NARRATIVE INFORMATION SHEET
FY22 ASSESSMENT GRANT PROPOSAL, EPA BROWNFIELDS PROGRAM

1. Applicant Identification
   County of Missoula
   200 West Broadway
   Missoula, MT 59802

2. Funding Requested
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested:
      i. Requested amount: $500,000
      ii. Site-specific Assessment Grant Waiver: Not applicable

3. Location
   Missoula County, Montana (outside City of Missoula incorporated area)

4. Target Area and Priority
   Site/Property Information
   Our Target Areas are East Missoula, Bonner, West Riverside, Milltown, Piltzville and Fort Missoula/Target Range. These Target Areas are within Census Tracts 4, 9.01, 14.01, and 14.02.
   Priority Site Addresses:
   • East Missoula Town Center Complex (3 sites)
     o 3655 Hwy 200, East Missoula, 59802
     o 428 Minnesota Avenue, East Missoula, 59802
     o 3747 Hwy 200, East Missoula, 59802
   • Mt. Jumbo School
     o 735 Michigan Avenue, East Missoula 59802
   • Bonner West Log Yard
     o 8129 Cowboy Trail, Milltown, 59851
   • Bitterroot Gravel Mine
     o 2800 40th Avenue, Missoula, 59804

5. Contacts
   a. Project Director
      Name: Sindie Kennedy
      Title: Brownfields Program Manager – Missoula County
      Phone Number: 406-258-3688
      Email Address: skennedy@missoulacounty.us
      Mailing Address: 200 West Broadway, Missoula, MT 59802
b. Highest Ranking Elected Official
Name: David Strohmaier
Title: Chair, Missoula Board of County Commissioners
Phone Number: 406-258-4877
Email Address: bcc@missoulacounty.us
Mailing Address: 200 West Broadway, Missoula, MT 59802

6. Population
Missoula County (unincorporated) – 44,084\(^1\)
- East Missoula – 2,111\(^2\)
- Bonner-West Riverside-Milltown-Piltzville – 2,079\(^2\)
- Fort Missoula-Target Range – 5,847\(^2\)

7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Community Population is 10,000 or less</th>
<th>4</th>
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<tbody>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>1</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td>1 through 5</td>
</tr>
<tr>
<td>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).</td>
<td>1 through 4, 6, 7, 9</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>3</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficient measures.</td>
<td>3</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority brownfield site(s) within the target area.</td>
<td>Not Applicable (Total in-kind planning contribution is $552,885.)</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>Not Applicable</td>
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8. Letters from State and Tribal Environmental Authorities
Letters from the Montana Department of Environmental Quality (MDEQ) and from the Confederated Salish & Kootenai Tribes (CSKT) are attached to this Information Sheet.

9. Releasing Copies of Applications
Not Applicable. No portions of the application are confidential, privileged, or contain sensitive information.

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1 U.S. Census Bureau Quick Facts Population Estimate, 2019. Includes East Missoula (population 2,111), Bonner, West Riverside, Milltown and Piltzville (population 2,079) and Target Range (5,847)
2 U.S. Census Bureau ACS 2019 5-year Population Estimates
November 17, 2021

Sindie Kennedy
Brownfields Coordinator
Missoula County Grants and Community Programs
200 W. Broadway
Missoula, MT  59802

RE:  Letter of Support: Missoula County’s Brownfields Assessment Grant Application

Dear Ms. Kennedy:

I am writing to express Montana Department of Environmental Quality’s (DEQ’s) support for Missoula County’s efforts to obtain a U.S. Environmental Protection Agency Brownfields Assessment Grant.

I understand that the assessment funds will be used to assess hazardous substance and petroleum Brownfields sites along the East Missoula and Milltown riverfront corridor and on the Flathead Reservation within the Missoula County boundary. These sites have promising redevelopment potential due to a thriving emerging economy that includes recreation, entertainment, home-based manufacturing and industries that utilize innovative renewable-energy technology. The DEQ supports Brownfield’s efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about petroleum brownfield sites, please feel free to call Brandon Kingsbury at 406-444-6547 or email him at bkingsbury@mt.gov. If you have any questions or comments about hazardous substance brownfields sites, please contact Jason Seyler at (406) 444-6447 or jseyler@mt.gov.

Sincerely,

Jenny Chambers, Administrator
DEQ Waste Management & Remediation Division

cc: Jason Seyler; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; jseyler@mt.gov
Brandon Kingsbury; Petroleum Brownfields Coordinator; Petroleum Technical Section; bkingsbury@mt.gov
Missoula Board of County Commissioners  
199 West Pine Street  
Missoula, Montana 59802

Re:  Letter of Acknowledgment  
Missoula County Brownfields Assessment Grant Application

Dear Commissioners Strohmaier, Slotnick and Vero:

As the Tribal Environmental Authority, we are writing to acknowledge that Missoula County plans to conduct assessment activities and is planning to apply for FY22 Federal Brownfields Assessment grant funds. The County has informed the Confederated Salish and Kootenai Tribes that a portion of the funds will target sites within the portion of Missoula County that overlaps the Flathead Indian Reservation. The Confederated Salish and Kootenai Tribes (CSKT) and Missoula County have agreed to partner on the assessment of eligible fee sites on the Flathead Indian Reservation that are also within the Missoula County boundary. Missoula County and CSKT have a long-standing, active partnership and look forward to collaborating on assessing brownfield sites in the Evaro community. The community of Evaro is part of the Flathead Reservation and is within Missoula County limits. The county has identified at least two potential brownfield sites in Evaro that are good candidates for brownfield assessments. CSKT supports brownfields revitalization efforts on the Flathead Reservation and wishes to promote assessment and cleanup planning activities that allow contaminated properties to be put into productive use. It is of mutual benefit for Missoula to obtain a brownfields assessment grant.

If you have any questions or comments please feel free to contact our CSKT Brownfields Tribal Response Program at: (406) 883-2888 Ext. 7215, MaryRose.Morigeau@cskt.org

Sincerely,

Richard Janssen, Head  
Department Head Natural Resources

cc: Shelly R. Fyant, Chairwoman, Confederated Salish & Kootenai Tribes - shelly.fyant@cskt.org  
MaryRose Morigeau, CSKT NRD Brownfields TRP – maryrose.morigeau@cskt.org  
Willie Keenan, Division Manager, NRD Environmental Protection – willie.keenan@cskt.org  
Sindie Kennedy – Grants Administrator, Missoula County – skennedy@missoulacounty.us
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

Missoula County, Montana requests a $500,000 Assessment Grant to help revitalize large properties for affordable housing, business startup space, and equitable recreation access for low-income communities. Our target area is unincorporated riverfront neighborhoods at the edge of our only city. Specifically, we have a five-mile stretch of former timber industry communities in the narrow Clark Fork River valley from Hellgate Canyon to confluence with the Blackfoot River, and a large gravel mine redevelopment opportunity on the Bitterroot River. Associated neighborhoods include East Missoula, West Riverside, Milltown, Bonner, Piltzville, and Fort Missoula/Target Range. Our Utility Service Area covers these neighborhoods, but brownfields blight and contaminant concerns leave them teetering between infill redevelopment or decay.

Our county’s landscape covers 2,600 square miles and consists of populated river valleys below forested mountains and alpine wilderness. Our rivers were key to early industry. In 1886, E.L. Bonner and business partners established the first industrial sawmill in Montana at the confluence of the Blackfoot and Clark Fork Rivers at the upstream edge of our target area. The Salish, Kootenai, and Qlispe people used these rivers since time immemorial, and were driven north to the Flathead Indian Reservation as early industry expanded. Our riverfront target area’s neighborhoods formed around dozens of sawmills and wood treatment facilities with supporting truck repair shops, fueling stations, motels, and gravel mines. After a century of expansion, in the late 1980’s the local timber industry began an extended downturn leading to closure of almost all mills, including the Bonner Mill in 2007 (442 employees) and the Frenchtown Mill in 2010 (417 employees). With no mill jobs, many families moved, and local school enrollment dwindled in our target area. Following the Great Recession and the timber industry collapse, the East Missoula school closed, log yards went silent, and former fueling facilities were simply paved over and left vacant due to lack of development interest.

In the last decade, tenacious local redevelopment efforts have gained initial traction at the upstream and downstream edges of our target area. Through collaboration with private owners and use of Tax Increment Financing, the Bonner Mill (upstream edge) has been repurposed to support startup manufacturing businesses. In East Missoula (downstream edge), affordable housing incentives led to new apartment buildings near the interstate. With experience and connections from a first Assessment Grant, and over a decade of sustained redevelopment planning, we seek to extend infill deeper into the target area.

ii. Description of the Priority Brownfield Site(s)

Through community outreach and research, we created an inventory of 344 brownfields sites in the County. These include former sawmills and wood treatment operations such as the former J&N Post and Pole (State Response Site on the Flathead Indian Reservation), a burned bowling alley, and a buried junk vehicles area in an Infrastructure Planning Area. We also identified four out-of-use schools, former fueling facilities (each with State Petroleum Fund status known, where applicable), and an historical oil refinery surrounded by urban development. The properties range in size from 1/8-acre residential lots to a 161-acre rural property with abandoned buildings. Environmental concerns include petroleum fuels at underground tank sites, methane and pentachlorophenol at sawmills and wood treatment facilities, tar at a former small refinery, and asbestos and lead-based paint in blighted buildings and former schools.

We selected six priority sites as the largest properties with most significant redevelopment opportunities in riverfront neighborhoods. The East Missoula Town Center complex consists of 3 priority sites on three acres of land with 1,200 feet of prime road frontage. Past land uses include former fueling stations with six petroleum releases, a truck repair facility with historical on-site septic system, a junk vehicles yard, and dilapidated single-wide trailers set back from the main street. Residents drive diagonally through the empty paved-over block, with no sense of community gathering place or even safe walkability. A development group is in the early stages of planning high-density residential redevelopment with
sidewalks and landscaping to transform the area into a gathering place but is proceeding slowly and cautiously due to the lack of environmental due diligence information.

Two blocks away, the 41,000 square foot former Mt. Jumbo School sits vacant. Reduced enrollment followed the decline of the timber industry from the early 1990’s until the school closed in 2004. Public input during the recent rezoning process supported reuse of the former school as a community center with startup spaces for new local manufacturing businesses, consistent with a revised zoning district titled Live-Make (i.e., residential with small-scale manufacturing). In parallel with the rezoning process, the school district has initiated a Use & Disposition analysis for this property. Before final reuse plans can be made, the school district and other stakeholders will need to know the extent of asbestos and lead-based paint, and estimated costs to address those materials.

The 108-acre Bonner West Log Yard priority site is on the Blackfoot River across from the Bonner Mill State Response Site with known PCB and arsenic impacts to groundwater. The site has been used as a sawmill, an industrial landfill, and a log storage area. It is easily accessible from the intersection of two main trucking routes, Interstate 90 and Montana Highway 200. Currently, the site has one new industrial building and is the subject of a multi-year industrial subdivision process. Non-profit and public stakeholders are working to connect trails upriver through the site to a former railroad grade and the 32-mile long Blackfoot River Recreation Corridor.

Our final priority site is the Bitterroot River Gravel Mine complex – 86 acres including 37 acres of ponds. In addition to being mined, the site had vehicle maintenance, crushing, sorting, and fueling. The un-reclaimed mine ponds have unsafe over-steepened banks, and an abandoned, vacant office building. A September 2020 Phase I assessment performed by the EPA START contractor identified several environmental issues that could hamper redevelopment, including on-site fueling operations with poor closure documentation and potential asbestos in on-site building materials. Proposed reuse of the site is as a riverfront park one block from the 156-acre Fort Missoula Regional Park sports complex that opened in 2017. The park would also be adjacent to a 110-acre nature area recently purchased by an education non-profit. We anticipate rapid eligibility review and initiation of environmental assessment on our priority sites, because of experience working with EPA, and because the Bonner West Log Yard and the Bitterroot River Gravel Mine were deemed brownfields-eligible under previous grants.

b. **Revitalization of the Target Area**

i. **Reuse Strategy and Alignment with Revitalization Plans**

Our planning documents seek to enhance housing affordability, recreational access, and business opportunity between undevelopable mountainsides and federally designated river floodplains. Each of these documents was shaped with community input per the County’s 2014 Public Participation Plan. At the East Missoula Town Center sites, projected reuse (high-density residential area with sidewalks and extended street grid) aligns with the 2021 Highway 200 Corridor Plan initiated by our Metropolitan Planning Organization (MPO). Increased density also aligns with the May 2021 proposed rezoning of the site as Neighborhood Residential. Reuse of Mt. Jumbo School as a community center with small business space would reinforce Live-Make zoning mentioned above and would be a presumed alternative for consideration by the school district Facilities Committee. The Committee is convening a new 5-year session focused on unused schools, after focusing on school expansion in other neighborhoods during the previous session.

At the Bonner West Log Yard, the owner plans a light industrial subdivision with riverfront setback. The site is a Targeted Economic Development District (TEDD), and the proposed reuse aligns with the 2019 Amended County Growth Policy - Action 5.4.1: “Use brownfields programs, tax increment finance, targeted economic development districts, and other tools to assist with redevelopment efforts”. The reuse strategy for the Bitterroot Gravel Mine and Bonner West Log Yard riverfront is to create public recreation areas. The former gravel mine has petroleum releases and an abandoned building. Recreational redevelopment there would be aligned with the City’s 2009 Concept Masterplan for the site and with the 2019 County Amended Growth Policy statement, “Plan for and develop access to rivers…”. The trail
extension through the Bonner West Log Yard would align with 2019 zoning designation of the site’s riverfront as Open Recreation.

ii. Outcomes and Benefits of Reuse Strategy

East Missoula is a low-income community isolated between two narrow constrictions in the Clark Fork River valley, centered around a gas station, acres of empty asphalt, and a junk vehicles area. Outcomes of the Town Center reuse strategy for the three priority sites in the center of this community will be higher-density housing, sidewalks, and transit connections envisioned in the 2021 Corridor Plan. Private development using the incentives listed above will overhaul traffic patterns and intersection alignments. Benefits include improved safety with sidewalks, clear traffic patterns, and better visibility; affordable living options; and increased social connections. At nearby Mt. Jumbo School, reuse is likely to result in community meeting space and leased shop space for businesses. Benefits will include amplified social connections near the Town Center and low-entry-barrier opportunities for new entrepreneurs.

At the Bonner West Log Yard, light industrial redevelopment will increase business growth as envisioned in the TEDD. Outcomes will include location of regional industries near the hub of Interstate 90 and Montana Highway 200. Benefits will include higher-wage employment opportunities (manufacturing compared to service industry).

City, County, and non-profit collaboration will reclaim the Bitterroot Gravel Mine for recreational reuse. Outcomes include accessible ponds with parking, trails, and a river boat launch. At all sites, Section 9.9 of the new County Zoning Code provides density incentives for developers who incorporate energy efficiency. Sites with direct public investment (Bitterroot Gravel Mine for example) will comply with the City and County’s joint commitment to carbon-neutral operations by 2025 and 100% clean electricity by 2030, which has led to the County-owned largest rooftop solar array in Montana.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

As a local government, Missoula County assists community partners through our Community and Planning Services (CAPS) Department to obtain state and federal resources for redevelopment projects. A new Assessment Grant would stimulate the following funding for our priority sites. At the East Missoula Town Center, assessment grant work to verify the edges of petroleum impacts and evaluate for vapor intrusion risk would facilitate use of housing and transportation resources. Housing resources include New Market Tax Credits through collaboration with MoFi, a local Community Development Financial Institution (CDFI), and Low-Income Housing Tax (LIHT) Credits through two nonprofits, Homeward and the Missoula Housing Authority. Resources to improve transportation and lighting include Congestion Mitigation & Air Quality (CMAQ) grants through the MPO. Resources for reuse of the Mt. Jumbo School, abandoned for 17 years, will be internal to the Missoula County Public Schools district. The district’s 2015 Smart Schools Bond has been used thus far for school construction and renovation. A County Assessment Grant would coincide with the new Facilities Committee focus on out-of-use schools.

In the Bonner West Log Yard, redevelopment resources include TEDD financing, which will route property tax dollars back to the site. A new industrial building has generated a tax increment for extension of infrastructure such as roads, lighting, wastewater, and communications after due diligence in the former landfill area. Resources for parkland reclamation at Bitterroot Ponds and the Bonner West Log Yard riverfront include local bonds, trails grants, and fundraising efforts already gaining traction. Local bonds used for purchase or improvement of parks and trails include the 2006 Open Space Bond ($488,000 remaining), 2014 Parks and Trails Bond ($2.25 million remaining for County trails), and 2018 Open Space Bond ($7.5 million remaining in County set-aside). Grant funds for the Blackfoot River trail include the Federal Highway Trust Fund resources through the State Recreational Trails Program.

ii. Use of Existing Infrastructure

Existing infrastructure is one of the drivers behind selection of our priority sites. At the East Missoula Town Center site, the property is easily accessible between Highway 200 and the adjacent street grid. Public sewer and water networks serve the community, including the priority site. Evaluations have
identified preferred road realignments, safety improvements, transit connections, and conceptual building layouts. Resources listed in l.c.i will be key to connecting adjacent infrastructure. The Mt. Jumbo School, at 41,000 square feet, has sewer, water, heat, and electricity service to be reused after environmental testing and Facilities Committee consideration of the results.

Bonner West Log Yard infrastructure includes excellent highway access, extensive water rights, and electrical service. Extension of roads, wastewater service, communications, and water to future light-industrial lots will be funded in part by TEDD tax increment. At the 86-acre Bitterroot Gravel Mine, we need only make minor improvements to the existing access roads, and install parking, bathrooms, and trails using Open Space funding described above.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
   a. Community Need
      i. The Community’s Need for Funding
         The County does not have funding to initiate environmental testing and cleanup planning on brownfields. Our target areas are low-population, low-income unincorporated areas in a state with a sluggish economy. Overall, Montana’s economy ranks near the bottom among states (47th in total GDP for 2020, 41st in GDP per person). All census tracts in our target areas contain less than 7,000 people, and families in our census block groups typically make less than $43,000 annually, which is lower than the County, State, and Nation. With low income and low population densities, our unincorporated areas suffer from lack of investment interest and low property tax generation potential. Montana has no sales tax, and in 2020 the state experienced a 29.2% drop in Oil & Natural Gas taxes. Additionally, in 2021, the state had extreme wildfire costs as well as reduced revenues from our largest industry – agriculture – due to 70% of the state experiencing extreme drought, as defined by NOAA. With these challenges at the state level, and the County revenues spread thin, we must rely on local partnerships and federal assistance to address brownfields challenges.
      ii. Threats to Sensitive Populations
         1) Health or Welfare of Sensitive Populations. Our most-sensitive populations in our target areas are children living in low-income families, particularly American Indian children. As shown in the EJ Screening Tool, median family incomes in 3 out of 5 of our target area census block groups are in lowest 10-percentiles of all Montana communities. In Missoula County, American Indian children have more than twice the household poverty rate of white children and are 2.5 times more likely to lack health insurance (2021 Urban Indian Institute report). Health threats experienced by these sensitive populations include diabetes and Chronic Obstructive Pulmonary Disease (COPD). Neighborhoods closest to our proposed parkland reclamation sites have the highest rates of diabetes and COPD of those studied by the local health department. Welfare threats in the East Missoula Corridor include unsafe traffic patterns and lack of sidewalks for pedestrians. After a series of accidents, the County commissioned a 2015 traffic study of the East Missoula Town Center area, and found 85 crashes with property damage, injury, and 3 fatalities in this short section of road in the previous decade.

         Brownfield assessment, cleanup, and reuse will reduce these health threats by reducing exposure to contaminants. At the East Missoula Town Center site, corridor transportation improvements completed in concert with brownfields assessment will improve safety by changing intersection alignments, adding lighting, and separating pedestrians from the street. Along the Blackfoot River edge of the Bonner West Log Yard and at the Bitterroot Gravel Mine site, we will provide improved park and river access, which will encourage physical activity and help mitigate conditions like diabetes and COPD.

         2) Greater than Normal Incidence of Disease and Adverse Health Conditions. In our target area, populations that disproportionately suffer adverse health conditions include American Indians who have high cancer rates and children who have reduced lung function. Both are chronic conditions that are likely exacerbated by poor air quality and brownfields contaminants. In the Missoula Area, cancer is the leading cause of death for American Indians, 1.6 times higher than the cancer rate for white people from 2013-2017. Our
narrow valley can trap air contaminants, which when inhaled cause respiratory issues. The State Air Board decision to create the Missoula Air Stagnation Zone (MASZ) was, in part, done to mitigate a history of decreased lung function in children (2016 City-County Air Quality Report). Related contaminants at sites and in air include benzene and dioxins, classified by EPA as known human carcinogens. Asbestos in substandard housing in the target areas also can lead to respiratory difficulties due to thickening of the pleura membrane and accumulation of fluid immediately outside the lungs (ATSDR). With an Assessment Grant, we will investigate for benzene, asbestos, and other harmful contaminants, and plan exposure-reducing mitigations. At the East Missoula Town Center, we will test for potential petroleum vapor intrusion, including benzene in soil gas. In buildings (Bitterroot Ponds former gravel pit office, Mt. Jumbo School), we will test for asbestos to support reuse planning. With the City’s EPA RLF, we can acquire funding to remediate sites and mitigation hazards to children in our low-income census tracts.

3) **Promoting Environmental Justice.** Populations that disproportionately share the negative effects of industrial operations in our target areas are low-income families. Due to the high housing cost, low-income citizens are forced to live in sub-standard housing near brownfields. Prime example is Bonner at the eastern end of our target area. Bonner has low median household incomes ($42,941) and a low rate (48%) of owner-occupied housing, lower than for the County, State, and Nation. Bonner has the highest rate of housing cost burden (70%) of any neighborhood studied by the City-County Health Department. The communities of Bonner and East Missoula were developed initially in response to the construction of the Bonner Mill in 1908. These communities contain numerous inexpensive trailers and outdated housing units, many connected to their own private well. We are thankful that there is a place for hard working, low-income residents to live in our county, but we recognize that congregation of these residents along polluted corridors and adjacent to brownfields is an environmental justice issue. Low-income families living in Bonner and East Missoula are exposed to chipping lead-based paint on old rental housing. The area also has PCBs and arsenic in groundwater related to the Bonner Mill and the former Milltown Dam.

We also believe wildfire smoke is an environmental justice issue. Wildfires in our region cause an annual increase in respiratory issues, and low-income people living in poor housing units are most at risk because they do not have resources for whole-house air purifiers to clean indoor air during smoky days. All models summarized in the Climate Smart Missoula project’s 2021 report predict increased duration and intensity of wildfire smoke. The Montana Air Quality Bureau reports that in a two-month period of 2017 there were 53 days with elevated levels of smoke, and particulate levels ranged as high as 5 times the World Health Organization recommended maximum particulate level. Our Health Department partnered with local hospitals and Missoula Aging Services to distribute air filters to low-income residents, prioritizing elderly, those with newborns, and low-income schools, but these efforts cannot meet the need.

Brownfields reuse will mitigate respiratory threats by (1) ensuring subsurface contamination is addressed before newer housing units are built in East Missoula, (2) identifying and remediating asbestos and LBP hazards in structures, and (3) providing sidewalks and additional public recreation space in and near the disadvantaged communities of Bonner and East Missoula and at the former Bitterroot Gravel Mine to encourage exercise and respiratory recovery outside the smoke season.

**b. Community Engagement**

i. **Project Involvement and ii. Project Roles**

Our community is highly engaged in brownfields redevelopment, as we have had brownfields funds ever since the 2000 pilot program. Developers, housing advocacy non-profits, and groups focused on business expansion, recreation, and environmental protection are all involved, and these partners will be essential to redevelopment of brownfield sites. Some of those partners involved are shown in the table below.
MISSOULA COUNTY, MONTANA – FY22 BROWNFIELDS ASSESSMENT GRANT PROPOSAL

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goodworks Ventures LLC</td>
<td>Kiah Hochstetler (COO) <a href="mailto:kaih@gwevergreen.com">kaih@gwevergreen.com</a> 406-203-0104</td>
<td>Private developer with projects on brownfields sites in East Missoula. He will identify timing constraints and data needs for assessment.</td>
</tr>
<tr>
<td>Bonner-Milltown Community Council</td>
<td>Kali Hannon (Chair) <a href="mailto:bcommunitycouncil@gmail.com">bcommunitycouncil@gmail.com</a> 406-549-4543</td>
<td>Identify people with historical knowledge of the Milltown Riverfront Neighborhoods, provide input on site selection priorities.</td>
</tr>
<tr>
<td>Missoula County Public Schools (MCPS)*</td>
<td>Pat McHugh (Operations Director) <a href="mailto:pmchugh@mcpsmt.org">pmchugh@mcpsmt.org</a> 406-728-2400 ext. 3020</td>
<td>Coordinate with County to ensure due diligence meets Facilities Committee timing needs and supports reuse of the building.</td>
</tr>
<tr>
<td>Missoula Organization of Realtors</td>
<td>Dwight Easton (Public Affairs Dir.) <a href="mailto:deaston@missoularealestate.com">deaston@missoularealestate.com</a> 406-728-0560</td>
<td>Educate members about availability of EPA Brownfields funds for due diligence, recommend brownfields sites.</td>
</tr>
<tr>
<td>Missoula Economic Partnership (Nonprofit research and business siting)</td>
<td>Julie Lacey (Economic Development Director) <a href="mailto:jlacey@missoulapartnership.com">jlacey@missoulapartnership.com</a> 406-543-6623</td>
<td>Connect businesses to brownfields with redevelopment potential in East Missoula and the Bonner area. Provide economic and demographic data.</td>
</tr>
<tr>
<td>Three Rivers Collaborative (State, City, and Non-Profit forum)</td>
<td>Morgan Valliant (City Conservation Superintendent) <a href="mailto:mvalliant@ci.missoula.mt.us">mvalliant@ci.missoula.mt.us</a> 406-552-6263</td>
<td>Advocate for riverfront public access and streambank restoration during redevelopment of the Bonner West Log Yard.</td>
</tr>
<tr>
<td>Homeword (Nonprofit developer and housing advocate)</td>
<td>Heather McMilin (Project Director) <a href="mailto:heather@homeword.org">heather@homeword.org</a> 406-532-4663</td>
<td>Bring large low-income housing redevelopment projects to the County Brownfields Program.</td>
</tr>
</tbody>
</table>

*Separate entity from Missoula County.

iii. Incorporating Community Input

Our Qualified Environmental Professional (QEP) will prepare an informational fact sheet to illustrate benefits of assessment to site owners, lenders, and local governments. Meetings will be conducted at a location large enough to allow for proper COVID-19 social distancing protocols and Zoom links will be provided for remote attendance. Each fact sheet will have contact information for our Brownfields Program Manager. Consideration of community input and preparation of a response will be through our Brownfields Program Manager for routine matters, and via written response from our commissioners if significant concerns or complaints arise.

We plan to communicate progress, identify new sites, and focus use of the Assessment Grant through three sets of public meetings, meeting with the Missoula Organization of Realtors and Missoula Economic Partnership, at least 6 small stakeholder meetings with landowners and developers, 12 quarterly email updates to development advocates, and active presence at our Community Councils in East Missoula and Bonner-West Riverside. The public meetings will be announced on our website, in the newspaper, and in the quarterly email updates to project partners. County personnel will attend these meetings to hear concerns, identify sites and community needs, and describe our plans and achievements. Our Qualified Environmental Professional (QEP) will prepare informational fact sheets to illustrate the Assessment Grant opportunity and successes. Consideration of community input and preparation of a response will be through the Brownfields Program Manager for routine matters and via written response from the County Commissioners if significant concerns or complaints arise.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
a. Description of Tasks/Activities and Outputs. Implementation details, lead entity, schedule, and outputs are described below for each proposed task.

Task 1. Program Management – Implementation and Lead: The County Brownfields Program Manager will be responsible for all grant management, oversight of the cooperative agreement, and coordination
with project partners and EPA, will submit quarterly reports and site-specific information in ACRES and will procure a QEP. **Schedule:** Cooperative Agreement completed with EPA as soon as possible (4 months) following award, QEP procurement within 3 months of completed Cooperative Agreement, grant management throughout the 3-year period. **Outputs:** 1 Cooperative Agreement, 1 RFP issued, 1 QEP contract, 12 quarterly reports, 12 site-specific entries in ACRES.

**Task 2. Community Outreach – Implementation and Lead:** The County Brownfields Program Manager will lead the development of a Community Involvement Plan (CIP) and will conduct stakeholder meetings for each priority site and with each of five volunteer Community Councils. The QEP will review and edit the CIP and provide technical materials and in-person consultation for the stakeholder meetings. **Schedule:** Initiated following procurement of a QEP and continued through the 3-year grant period. **Outputs:** 1 CIP, 9 fact sheets and 9 stakeholder meetings (one for each site that receives Phase II assistance).

**Task 3. Site Assessment – Implementation and Lead:** The County will lead site selection and prioritization, with input from the QEP and partners identified in Section 2.b. We will obtain site access agreements and eligibility determinations prior to work on each site. EPA deemed two of our priority sites brownfields-eligible under a previous grant, allowing quick eligibility updates. Under that grant, we learned the site prioritization and eligibility determination processes (9 sites addressed thus far in 2 years). Prior to on-site work, the QEP will update our QAPP with new best practices and ensure all items are addressed on the most-recent EPA Region 8 Quality Assurance Document Review Crosswalk. Due to technical expertise, QEP will lead Phase I and II assessments.

We will complete ASTM-compliant Phase I Environmental Site Assessments (ESAs) to identify Recognized Environmental Conditions (RECs). After discussion with each site owner about data needs, we will prepare Sampling and Analysis Plans (SAPs) and conduct ASTM-compliant Phase II ESAs to evaluate the extent and severity of contamination. All onsite activities will be performed in accordance with applicable EPA rules and regulations, grant requirements, and guidelines from the Montana Department of Environmental Quality. **Schedule:** The QEP will update our QAPP within 3 months of contract and will complete Phase I ESAs on priority sites within the first year after signing the coop agreement. QEP will complete Phase I and II ESAs at eligible sites until 3 months remain in the grant, allowing time for budget reconciliation, ACRES updates, and final reporting. **Outputs:** 12 site access agreements, 12 eligibility forms, 7 ASTM-compliant Phase I ESA reports, 11 EPA-approved Sampling and Analysis Plans, 11 Health & Safety Plans, and 11 ASTM-compliant Phase II ESA reports.

**Task 4. Cleanup & Reuse Planning – Implementation and Lead:** Drawing on their scientific and engineering expertise, the QEP will perform cleanup planning at the East Missoula Town Center, Bitterroot Ponds Complex, and Mt. Jumbo School. Cleanup plans will include evaluation of alternatives and costs. QEP will also lead reuse planning sessions to identify preferred recreational redevelopment layout for the Bitterroot Ponds Complex and will produce a Recreational Reuse Vision document for the Blackfoot River frontage through the Bonner West Log Yard priority site. **Schedule:** Initiated toward the end of Year 1 and completed with stakeholder review/comment by the end of Year 2 to allow applications for cleanup funding, where warranted. **Outputs:** 3 Cleanup Plans, 1 Site Reuse Plan, and 1 Recreational Reuse Vision.

**In-kind Reuse Planning – Implementation, Lead, and Outputs:** The County will support redevelopment of unincorporated areas by the following in-kind planning activities: (1) help produce a final East Missoula Transportation Plan, (2) complete a Use & Disposition Evaluation for all County-owned land, (3) integrate public comment into final Zoning Regulations, and (4) write a Housing Policy based on our recently-published Housing Action Plan. **Schedule:** East Missoula Transportation Plan will be produced by mid-2023, Use & Disposition Evaluation by mid-2023, Zoning Regulations will be complete by end of 2023 (first major update since 1976), and Housing Policy will be complete by end of 2024.

### b. Cost Estimates

**Budget table is below, followed by description of unit costs used to create the budget for Assessment Grant activities.**
## Budget Categories

<table>
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<th>Project Tasks ($)</th>
<th>1: Program Management</th>
<th>2: Community Outreach</th>
<th>3: Site Assessment</th>
<th>3: Cleanup &amp; Reuse Planning</th>
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### No Equipment, Supplies, or Other Costs

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</table>

*The County is not requesting Indirect Costs. **Fringe Benefits are 36.2% of Personnel cost. ***Travel is for brownfields-related conferences and community outreach.

### Task 1: Program Management

Costs ($31,000, 6% of total) are calculated as follows: Personnel costs of 570 hours of Brownfields Program Director at $34.65/hour = $19,750. Fringe Benefits at 36.2% of Personnel costs = $7,150. Travel is mileage, hotel, and food for one Montana DEQ Brownfields Conference ($500), plus flight, hotel, and food for two National Brownfields Conferences ($1,800 each).

### Task 2: Community Outreach

Costs ($29,147, 6% of total) is calculated as Personnel costs of 274.2 hours of Brownfields Program Director at $34.65/hour = $9,500. Fringe Benefits of 36.2% times Personnel costs = $3,439. Travel cost of fuel and per diem for 18 trips to communities throughout the County ($2,228). Contractual cost of $13,980 includes $750 to assist with a new Community Outreach Plan, stakeholder meetings ($620 each) and fact sheets ($850 each) on 9 of the sites that receive Phase II assessments.

### Task 3: Site Assessment

Costs ($363,000, 73% of total) is for contractual work to produce 7 Phase I ESAs (average of $4,000 each; $28,000 subtotal), 11 Phase II ESAs averaging approx. $30,455 each ($335,000 subtotal). The contracted QEP will perform Phase I ESAs for the three priority sites that have not had a recent Phase I, then four additional Phase I ESAs on inventoried sites. Phase II assessments will occur at 11 sites, which consist of the 4 priority sites, 2 additional petroleum sites, and 5 additional building materials sites (i.e., testing asbestos and lead-based paint only).

### Task 4: Cleanup & Reuse Planning

Costs ($76,853, 15% of total) is for County stakeholder engagement (187.6 hours at personnel rate of $34.65/hour = $6,500, plus 36.2% fringe benefit rate = $2,353) and contractual work to produce 3 Cleanup Plans at average of approx. $12,167 each = $36,500, 1 Reuse Plan for $25,000, and Recreational Reuse Vision document for the waterfront at Bonner West Log Yard ($6,500). The East Missoula Town Center cleanup planning will support dense residential reuse. We anticipate the plan will call for excavation of accessible soils, mitigation of vapor impacts, institutional controls against use of on-site groundwater, and a soil management plan. Cleanup plan for the Bitterroot...
Ponds complex and Mt. Jumbo School will likely call for building materials mitigation, along with brief alternatives analysis and draft bid specifications for asbestos abatement. Bitterroot Ponds Cleanup Plan will also address lingering petroleum impacts. Recreational reuse planning at the Bitterroot Ponds area will engage the City of Missoula and adjacent landowners including the university system and a nature education non-profit. Recreational reuse vision for the waterfront at Bonner West Log Yard will include a summary of recreational assets and potential recreation paths and other infrastructure.

In-kind Reuse Planning ($552,885, not funded by Assessment grant) assumes County staff at $75,000/year for FTE salary incl. fringe, except where noted. Budget includes $37,500 for staff participation in the Transportation Corridor Plan for East Missoula (0.5 FTE for 1 year), $28,500 to support a Use & Disposition Evaluation for County-Owned Land ($6,000 contractual for real estate data analysis firm, 0.25 FTE for 1 years at $90,000/year), $262,500 for Final Zoning Regulations (1.75 FTE County staff for 2 years), and $224,385 for the Housing Policy ($36,885 contractual, 1 FTE for 2.5 years).

d. Measuring Environmental Results

County Grants Administrator and Brownfields Program Manager, Sindie Kennedy, will be responsible for tracking and measuring progress. She will develop a work plan with the EPA project manager that will include anticipated Outputs listed above. We believe several positive Outcomes will occur through completion of the project Outputs. Effective Program Management will result in compliance with EPA requirements. Community Outreach will result in site owners requesting assessments and public awareness of environmental issues in their communities. Those involved will also recognize the County Brownfields Program as a resource, which will increase demand for brownfields services.

Site Assessments will lead to redevelopment, residential infill and creation of a town center in East Missoula. Other likely results include reuse of the 41,000 square feet Mt. Jumbo school as a community center and business incubator space, clean reuse of business property at Bonner West Log Yard with recreational trail along the Blackfoot River, and safe reuse of the Bitterroot mine ponds as parkland. Overall project results will align with our goals of increased density in the Utility Service Area, improved recreational safety and accessibility, and facilitation of small business growth.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity: Three elected Commissioners lead Missoula County’s government which includes a chief financial officer, chief administrative office, chief operating officer and directors of nearly 30 departments, eight of which are led by elected officials. Missoula County complies with the auditing and reporting requirements provided for in 2 CFR Part 200 and Montana Code Annotated and maintains an established financial accounting system that conforms with Generally Accepted Accounting Principles. Missoula County maintains effective internal controls over federal awards that provide reasonable assurance that the County is managing such awards in compliance with federal statutes, regulations, and the terms and conditions of each award. In 2020, Missoula County received and efficiently administered over $10 million in federal grant funding (not including CARES and ARPA funding) for a population of 117,922, according to the 2020 Census.

ii. Organizational Structure: The Assessment grant will be managed by our Grants and Community Programs (GCP) Division of the Community and Planning Services (CAPS) Department. GCP’s principal function is to acquire and administer grants and loans for the County, which currently includes a portfolio of local, state, federal, and foundation grants totaling $9.9 million. GCP staff members report to the CAPS Department Director and the elected Commissioners. Until June 2016, GCP was a joint City/County department, and in that capacity administered the City’s EPA Brownfields grants for the prior 12 years. In 2019, Missoula County was awarded an EPA Assessment Grant. Due to the success of that program, Missoula County has met the 70% drawdown requirement and is positioned to apply for another brownfields assessment grant. Accordingly, GCP staff are well qualified to manage a Brownfields assessment grant, as they have been successfully managing local, state, and federal grants for more than
30 years. For the upcoming grant period, the brownfields team includes Sindie Kennedy, Melissa Gordon, and Emily Brock. These key staff are profiled below.

iii. Description of Key Staff: Sindie Kennedy, Grants Administrator, currently serves as Missoula County Brownfields Program Manager and will continue to be responsible for everyday management and implementation of the assessment grant. Ms. Kennedy developed the Missoula County Brownfields Program upon securing an assessment grant in 2019. Since then, Ms. Kennedy formed strong relationships with stakeholders and increased demand for the brownfields program. She attended the 2019 Annual Brownfields Conference in Los Angeles; EPA Western Brownfields Workshop; and works closely with Montana DEQ and EPA staff on other ongoing projects. Prior to joining the County in 2015, Ms. Kennedy was a grants administrator and project manager at the University of Montana for six years, and a Federal Projects Manager with Missoula County Public Schools for three years, where she was responsible for managing several million dollars of Title I funds. Ms. Kennedy has a master’s degree from the University of Arizona, where her research focused on community environmental justice activism related to trichloroethylene (TCE) in the south Tucson water supply. Through that experience, she became aware of the importance of community involvement in assuring environmental justice and has familiarity with technical concepts of toxicology and groundwater contamination.

Melissa Gordon, with 20+ years of grant management experience, will provide senior-level oversight of the Brownfields Assessment Program, including periodic certification that program requirements and deadlines are being met, and review of contracts in tandem with the County Attorney.

Emily Brock, Missoula County Director of Economic and Land Development, manages our four County Tax Increment Financing districts and Targeted Economic Development Districts (TEDD) as well as all developable lands owned by Missoula County. Ms. Brock will be instrumental in identifying additional sites for assessment and informing stakeholders of the Brownfields Assessment Program.

iv. Acquiring Additional Resources: Our GCP staff have a long-standing track record of successfully procuring contractors, and we will select a QEP to assist with community outreach, conduct assessments, and plan for cleanups. Our practice is to require competitive procurement of a QEP in accordance with 40 CFR 30.40 through 30.48, and to involve senior oversight and the County Attorney in contracting. The county auditor reviews GCP procurement and grant management annually. Our successful procurement system is evidenced by the fact that none of the grants GCP manages have been subject to a negative audit or monitoring finding.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: Missoula County was awarded a $200,000 EPA Brownfields Cleanup grant in 2012 for the Missoula County Courthouse Remodel Project to clean up lead-based paint, other hazardous substances, and asbestos. In 2019, Missoula County was awarded a $300,000 EPA Brownfields Community-Wide Assessment Grant.

1) Accomplishments: Hazardous materials were removed or mitigated from the Missoula County Courthouse. The remodel resulted in new offices and meeting rooms used by County staff and the public. With the 2019 Assessment grant, Missoula County assessed nine brownfields sites totaling 69 acres, including 8 Phase I ESAs and 4 large Phase II ESAs. Deliverables include 1 site inventory, 1 EPA-approved QAPP, 12 public meetings, estimated scope and cost of building materials abatement for 3 properties, and 8 quarterly reports. Of the 69 acres assessed, 59 are slated for residential redevelopment with one site currently under construction to include 130 affordable housing units and leveraging of at least $38 million in non-brownfields funds.

2) Compliance with Grant Requirements: For both grants, Missoula County delivered acceptable quarterly reports and grant deliverables, and reported activities and successful outcomes in ACRES. The Brownfields Cleanup grant for the County Courthouse project was completed with all funds expended, and the grant was successfully closed out in December 2015. All brownfields assessment projects were implemented according to the original work plan, schedule, and terms. The current Assessment grant is more than 70% exhausted after two years and will be completely utilized by end of March 2022.
ATTACHMENT A

Threshold Criteria
ATTACHMENT A

Threshold Criteria

1. Applicant Eligibility:
   As a General Purpose Unit of Local Government, Missoula County, Montana is an eligible applicant for an EPA Brownfields Assessment grant.

2. Community Involvement:
   Missoula County understands the value of community and stakeholder involvement in the Brownfields assessment program and has attended Community Council meetings in the target areas, as well as met with business owners and community leaders in preparation for this proposal. The County intends to inform and involve community residents and other stakeholders during the planning and implementation phases of this project. Please see Section 2 in the Narrative Proposal for more information on the County’s proposed community engagement efforts.

   Missoula County will take the following Community Outreach steps under this grant:
   
   a. Hold open public meetings and present current information to Community Councils in the target areas
   b. Meet with landowners, developers and business owners to discuss assessments, cleanups, and the redevelopment potential of specific properties
   c. Prepare educational fact sheets for sites assessed
   d. Distribute email updates to redevelopment advocates
   e. Maintain and update the County Brownfields Program web page

3. Names Contractor and Subrecipients
   A contractor or subrecipient has not been identified or procured for this project. Upon being awarded an EPA Brownfields Assessment Grant, Missoula County will comply with federal and local procurement requirements to procure a Qualified Environmental Professional.

4. Expenditure of Assessment Grant Funds:
   Missoula County was awarded an EPA Brownfields Assessment Grant in 2019, with a grant period of 10/1/2019 to 9/30/2022. As of October 1, 2021, Missoula County had expended over 70% of the 2019 Brownfields Assessment Grant award (see attached Cash Management Report).