Less than high school graduate (25+ years)	8.6%	30.6%	21.5%	9.7%	10.5%	11.1%

Gila Bend and the Pisinemo District are labeled disadvantaged according to the Climate and Economic Justice Screening Tool (CEJST). Gila Bend is identified as disadvantaged for being in the highest percentiles for asthma (91st) and diabetes (92nd), linguistic isolation (93rd), low median income (92nd), poverty (95th), low income (94th), and high school education (28%²⁴). The CEJST data for the Pisinemo District includes the entire western half of the Tohono O’odham Nation. The area is labeled as disadvantaged for energy costs (97th), health (asthma 99th, diabetes 96th, heart disease 98th), lack of indoor plumbing (99th), the presence of a formerly used defense site, low median income (95th), poverty (98th), unemployment (99th), lack of high school education (26%²⁵), and low income (99th). Our target areas are also in food deserts and lack access to transportation.²⁶

The proposed site reuse(s) will enhance the community’s access to healthcare as the traveling medical care services will have permanent locations in which to serve. An example is the proposed reuse of the former church school in the Pisinemo District. Traveling medical services is one of the “service groups” the revitalized community gathering space will accommodate. With ready access to medical care and space for providing nutritional education the community may see improved health of residents. The revival of historic downtown Gila Bend will allow space for farmer’s market events and community cooperative food sources to reduce the effects of food deserts. All these additional services also increase employment opportunities for local residents.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Our residents are burdened with higher incidences of diseases associated with contaminants found at brownfields sites. The table shows the health indicators where our target communities are in the 90th or near-90th percentile.

Health Indicator	State Percentile ²⁷		
	Ajo	Gila Bend	Tohono O’odham
Heart Disease	NA	78	93
Asthma	79	91	99
Cancer	87	31	43
Persons with Disabilities	98	77	72

Contaminants that may be found at our sites, such as asbestos²⁸ and heavy metals²⁹ are known to cause cancer and can exacerbate asthma. By assessing and abating asbestos at all three of our top priority sites, we will be reducing exposure to these contaminants.

¹⁸ US Census Bureau 2021 American Community Survey 5-Year Estimates

¹⁹ Data for Tohono O’odham Nation in Pima County. District specific information not available. Districts to be served are all in Pima County.

²⁰ EJScreen Community Reports

²¹ Arizona State Unemployment from US Bureau of Labor Statistics September 2023

²² US Census Bureau 2021 American Community Survey 5-Year Estimates

²³ Data for Tohono O’odham Nation in Pima County. District specific information not available. Districts to be served are all in Pima County.

²⁴ The slight difference in lack of high school diploma rates is due to the information sources (US Census 2021 data in table vs. CEJST)

²⁵ The slight difference in lack of high school diploma rates is due to the information sources (US Census 2021 data in table vs. CEJST)

²⁶ EJScreen Critical Service Gaps

²⁷ EJScreen Environmental and Socioeconomic Indicators Data

²⁸ <https://www.atsdr.cdc.gov/toxprofiles/tp61.pdf>

²⁹ <https://www.atsdr.cdc.gov/toxfaqs/tfacts2.pdf>

(3) Promoting Environmental Justice (a) *Identification of Environmental Justice Issues:* The environmental injustices our target communities have faced are nearly unimaginable. The sites in Gila Bend and the Pisinemo District are located within disadvantaged census tracts according to CEJST for the reasons described in Section 2.a.ii.(a). Ajo was originally built as three separate segregated towns created by the mining company; Mexican Town, Indian Village, and the predominantly Anglo town center³⁰. Indian Village abutted the open pit mine while Mexican Town was closer to the smelter. The smelter opened in 1949, pumping out sulfuric acid smoke. Residents said it made it hard to breathe and ruined the roofs of houses and cars³¹. Both Mexican and Indian towns were eventually bulldozed when the mine closed³². Ajo went from a town of 8,000 to around 3,000 today. Ajo suffered elevated levels of arsenic in groundwater (above Arizona’s high background arsenic concentrations) compared to other neighboring Arizona communities.³³ Today, Ajo is a tri-national community of Native Americans from the Tohono O’odham Nation, Hispanic population primarily from Mexico, and the white population, all working together focused on creative placemaking, keeping the historic community identity while revitalizing and changing the future.

The western portion of the Tohono O’odham Nation has Formerly Used Defense Sites (FUDS) munitions response sites where the Department of Defense (DOD) is not expected to investigate or conduct removal or remedial actions for an extended period³⁴. In 2018, the DOD created age-appropriate explosive safety awareness materials to inform children of what to do if they find ammo or a bomb. FUDS sites with unexploded ordinances, like the one on the Tohono O’odham Nation, may have lead and polyaromatic hydrocarbon contamination³⁵.

(b) *Advancing Environmental Justice:* An assessment grant will allow ISDA to advance environmental justice in the target areas and region. First, we will assess contaminants and develop cleanup plans so that resident exposures to contaminants can be reduced. The redevelopment at Stout’s Hotel will foster economic opportunities by providing mixed-use spaces, consequently generating fresh job prospects. The former church school in the Pisinemo District will be redeveloped into a community space with a kitchen and sleeping areas providing space for church and other service groups. Importantly, no residents or businesses will face displacement with the assessment, cleanup, or redevelopment.

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

Name of organization/ entity/group	Point of contact (name & email)	Specific involvement in the project or assistance provided
Ajo District Chamber of Commerce	Bo Johnson, Executive Director AjoCofC@AjoChamber.com	Business outreach, meeting announcements and information disseminations via Z89.3, the local radio station co-located with the Chamber.
United Way of Tucson and Southern Arizona	Elizabeth Cozzi, Associate VP Community Development ecozzi@unitedwaytucson.org	Connecting ISDA with funding opportunities and bring other non-profits to the table that it works with for brownfields site redevelopment
Local First Arizona	Katie McCown, Senior Manager of Econ. Dev. katie@localfirstaz.com	Assist ISDA with grant identification and application support. Specifically supporting community housing, water, utilities.
Pima County Community and Workforce Dept.	Dan Sullivan, Director Daniel.Sullivan@pima.gov	Assist with funding strategies for redevelopment.
Tohono O’odham Nation, Pisinemo District	Stanley Cruz, Pisinemo District Chairman, tanley.cruz@toua.net	Provide input and access to sites in the Pisinemo District, provide space for public meetings
Desert Senita Community Health Center	Dr. Daniel Barbara pei@desertsenita.org	As a trusted resource among residents, assist with outreach regarding potential health impacts associated with brownfields sites. Own Guest House Inn brownfields site. Will provide access to property for assessment.
Center for Creative Land Recycling (CCLR)	Claire Weston Claire.weston@cclr.org	Redevelopment planning (feasibility study) at the New Cornelia Hospital.

³⁰ National Endowment for the Arts, Ajo, AZ: Ajo Masterplan. <https://www.arts.gov/impact/creative-placemaking/exploring-our-town/ajo-az-ajo-masterplan>

³¹ Ajo History Book #2, Legends of Ajo, Bob Hightower, 2020.

³² Depot Park Design Plan, 2012.

<https://static1.squarespace.com/static/5e0144fd0435dd177bb77d3b/t/61428fabfcc5b43c92a3123a/1631752114090/Depot+Park+Conway+School+plan.pdf>

³³ Environmental arsenic exposure, selenium and sputum alpha-1 antitrypsin, Journal of Exposure Science & Environmental Epidemiology, published July 10, 2013

³⁴ US Army Corp. of Engineers, LA District, “District partners with Tohono O’odham Nation to promote explosives safety” published March 25, 2019.

<https://www.spl.usace.army.mil/Media/News-Stories/Article/1794523/district-partners-with-tohono-oodham-nation-to-promote-explosives-safety/>

³⁵ Arizona DEQ Formerly Used Defense Sites Fact Sheet. <https://www.azdeq.gov/DOD/FUDS>

Town of Gila Bend	Katherine Valenzuela, Town Manager kvalenzuela@gilabendaz.org	Provide input and access to sites in the Pisinemo District, provide space for public meetings
Arizona Department of Environmental Quality	Travis Barnum Barnum.travis@azdeq.gov	Participate in selected outreach events to illustrate the “bridge” between assessment and cleanup. Provide insight into ADEQ remediation resources.
ISDA Business Support Center	Cristal Franco, Manager cristal@isdanet.org	Business outreach and resource dissemination. Assist in facilitating public meetings.
Victor Garcia and Klaila Neblina	victorkgarcia4@gmail.com	O’odham language interpretation.
Tribal TAB Services: CCLR or KSU	(EPA has not yet selected the new Tribal TAB contractor)	Assist with redevelopment planning and community engagement on Tohono O’odham Nation

iii. Incorporating Community Input: ISDA has strong connections to community members and communities in each of the target areas as well as the greater region. Our board is a diverse set of community, business, government, and non-profit representatives and will serve as our brownfields steering committee. We will announce our grant award via social media and through our board of directors to disseminate to their representative areas. Our communities are rural and often word-of-mouth will get you further than official announcements. We will host one public meeting in each target area within six months of award. The public meetings will be advertised three weeks in advance through a newspaper advertisement, social media (Facebook and Instagram), and the local radio station. At these kick-off meetings we will announce the grant award, describe the program, and discuss strategy to engage landowners and the public and address questions about the program. Then to continually engage stakeholders, we will host at least one meeting per year in a workshop style format. We will provide a project update and then ask for public input. As an organization dedicated to creative placekeeping, it is the community that helps determine what is important to that community and what needs the community has. We will also develop a website designed for easy user access of information, contacts, and upcoming public events. Additionally, we will develop informational guides for distribution including fliers and brochures. We will create one overall project factsheet and one for each site assessed. For meetings and physical information, we will provide information in English and Spanish, as well as O’odham when needed. We use several means for translation services. Often, we use Google Translate when translating documents into Spanish and have our bi-lingual staff review it to ensure it is appropriate and easily understandable by the local community. When live interpretation services are needed in Spanish, we hire an outside firm. For O’odham translation, we rely on two Tohono O’odham Nation members, an elder and a young person. The elder is best in translating verbally, while the young person is best with documenting the translation on paper. Combined, they work together and can meet the need for any O’odham translation in the local dialect. As a rural area, in person meetings are well attended, but we also offer a hybrid meeting option whenever infrastructure allows to maximize participation.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs: ISDA is not using funds for participant support costs or subawards. Additionally, there are no non-EPA grant resources needed to implement the tasks and activities.

Task/Activity: Programmatic Activities	
<i>i. Project Implementation:</i>	Prepare work plan, procure QEP, manage and oversee project, reporting (ACRES, DBE, quarterly, annual), attend 2 EPA, 1 regional brownfield conferences
<i>ii. Anticipated Project Schedule:</i>	Workplan completion upon award of the cooperative agreement. Procurement and selection of QEP within 4 months of cooperative agreement. Quarterly reports submitted within 30 days after reporting period and ACRES reporting conducted for site updates. Continuous project oversight, obtaining site access and submitting site eligibility forms.
<i>iii. Task/Activity Lead:</i>	ISDA with QEP assistance
<i>iv. Outputs:</i>	1 QEP, 1 work plan, 16 quarterly progress reports for 4-year grant, DBE reports, updated property profile forms in ACRES, 4 annual reports, final report.
Task/Activity: Community Outreach	
<i>i. Project Implementation:</i>	At least one public meeting in each target area annually. Board/Steering committee meetings. Small-scale meetings with local stakeholders. Community outreach through ISDA website, board of directors outreach, newsletter, radio, press releases, social media. Develop brownfields webpage.
<i>ii. Anticipated Project Schedule:</i>	First round of public meetings within first 6 month of cooperative agreement. Additional meetings at least annually. Steering committee meetings quarterly, small-scale meetings regularly and as needed. Press releases, social media, radio updated quarterly or as needed.
<i>iii. Task/Activity Lead:</i>	ISDA with QEP assistance

iv. Outputs: 12 target area public meetings with minutes, 16 steering committee meetings with minutes, documentation of press releases, social media posts, newsletters

Task/Activity: Site Assessment

i. Project Implementation: Completion of programmatic QAPP, Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for EPA approval. Phase I ESAs conducted in accordance with All Appropriate Inquiry (ASTM E1527-21). Phase II ESAs conducted in accordance with ASTM E 1903-19. Regulated building material surveys will be completed in accordance with National Emission Standard for Hazardous Air Pollutants (NESHAP). AHERA training for ISDA registered apprenticeship program.

ii. Anticipated Project Schedule: First Phase I ESA completed within 3 months of QEP procurement, other Phase I ESAs as sites are selected. QAPP submitted to EPA within 4 months of QEP procurement. SAP/HASP submitted to EPA within 2 months of QAPP approval. First Phase II ESA will begin within one month of EPA SAP approval. Assessments on other sites following appropriate approval will commence throughout the grant period. AHERA training will commence in year one of the grant.

iii. Task/Activity Lead: QEP

iv. Outputs: 13 Phase I ESA reports, 3 SAPs, 3 HASPs, 3 Phase II ESA reports, 5 regulated building material survey reports, 1 former New Cornelia Hospital assessment report

Task/Activity: Cleanup/Reuse Planning

i. Project Implementation: Cleanup and reuse will be evaluated following the results of Phase II ESA data based on potential reuse scenario(s). Remedial actions are evaluated on cost, intended use, feasibility, and effectiveness in protection of human health and environment. Completion of cleanup plans which include the components of an analysis of brownfields cleanup alternatives (ABCA). Corridor study in Gila Bend. Site-reuse plan for former church school building.

ii. Anticipated Project Schedule: Corridor and site-reuse studies will begin within 18 months of the cooperative agreement. Cleanup plans completed as needed within 90 days after Phase II complete.

iii. Task/Activity Lead: ISDA with QEP and architectural assistance

iv. Outputs: 5 ABCAs, 1 corridor study, 1 site-specific reuse plan

b. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1: Prog.	Task 2: Outreach	Task 3: Assessment	Task 4: Cleanup/ Reuse Planning	
Direct Costs	Personnel	\$36,000	\$3,200	\$28,800	\$3,200	\$71,200
	Fringe Benefits*	\$10,800	\$960	\$5,760	\$960	\$18,480
	Travel	\$7,000				\$7,000
	Supplies		\$2,295			\$2,295
	Contractual	\$14,500	\$21,025	\$280,500	\$85,000	\$401,025
Total Direct Costs		\$68,300	\$27,480	\$315,060	\$89,160	\$500,000
Indirect Costs		-	-	-	-	-
Total Budget		\$68,300	\$27,480	\$315,060	\$89,160	\$500,000

*ISDA fringe rate is 30% for tasks 1, 2, & 4. Fringe rate is 20% for Task 3 as this is for the apprenticeship program. This grant will not use participant support costs or subawards.

Task 1 – Programmatic Activities \$68,300: Personnel: 900 hours @ \$40/hour = \$36,000 * Fringe: Calculated at 30% of personnel = \$10,800 * Travel: National: 2 National Brownfields Conferences (\$500 flight, \$1,200 hotel, \$300 per diem, \$300 transportation and misc. = \$2,300 x 2 conferences = \$4,600 * Regional: \$2,400 = mileage at \$0.655/mile x 2000 miles = \$1,310, \$1,090 for hotels, per diem, other misc. expenses * Contractual: QEP @ \$145/hour x 100 hours = \$14,500.

Task 2 –Community Outreach \$27,480: Personnel: 80 hours @ \$40/hour = \$3,200 * Fringe: Calculated at 30% of personnel = \$960 * Supplies: \$2,295 for printing, postage, paper, and other supplies * Contractual: QEP @ \$145/hour x 145 hours = \$21,025

Task 3 – Site Assessments \$315,060: Personnel: 160 hours @ \$18/hour for apprentices = \$28,800 * Fringe: Calculated at 20% for apprentices = \$5,760 * Contractual: 13 Phase I ESAs @ \$5,000 each. Due to the rural and isolated locations, the cost for a Phase I is higher than a typical Phase I. * 1 Phase II ESA including building materials assessment at the former New Cornelia Hospital: \$75,000 * 3 Phase II ESAs averaged at \$28,000 each = \$84,000 * 5 Building material investigations @ \$7,000 each = \$35,000. BMI costs are elevated due to the rural and isolated location. *1 QAPP: \$6,500 * AHERA asbestos inspector training: 10 participants @ \$1,500/participant = \$15,000. Costs estimated developed by an environmental consultant.

Task 4 – Cleanup/Reuse Planning \$89,160: Personnel: 180 hours @ \$40/hour = \$3,200 * Fringe: Calculated at 30% of personnel = \$960 * Contractual: 1 Corridor Reuse Plan in Gila Bend: \$45,000, 1 Site Specific Plan for New Cornelia Hotel: \$15,000, 5 ABCAs at \$5,000 each = \$25,000. Costs estimated developed by an environmental consultant.

c. Measuring Environmental Results: ISDA’s program manager will use an excel spreadsheet for internal tracking purposes. Corrective actions will be taken immediately to minimize delays and grant progress will be reported to and monitored by the steering committee. The program manager will meet quarterly with the steering committee to evaluate and make necessary adjustments to the project. While the number of completed Phase II ESAs and corrective action plans will also be used as measures of success, their number and cost to complete will be dependent on the outcome of Phase I ESAs. ISDA will enter site specific data into the ACRES database. Quarterly reports will be submitted to the EPA Region 9 Project Officer (via ACRES) within 30 days of the previous reporting period. ISDA, along with its QEP, will ensure that the following measures of success are tracked and documented: assessment start and completion dates and amount expended per assessment; properties with brownfields redevelopment activities underway; cleanup & redevelopment dollars leveraged; jobs leveraged; properties with cleanup activities started and completed; and those without cleanup. Quarterly progress reports will include modifications to the work plan; project activities relative to the EPA grant; task progress/schedule; site identification and targeted sites; cleanup redevelopment activity; summary of expenses by category; and other financial assistance leveraged. Electronic copies of all Phase I, Phase II, and corrective action plans completed during the quarter will be forwarded to the EPA Project Officer via email within a week of completion.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability *i. Capacity ii. Structure iii. Description of Key Staff:* ISDA is governed by a 13-member board of directors representing the indigenous and non-indigenous populations that ISDA serves. ISDA was founded in 1993 and has managed federal, state, and local funding since then as well as being the recipient of private foundation grants. Today ISDA’s budget is approximately \$1.34 million. Of this, 77% is from earned income from the Ajo Plaza, Sonoran Desert Inn and Conference Center and Curley School, 15% is government grants, 6% is foundation grants and the remaining 2% is from individual and corporate giving. Nearly 90% of ISDA’s funding is expended directly for programming. ISDA’s board oversees all financial activities of the organization and board members have the background to provide this oversight and assistance. ISDA has an annual third-party audit with no findings for more than 10 years. The board includes members with experience in banking/finance, real estate, business ownership, and the public sector. ISDA employs 13 full-time and 17 part-time staff that manage the business operations as well as operations at the Convention Center, School, and the Ajo Business Support Center and Co-Working Space.

This grant will be managed by Aaron Cooper, Lydia Larremore, and Kenneth Schoof. Aaron Cooper began as ISDA’s Executive Director in 2016 and as a small organization he wears many hats. He oversees the annual operating budget and is responsible for all funding implementation and reporting. Prior to being the Executive Director, Aaron was ISDA’s Director of Economic Development Programs. He led multiple redevelopment projects including the transformation of the former elementary school into the Sonoran Desert Inn and Conference Center. For redevelopment of the Sonoran Desert Inn & Conference Center, he successfully managed at least six funding sources for a successful project. Aaron has a BS in Mathematical Sciences from the University of Texas at Dallas. Lydia Larremore is an Ajo native and dedicated to her community. She is bilingual in Spanish and will assist in providing information in Spanish to residents in the ISDA region. She is well respected throughout the community and will assist with public outreach activities and acts as a trusted member of the community. She will assist Aaron with the office functions of managing the grant, helping respond to inquiries, and assisting with quarterly reporting. Lydia has over 20 years of experience working as a business manager. Kenneth Schoof is a Senior Project Manager for ISDA, overseeing facilities maintenance at ISDA owned property. Kenneth will assist with contractor selection and be the primary contact for site access at ISDA owned sites. He has 43 years of multi-faceted trades experience, and his institutional knowledge will be helpful for asbestos and lead assessments.

iv. Acquiring Additional Resources: ISDA uses a qualifications-based selection process that complies with the Arizona Procurement Code (A.R.S. 41-2501 et. seq., and administrative rules and regulations A.A.C. R2-7-101 et. seq.) and federal (2 CFR Part 200) procurement requirements. ISDA regularly uses this process to solicit proposals and bids according to its procurement policy. All ISDA bid opportunities are published in the Daily Territorial, a regional publication. We will use this process to select a QEP to complete grant activities. Should additional consultants or subcontractors be necessary, ISDA will use the same procurement process followed during the initial search for the QEP. ISDA will also receive support from the previously mentioned community partners in Section 2(b)(i-ii) and will use the services provided by the Technical Assistance to Brownfields (TAB) program as needed. To engage the community, we plan to work with our Registered Apprenticeship Program to provide

EPA AHERA certification training for local residents. Our Apprentice-to-Journeyman program is a three-year (4,000 hour) paid apprenticeship program sponsored by ISDA. Registered with both the Arizona State Apprenticeship Office and the U.S. Department of Labor, apprentices are mentored by area handymen learning the basics of various building trades while working on both repair and renovation projects within Ajo and surrounding communities. AHERA asbestos inspection certification would complement this program and would have our apprentices work with the QEP on the hospital assessment for paid on-the-job training. After that, our Business Development Center will help place apprentices who complete their full program into paid jobs. The newly trained and certified workforce would work with assessment, construction and abatement companies hired to complete renovation activities. This workforce training element would provide employment opportunity and help local companies maintain staff, which can be difficult in the rural community of Ajo.

b. Past Performance and Accomplishments *ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements* (1) Purpose and Accomplishments: ISDA regularly receives federal, state, and local assistance agreements. The descriptions below provide recent examples of these awards, their purpose, and measures of success.

US Department of Health & Human Services: Community Economic Development Grant (CEDG) Amount: \$500,000, Project Period: 9/30/2016 – 9/29/2022: In the 1940s, an elementary school was constructed on the Curley School campus as a part of an overarching ‘city beautiful’ town center. ISDA purchased the former elementary school in 2006 and in 2015 worked with Tucson architect Rob Paulus and his ‘Southwest Industrial’ design aesthetic to transform the former school building into the Sonoran Desert Inn & Conference Center. The CEDG grant allowed for the expansion of the Sonoran Desert Inn’s three new guest suites, new laundry facilities, and augmented staffing to strengthen operations. The changes resulted in seven new businesses (one coffee roasting business, one mobile food cart vendor, and four catering businesses), two businesses were expanded, 11 full-time jobs were created and 22 part-time jobs. An additional \$110,000 was leveraged through loans and a contribution from the Southwest Center at the University of Arizona to create a learning garden in the courtyard.

USDA Arizona State Office: Rural Business Development Grant, Amount: \$268,236, Project Period: October 2022 – September 2026: ISDA operates a small-business co-working space, and this grant enables us to expand the facility into a fully functioning business support center with wrap-around services and flexible facilities designed to activate and support entrepreneurs. The grant covers the architectural and engineering costs to develop a 12,000 square foot space from an un-redeveloped space on the second floor of a historic structural originally constructed in 1917. To date, we have expended \$35,000 of the grant and the design phases are nearing completion. We had project delays due to a structural concern with the roof but an intervention has been designed so the project can move forward. Permitting and construction bidding is moving forward with construction anticipated to begin in the first quarter of 2024.

US Small Business Administration, Amount: \$400,000, Project Period: June 1, 2023 – May 31, 2024: This grant leverages the achievements of the Rural Business Development Grant to facilitate the expansion of our small business facility into the Ajo Business Support Center and Co-Working Space. Notably, this grant is earmarked for the construction phase of the redevelopment, which has encountered delays due to the structural roof integrity concerns. Because of these delays we have not drawn down grant funds yet but anticipate beginning in early 2024.

(2) Compliance with Grant Requirements: *US Department of Health & Human Services: CEDG:* ISDA expended all the grant funds allocated and submitted the semi-annual reports on-time. We successfully met the anticipated outcomes outlined in the grant application. However, our project timeline experienced delays due to the suspension of construction activities amid the COVID-19 pandemic. In response, we applied for and received a one-year extension at no additional cost, which allowed us the necessary time to accomplish the grant-related tasks. The final grant report presents the outcomes and achievements of the grant project.

USDA Arizona State Office: Rural Business Development Grant (RBDG): ISDA submitted all quarterly reports on-time. The initial grant end date was set for September 30, 2023. While conducting engineering design work, structural issues related to the roof were identified, causing a delay in the project. The engineering team developed a solution to guarantee the roof’s structural integrity. During this process, we maintained open communication with the RBDG staff, keeping them informed of the situation and we are in the process of securing a no-cost time extension for the grant. These changes are documented in the final engineer’s report.

US Small Business Administration (SBA), Ajo Business Support Center and Coworking Space: ISDA entered into the cooperative agreement with the SBA but because of construction delays has not been able to spend the funds. No reporting is required until funding is expended but we communicate with our project officer regularly.

THRESHOLD CRITERIA

International Sonoran Desert Alliance

1. **Applicant Eligibility:**

- a. The International Sonoran Desert Alliance (ISDA) is a non-profit organization with tax-exempt status under section 501(c)(3) of the Internal Revenue Code. Documentation of non-profit status is attached.
- b. ISDA is a 501(c)(3) organization and not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. **Community Involvement:** ISDA has strong connections to community members and communities in each of the target areas as well as the greater region. Our board is a diverse set of community, business, government, and non-profit representatives and will serve as our brownfields steering committee. We will announce our grant award via social media and through our board of directors to disseminate to their representative areas. Our communities are rural and often word-of-mouth will get you further than official announcements. We will host one public meeting in each target area within six months of award. The public meetings will be advertised three weeks in advance through a newspaper advertisement, social media (Facebook and Instagram), and the local radio station. At these kick-off meetings we will announce the grant award, describe the program, and discuss strategy to engage landowners and the public and address questions about the program. Then to continually engage stakeholders, we will host at least one meeting per year in a workshop style format. We will provide a project update and then ask for public input. As an organization dedicated to creative placekeeping, it is the community that helps determine what is important to that community and what needs the community has. We will also develop a website designed for easy user access of information, contacts, and upcoming public events. Additionally, we will develop informational guides for distribution including fliers and brochures. We will create one overall project factsheet and one for each site assessed. For meetings and physical information, we will provide information in English and Spanish, as well as O’odham when needed. We use several means for translation services. Often, we use Google Translate when translating documents into Spanish and have our bi-lingual staff review it to ensure it is appropriate and easily understandable by the local community. When live interpretation services are needed in Spanish, we hire an outside firm. For O’odham translation, we rely on two Tohono O’odham Nation members, an elder and a young person. The elder is best in translating verbally, while the young person is best with documenting the translation on paper. Combined, they work together and can meet the need for any O’odham translation in the local dialect. As a rural area, in person meetings are well attended, but we also offer a hybrid meeting option whenever infrastructure allows to maximize participation.

3. **Expenditure of Assessment Grant Funds:** ISDA does not have an open US EPA Brownfield Assessment Grant or Multipurpose Grant.

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