City of Show Low

“Named by the turn of a card”

1. Applicant Identification
   City of Show Low
   180 N. 9th Street
   Show Low, AZ  85901

2. Funding Requested
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested
      i. $409,000
      ii. Not Applicable
      iii. Not Applicable

3. Location
   a) City of Show Low b) Navajo County c) Arizona

4. Property Information
   Former Woody’s Bulk Fuel Storage and Distribution Facility
   180 North 11th Street
   Show Low, AZ 85901

5. Contacts
   a. Project Director
      Bill Kopp, Public Works Director
      (928) 532-4081
      bkopp@ci.show-low.az.us
      180 North 9th Street, Show Low, AZ  85901

   b. Chief Executive/Highest Ranking Elected Official
      John Leech Jr., Mayor
      (928) 532-4000
      jleechjr@showlowaz.gov
      180 North 9th Street, Show Low, AZ 85901

6. Population
   City of Show Low: 11,130 (US Census: 2015–2019 American Community Survey)
7. **Other Factors**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>NA</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>NA</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>NA</td>
</tr>
<tr>
<td>Secure firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>3</td>
</tr>
<tr>
<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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>NA</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>3</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>3</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>NA</td>
</tr>
</tbody>
</table>

8. **Letter from the State or Tribal Environmental Authority**
   See attached

9. **Releasing Copies of Applications**
   Not Applicable
Via email

October 25, 2021

Bill Kopp
Public Works Director
City of Show Low
180 North 9th Street
Show Low, AZ 85901

Re: State Acknowledgement Letter for the City of Show Low’s EPA FY22 Brownfields Cleanup Grant Application

Dear Mr. Kopp,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for the City of Show Low’s Brownfields Cleanup Grant (FY22) application to the Environmental Protection Agency (EPA).

ADEQ believes that the FY22 Brownfields Cleanup Grant will support the Brownfields assessment work already performed at the site. The funds to clean up the Former Woody’s site will be used to redevelop into a parking lot adjoining a new community outdoor learning space associated with the city’s public library. The redevelopment of the Former Woody’s is a key element to providing needed accessibility to the library, civic centers and downtown businesses. Removal of the blight and redevelopment of community outdoor activities and learning spaces will create economic and non-economic benefits which will have a far-reaching positive impact on the local and surrounding communities.

ADEQ fully supports the City of Show Low and its’ stakeholders with the important Brownfields projects and we look forward to providing the community and stakeholders with additional services and funding opportunities when they arise.

Sincerely,

Travis Barnum
Travis Barnum, Brownfields Coordinator
Waste Program Division
1. **PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

a. **Target Area and Brownfields**

   i. **Background and Description of Target Area:** The City of Show Low was initially founded as a sleepy Western ranching town. The completion of US Highway 60 through the heart of downtown and the outdoor-recreational and road-trip tourism boom that followed fundamentally altered the City’s cultural narrative and economic development.\(^1\) Foreseeing potential economic benefits as a tourist stop along route 60, the City welcomed the opportunity for growth, but it came with significant industrial expansion. The downtown had previously been established as a mix of residential neighborhoods, retail areas, and civic establishments. However, in the wake of the US 60, vehicle maintenance garages, fuel stations, and a bulk fuel plant were developed rapidly to meet the demand of travelers. Due to the placement of the highway through the center of the city, the associated industrial development became threaded in and around the quaint residential neighborhoods and community gathering spaces. By the early 1970s, however, a completed Interstate 10 spanned southern Arizona, excluding the City. Interstate 10’s completion siphoned much of the tourist traffic that once flowed through the City, leaving the City with abandoned garages, a bulk fuel tank farm in the heart of downtown, and a highway that divided the community. The downtown became blighted by vacant structures and abandoned industrial properties left by the nation’s transition to the interstate system. Those who occupy the residential neighborhoods and community spaces in the downtown corridor are among the elderly and impoverished families who had no choice but to persist amongst the blight. These are community members without resources or the desire to abandon their generational family homes to relocate to the outer areas of the city that are now further from their schools, work, and community spaces.

   The target area for this application is the City’s original downtown business district (Census Tract 9617), which surrounds the proposed clean-up site: **Former Woody’s Bulk Fuel Storage Facility (Former Woody’s).** This abandoned fuel tank farm and associated structures sit dilapidated next to the city library, civic center, and residential neighborhoods. The clean-up site **is within the City’s designated Downtown Redevelopment Zone (DRZ),** which is bounded by Frontier Park to the north, Show Low Creek to the east, East McNeil Street to the south and North 6th Street to the west.\(^2\) The project goals in this area are to beautify the downtown corridor to increase accessibility to civic and community spaces, walkability to local businesses, and additional investment and tourism foot traffic. Not only is this area historically significant, but it also remains, in spite of the scattered blight, the heart of the local community and business economy.

   ii. **Description of the Proposed Brownfield Site(s):** The proposed cleanup site, the **Former Woody’s,** located at 180 North 11th Street, consists of 0.64-acres in the heart of the downtown business district. The site’s operations as a bulk fuel storage facility, with four vertical fuel aboveground storage tanks (ASTs), began in the 1940s. A modular office building was developed at the site in 1977 along with additional storage structures and loading docks. The site operated as a bulk fuel storage and dispensing facility until 2009. Since 2009, the facility has been abandoned. The dilapidated remnants of the site, which consist of a modular office building, associated covered loading/storage dock, fuel pump house, and concrete pads, are a blight next to the City’s public library and civic center and across the street from a residential neighborhood.

   A Phase I environmental assessment completed at the site identified significant staining in the vicinity of the tanks, fuel pump, and storage docks. The assessment also noted that due to the age.

---

2 City of Show Low Resolution No. R2019-06
of the structure, asbestos would likely be present. The City applied for Arizona Brownfields 128A Funding to assist in further environmental site investigation. In the following Phase II environmental site assessments, multiple hazardous substances were identified: asbestos containing materials (ACM), lead containing paint (LCP), and petroleum contamination. ACM and LCP were identified in the dilapidated modular structure. The City has obtained funding from the Arizona Department of Environmental Quality (ADEQ) to abate the hazardous materials in the on-site structures to support the overall clean-up goals of this site. Petroleum contamination of the soil and perched aquifer groundwater were also identified. Benzene and total xylenes were found above ADEQ Soil Remediation Levels (SRLs) in subsurface soils. Benzene, toluene, ethylbenzene and xylene were detected above Aquifer Water Quality Standard (AWQS) in perched aquifer groundwater. This application requests EPA brownfield funding to be used for the cleanup of the petroleum-contaminated soil and perched aquifer groundwater.

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

   The DRZ strategy is to redevelop areas of blight with infrastructure designed to increase community spaces, improve connectivity between the community residents and these spaces, and to remove blighted areas that have become havens of drug use and crime. The redevelopment projects in the DRZ are known by the community as the “Gateway to Downtown” projects and are funded by the City in cooperation with partners such as the Show Low Main Street nonprofit organization and the public library.

   The DRZ redevelopment plans place high importance on increasing space and accessibility for public educational and social programs for its impoverished, youth, and elderly communities as well as enhancing walkability of the downtown corridor. The DRZ plans will enhance the health and lifestyle of the community and drive economic benefits for local businesses via greater engagement with the community and recreational tourists that pass through the City. The Former Woody’s site is a key element to the greater redevelopment plan as it currently abuts the City’s highly trafficked public library and civic center, separating the community from these public spaces. The Former Woody’s site will be redeveloped into well-lit paved parking with landscaped areas. As part of the DRZ Strategic Plan, the City will also develop an outdoor, experiential, community-learning venue on the property adjacent to the cleanup site to the south. The outdoor learning space will increase venue space for public programs and events hosted by the City and public library.

   While the cleanup site and proposed outdoor learning spaces are located within a federally designated flood zone (AE), the proposed redevelopment plan will result in no structures subject to periodic flooding.

   ii. Outcomes and Benefits of Reuse Strategy: Removal of the blight and redevelopment of the site will have a multitude of positive impacts, with both non-economic and economic benefits for the City’s disadvantaged communities within the target area. The new lighting and paved parking infrastructure at the Former Woody’s will increase accessibility to the library and proposed outdoor learning space. Redevelopment of the site into parking and the adjacent site’s outdoor learning venue will greatly expand and diversify the types of programming hosted by the City and public library that will address the unemployment and low-income issues within the community. Over the course of a year, the library hosts more than 250 public programs with over 12,000 community members in attendance. Programs include workforce development; healthy cooking demonstrations; DIY; computer classes; one-on-one assistance; Medicare, caregiver, and parenting workshops; family story times; homeschool programming; club meetings;
and art and movie nights. Anticipated additional programs will include astronomy nights, employment events, and job fairs. These new programs will address employment and education issues as well as increase community engagement.

Additionally, by creating a welcoming downtown and accessible local businesses, the City hopes to capitalize on the influx of outdoor recreational tourism within the region. The City is a gateway to many of the region’s most idyllic tourist destinations including the greatest number of water bodies of all the Arizona National Forests; a sought-after recreation for local desert-dwelling inhabitants and national tourists. The Arizona travel industry represents a $15 billion per year industry that employs approximately 3,700 people in Navajo County.3 Day travel in north central Arizona accounts for nearly 39% of the region’s travel spending.

**Enhancement of the target area will positively impact the disadvantaged community residents through increased job availability, which will address unemployment and poverty within the DRZ. Reuse of the site as a parking lot will eliminate existing blight and associated safety concerns, which will enhance accessibility of the civic centers and community resources at the library for the disadvantaged communities.** This redevelopment plan will also benefit community health by increasing the City’s foot traffic and walkability.

c. **Strategy for Leveraging Resources**

i. **Resources Needed for Site Reuse:** Following the cleanup of the Former Woody’s site, funds will be required to construct the paved parking area and community outdoor learning space, which will include asphalt, sidewalk, curb, gutter and drainage improvements, landscaping, and **decorative solar powered streetlights** ($300,000). Through partnerships with the Show Low Main Street organization, Chamber of Commerce, Public Library and Navajo County Workforce Development the City and partners are committed to finance this redevelopment project provided they obtain the necessary assistance for the petroleum contamination cleanup. Through careful budgeting and DRZ planning, the City has allocated $400,000 in anticipation of the grant cost-share and redevelopment costs to take the project from clean-up to redeveloped. The total cost ($674,000) of a comprehensive clean-up ($374,000) and the redevelopment plan ($300,000) exceeds the City’s redevelopment budget and ability to conduct a thorough remediation of the Former Woody’s clean-up site. Having the city partner with EPA for financial assistance will assure a comprehensive clean-up is completed and the site can be reused for its intended community benefit.

ii. **Use of Existing Infrastructure:** Since 2010 the City has been implementing the Redevelopment Plan for the downtown corridor, which has included the use of Community Development Block Grant (CDBG) and Show Low Main Street funding. The Former Woody’s site has existing infrastructure in place such as water, sewer, and electricity. The City is committed to providing the financial support for the proposed site improvements and long-term maintenance of the site.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need**

i. **The Community’s Need for Funding:** The City’s small population of 11,1301 and its economic status has been in rebound since the economic transition of the late 1970s. What was once a vibrant downtown has been littered with vacant properties and abandoned buildings that attract vagrants and crime. Within the City, the **median household income is $46,310, which is below** that of the nation ($62,843) and state ($58,945).4 The **median family income in the City is $54,395 and the per capita income is $25,014, which are significantly lower** than state and national values (AZ $70,184 & $30,694; US $77,263 & $34,103).4

---

1 The Economic Impact of Travel, Arizona 2020, State, Region, County Impacts, https://tourism.az.gov, May 2021
The City currently spends 35% of its annual budget on public safety, which is the largest of any single expenditure area. The City also prioritizes public works, which is the second largest area of expenditure at 18%. With low-income residents, raising taxes to afford redevelopment throughout the target area is not an option. The cost of a comprehensive cleanup is nearly the cost estimated to redevelop the site and southern adjoining properties into the proposed parking lot and community learning space. Without the assistance of this grant, the City will struggle to redevelop the site. The assistance of the EPA Brownfield Cleanup funding will make possible the redevelopment of the site benefiting the sensitive populations by providing the much-needed outdoor community space to enhance existing governmental and library services.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The City’s sensitive populations include the impoverished, youth, and elderly, who are disproportionately affected by poverty and adverse environmental health issues. The median age is approximately 51 compared to the state and national average of 38. Approximately 30% of the population is over 62 years old and almost half the population (49%) is either over 62 or under 18 years old (compared to 41% nationally). The City’s unemployment rate at 6% is higher than the national average (US 5%). Almost 70% of families with a single-mother householder and children are living in poverty (US 36%). Additionally, nearly one-third (32%) of children in the City live in poverty (US 19%). Within Navajo County, the unemployment rate is 9% and the overall poverty rate is 26%. One in three children in the County are living in poverty, which is nearly double the state and national averages and trending upward from 2015 to 2019. Health-harming stress can accompany the social and economic hardship caused by unemployment. Job insecurity and lack of benefits associated with employment result in unmet medical needs and increase the City’s sensitive population’s vulnerability to adverse health conditions from environmental exposures.

The County has a particularly high rate of alcohol- and drug-induced deaths (71.8 and 27.5 per 100,000) compared to the state (17.8 and 27.8 per 100,000) and national rates (15.3 and 21.6 per 100,000; City-level drug data is not publicly available as it is reported directly to the county). Drug use in the County’s youth is of particular concern as about 25% of eighth graders and over 50% of twelfth graders have reported they have used alcohol. Drug use among these age groups was reported at 14% and over 50% respectively. Approximately 30% of youth cited stress and sadness as contributing to their desire to use drugs and/or alcohol. Navajo County is designated a medically underserved area. When compared to other counties in Arizona, Navajo County is among the counties with the most hospital stays due primarily to mental health disorders and substance abuse. Additionally, the vacancy rate in the City is 42%. With large numbers of vacant properties comes high crime. The City’s violent crime rate (8.8 per 1,000 residents) is almost twice the state of Arizona (4.5 per 1,000 residents) and more than double the national rate (4 per 1,000 residents). According to the City’s Public Safety Department, the City has recorded nearly 400 or more crimes each year.

Promoting the social-emotional well-being of youth leads to lower crime rates, a stronger economy, and lower health care costs through greater positive engagement of the youth in their community. Additionally, community engagement for youth and elderly populations reduces

5 City of Show Low, Arizona Final Budget FY2021
7 Community Health Assessment (CHA) Update, Navajo County, 2020
8 Health Resources Services Administration, Health Professional Shortage Areas (HPSA), HRSA Map Tool https://data.hrsa.gov
9 Show Low, Arizona www.neighborhoodscout.com
10 http://showlowaz.gov/373/Crime-Reporting
isolation and contributes positively to mental health and the prevention of substance abuse issues, which contribute to crime. A significant portion of the City’s public community services and engagement are provided through the city library. The cleanup of the Former Woody’s site will alleviate crime through the removal of blight and by enabling the creation of and public access to the outdoor community space. The overall redevelopment of the cleanup site will reduce welfare threats affecting the sensitive populations by increasing the availability of public programming, removing the existing public safety hazards, and more generally increasing engagement with the community’s sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The sensitive populations, the youth and elderly that account for almost half of the City’s population, are more likely to be adversely affected by the volatile organic contaminants from historical automotive activities at the Former Woody’s site. Cancer is among the leading causes of death in Navajo County (City/target-area health data is reported directly to the County and is not available) with 176.4 deaths per 100,000 people, which is greater than that of Arizona and the US (173 & 152.5). The County is in the 72nd percentile for Air Toxics Cancer Risk and 73rd percentile for Particulate Matter within the US. The socioeconomic status of the City and proportion of sensitive receptors (youth and elderly) are tied to greater harm and higher vulnerability to air pollution and long-term adverse effects such as cancer. Furthermore, poor air quality leads to greater time indoors, greater isolation, and a sedentary lifestyle, which increases risks for mental health issues and substance abuse. In line with these issues, mental health is a significant contributor to hospital stays in the county at a rate of 8.1 (compared to the Arizona average at 7.8) and the suicide death rate (26.6) is significantly higher than that of state (19.6) and national (14) average.

The cleanup site’s soil and perched aquifer groundwater are contaminated with petroleum products from a former bulk fuel plant. Volatile organics from petroleum products such as those that currently contaminate the Former Woody’s site contribute to poor air and groundwater quality. The remediation of the petroleum and Volatile Organic Compounds (VOCs) at the site will remove the threat of adverse health conditions that contribute to cancer and also eliminate the migration of VOCs to the community as they use the existing and proposed public spaces.

(3) Promoting Environmental Justice: The City’s youth, elderly, and low-income populations living in generational homes and neighborhoods in the heart of downtown have had a disproportionate burden of pollution resulting from the historic automotive-industrial expansion as well as the consequential adverse environmental impacts. According to the EPA EJ Screen Demographics Indicators, the City is in the 73rd percentile for youth, 83rd percentile for elderly, and 65th percentile for low-income populations within the US. The planned redevelopment of the parking lot and adjoining community experiential learning space promotes environmental justice by increasing accessibility to the City’s public spaces and programs for these sensitive populations. The library will be able to expand their educational and outreach programs aimed at promoting environmental justice by addressing the existing persistent poverty and unemployment through job training and employment fairs. Greater access to jobs that provide health-promoting benefits such as health insurance, medical leave, and long-term retirement will enable the City’s elderly and youth greater access to health care and preventative screenings. Health outcomes are also influenced by behaviors such as physical activity and

---

12 Mental Health Myths and Facts; mentalhealth.gov
13 EPA EJ Screen Report
14 American Lung Association, Disparities in the Impact of Air Pollution, April 2020
15 EPA NATA Summary of Results, 2014
engagement with the community. These behaviors are influenced by the physical-activity environment, education, and skills. The redeveloped parking lot planned for the site will increase the accessibility and walkability of the downtown corridor, which promotes Environmental Justice (EJ) for the youth and elderly via a more active community lifestyle and greater community engagement and reduces isolation and behaviors associated with adverse health outcomes, drug use, and crime. The revitalization of the target area, particularly of the Former Woody’s and associated southern property that make up the keystone of the redevelopment plan, will mitigate the existing health risks and support economic vitality of the City while addressing EJ issues.

b. Community Engagement
   i. Project Involvement & ii. Project Roles: Local organizations that regularly work with the City will be involved in the EPA Brownfield Cleanup project through the process of cleanup and future redevelopment of the site, and community outreach to share project progress with target-area residents.

<table>
<thead>
<tr>
<th>Name of Org</th>
<th>Point of Contact</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Show Low Main Street (SLMS)</td>
<td>Denise Wiseman Stow 623-340-4131 <a href="mailto:showlowmainstreet@gmail.com">showlowmainstreet@gmail.com</a></td>
<td>SLMS is an economic development organization active in revitalization activities that encourage investment, strengthen the community, preserve historic features, and improve overall appearance of the downtown. As such, SLMS will provide expertise on local economy and outreach assistance, engaging local community in the future reuse of the property. SLMS will also continue to be a funding partner for revitalization activities.</td>
</tr>
<tr>
<td>Chamber of Commerce (CoC)</td>
<td>Trisha Spear 928-537-2326 <a href="mailto:trisha@jtwildlifeoutdoors.com">trisha@jtwildlifeoutdoors.com</a></td>
<td>The goal of the CoC is to create a dynamic and evolving networking environment for the City’s small businesses. The CoC will assist with outreach and local business involvement in revitalization activities as well as be a funding partner for revitalization activities in the target area.</td>
</tr>
<tr>
<td>Show Low Public Library (SLPL)</td>
<td>Lisa Lewis, Library Manager 928-532-4073 <a href="mailto:llewis@showlowaz.gov">llewis@showlowaz.gov</a></td>
<td>The SLPL serves the community by providing community resources, public outreach, and education programs. The SLPL will assist with creating community outreach materials, dissemination of information, and site planning for reuse.</td>
</tr>
<tr>
<td>Navajo County Workforce Development</td>
<td>Stephanie Ray 928-524-4167 <a href="mailto:stephanie.ray@navajocountyaz.gov">stephanie.ray@navajocountyaz.gov</a></td>
<td>The Workforce Development Board’s mission is to facilitate business retention and growth by partnering with education, service agencies, and the business community to empower individuals with skills that promote self-sufficiency. The NCWD will assist with future site planning for reuse and educational programming development.</td>
</tr>
</tbody>
</table>

iii. Incorporating Community Input: A Public Hearing announcement was posted in the local newspaper on Tuesday, October 26, 2021, informing the residents of the public meeting and requesting comment on the EPA Cleanup Application and ABCA for the Former Woody’s Site. The City Council held a public meeting on November 2, 2021, at 7:00 p.m. at the City Council Chambers to discuss the draft application and ABCA. The Show Low TV channel broadcast the meeting live. Public comments on the drafts were accepted until November 15, 2021, via social media, email, the City’s website, mail, and in-person. Public comments from this meeting on the cleanup/reuse alternatives in the draft ABCA will be incorporated into the final decision-making.

A Community Involvement Plan (CIP) will be created to describe the project’s planned community-engagement activities, schedule, background, and key players. Residents can review the CIP online at the City’s website, social media page and in hard copy at city hall and the public library. City staff will continue to inform the community on site redevelopment. All information
gathered from the members of the community, local organizations, and entities during community outreach meetings will be presented at the annual public meeting and will be responded to within one month of the meeting taking place.

Public meetings will be held once a year throughout the grant period to inform and engage members of the public, and periodic updates will be made during regularly scheduled council meetings. **The City relies on multiple forms of media to provide much-needed alternatives to in-person community engagement due to COVID-19 restrictions.** To keep all residents safe and ensure everyone maintains social distancing during the pandemic, meetings will be available through the *Show Low Live TV* station. Additionally, project updates and other grant project-related documents will be provided on social media pages and email distribution lists. The target-area residents and property owners will be encouraged to join an email distribution list and follow the project on social media to remain informed of the latest news of the project’s progress and upcoming events. Partners will be encouraged to disseminate information to those without internet access. Project partners committed to outreach assistance will be asked to help to publicize project progress, events and accomplishments. If non-English speaking members of the community are present, a translation will be made available.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**
   a. **Proposed Cleanup Plan:** Based on the assessments completed under the ADEQ Brownfields Response Contract (ADEQ14-076784), petroleum contaminated soil and perched aquifer groundwater are present at the site. To address the petroleum contamination in soil and perched aquifer groundwater, a draft ABCA was completed in support of this application that evaluated four cleanup alternatives including a no-action alternative. Based upon effectiveness and cost, it was determined that soil vapor extraction and in-situ groundwater remediation is the best strategy to remediate the site.

   Soil vapor extraction (SVE) will be used to remediate the unsaturated vadose zone. Perforated piping will be placed in trenches excavated to about three feet below ground surface. A vacuum will be applied to induce subsurface air flow and remove VOCs from the soil. Air extracted from the subsurface and containing entrained VOCs will be drawn through a pipe manifold to the SVE skid containing the vacuum pump, instrumentation, and controls. Air containing VOCs in concentrations above the applicable permit threshold will be treated using granular activated carbon (GAC). Operation and maintenance of the SVE system is estimated to require approximately 12 months to reduce petroleum concentrations to less than the residential SRLs and groundwater protection levels (GPLs) in site soil. Soil samples will be collected using analytical data for samples collected from air discharged from the SVE system to confirm that soil remediation is complete (i.e., contaminant concentrations are present in soil at concentrations less than residential SRLs and GPLs). The SVE laterals will be abandoned and the SVE system will be decommissioned after soil treatment is complete. The four on-site groundwater monitor wells will be properly abandoned, and six new groundwater monitor wells will be installed. An oxidation release compound (ORC) will be injected into groundwater underlying the site to enhance aerobic biodegradation of petroleum hydrocarbons and reduce concentrations to less than applicable AWQSs. Groundwater treatment will be conducted approximately six months after SVE treatment is initiated and groundwater will be monitored for four quarters after the ORC is introduced into groundwater. The groundwater monitor wells will be abandoned after groundwater treatment is complete. **As part of the cleanup process, barriers and safety signage will be put in place to ensure the safety of residents at all work sites. Additional outreach signage will be placed at the cleanup site for the community’s benefit.**


b. Description of Tasks/Activities and Outputs

<table>
<thead>
<tr>
<th>Task 1: Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong> The City’s Brownfield Project Manager will develop a CIP, outreach materials and social media posts with the assistance of the environmental consultant (consultant). City staff will lead the community meetings (virtual/online during COVID-19 and in-person post-COVID-19) to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong> CIP created within 3 months of award (including a more concrete schedule). Website and Outreach Materials created following award (10/2022) and posted at critical junctures throughout the grant project. The annual community meeting will be held in the 2nd quarter of each year.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong> City: Lisa Robertson – Grants and Transit Manager/Brownfield Project Manager</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong> CIP, 3 Community Meetings, Brochures/Handouts, Social Media Posts, 3 TV Broadcasts, Summary of Community Meetings in EPA required Quarterly Reports.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 2: Programmatic Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong> The City will procure an environmental consultant to assist with the technical parts of the grant project. The City’s Brownfields Project Director will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule and terms and conditions. The consultant will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the 3-year term of the grant. Two city staff will attend two brownfield training conferences/workshops.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong> Contractor selection by 01/2023, ACRES Reporting begins in the 1st quarter &amp; Quarterly Reporting begins in the 2nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in 5th quarter, 9th quarter, and during final closeout.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong> City: Bill Kopp – Public Works Director/Brownfield Project Director</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong> ACRES Database Reporting, 3 Yearly Financial Reports, 12 Quarterly Reports, 3 MBE/WBE Forms, Programmatic Support for the three-year grant period. Two staff to attend two conferences.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 3: Planning</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong> The City’s Brownfields Project Manager will oversee the consultant as they finalize the ABCA and Remediation Design and prepare QAPP and Health and Safety Plan (HASP).</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong> Initiated upon award of the grant 10/2022. QAPP and Final ABCA preparation 03/2023; QAPP approval 06/2023.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong> The consultant will handle the technical aspects of the project with oversight from City: Lisa Robertson – Grants and Transit Manager/Brownfield Project Manager.</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong> 1 ABCA, 1 Abatement Design, 1 Site Specific-QAPP &amp; HASP, 1 O&amp;M Plan</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 4: Cleanup</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong> The City’s Brownfields Project Manager will oversee the consultant as they manage the proposed site cleanup activities including contractor mobilization, well installation, in-situ remedial media application, quarterly groundwater monitoring, capping and vapor barrier, well abandonment, and cleanup reporting.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong> Field mobilization 07/2023; in-situ cleanup application and capping field work complete 07/2024; quarterly groundwater monitoring for 1 year (7/25); final remedial action report 10/2025; EPA closeout report 12/2025.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong> The consultant will handle the technical aspects of the project with oversight from Lisa Robertson – Grants and Transit Manager/Brownfield Project Manager.</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong> one 0.64-acre site ready for reuse, a total 1.89 acres of greenspace created, 5 remediation jobs created (annualized), 1 cleanup report</td>
</tr>
</tbody>
</table>

c. **Cost Estimates:** Below are the cost estimates for this project as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes travel, supplies, contractual costs, and personnel costs. The
personnel costs, travel, and supplies will be in-kind cost share. Hourly rates are approximately $60/hr for Project Director, $33/hr for Project Manager, and $34/hr for Financial Director.

**Task 1 Outreach:** Contractual: $6,000 – Consultant Support for 3 Public Meetings (30hrs x $100, incl. drive time & mileage), Fact Sheets, Addressing Public Comment as necessary and Cleanup Site Signage information (30hrs x $100/hr). **Task 2 Programmatic Support:** Contractual: $20,000 – Programmatic Support for the Three-Year Grant Period to include ACRES Database Reporting, Yearly Financial Reporting contributions, Quarterly Reporting, MBE/WBE Forms, Voluntary Clean-up Plan & Reporting (200hrs x $100). **Task 3 Planning:** Contractual: $9,000 – Consultant to Finalize ABCA, Prepare QAPP, HASP, and permit assistance (90hr x $100). **Task 4 Cleanup:** Contractual: $374,000 – ORC Application ($159,677), SVE System Installation ($192,526), Laboratory Analytics ($21,797). **Cost Share:** In-kind Contribution

<table>
<thead>
<tr>
<th>Category</th>
<th>Task 1 Outreach</th>
<th>Task 2 Programmatic Support</th>
<th>Task 3 Planning</th>
<th>Task 4 Cleanup</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outreach</td>
<td>$24,600</td>
<td>$8,500</td>
<td>$9,540</td>
<td>$33,160</td>
</tr>
<tr>
<td>Programmatic Support</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning</td>
<td></td>
<td></td>
<td>$5,000</td>
<td></td>
</tr>
<tr>
<td>Cleanup</td>
<td></td>
<td></td>
<td></td>
<td>$33,160</td>
</tr>
<tr>
<td>Supplies</td>
<td>$1,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contractual</td>
<td>$6,000</td>
<td>$20,000</td>
<td>$9,000</td>
<td>$374,000</td>
</tr>
<tr>
<td>Total Federal Funding</td>
<td>$6,000</td>
<td>$20,000</td>
<td>$9,000</td>
<td>$409,000</td>
</tr>
<tr>
<td>Cost Share (20%)</td>
<td>$25,600</td>
<td>$13,500</td>
<td>$9,540</td>
<td>$81,800</td>
</tr>
<tr>
<td>Total Budget</td>
<td>$31,600</td>
<td>$33,500</td>
<td>$18,540</td>
<td>$490,800</td>
</tr>
</tbody>
</table>

**d. Measuring Environmental Results:** To ensure this EPA Brownfield Grant is on schedule, the City’s Brownfields Project Team, which will include the consultant, will meet quarterly to track all outputs identified in 3.b using an Excel spreadsheet. The City will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the anticipated time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP, ABCA, and cleanup plan development, contractor procurement, quarterly, annual, and closeout reports, and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem, which include making monthly calls to their EPA Project Officer and, if needed, create a Corrective Action Plan to get back on schedule.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

i. Organizational Structure &

ii. Description of Key Staff: The City has a knowledgeable and experienced staff, a variety of resources at their disposal, and are ready and able to successfully manage and implement all phases of work required to remediate and
redevelop the Former Woody’s site. Bill Kopp will serve as the **Brownfield Project Director** and will be responsible for the overall management of the grant. Bill is the Public Works Director for the City and oversees engineering, environmental quality, Right-of-Way, streets, water and wastewater, among other areas. Bill has been in this position with the City for over 16 years and has over 8 years of experience in overseeing CDBG, ADOT, and ADEQ grant funded projects. Lisa Robertson, Grants & Transit Manager, will serve as the **Brownfield Project Manager**. Lisa has been in this role with the City for over seven years and is responsible for managing grants across city departments which include ADEQ, CDBG, ADOT, and State Library grants. Lisa will be responsible for the day-to-day activities, coordinating the completion of the grant cleanup activities with all involved city departments, project partners, and subconsultants throughout the life of the grant. Cari Bilbie will serve as the **Financial Director**. Cari has been employed with the City of Show Low for 27 years. She is the Accounting Manager for the City with duties that include supervising accounts payable, utility billing, cash receipting, managing the bank and investment accounts, and overseeing all payments and receipts to ensure compliance with local, State, and Federal regulations. She is responsible for preparing for the annual audit, including a single audit that covers Federal Grants as required. Cari will be responsible for all financial aspects of this grant, including timely expenditure of funds and financial management of the cleanup project through the ASAP system. The qualified environmental consultant (QEC) will assist with the technical and reporting portions of the project.

iii. Acquiring Additional Resources: Using local contracting requirements and procurement process, the City will procure a qualified environmental consultant to assist with technical and reporting portions of the Brownfield Cleanup in addition to any other contractors needed to complete the project. The City will ensure compliance with the EPA’s “Professional Service” procurement process.

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: The City was awarded a $86,880 ADEQ Brownfields Grant in 2014 (ADEQ14-076784). The purpose of this grant was to assess the Former Woody’s site. The goal was to identify if a material release had occurred as the result of the operations of the former bulk fuel storage facility and then to delineate the horizontal extent of contamination in the soil as well as the vertical extent of contamination to identify if groundwater had been impacted. A hazardous materials survey was also funded by this grant money. Hazardous materials were identified in the on-site buildings for the cleanup site and southern properties. To date, the assessments made possible by the ADEQ Brownfields grant has resulted in the completion of a Phase I ESA, 3 Phase II ESAs and 1 draft ABCA. All the funding has been spent and this award has been closed. Additionally, the City was awarded a CDBG award of $315,000 in 2020 to improve infrastructure including sidewalks, drainages, and roads along 11th and Hall Street. The funding has been fully expended and award closed. The improvements made possible by this grant have increased the connectivity of the downtown civic center and accessibility for the community.

(2) Compliance with Grant Requirements: For the City’s past grant awards, there were no delays in executing the project as the City held to the schedule established by the granting agency. The City has a good history of compliance with grant schedules, terms and conditions, and all reporting with award agencies. The City completed all grant reporting via the required state forms and sent via email to the granting agency. Ms. Robertson/Ms. Bilbie tracks all project results individually via Excel spreadsheets and will be able to manage the requirements for tracking projects in ACRES if awarded a grant from the EPA.
FY22 Brownfield Cleanup Grant
Threshold Criteria
1. **Applicant Eligibility**
The City of Show Low, Arizona, is eligible to apply for the EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR 200.64.

2. **Previously Awarded Cleanup Grants**
The City of Show Low affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
The City of Show Low affirms that the proposed site does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**
The City of Show Low acquired title to the site on September 15, 2021.

5. **Basic Site Information**
a) Site Name – Former Woody’s Bulk Fuel Storage and Distribution Facility (Former Woody’s);
b) Site Address – 180 North 11th Street, Show Low, Arizona 85901; and
c) Current Site Owner – The City of Show Low, Arizona

6. **Status and History of Contamination at the Site**
a) The site is contaminated with petroleum products in the soil and perched aquifer groundwater;
b) The site is a single, 0.64-acre parcel of land located at the heart of the original downtown business district of Show Low. The site was used as a bulk fuel storage facility beginning in 1955 and contained four vertical fuel aboveground storage tanks (ASTs), product piping, and distribution system. A modular office building and loading docks were constructed at the site in 1977. The site operated as a bulk fuel storage and dispensing facility until 2009, after which no commercial or other activities have been conducted at the site. The dilapidated modular structure, concrete pad, and other remnants of the former operations are present on the site. No fuel products are stored or otherwise used currently on the site;
c) Petroleum contamination includes benzene and total xylenes above Arizona Department of Environmental Quality (ADEQ) non-residential Soil Remediation Levels in subsurface soils and benzene, toluene, ethylbenzene and xylene contamination above Aquifer Water Quality Standard (AWQS) in the perched aquifer groundwater; and
d) Four vertical fuel ASTs released petroleum at the site due to poor housekeeping practices not uncommon during the time the ASTs were in use and the age of the ASTs (1940s to 2009). Previous Phase I/II Environmental Site Assessments (ESAs) conducted at the site in 2008, 2009, 2015, 2020 and 2021 identified releases of petroleum products onto the ground which then migrated to the subsurface and perched aquifer groundwater. The vertical and horizontal extent of contamination has been generally defined within the central portion of the site underlying and near the former bulk storage operations. Assessments conducted on the adjoining properties did not identify off-site impacts from petroleum product releases.
7. **Brownfields Site Definition**  
The City of Show Low affirms that the site is:  
a) Not listed or proposed for listing on the National Priorities List;  
b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and  
c) Not subject to the jurisdiction, custody, or control of the US government.

8. **Environmental Assessment Required for Cleanup Grant Applications**  
- December 12, 2008: A Phase I ESA completed.  
- June 25, 2009: Phase II ESA for initial investigation of subsurface impacts was completed.  
- January 12, 2015: A second Phase II ESA for delineation of contamination was completed.  
- February 18, 2020: A third Phase II ESA to determine migration of contamination was completed.  
- October 30, 2020: A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was completed.  
- October 11, 2021: A Hazardous Materials Survey was completed.  
- October 19, 2021: A Phase I ESA completed.  
- October 27, 2021: A draft ABCA was completed to update cost estimates following COVID-19 impacts on supplies.

9. **Enforcement or Other Actions**  
There are no known or ongoing enforcement or other actions related to this site.

10. **Sites Requiring a Property-Specific Determination**  
The City of Show Low affirms that this site does not require a Property-Specific Determination to be eligible for Brownfield Grant funding.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability**  
b. **Property Ownership Eligibility – Petroleum Sites**  
i. **INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION**

(1) **Current and Immediate Past Owners**  
The City of Show Low acquired the site by negotiated purchase from the City of Show Low Municipal Property Corporation (an Arizona Corporation).

(2) **Acquisition of Site**  
The site was acquired by the City of Show Low on September 15, 2021.

(3) **No Responsible Party for the Site**  
The City of Show Low and the immediate past owner (i) has not dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site; (ii) has not owned the site when any dispensing or disposal of petroleum (by others) took place; and (iii) took reasonable steps with regard to the contamination at the site.
(4) **Cleaned Up by a Person Not Potentially Liable**
The City of Show Low (the applicant) has not dispensed or disposed of petroleum or petroleum product or exacerbated the existing petroleum contamination at the site. The City of Show Low took reasonable steps with regard to the contamination at the site.

(5) **Judgments, Orders, or Third-Party Suits**
**There is no responsible party** (including the City of Show Low) **identified for the site, through either:**

(a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or

(b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or

(c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

(6) **Subject to RCRA**
The site is not subject to any order under § 9003(h) of the Solid Waste Disposal Act.

(7) **Financial Viability of Responsible Parties**
The current and immediate past owners are not identified as responsible for the contamination at the site; therefore, financial viability of the responsible parties does not apply to this site.

12. **Cleanup Authority and Oversight Structure**

a. The City is not currently enrolled in a state or tribal response program. The City will hire a qualified environmental consultant prior to implementing remediation activities. The City will comply with competitive procurement provisions of 2 CFR 200.317 through 200.327 for contracting the qualified environmental consultant. The consultant will provide the technical expertise required to conduct, manage, and oversee the cleanup, ensuring the adherence to applicable state and federal regulations and requirements.

b. The subject property is accessible on the north and eastern sides from public roads. The western and southern property boundaries are owned by the City and as such, are accessible during cleanup activities.

13. **Community Notification**

a. **Draft Analysis of Brownfield Cleanup Alternatives**
The City of Show Low announced their intent to apply for cleanup funding for the Former Woody’s site through the local newspaper on October 26, 2021. A draft ABCA for the site and draft of this proposal were made available for public review and comment at City Hall, at the Public Meeting held on November 2, 2021, and on the City’s website.
b. Community Notification Ad
The City of Show Low announced their intent to apply for cleanup funding for the Former Woody’s site through the local newspaper on October 26, 2021 and two social media posts. The announcements indicated that:
- The draft ABCA for the site was available for public review and comment at the City Hall and at the City’s website;
- Project staff (contact information provided) could be contacted for feedback; and
- A public meeting to solicit input would be held on November 2, 2021, and feedback should be submitted to Lisa Robertson by phone, fax and/or TeleTY text telephone.

c. Public Meeting
The City Council held a public meeting on November 2, 2021, at 7:00 p.m. at the City Council Chambers to discuss the draft proposal and ABCA. The Show Low TV channel broadcast the meeting live. Comments were accepted until November 15, 2021.
- There is no meeting comment sheet attached as no comments were received.

d. Submission of Community Notification Documents
No comments were received, therefore comments and the City’s response to those comments are not included as an attachment; however, the following community notification documents are included as an attachment to this proposal:
- A copy of the draft ABCA;
- A copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at least 14 days before the application was submitted to the EPA.
- Meeting sign-in sheets/participant list.

14. Statutory Cost Share
a. The City has committed $81,800 from its General Fund in the form of salaries in order to meet the required 20% cost share. Please see the attached leveraging commitment letter from the City. The in-kind salary breakdown for the cost share is explained as follows:

   In-Kind Contribution Task 1 Outreach: Personnel: $24,600 – Community Involvement Plan, Outreach Brochure/Handouts, Social Media Posts, Newspaper Posts, Show Low TV, Annual Community Meetings (3 Meetings), Signage for the Cleanup Site and Responses to Community Input (80hr x $60/hr; 600hr x $33/hr); Supplies: $1,000 – Outreach Supplies (paper for printouts, ink, large signage printing) 
   Task 2 Programmatic Support Personnel: $8,500 – ACRES Reporting Assistance, 3 Yearly Financial Reports (40hr x $60/hr, 122hr x $33/hr, 61hr x $34/hr); Travel: $5,000 – Two staff to attend two conferences (flights at $750, hotel at $350, incidentals and per diem at $150 x 2 attendees).
   Task 3 Planning: Personnel: $9,540 Project and Consultant Management (60hr x $60/hr, 180hr x $33/hr). 
   Task 4 Cleanup: Personnel: $33,160 – Oversight for consultant, Managing City Departments, Site Access (200hr x $60/hr, 600hrs x $33/hr, 40hrs x $34/hr).

b. The City of Show Low is not requesting a hardship waiver of the cost share.
15. Waiver of the $500,000 Limit
The City of Show Low is not requesting a waiver of the $500,000 limit.

16. Named Contractors and Subrecipients
Not Applicable