SOUTHEAST IDAHO COUNCIL OF GOVERNMENTS
FY22 BROWNFIELDS ASSESSMENT GRANT APPLICATION
Narrative Information Sheet

1. Applicant Identification: Southeast Idaho Council of Governments (SICOG) Community & Economic Development
   214 E Center Street Suite 10
   Pocatello, ID 83201

2. Funding Requested
   a. Grant Type: Community-Wide Assessment
   b. Federal Funds Requested
      i. Requested Amount: $500,000
      ii. N/A

3. Location: SICOG serves an area of seven counties in Southeast Idaho, including lands located in Bingham, Power, Bannock, Caribou, Oneida, Franklin, and Bear Lakes Counties. It excludes the Fort Hall Indian Reservation, as SICOG does not have permission from the tribe to assess trust lands located on the reservation.

4. Target Area and Priority Site Information: The target area includes lands located in Bingham, Power, Bannock, Caribou, Oneida, Franklin, and Bear Lakes Counties in southeastern Idaho. Our target area includes the Pocatello Opportunity Zone (census tract #16.01). Priority sites featured in this application include:
   a. Oasis Sports Bar
      304 N. Main St
      Pocatello, ID 83204
   b. Pocatello Electric
      258 N. Main St.
      Pocatello, ID 83204
   c. Odd Fellows Building
      257 N. Main St.
      Pocatello, ID 83204
   d. Old Bangs Building
      Bannock County
      Arimo
      Chubbuck
      Downey
      Inkom
      Lava Hot Springs
      McCammon
      Pocatello
5. Contacts
   a. Project Director
      Who: Krystal Denney
      Title: Community and Economic Development Director
      Address: 214 E Center Street Suite 10
                Pocatello, ID 83201
      Phone: (208) 233-4535
      Email: krystal@sicog.org

   b. Chief Executive/Highest Ranking Elected Official
      Who: David Doran
      Title: Executive Director
      Address: 214 E Center Street Suite 10
                Pocatello, ID 83201
      Phone: (208) 233-4535
      Email: daved@sicog.org

6. Population
   Bingham County: 47,202
   Power County: 7,643
   Bannock County 88,795
      City of Pocatello 54,255
   Caribou County 7,123
   Oneida County 4,520
   Franklin County 14,215
   Bear Lakes County 6,143

7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Other Factor</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>None of the Other Factors are applicable.</td>
<td></td>
</tr>
<tr>
<td>X Community Population is 10,000 or less.</td>
<td>Narrative Info Sheet</td>
</tr>
<tr>
<td>X Applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>Page 5</td>
</tr>
<tr>
<td></td>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
</tr>
<tr>
<td>---</td>
<td>------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<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>
</tr>
<tr>
<td></td>
<td>The priority site(s) is in a federally designated flood plain.</td>
</tr>
<tr>
<td>X</td>
<td>The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
</tr>
<tr>
<td>X</td>
<td>The reuse of the priority sites(s) will incorporate energy efficiency measures.</td>
</tr>
<tr>
<td></td>
<td>30% or more of the overall project budget will be spent on eligible reuse/area wide planning activities, as described in Section I.A., for priority site(s) within the target area</td>
</tr>
<tr>
<td></td>
<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>
</tr>
</tbody>
</table>

8. **Letter from the State or Tribal Environmental Authority**
   SICOG has attached a letter of acknowledgement from Idaho Department of Environmental Quality.

9. **Releasing Copies of Applications:** Not Applicable
Narrative Information Sheet Attachment

Letter from Idaho Department of Environmental Quality
November 24, 2021

Mr. Mark Blascett  
Southeast Idaho Council of Governments  
214 East Center Street  
Pocatello, Idaho 83201

RE: State Letter of Acknowledgement for the Southeast Idaho Council of Governments 104(k) Community Wide Assessment Grant Application

Dear Mr. Blascett:

This letter acknowledges that the Southeast Idaho Council of Governments has notified the Idaho Department of Environmental Quality (IDEQ)- the designated State Environmental Authority- that the Southeast Idaho Council of Governments is submitting to the Environmental Protection Agency (EPA) a Brownfields Assessment Grant. The notification to IDEQ satisfies the notification criteria of the EPA Proposed Guidelines for Brownfields Assessment Grants.

The Southeast Idaho Council of Governments intends to apply for both petroleum and hazardous substances funding. The Southeast Idaho Council of Governments represents Bannock county, Bear Lake county, Bingham county, Caribou county Franklin county, Oneida county, and Power county in southeastern Idaho.

The IDEQ fully supports the submission of a Brownfields 104(k) Assessment Grant application in order to help in the effort to revitalize Brownfield Sites in their communities.

Regards,

Eric Traynor  
Idaho Brownfields Program Manager  
Idaho Department of Environmental Quality
Southeast Idaho Council of Governments (SICOG)
EPA Brownfields Assessment Grant FY22
Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of the Target Area

Southeast Idaho Council of Governments (SICOG) is applying for a $500,000 brownfields assessment grant to assess sites in seven counties in southeast Idaho: Bingham, Power, Bannock, Caribou, Oneida, Franklin and Bear Lakes Counties (target area), with a special focus on properties within Historic Downtown Pocatello and the Pocatello Opportunity Zone. SICOG would like to use grant funds to focus on redevelopment of properties that will increase the quality of life in our communities by providing affordable housing, access to childcare, community space for gathering, and revitalizing Pocatello’s downtown area.

The target area serves a combination of agricultural, mining and railroad interests. The Southeast region is known for phosphate mining and processing, fishing, hot springs and the production of wheat, sugar beets and of course, potatoes. Bingham and Power counties are home to global food manufacturers. The four active phosphate mines in Caribou County account for 14% of the country’s phosphate used in fertilizer, detergents, feed and industrial applications. The phosphate is mined in the southern counties, and much of it is processed at the J.R. Simplot Don Plant (Simplot Plant) just outside of Pocatello. Pocatello, Idaho’s third largest city, is also a major railroad hub.

This region's unique blend of urban, industrial, and rural character creates a variety of environmental challenges and opportunities. Residents are exposed to contaminants from active mining operations such as the Simplot Plant and its emissions discussed below. Residents are also concerned about the former gravel mine at the Bingham County Landfill. Shifting trends in industries like agriculture, mining and railroading has led to abandoned downtown properties which sit vacant, sometimes for decades. Although the presence of industry leaders, such as Amy’s Kitchen, which took over the abandoned Heinz plant in 2015, has helped with unemployment rates in our region, wages in southeastern Idaho are among the lowest in the state. In the wake of the COVID-19 pandemic, our region has seen a housing shortage as Americans in more populated areas flock to our region due to perceived safety and need for open spaces and less-densely populated areas. Low pay, childcare shortages and a lack of affordable housing have made it harder for families to cover basic expenses. We recognize that a viable and safe housing stock is a key to sustainable communities. We will therefore focus assessment on sites that promote and prioritize housing development and livable communities with redevelopment of childcare centers, office space, community centers and community facilities.

ii. Description of the Priority Brownfield Site(s)

Of the many eligible sites in our area, we have a list of 16 sites in immediate need of assessment and have selected six priority sites to highlight in this application based on input from the communities, redevelopment potential, and community need.

**Pocatello Electric:** Located in Historic Downtown Pocatello and the Pocatello Opportunity Zone, this three-story building is a new housing and business space opportunity. Redevelopment is hampered by the suspected presence of asbestos and lead based paint. Assessment is necessary before this property can be expanded to include additional small business office space on the third floor, as well as additional business or apartment space on the second floor.

**Oasis Sports Bar:** Located across the street from the Pocatello Electric Building in the Pocatello Opportunity Zone, this two-story building is under new ownership. The new owners would like to address concerns of asbestos before moving forward with redevelopment. The first floor of the building houses the Oasis Sports Bar, one of
Pocatello’s oldest bars. Redevelopment plans for the second floor include new housing, creating approximately eight new apartments in Historic Downtown Pocatello.

*Odd Fellows Building:* Also included in the triad of buildings in Historic Downtown Pocatello and the Pocatello Opportunity Zone, the Odd Fellows Building is a multi-story building that boasts an empty second floor. Asbestos and lead based paint are concerns prior to redevelopment. Following assessment, redevelopment plans include two new apartments on the second floor.

*Old Bangs Building:* Constructed in 1950 and located in Historic Pocatello and the Pocatello Opportunity Zone, this building served as the home of the James C. Bangs Stationer supply store, until that company merged with another in 2009, leaving the building predominantly vacant. Presence of asbestos and lead based paint are the primary concerns. The Parks Department is interested in redeveloping this property into a community center, but the building needs to be tested for contamination and properly abated prior to redevelopment. Located less than four blocks from the three above-described properties, this property boasts a large parking lot and is adjacent to a beautiful park. Redeveloping this property as a community center opens up potential for a myriad of community functions and gatherings designed to improve the sense of community and quality of life for downtown residents.

*Old Flying J:* Located just over 20 miles southeast of Pocatello, McCammon serves as a bedroom community for Pocatello’s workforce. This former gas station sits vacant and has been acquired by a new owner. Historically there were multiple above ground storage tanks, which have now been removed. At the time of tank removal, the soil below the tanks was never tested. Once the property has been fully assessed and deemed free of any soil contamination, the landowner would like to redevelop this space as a new childcare center.

*Bingham County Landfill:* This 17-acre former gravel mine and landfill is in a growth area and adjacent to a new residential housing development. The site was operated as a landfill from 1960 to 2001 and has remained vacant since. Onsite concentrations of mercury, arsenic, selenium, and thallium exceeded Initial Default Target Levels (IDTLs) in soils and groundwater, and vapor samples showed elevated levels of methane and hydrogen sulfide on the eastern portion of the site. Following surface soil cleanup, this site will be redeveloped into a youth soccer complex featuring 8 soccer fields and a parking facility for the Eastern Idaho State Fair.

### b. Revitalization of the Target Area

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

“Support Brownfields cleanup and assessment programs” is listed as a primary goal for strengthening communities within the target area in SICOG’s 2020 Comprehensive Economic Development Strategy (CEDS), a regional strategic plan developed by local business and community leaders. In addition to this comprehensive goal, the CEDS 2021 Summary identifies six regional goals as well as several county-specific goals. Redevelopment of the priority sites aligns with area-wide planning goals in the following ways (italicized paragraph headings state the goals identified in our CEDS):

*Providing affordable housing:* Idaho faces extremely low housing vacancies. As individuals from out of state look to Idaho as a place for a second home, prices are rising at an alarming rate and very few full-time residences remain available. As a whole, the State has a rental vacancy of 4%, which is 35.5% lower than the national average. Only eight states in the nation have a lower rental vacancy rate. The counties we serve have an average rental vacancy of 5.9%, with Franklin County reporting a 0% rental vacancy rate. An inability to find rentals can lead to increased homelessness, particularly as Idaho and our target counties specifically see a spike in population. Homelessness is closely connected to declines in physical and mental health; homeless persons experience high rates of health problems such as HIV infection, alcohol and drug abuse, mental illness, tuberculosis, and other conditions.

---

1 SICOG CEDS 2020-2025; SICOG, CEDS. Seven County Summary for Region 5, 2021.
2 https://ipropertymanagement.com/research/rental-vacancy-rate/idaho
3 https://www.cdc.gov/phlp/publications/topic/resources/resources-homelessness.html
As the number one priority identified in the CEDS, we are especially interested in redevelopment that creates housing. One of the primary goals within our 2020 CEDS is “partner to support affordable housing and neighborhood revitalization” within the Opportunity Zone. Our CEDS goes on to identify low housing availability and inventory as both a “prominent weakness” and a “critical threat” to the target area. Redevelopment of the four downtown Pocatello properties will add over a dozen apartments or condominiums to the rental or housing market within the Opportunity Zone.

**Providing quality and affordable childcare services:** Redevelopment of the 4,000 square foot building at the Old Flying J location addresses the region’s number two priority. A 700 square foot room can be used as a childcare room for 20 children supervised by 2 adults. Remodeling this large existing structure would create jobs and provide care for many children. A 2020 study conducted by the U.S. Chamber of Commerce Foundation found that Idaho loses $479 million annually due to breakdowns in childcare. When their children are cared for, parents within our region will be able to go to work on time, stay at work throughout the day and maintain better focus.

**Diversifying and expanding small business:** Redevelopment of the four buildings in Historic Downtown Pocatello meets our region’s number three priority. Additional office space will be created in the Pocatello Electric Building as well as the Old Bangs Building, and cleanup of the buildings will support the existing businesses in the buildings.

**Improving mental health and reducing social isolation:** Identified as the region’s fifth most important aim, redevelopment of most of the priority sites aligns with this goal. Redeveloping the Old Bangs Building into a community gathering place will create space for people to gather with community members and friends. A related goal identified in our 2020 CEDS is to “strengthen communities by inspiring community vitality.” Research has shown community sports can help relieve boredom, one of the biggest factors in youth crime. Sporting events are also proven to be a great facilitator for community engagement and interaction, helping to build stronger bonds within neighborhoods and communities. Currently, Bingham County, a population of 45,551, has no kids sports complex to create a soccer program. Redevelopment of the former Bingham County Landfill will not only help create physical and social opportunities for our youth but will also serve to strengthen and inspire community vitality and reduce social isolation.

**Increasing tourism and revitalization of Historic Old Pocatello:** This Bannock County specific goal is furthered by the redevelopment of the four downtown sites featured. The first three priority sites are located on the same block; therefore, their redevelopment will go a long way to increase the atmosphere of the area and will preserve several prominent downtown buildings which are otherwise underutilized.

---

**ii. Outcomes and Benefits of Reuse Strategy**

Redevelopment of the priority sites will result in numerous benefits to the seven counties in our region. Because the four downtown Pocatello buildings are in an Opportunity Zone, developers looking to defer taxes on capital gains until 2026 have an incentive to invest in the projects. Redevelopment of these properties will benefit a disadvantaged community by providing twelve new apartments housing and two to three business spaces in the area. Presently Pocatello has a homeowner vacancy rate of 1.2%. Redevelopment of these properties would likely add over a dozen new properties to this very tight housing market, as well as attract outside investment into a Justice40 community. The redevelopment of the Bangs Building alone is expected to triple the investment into the Pocatello Opportunity Zone and will leverage an estimated $1.54 million in private funding. While the Bangs Building project will not create jobs, it will create a new playground, children’s wading pool, and an outdoor music amphitheater for a low-income community with very little community space. The Bingham County landfill project will create two jobs, and it will create recreational opportunities for local children. During the Eastern

---

5 https://www.sicog.org/ceds.html

Page 3 of 10
Idaho State Fair, the soccer complex’s parking area will be used for fair parking. The county plans to charge $5-$10 per car, with proceeds supporting youth soccer. The additional parking area will also allow four additional concerts per year to be offered at the fairgrounds, generating additional net income to Bingham County of approximately $25,000 per year. The Old Bangs Building, Pocatello Electric and Odd Fellows buildings are recent recipients of energy efficiency upgrades. The Oasis Bar Building will see energy improvements to lighting and insulation. The Bangs Building will have a wide area of green space and a built-in runoff collection system to preserve water, and trees will be planted to provide natural cooling for the building. Idaho Power is donating all LED lighting to save energy in the building, and water in the kids’ wading pool will be recycled using a combination of reverse osmosis, ultraviolet light and microfiltration. SICOG will work with all developers to encourage the use of energy efficient building practices in redevelopment work. Our region’s energy is generated from geothermal and hydropower sources and will be used at our priority sites, with the exception of the Bingham County Landfill.

c. Strategy for Leveraging Resources
i. Resources Needed for Site Reuse
SIGOG has a tenured history of leveraging funds for redevelopment projects that can used to complement brownfields funds. As a non-profit organization and an economic development entity, we are eligible for a wide variety of funding and have experience applying for and managing grants and loans. Specifically, we have run an extremely successful Revolving Loan Fund since 1984, and landowners will have the ability to apply for funding through this established fund to assist with cleanup and redevelopment. Each year we assist local communities in obtaining and managing multi-million-dollar projects in grants and loans.

Idaho Gem Grants are also available for planning and implementation of economic development projects. Power companies provide funds to the communities they serve, including Idaho Power’s Community Contributions program, which provides support ranging from support for capital fund drives to sponsorship of nonprofit fundraising events to non-cash donations. Idaho Power has pledged to donate LED lighting for the Old Bangs Building project.

Historic Downtown Pocatello is an organization that has been working to redevelop and revitalize downtown Pocatello since 1991. To date, they have obtained and funneled $1.8 million of Community Development Block Grant Funding into the Historic Downtown area, where four of our priority sites are located. Historic Downtown Pocatello has also raised $1.54 million in private funding for the Old Bangs Building and has pledged additional fundraising assistance for the sites in Historic Downtown Pocatello. These sites, as well as the Old Flying J, are privately owned, and private financing will also be leveraged for redevelopment.

ii. Use of Existing Infrastructure
The priority brownfields sites are all connected to community water and sewer and have power, natural gas, phone, and high-speed internet connections. The Pocatello Electric, Oasis Sports Bar and Odd Fellows buildings will be reused after assessment and any necessary cleanup. Their brick exteriors provide a lot of character to the neighborhood and the intent is to keep the buildings intact, while redeveloping the interior to fit the housing and business space needs. The Old Bangs Building will also be reused after assessment and cleanup. Redeveloping the Old Flying J into a childcare center will take a bit more construction; however, the existing concrete and building will likely be able to be reused. This property’s location close to major roadways provides easy access for redevelopment. The Bingham County Landfill site will be built to support the existing infrastructure of the Eastern Idaho State Fairgrounds.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
a. Community Need
i. The Community’s Need for Funding
SIGOG and the communities we serve do not have funds for brownfields assessment. Most of the communities in our seven-county area have populations under 10,000 people. SICOG is primarily funded through grants from
the US Economic Development Agency, supplemented by Community Development Block Grant support within our associated communities. This funding is focused and does not provide an opportunity to address brownfields assessment. The communities that house our priority sites have no discretionary funding to put toward assessment. As such, we have received letters of support for this application from every county and city within our target area, including the mayor of Pocatello.

As of the 2020 CEDS, unemployment rates in the area were low; however, wages in southeastern Idaho are among the lowest in the state. Many census tracts within our region are within the 80th – 100th percentile on EPA’s EJ Screen Elevated Demographic Index. Four of the seven counties in our region have a poverty rate greater than both the State and the United States, and five of our seven counties have lower than average median household incomes, ranging from 9-23% lower than the United States median household income. The counties in our region rely heavily on tourism, an industry which has suffered greatly in the wake of the COVID-19 pandemic. 60% of our residents are over 65 years of age or under 18, placing the burden of full-time wage earning on 40% of the population. Retirees are moving to region at a faster rate resulting in a decrease in the workforce population. Additionally, without proper long-term care facilities or childcare facilities, we have seen an increase in seasoned workers leaving workforce to take care of aging relatives and their young children, further exacerbating the workforce shortage. The ALICE Report, commissioned by the United Way, aims to identify those that are asset limited, income constrained, and employed. The ALICE population represents those among us who are working, but due to childcare costs, transportation challenges, high cost of living, and other expenses are living paycheck to paycheck. Within the target area, our ALICE populations range from 39% in Franklin County to 47% in Power County, significantly higher than the total ALICE population of 28% for the state of Idaho.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Native American youth within the target area are of primary concern for SICOG. The Fort Hall Reservation is located at the center of the target area, and while the tribes do not wish for us to assess tribally owned lands, remediation of Brownfields sites around the perimeter of the reservation are important to the Shoshone-Bannock Tribes. The non-reservation school districts of Pocatello (Bannock County) and Blackfoot (Bingham County) are the two school districts with the highest population of Native American students in the state of Idaho. Idaho’s education data illustrates wide gaps from kindergarten through third grade. In 2018, only 30 percent of Native American and Alaskan Native students scored at grade level on Idaho’s new reading test. By contrast, 57 percent of white students scored at grade level. Studies show only 37 percent of Idaho Native American high school graduates went on to college in 2017, compared to 46 percent of white students. Sadly, suicide is the 2nd leading cause of death in Idaho American Indian youth ages 10-24. Suicide rates among Idaho American Indians have doubled since 2014 and are now 1.3 times that of white residents. Given our region’s geographical proximity to the Fort Hall Reservation, residents of the Reservation frequently leave the Reservation to come to neighboring towns like Pocatello for shopping, entertainment and other services not offered on the Reservation. Redeveloping the Old Flying J into a childcare center will provide new opportunities for preschool education for our Native American Youth. The creation of a youth soccer complex at the Former Bingham County Landfill, which is located just on the border of the Fort Hall Reservation, will give our Native American youth a new after school activity to enjoy, as will the wading pool planned for the Community Center at the Old Bangs Building.

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

Brownfields and their associated contaminants may lead to health concerns for area residents. Benzene, a common contaminant which is known to cause leukemia, has industrial use in lubricants, rubbers, dyes, solvents, gasoline,
drugs and pesticides; and is frequently found at petroleum release sites like the Flying J. Our counties all have rates of leukemia higher than the state rate of 16.4/100,000 people. These range from just over the state average in Bannock County to approximately 71/100,000 people in Oneida County. In addition to leukemia, high rates of lung cancer are seen Caribou, Power and Oneida Counties (approximately 56-63/100,000 persons). This is higher than the state rate of 49.1/100,000 persons. Asbestos is a known cause of lung cancer and other diseases and is contaminant of concern at brownfields sites including the Historic Downtown Pocatello sites. Assessment and cleanup of brownfield’s sites will help our population reduce exposures to cancer-causing contaminants and have better health outcomes.

(3) Promoting Environmental Justice

Residents living in the target area struggle with negative environmental consequences regularly, particularly from the booming phosphorus mining and processing operations. The Simplot factory near Pocatello has processed locally mined phosphorus into fertilizer for the past 80 years and produces sulfur dioxide (SO2) and sulfuric acid mist. The factory also maintains a giant toxic waste pile, which they seek to expand pending the outcome of litigation initiated by the Shoshone-Bannock Tribes, the residents of the Fort Hall Reservation. In late 2015, the J.R Simplot Company reached a settlement with the US EPA and Department of Justice to address violations of the Clean Air Act at five of its plants, including one located in Pocatello (Bannock County). Per the settlement, Simplot was required to cut its SO2 emissions in half moving forward. Short-term exposures to SO2 can lead to serious respiratory problems, including constriction of airways in the lungs and increased asthma symptoms. Additionally, SO2 is a precursor to the formation of PM2.5, which causes a wide variety of health and environmental impacts, including asthma attacks, reduced lung function, and aggravation of existing heart disease. It is perhaps no surprise that the rate of deaths from heart disease in Bannock County 194/100,000 people, significantly higher than the State average of 155.9/100,000. Six out of seven counties in our region suffer higher rates of deaths from heart disease than the State average, ranging from 180/100,00 people in Bear Lake County to 239/100,000 people in Oneida County. In 2019, Simplot pursued a land swap with the U.S. Government, which would allow the company to expand the phosphogypsum stacks next to the Reservation. The stacks are composed of waste from fertilizer production and contain small amounts of naturally occurring radium and uranium. The stacks also can release large concentrations of radon gas. In its lawsuit, the Tribe alleged the stacks pollute the Portneuf River that flows through the Reservation, as well as send fine particles of radioactive material from the gypsum stacks to the Reservation and toward the cities of Chubbuck and Pocatello. Brownfield redevelopment will help move environmental justice issues forward by providing housing for our low-income and elderly populations. It will cleanup carcinogens and reduce the cumulative exposure residents experience. Cleanup and redevelopment will diversify the economy through downtown improvements that entice residents to support and build local businesses instead of having blighted town centers. It will increase mental health by providing gathering places and sports facilities to reduce social isolation.

b. Community Engagement

i. Project Partners and ii. Project Partner Roles

SICOG has strong partnerships throughout the target area and regularly works with each of the cities and seven counties. In addition to local governments, we have also received commitments from the following community organizations:

<table>
<thead>
<tr>
<th>Partner</th>
<th>Point of Contact</th>
<th>Specific Role in Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bingham County Economic Development</td>
<td>Tiffany Olsen, 208-782-3177 <a href="mailto:tolsen@co.bingham.id.us">tolsen@co.bingham.id.us</a></td>
<td>Provide in-kind assistance for outreach materials. Work with partners to assist with redevelopment of Bingham County Landfill</td>
</tr>
</tbody>
</table>

---

15 Tribes sue to stop Idaho land swap amid pollution concerns | Idaho Business Review
16 J.R. Simplot Company to Reduce Emissions at Sulfuric Acid Plants in Three States - SweetwaterNOW
17 Heart Disease FS 0911 (idaho.gov)
### iii. Incorporating Community Input

We plan to communicate progress and identify new sites through four public meetings, at least 20+ small stakeholder meetings with landowners, 12 quarterly email updates to project partners, and Facebook and Instagram updates. Our Brownfields Coordinator will maintain an active presence at our board meetings (which have representatives from multiple local communities). At these board meetings, our Brownfields Coordinator will hear concerns, identify community needs related to redevelopment, and communicate our plans and achievements. The public meetings will be announced on our website, in the newspaper, and in the quarterly email updates to project partners. All meetings will accommodate sight, hearing and ADA needs as needed. 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 Coordinator. Consideration of community input and preparation of a response will be through our Brownfields Coordinator for routine matters, and via written response from our Board President if significant concerns or complaints arise.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (50 POINTS)

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

**Task 1: Program Management** – Activities will include procurement of a QEP, completing eligibility questionnaires, facilitating site access, producing quarterly reports, entering information into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES), and coordinating with EPA on progress toward work plan goals. We will also meet with landowners about proposed assessments and their findings, update local city and county officials on site-specific activities in their respective areas, and attend one national brownfields conference. **Schedule:** October 2022 - September 2025. **Lead:** SICOG staff. **Outputs:** One QEP contract, 10 site eligibility questionnaires and 10 access agreements, 12 quarterly reports, ACRES entries for 10 new sites, one final closeout Report.

**Task 2: Community Outreach** – Activities will include completing a community outreach plan, creating a brownfields page on our website, posting updates to our Facebook at Instagram pages, preparing educational fact sheets and developing presentation materials, expanding relationships with developers, lenders, and blighted property owners through small stakeholder meetings. **Schedule:** December 2022 – July 2025. **Lead:** SICOG with support from the QEP. **Outputs:** Brownfields information added to our web page, 12+ social media updates, an informational fact sheet, 4 fact sheets discussing site specific assessments, 4 public meeting presentations, and 20+ landowner/stakeholder meetings.

**Task 3: Site Assessment** – Activities will include producing a Programmatic Quality Assurance Project Plan (QAPP) and a Building Materials Sampling (BMS) guide. Activities also include completing 5 Phase I assessments (1 petroleum, 4 hazardous substance) and 5 Phase II Assessments (1 petroleum, 4 hazardous substance) on our priority sites. Phase Is will target the following concerns on our priority sites: identify hazardous substances at the Downtown Historic Pocatello sites and potential above-ground storage tank petroleum contamination at the Old Flying J site. An additional five Phase I site assessments will be conducted at non-priority sites. Phase II assessments will include the following activities at priority sites. At the Flying J, subsurface
and surface soil testing will be conducted site wide to support soil management during redevelopment. At the Historic Downtown Pocatello sites, building materials will be tested for asbestos and lead based paint to support renovation of these large historical downtown buildings. An additional four Phase II assessments (two petroleum and two hazardous substance) will be conducted at additional sites. Schedule: December 2022 - August 2025. Lead: QEP (due to experience). Outputs: One programmatic QAPP, BMS Guide, 10 Phase I assessments, (3 petroleum and 7 hazardous substance) 10 Phase II Assessments (3 petroleum, 7 hazardous substance) including SAP, HASP, and Report of Findings.

**Task 4: Cleanup Planning** – Six cleanup documents will be produced, including an Analysis of Brownfields Cleanup Alternatives (ABCA) and a comprehensive cleanup plan for both the Flying J and Bingham County Landfill priority sites. A conceptual reuse plan will also be developed for both priority sites to incorporate community needs and to communicate the overall redevelopment vision of a soccer complex and childcare center. Schedule: March 2023 – July 2025. Lead: QEP. Outputs: 2 cleanup plans, 2 ABCAs, 2 conceptual reuse plans.

## b. Cost Estimates

The following table reflects our budget breakout by task with 89% of the grant funding going toward direct costs for community outreach, assessment, and cleanup planning.

<table>
<thead>
<tr>
<th>PROJECT BUDGET</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget Categories</strong></td>
</tr>
<tr>
<td>Personnel</td>
</tr>
<tr>
<td>Fringe Benefits</td>
</tr>
<tr>
<td>Travel</td>
</tr>
<tr>
<td>Supplies</td>
</tr>
<tr>
<td>Contractual</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
</tr>
</tbody>
</table>

The following explains how costs shown in the Project Budget table were developed.

**Task 1: Program Management** – Personnel costs were calculated at a rate of $40/hour for 924 hours ($36,960), which will allow us to: procure a QEP; update ACRES quarterly; and prepare 12 EPA quarterly reports, prepare site eligibility questionnaires, communicate with property owners, provide oversight to the QEP, and monitor project budget as well as overall grant budget during the three-year grant cycle. Program management will also include monthly strategy meetings with the QEP and interfacing with our Board and local partners. Fringe benefits were calculated at a rate of 30% for personnel expenses. Travel costs, including airfare, hotel, transportation, and per diem were calculated at $3,000 for two employees to attend one EPA National Brownfields Conference and $4,000 for two employees to attend two regional EPA Roundtable workshops.

**Task 2: Community Outreach** – We calculated time spent on community outreach at a rate of $40/hour for approximately 156 hours ($6,240). This time will allow us to plan and conduct 4 public meetings, create a new Brownfields webpage on our existing website, conduct 20+ landowner meetings, and post updates to our social media platforms. Regional travel for community outreach was estimated at approximately $700 for gas and vehicle use. Contractual Costs for outreach include the preparation of 5 fact sheets at $400 each ($2,000), 4 public meeting presentations at $500 each ($2,000), and $5,125 for the QEP’s assistance with stakeholder’s meetings.

**Task 3: Site Assessment** – Contractual Costs include the preparation of one programmatic QAPP ($5,000), one BMS guide ($3,035), 10 Phase I assessments at $5,000 each ($50,000), 10 Phase II Assessments (3 petroleum, 7 hazardous substance) including a SAP, HASP, and Report of Findings for each. Phase II cost details are as follows. Including the SAP, HASP, and Report of Findings, average Phase II assessment costs are estimated to be: $20,000 each for the Pocatello Electric, Oasis Sports Bar and Odd Fellows hazardous building materials priority sites; $25,000 for the Old Bangs Building and $25,000 for the Flying J petroleum site. Costs for the Old Bang Building are estimated to be above-average due to the large size of the building, and multiple types of materials anticipated for the assessment. Additional Phase II costs are estimated to be $20,000 each for the three
additional hazardous substance Phase II assessments ($60,000) and ranging from $35,000-$40,000 for the two additional petroleum site Phase II assessments.

**Task 4: Cleanup Planning** - Contractual Costs include the preparation of 6 cleanup documents. We anticipate a comprehensive cleanup plan for the Flying J and Bingham County Landfill priority sites, which will include an ABCA for each ($30,000 x 2 = $60,000). We also anticipate a conceptual reuse plan for both the Flying J and Bingham County Landfill priority sites ($30,000 x 2 = $60,000).

c. Measuring Environmental Results
The SICOG brownfields coordinator will be responsible for tracking and measuring progress. They will evaluate performance of the contract agreement workplan each quarter through quarterly reports and ACRES and will discuss any obstacles with the EPA project officer. SICOG and the EPA project officer will develop a plan to overcome the obstacle and achieve the desired outcome in its workplan. Because we work closely with each county and many communities on a regular basis, we will have the ability to closely track final outcomes. We are confident assessments will be completed within the 3-year grant timeline. Final outcomes will include twelve new downtown apartments, additional tax base, two to three new downtown office spaces, removal of blight on a large portion of the downtown area, a new childcare facility, additional revenue sources for the county, a new downtown community gathering space and a youth soccer facility.

4. **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (25 POINTS)**

a. Programmatic Capability

i. Organizational Capacity, Structure and Description of Key Staff

Created in 1984, SICOG is a non-profit, regional economic development organization. We are well-qualified to administer a Brownfields Assessment grant, as proven by our management of over $78 million in state and federal funds since our inception. Over the last 37 years, we have managed over $12 million in RLF funds. We have successfully worked with numerous agencies, including the U.S. Economic Development Administration (EDA), Idaho Department of Commerce, Community Block Grant Development Program, USDA Rural Development, Idaho DEQ, and numerous foundations.

To ensure all grant requirements are met for this grant within the three-year grant cycle, we will rely on the expertise of Ms. Krystal Denney, SICOG’s Community Development Director. Ms. Denney has 10 years of experience working in economic development and has secured over $30 million in infrastructure funding for the SICOG district in the last 5 years. She will be responsible for overall management of the Brownfields Program, and will ensure all program requirements, objectives, and deadlines are met. Ms. Denney’s time will be donated as in-kind toward the grant.

Ms. Callie Dance will serve as the SICOG Brownfields Coordinator. Ms. Dance holds a doctorate in Political Science, with a focus on public administration and environmental policy. For the last five years, she has worked as SICOG’s Economic Development Coordinator to administer grants to local municipalities and has been the chief community outreach coordinator to identify regional strategies and priorities. Ms. Dance will be responsible for the daily management of the Brownfields Assessment Program, reporting, grant compliance, budget tracking, ensuring cooperative agreement requirements are fulfilled, and leading community outreach.

Mr. Mark Blancett serves as SICOG’s Loan Officer. Mr. Blancett has been our chief loan officer since 2020 and brings with him over 20 years of business management experience. He has owned several businesses, developed subdivisions in southern Utah, and led a research and development company in southeast Idaho. Mr. Blancett’s diverse background has allowed him to develop a large network of business owners, developers, and investors in Idaho and Utah. He will be responsible for SICOG’s outreach to business owners and developers and will evaluate project proposals to ensure redevelopment is feasible.

Ms. Shiela Eriksen has worked as SICOG’s fiscal officer since 1994. Ms. Eriksen is responsible for daily accounting functions and preparation of financial reports consistent with Generally Accepted Accounting
Principles. As recipients of multiple federal grants and state funds, SICOG has implemented internal controls consistent with OMB Circulars A-110, A-122 and A-133. Ms. Eriksen will ensure timely draws of grant funds monthly, as well as accurate financial reporting of grant expenses.

iv. Acquiring Additional Resources
Upon receiving a signed cooperative agreement, SICOG will hire a QEP, who will be contracted to support certain public involvement functions, prepare cleanup plans, and oversee cleanup projects. All contracts for this program will be completed and consistent with applicable and competitive Procurement Standards in 40 CFR Parts 30 or 31.

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: SICOG has a long history of receiving and successfully managing federal grant funds. In 2017, we were awarded a $2.9 million grant from Housing and Urban Development (HUD) for the Weston Drinking Water Improvement Project. This project provided upgrades to drinking water storage and supply in the Preston, Idaho area and resulted in 175 new water connections throughout the city. In August 2020 we were awarded a HUD CARES grant in the amount of $795,000 for the American Falls (Power County) Broadband project. The goal of this project was to bring Wi-Fi to low-income and minority students that previously did not have access to internet services for remote learning, as over 30% of the children in the town of American Falls did not have access to broadband. Funding was used to bring fiber optic cabling to the four parks in town as well as the American Falls Police Department. The project was completed in December 2020 and resulted in 85% of the town receiving access to broadband services. Recently, we were awarded an EDA Construction grant ($4,245,000) in February of 2020. This project is in the final phase of a three-phase project resulting in the construction of a 12,000 square foot technical education and training facility for Idaho State University’s (ISU) Diesel and On-Site Power Generation Technology program. Idaho State is one of only two schools in the nation that offer specific training in on-site power generation, and the new facility will provide over 200 students with hands-on training that will benefit our local workforce and bolster Idaho’s economy.

(2) Compliance with Grant Requirements: SICOG manages each grant received according to the cooperative agreement, work plans, requirements, and deadlines as agreed upon. Our 2017 HUD Weston Drinking Water grant required quarterly progress reports, annual reports, Section 3 reporting, and Davis Bacon Prevailing Wage compliance reporting as well as regular communication with HUD. We completed all reports on time and fulfilled all obligations in our cooperative agreement and workplan to successfully closeout this grant on schedule. Our 2020 American Falls Broadband Grant required substantial planning, coordination, and oversight to complete the project within five months. We provided monthly updates to HUD documenting sufficient progress, remaining budget, and any obstacles encountered to ensure we met the December 15, 2020, deadline. All workplan items were fulfilled within budget for this grant, and the grant was closed out in December 2020. Reporting requirements for the ISU grant include quarterly progress reports to EDA, semi-annual financial reports (SF-425), real property reports (SF-429), and compliance reporting for Davis Bacon Labor monitoring. We are also required to conform with the Government Performance and Results Act, which requires us to develop a five-year strategic plan outlining ISU’s mission, long-term goals for ISU’s major functions, performance measures, and reporting results. The strategic plan must be updated every three years. In addition to the strategic plan, we are required to submit an annual performance report to the Office of Management and Budget with established fiscal year performance goals, objectives on how to achieve these goals, and an explanation of how performance is measured and verified. EDA also requires us to track and submit performance data on grant outputs and outcomes, semi-annually, and annually, respectively. We have submitted all plans and reports for this grant on time, and we are on-track to finalize the project within the three-year project period with no funds remaining. Our experience managing federal grant funds and accomplishing goals and objectives demonstrates our ability to successfully manage an EPA Brownfields Assessment grant.
Attachment A

Threshold Criteria Response
ATTACHMENT A: THRESHOLD CRITERIA RESPONSE

1. Applicant Eligibility: Southeast Idaho Council of Governments (SICOG) is an eligible applicant for an EPA Brownfields RLF Grant as we are organized as a non-profit 501(c)(3). Documentation of our non-profit 501(c)(3) status from the Internal Revenue Service is provided as Attachment B.

2. Description of Community Involvement: A description of SICOG’s community involvement plan is provided as Attachment C.

3. Named Contractors and Subrecipients: SICOG has not selected any contractors or subrecipients to conduct any work proposed in this application. Once an EPA cooperative agreement is awarded, SICOG will procure contractors in accordance with procurement provisions of 2 CFR 200.317 through 200.327 prior to beginning any assessment activities.

4. Expenditure of existing grant funds: SICOG does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.
Attachment B

Documentation of Applicant Eligibility
Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

We have further determined that you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of $100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please let us know.

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.
Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of Code sections 2055, 2106, and 2522.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. See Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, which sets forth guidelines regarding the deductibility, as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

In the heading of this letter we have indicated whether you must file Form 990, Return of Organization Exempt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than $25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally $25,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of $10 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed $5,000 or 5 percent of your gross receipts for the year, whichever is less. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

In accordance with section 508(a) of the Code, the effective date of this determination letter is November 16, 1995.

If we have indicated in the heading of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.
Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

[Signature]

Steven A. Jensen
District Director
Attachment C

Community Involvement
SOUTHEASTERN IDAHO COUNCIL OF GOVERNMENTS
Threshold Criteria

Community Involvement
SICOG understands the importance of involving stakeholders in the Brownfields assessment program and intends to inform and involve the community and other stakeholders during the planning and implementation phases of this project.

Community engagement will be a cornerstone of our Brownfields program. A Community Outreach and Education Plan will guide our brownfield program public and community participation. We will educate our citizens and provide opportunities to learn more about the brownfields program, updating our site inventory, and providing a forum to address concerns regarding contamination at specific sites. Planning efforts will also be instituted as site redevelopment plans are finalized to allow the community to have a voice in site cleanup and development.

Regular meetings will be held with our Brownfields Steering Committee that consists of member representatives from local cities and counties as well as private industry and higher education institutions. Program highlights will be included in updates on our SICOG Facebook and Instagram accounts as well as our annual report. Announcements for public meetings will be included in press releases and/or public notices in local papers for each county. Information will be posted to our website, included on local government agendas, and promoted on local radio stations. We will continue to meet with landowners of sites selected for assessment. The purpose of the meetings will be to gain an understanding of the owner’s current needs and to determine how best to use brownfields funds to meet redevelopment goals for the site. We will also meet with the landowner after a Phase I/Phase II report has been completed to discuss the findings and next steps for cleanup and site reuse.

The following actions outline SICOG’s Community Outreach efforts under this grant:

1. Community Outreach Plan
2. Brownfields Steering Committee
3. Prepare educational fact sheets for sites assessed
4. Consult with local affected property owners
5. Maintain and update brownfields pages on SICOG’s website
6. Update SICOG’s social media pages with brownfields information
7. Highlight brownfields projects in our annual report
8. Create opportunities to engage local press
9. Hold public meetings
10. Facilitate one-on-one meetings with landowners
11. Conduct meetings at a location large enough to allow for proper COVID-19 social distancing protocols and provide Zoom links to allow for remote attendance.