SOUTHEAST IDAHO COUNCIL OF GOVERNMENTS
RE: FY22 BROWNFIELDS RLF 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: Individual RLF
   b. Federal Funds Requested
      i. Requested Amount: $1,000,000
      ii. We are not requesting a cost-share waiver.

3. RLF Boundaries: The RLF boundary includes lands located in Bingham, Power,
   Bannock, Caribou, Oneida, Franklin, and Bear Lakes Counties in southeastern Idaho. It
   excludes the Fort Hall Indian Reservation, as SICOG does not have lending authority on
   tribal lands.

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. Priority sites featured in this application include:
   
   a. Oasis Sports Bar
      304 N. Main St
      Pocatello, ID 83204

   b. Fashion Cleaners
      415 E. Oak St.
      Pocatello, ID 83201

   c. Former Grace Elementary School
      117 W. 4th St.
      Grace, ID 83241

   d. Former Thatcher Elementary School
      6007 E. Thatcher Rd
Thatcher, ID 83283

e. Former Bingham County Landfill
Between Eagle Way & Peach St. & Wooten Way (43d12'02"N, 112d20'25"W)
Blackfoot, ID 83221

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
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>X Community Population is 10,000 or less.</td>
<td>Narrative Info Sheet</td>
</tr>
<tr>
<td>Applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></td>
</tr>
<tr>
<td>X The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td>Page 1</td>
</tr>
<tr>
<td>The priority site(s) is adjacent to a body of water (i.e. the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td></td>
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<tr>
<td></td>
<td>The priority site(s) is in a federally designated flood plain.</td>
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<td>------------------------------------------------------------------------</td>
</tr>
<tr>
<td>X</td>
<td>The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. Page 4</td>
</tr>
<tr>
<td>X</td>
<td>The reuse of the priority sites(s) will incorporate energy efficiency measures. Page 3</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 Blasncett
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 and Revolving Loan Fund Application

Dear Mr. Blasncett:

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 also is applying for a Revolving Loan Fund grant in order to support any remediation that may be needed at identified Brownfields sites.

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. The IDEQ also supports the Revolving Loan Fund grant application is support of remediation in the seven counties that the Southeast Idaho Council of Governments represents.

Regards,

Eric Traynor
Idaho Brownfields Program Manager
Idaho Department of Environmental Quality
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area

Southeast Idaho Council of Governments (SICOG), a regional non-profit economic development corporation, is applying for a $1,000,000 EPA Brownfields Revolving Loan Fund (RLF) Grant. These funds will assist communities and businesses in Bingham, Power, Bannock, Caribou, Oneida, Franklin, and Bear Lakes Counties in southeastern Idaho (target area). Our geography is diverse, with over 9,200 square miles of mountains, foothills, lava fields, ranches, and irrigated farms. Our city centers include Pocatello, Idaho’s third-largest city with a population of 55,525, to towns like Thatcher with a population of 306. U.S. Interstates I-15 and I-85 run through the target area, linking us to Utah, Montana, Wyoming, Oregon, and Nevada. Settlement began here in the mid-1800s when fur traders established trading posts along the Oregon Trail. The 1860’s saw disenfranchised gold miners move to the area in search of the next great find, only to discover beds of phosphate, which would become a cornerstone of our regional economy. By the end of the 1800’s, railroad construction was well underway throughout the target area, contributing to city growth and the establishment of new business.

Today, phosphate mining, agriculture, and the railroad are key economic drivers in the target area but have left a legacy of poor air quality, contamination, and blight within our communities. Currently, we have an inventory of over 25 sites in need of environmental mitigation in the target area. The COVID-19 pandemic has increased redevelopment demand for these properties, as residents from California, Washington, and Oregon have relocated to our area in search of lower population densities, less risk of infection, and outdoor recreation. Our growth is commensurate with Idaho, which has had the fastest growing population in the nation from 2019 to 2020. While this growth has been positive, it has resulted in lack of housing, jobs, and community services such as childcare. Brownfields, once overlooked for development, are now sought to create sustainable communities throughout the target area. As the leading regional economic development organization, we are at the forefront of the redevelopment wave, working with residents and developers across the target area creating sustainable development for future generations.

1.a.ii. Description of the Priority Brownfield Site(s)

Environmental contamination is prevalent throughout the SICOG district. Idaho DEQ has identified numerous brownfields sites within our region but does not have the funds to complete cleanup on them and has recommended we seek Brownfields RLF funding. We currently have 11 sites that require cleanup funds and are “shovel-ready”. These include former gas stations, industrial agricultural facilities, an abandoned polysilicon plant, and historic buildings with asbestos and lead-based paint. The following five sites are top priorities for SICOG:

**Oasis Sports Bar:** Located in Historic Downtown Pocatello and the Pocatello Opportunity Zone, this two-story building is under new ownership. The owners would like to abate asbestos and lead-based paint (LBP) 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.

**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

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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.

**Former Grace Elementary School:** Located in the town of Grace (population 1,240) in Caribou County, the former elementary school was built in 1929. The building became vacant in 2021, when a new elementary school was constructed. The school district would like to sell the building to a developer, but asbestos and LBP must be abated prior to renovations. The developer plans to redevelop the property as a vocational-technical (vo-tech) school. The new vo-tech would provide educational opportunities to high school students and adults, allowing them to acquire new skills to navigate Idaho’s highly competitive job market.

**Former Thatcher Elementary School:** The Thatcher Elementary School is in the town of Thatcher (population 306) in Franklin County. The school was built in 1923 but was left vacant in 2021 when a new elementary school was constructed. A developer is interested in accepting the building via donation from the school district but would need brownfields RLF financing to complete the abatement of asbestos and LBP in the building. Redevelopment plans for the building include a preschool and childcare program.

**Fashion Cleaners:** Fashion Cleaners has been an iconic business in Pocatello since 1949 but has remained vacant since the 83-year-old owner sold the property in 2014. Environmental investigations have revealed solvents from the former dry-cleaning facility have impacted nearby soil and groundwater. The new owners would like to secure brownfields RLF financing to clean up the property and redevelop it as business space for an area food production establishment.

1.b. **Revitalization of the Target Area**

1.b.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, site reuse strategies for each of the priority sites align with area-wide planning goals in the following ways:

**Oasis Sports Bar:** An RLF loan on this site will create 8 affordable housing units. This historic building is located within the Pocatello Opportunity Zone, an area of continued disinvestment over the course of many years and an area with a large low-income population. One of the primary goals within our 2020 CEDS is “partner to support affordable housing and neighborhood revitalization” within the Opportunity Zone. The #1 goal identified in our 2021 CEDS Summary was housing. The CEDS goes on to identify low housing availability and inventory as both a “prominent weakness” and a “critical threat” to the target area.

**Former Thatcher Elementary School:** An RLF cleanup loan will help create 6 preschool and childcare classrooms, serving approximately 72 children in the former school. The #2 goal of our Seven-County 2021 CEDS Summary is to create more childcare availability. Our CEDS Summary highlights childcare as a primary regional weakness. A 2020 study conducted by the U.S. Chamber of Commerce Foundation found that Idaho loses $479 million annually due to breakdowns in childcare. As a result of the COVID-19 pandemic, many of our childcare facilities shut down permanently. The creation of a preschool and childcare facility Thatcher Elementary School will provide childcare services in a rural community with limited access to daycare.

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**Fashion Cleaners:** An RLF loan to cleanup this property will result in the redevelopment of additional business space for a local food production company. SICOG’s 2021 CEDS Summary shows diversification and expansion of our business community as our #3 goal.³ Our 2020 CEDS highlights the need to “create spaces to support entrepreneurial growth” and “support the diversification of small, local business” within the target area. Cleanup and revitalization of properties like Fashion Cleaners will allow us to achieve these goals by removing the environmental barriers preventing business growth.

**Former Grace Elementary School:** An RLF loan will help create a new vo-tech facility in Grace, serving approximately 120 students. Creating broader access to technological education for secondary school age youth was listed in our CEDS as the #1 opportunity for positive economic growth for the target area. Creating opportunities for career technical certificates and workforce training programs were both identified as top priorities for our region’s workforce. As residents struggle to find ways out of low-wage jobs, vo-tech and workforce training at the Grace Elementary School will help fill an educational gap and create a more prosperous workforce.

**Bingham County Landfill:** A subgrant from our RLF will help create an 8-field kids soccer complex and parking area for the state fair at the former landfill. Currently, Bingham County, a population of 45,551, does not have a kids sports complex. One of the goals identified in our 2020 CEDS is to “strengthen communities by inspiring community vitality.”⁴ Research has shown community sports can help relieve boredom, one of the biggest factors in youth crime.⁵ Sporting events are also proven to be a great facilitator for community engagement and interaction, helping to build stronger bonds within neighborhoods and communities. 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.

1.b.ii. Outcomes and Benefits of Reuse Strategy

Redevelopment of our priority brownfields sites would provide significant community and economic benefits. Creating eight affordable housing units in the Oasis Sports Bar Building in Historic Pocatello, would not only create additional housing, but would attract outside investment into a Justice40 community. Because the site is in an Opportunity Zone, developers looking to defer taxes on capital gains until 2026 have an incentive to invest in the project. Creation of an affordable childcare center at the Thatcher Elementary School would yield substantial economic benefits to the surrounding community. The school’s redevelopment would create 14 new jobs. Studies show that access to stable childcare helps parents improve their labor productivity by increasing work hours, missing fewer workdays, and generating up to an additional $7.30 for every dollar invested.⁶ Redevelopment of additional business space at the Fashion Cleaners site would an additional four jobs. The new vo-tech center at the Grace Elementary School is slated to add 12 new jobs, and data shows that vocational training can reduce income inequality while improving income for workers earning below the top 10 percent of household incomes.⁷ The Bingham County Landfill project will create two jobs and recreational opportunities for local children. During the Eastern 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. Energy efficiency improvements such as new lighting, windows, insulation, and weatherization will be made to the Thatcher and Grace Elementary Schools during redevelopment. The Oasis Bar Building will see energy improvements to lighting and insulation. The Bingham County Landfill site will use solar-powered lighting during late games.

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³ SICOG, CEDS: Seven County Summary for Region 5, 2021.
⁴ https://www.sicog.org/ceds.html
Our region’s energy is generated from geothermal and hydropower sources and will be used at all of our priority sites, with the exception of the Bingham County Landfill.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse
As a non-profit organization and an economic development entity, SICOG is eligible for a wide variety of funding and has experience applying for and managing grants and loans. Idaho Gem Grants are available for planning and implementation of economic development projects. SICOG also manages loan programs that can be used for redevelopment including the US Small Business Administration 504 Loan Program, US Economic Development Association Revolving Loan Fund, and the US Department of Agriculture Rural Development Intermediary Relending and Micro Loan Programs. These loan funds are available to brownfields developers seeking financing for redevelopment. Specific resources for site reuse at our priority sites may include the following:

<table>
<thead>
<tr>
<th>SITE</th>
<th>REDEVELOPMENT</th>
<th>LEVERAGED RESOURCES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oasis Sports Bar</td>
<td>Housing</td>
<td>Historic Downtown Pocatello; Community Development Block Grant funding; Opportunity Zone Tax Credits; Private financing</td>
</tr>
<tr>
<td>Thatcher Elementary School</td>
<td>Childcare Center</td>
<td>Child Care and Development Block Grant (CCDBG) program; Kaboom! Playground Grants; LEGO Children’s Fund grants; and the Kellogg Foundation; Private financing</td>
</tr>
<tr>
<td>Fashion Cleaners</td>
<td>Business Space</td>
<td>Private Financing</td>
</tr>
<tr>
<td>Grace Elementary School</td>
<td>Vo-Tech Center</td>
<td>U.S. Dept of Education College and Career Transitions Initiative; Idaho Workforce Development Council Industry Sector Grants; Idaho Perkins V Funding; Private Financing</td>
</tr>
<tr>
<td>Bingham County Landfill</td>
<td>Youth Soccer Complex</td>
<td>Idaho Department of Parks and Recreation Grant Funding; Private donations; Local Fundraising</td>
</tr>
</tbody>
</table>

1.c.ii. Use of Existing Infrastructure
Each of our priority sites represents an opportunity to utilize existing infrastructure and city services. Additional primary right of way infrastructure would not be needed for any of our priority brownfield sites, as we are focusing on assessing in-fill properties within the city limits and established communities. The youth soccer complex plans to use porta-toilets and solar-powered lighting to avoid adding additional infrastructure to the site. Using existing infrastructure will limit local costs associated with development sprawl.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a.i. The Community’s Need for Funding
SICOG and the communities we serve do not have funds for environmental cleanup. Most of the communities in our seven-county area have populations under 10,000 people, providing a small tax base with little discretionary income. Our organization 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 very specific and does not provide an opportunity to address brownfields cleanup. The Idaho DEQ does not offer cleanup assistance and does not have any loan or grant funding available to landowners in the target area.

Landowners in our communities have no extra funding for cleanup. As of our 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.8 Four of the seven counties in our region have a poverty rate greater than both the State and the United

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8 https://www.epa.gov/ejscreen
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 city of Pocatello, where the Oasis Sports Bar and Fashion Cleaners are located, is one of six metropolitan areas in Idaho and the only one with neighborhoods where 40% or more of the population live in poverty. In addition to poverty rates, 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.

2.a.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 we cannot lend funds on the reservation, 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. Cleanup at the Thatcher School and redevelopment as a preschool will help young readers thrive in the classroom. Redevelopment of the former Grace school as a vo-tech school would provide more workforce training opportunities to Native American students within the target area. 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.

(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, drugs and pesticides; and is frequently found at landfill sites such as the Bingham County Landfill. 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 our priority brownfields sites such as the Oasis Bar Building, and the Grace and Thatcher Schools. Assessing and cleaning up 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 suffer from negative environmental consequences, particularly from booming phosphorus mining and processing operations. The

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9 SICOG 2020 CEDS.
11 https://www.unitedforalice.org/national-overview
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J.R. Simplot factory in Bannock County has processed locally mined phosphorus into fertilizer for the past 80 years and emits SO2 and sulfuric acid mist into the surrounding air near Pocatello and the Fort Hall Indian Reservation. The company also maintains a giant toxic waste pile, which they seek to expand pending the outcome of litigation initiated by the Shoshone-Bannock Tribes. 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 emit waste from fertilizer production and contain small amounts of naturally occurring radium and uranium. The stacks also 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. Proximity to the factory has already resulted in measurable health concerns for the surrounding residents. 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. Brownfield redevelopment will help move environmental justice issues forward by providing safe housing with central air and filtration at the Oasis Sports Bar Building. It will also provide safe spaces with quality air filtration for youth at the former Grace and Thatcher Schools and employees at the Fashion Cleaners site.

2.b. Community Engagement

2.b.i. Program Involvement and 2.b.ii. Program Roles

Coordination between local partners is essential for the successful planning and implementation of our project. Each of the partners listed below has committed to be an integral partner in facilitating site cleanup and redevelopment.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact (name, email, phone)</th>
<th>Specific Role in Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historic Old Town Pocatello</td>
<td>Stephanie Palagi, 208-232-7545, <a href="mailto:spalagi@oldtownpocatello.com">spalagi@oldtownpocatello.com</a></td>
<td>Partner will help educate community on the project and offer meeting space. Partner will assist with application for CDBG grant funds for redevelopment of the Oasis Bar Building.</td>
</tr>
<tr>
<td>Small Business Development Center</td>
<td>Ann Swanson, 208-282-4402, <a href="mailto:swanann@isu.edu">swanann@isu.edu</a></td>
<td>Will help developers secure loans/grants for redevelopment; will help distribute educational materials about SICOG’s RLF program to the business community.</td>
</tr>
<tr>
<td>Bannock County Planning</td>
<td>Hal Jensen, 208-236-7230, <a href="mailto:halj@bannockcounty.us">halj@bannockcounty.us</a></td>
<td>Will assist with zoning, permitting, and cleanup and redevelopment approvals within the Historic Pocatello district.</td>
</tr>
<tr>
<td>Great Rift Business Development</td>
<td>Kristen Jensen, 208-380-1719, <a href="mailto:kjen@bannockcounty.us">kjen@bannockcounty.us</a></td>
<td>Will assist with community education about RLF program; will help secure public meeting spaces; will promote program to local landowners.</td>
</tr>
<tr>
<td>Idaho Women’s Business Center</td>
<td>Cheryl O’Brien, 208-520-0301, <a href="mailto:cobrien@idahowomen.org">cobrien@idahowomen.org</a></td>
<td>Will provide connection with Women and Hispanic-owned businesses; provide translation and training services for Latina and Women owned business entrepreneurs to help get them into remediated business sites.</td>
</tr>
<tr>
<td>Four County Alliance of Southeast Idaho</td>
<td>Kathy Ray, 208-317-1827, <a href="mailto:fourcasi@hotmail.com">fourcasi@hotmail.com</a></td>
<td>Will help assist with funding for redevelopment efforts at Thatcher and Grace Elementary Schools; will work with school district, and universities/colleges on potential vo-tech school.</td>
</tr>
<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>Will help coordinate redevelopment partners; will work with potential funding sources to help develop the Bingham County Landfill.</td>
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</tbody>
</table>

16 Tribes sue to stop Idaho land swap amid pollution concerns | Idaho Business Review
17 Heart_Disease_FS_0911 (idaho.gov)
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2.b.iii. Incorporating Community Input

To promote community input, SICOG has already established a Brownfields Steering Committee, which met for the first time in October 2021. We are also in the process of creating a Brownfields webpage on our current website. Public meetings will be held for each project during the grant period to update the community of the cleanup plans and cleanup completion. Four educational fact sheets will be developed to describe cleanup achievements. We will also reach out to the press with updates and information to highlight progress made on specific sites undergoing cleanup. Most residents read the daily and weekly newspapers in the area, and we believe this is the best way to reach a large percentage of the population. We will use our Facebook and Instagram accounts to notify various stakeholders, interested persons, and non-profit groups of upcoming events, project milestones, etc. Given the current COVID-19 pandemic, we will hold our meetings at a location large enough to accommodate social distancing. Additionally, we will provide a Zoom link so that individuals may participate virtually. As a part of all community outreach, residents will be encouraged to provide verbal and/or written input to either SICOG staff or Brownfields Steering Committee members. Input will then be considered at our monthly Steering Committee meetings, and we will respond to comments or concerns in writing or with a one-on-one stakeholder meeting.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a. Program Description and Marketing Strategy

3.a.i. Program Management

SICOG will rely on our 37 years of experience as a RLF lender to manage our Brownfields RLF program. Our RLF team will consist of a Brownfields Coordinator, RLF Loan Officer, Brownfields Steering Committee, and a RLF Advisory Committee. The Brownfields Coordinator and Loan Officer will be responsible for marketing the program, engaging with developers and landowners, facilitating public outreach, ensuring RLF requirements are met, borrowers are following EPA requirements, and communication with Idaho Department of Environmental Quality (DEQ) and EPA staff regarding project progress. The Loan Officer will also be responsible for obtaining loan applications from applicants and conducting loan underwriting. Our 55-person Brownfields Steering Committee, which includes local government officials, city/county planners, economic developers, and business leaders, will consider whether a project will benefit the community in a meaningful way. Once they have approved the project, our 11-person RLF Advisory Committee will determine whether the credit and viability of the borrower/subgrantee is sufficient. When selecting borrowers/subgrantees and projects to fund with the RLF, we will prioritize projects based on need, likelihood of success, and the extent to which they advance the public interest consistent with area strategic plans. Loans will be made to developers and private entities with business plans that show secured funding for redevelopment after cleanup is complete and a good credit history. Subgrants will be made to non-profits and local governments for projects where there is no other funding source for cleanup and sufficient state and federal funding sources are available for redevelopment. Our financial underwriting will include an evaluation of the borrower’s business plan, current and future project cash flows to determine repayment ability, collateral analysis, and personal credit analysis to ensure a high likelihood of repayment.

3.a.ii. Revolution of the RLF Program

SICOG has successfully managed RLF funds since 1984. We will follow our existing loan policies outlined in our 32-page, 2018 RLF Plan approved by the U.S. Economic Development Administration (EDA) to ensure the long-term viability and revolution of the RLF. Responsible and prudent lending practices are at the core of our current lending operations and would extend to our Brownfields RLF. Our Loan Officer will review applications for evidence of timely payments on past loans, tax returns, credit reports, financial statements, and any other records relevant to the financial capability of the borrower. Applicants will be required to submit a financing proposal or business plan, pro-forma with at least three years of cash flow assumptions, last three years of financial reports (income statements and balance sheets), and last three years of tax returns. Interest
rates will range from 0% - 3%, and loan maturities will range from 5 -10 years, depending on the cash flow and repayment ability of the borrower. We will write loans with loan guarantees from the Idaho Petroleum Tank Storage Fund, which would repay a portion of the loan amount on the borrower’s behalf at maturity. An application fee of $150 will be charged for each loan application, but our typical 2.5% origination fee will be waived. All loans will be 100% collateralized, and we will obtain personal guaranties from borrowers. Borrowers will be expected to have a satisfactory credit score (600+) and no past bankruptcies, with the exception of medical reasons. We will maintain a funded loan loss reserve of 10% for the RLF so as not to overextend ourselves, which means that once principal is repaid back to the RLF, 10% will be retained to fund any losses and ensure that the RLF will continue to revolve.

In addition to following these lending policies, SICOG will maintain and track loan information on our loan portfolio software. Our software tracks information such as jobs created and maintained, leveraged funding, and key outcomes. We will report this program data to EPA even after the 5-year cooperative agreement is closed, ensuring that the RLF cleanup funds continue to revolve and help remediate other sites. We will remain in communication with the borrower for the life of the loan and beyond, reporting outputs and outcomes to EPA through the ACRES program and quarterly reports.

3.a.iii. Marketing Strategy
SICOG will target borrowers who own sites with known contamination and want to serve as a catalyst for positive change in our communities. Currently, we have a site inventory of 11 sites in need of cleanup funding for redevelopment. We have garnered commitments from every property owner of the priority Brownfield sites featured in this application. Each has stated they will utilize our Brownfields RLF for cleanup. Idaho DEQ has become a significant cheerleader for our Brownfields program, and Eric Traynor, Idaho DEQ Brownfields Coordinator, checks in with us monthly to provide additional sites in need of cleanup within the target area. To further market SICOG’s RLF program, we will focus on properties within our downtown and urban cores that are underutilized and undervalued. Revitalizing properties within the Pocatello Opportunity Zone is a top priority for our program. The projects funded by our RLF must leverage private capital and create jobs. We will also prioritize loans for projects that provide opportunities for mitigation of unemployment of dislocated workers or stimulate economic growth to commercial districts that have become blighted or stagnant. To identify and communicate with these property owners, we will focus on our existing network of community and business leaders, including coordination with our local Small Business Development Center on loan client referrals; continual communication with local lenders, realtors, and the business community, including CPA’s and legal advisors to identify eligible projects; placement of brochures at county and city planning departments; presentations to civic groups on our Brownfields RLF program; and, referrals from Idaho DEQ’s Brownfields Program.

3.b. Description of Tasks/Activities and Outputs
i. - iv. Program Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs
1. Cooperative Agreement Oversight - Program Implementation: We will issue a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP) within two months of award. Submitted proposals will be reviewed and scored by members of our Board of Directors. Our staff will update the SICOG Board of Directors on progress quarterly; work with governing bodies, landowners, and developers; lead the Brownfields Steering Committee, coordinating with EPA, Idaho DEQ; update Assessment, Cleanup and Redevelopment Exchange System (ACRES) quarterly; prepare 20 EPA quarterly reports; facilitate site access; attend three national Brownfields conferences; and general grant management. Anticipated Schedule: December 2022 – September 2027. Task Lead: Grantee. Outputs: 1 QEP hired; 20 quarterly board updates; 20 EPA quarterly updates; 20 ACRES updates; 3 National Brownfields conferences.
2. Marketing & Community Outreach - Program Implementation: SICOG and the QEP will develop an RLF brochure; prepare 4 fact sheets; foster relationships with regional developers; consult with local affected property owners; maintain Brownfields information on our website; provide regular Brownfields updates on our Facebook and Instagram pages; create opportunities to engage local press; and hold 10 public meetings. Anticipated Schedule: December 2022 – September 2027. Task Lead: Grantee. Outputs: 4 fact sheets; 1 website; 10 public meetings; 30+ landowner/developer meetings.

3. Establish and Service the RLF - Program Implementation: SICOG will be responsible for reviewing loan/subgrant applications. When considering loans, the RLF Loan Officer will conduct the loan underwriting, which will include review of financials and tax returns; business plan review; cash flow analysis; collateral valuation and analysis; review of credit scores; and, overall loan repayment ability. When considering subgrants, the RLF Loan Officer and Brownfields Coordinator will consider the overall economic or community impact and redevelopment of the site. Anticipated Schedule: February 2023 – June 2027. Task Lead: Grantee. Outputs: 6 loans underwritten; 6 loans closed; 4 subgrants closed.

4. Cleanup Planning and Oversight - Program Implementation: SICOG and the QEP will prepare the necessary documents for cleanup loans/subgrants. The hired QEP will develop a Quality Assurance Project Plan (QAPP) prior to any cleanup being done to ensure quality data and results. An RLF site eligibility form will be prepared for each site and submitted to EPA. When applicable, a Corrective Action Plan (CAP) will be submitted to Idaho DEQ for approval to ensure the state agrees with the proposed cleanup actions. Required documents such as an Analysis of Brownfields Cleanup Alternatives (ABCA) and a Community Relations Plan (CRP) will be submitted to EPA. SICOG will prepare a loan/subgrant agreement and submit to EPA for review. The QEP will develop site-specific cleanup plans and bid specifications to ensure the cleanup is completed in accordance with state and federal laws. After cleanup is complete, the QEP will develop a Cleanup Completion Report. Anticipated Schedule: February 2023 – March 2027. Task Lead: Grantee and QEP. Outputs: 1 QAPP; 10 ABCAs; 10 CRPs; 6 loan agreements; 4 subgrant agreements; 10 site-specific cleanup plans; 10 bid specifications; 10 Cleanup Completion Reports.

5. Cleanup – Program Implementation: Borrowers or subgrantees will be required to contribute 20% of the cleanup and oversight costs in the form of in-kind or cash. A cleanup and/or abatement contractor will be hired to complete the cleanup. Cleanup will often include excavation of contaminated soil at sites, such as the Bingham County Landfill. Abatement of asbestos and removal of lead-based paint will be common at hazardous substance sites such as the Oasis Bar Building. The QEP will ensure that cleanup is completed in accordance with state and federal requirements. Anticipated Schedule: June 2023 – June 2027. Task Lead: QEP (due to environmental experience). Outputs: 10 sites cleaned up; $200,000 contributed as cleanup cost-share.

3.c. Cost Estimates
3.c.i – 3.c.iii Development and Application of Cost Estimates; Eligibility of Cost Share Activities
The following table presents our grant budget. To maintain the viability of the RLF, we intend to loan 70% of our cleanup budget. As shown in the table, 94% of the federal funding is allocated to cleanup planning and oversight, loans, and subgrants.
The following explains how costs shown in the Project Budget table were developed:

**Cooperative Agreement Oversight** – Personnel costs: $40/hour for 120 hours = $4,800; Fringe Benefits: 30% of Personnel Costs = $1,440; Travel: $1,500 per National Brownfields Conference for 2 employees at 3 conferences = $9,000; Cost Share: Grantee contributes 120 hrs. of in-kind labor for Director at $50/hour = $6,000.

**Marketing/Community Outreach** - Personnel costs: $40/hour for 120 hours = $4,800; Fringe Benefits: 30% of Personnel Costs = $1,440; Travel: $100 per meeting for 10 meetings within target area = $1,000; Supplies: $0.50 color printing cost for 200 brochures & fact sheets = $100 and 4 Color Posters at $100 each = $400 for a Total = $500; Contractual: $125/hour at 2 hours per public meeting for 10 meetings = $2,500; 4 hours per fact sheet development (4 fact sheets) plus 6 hours for 1 brochure, for a Total = $2,750; 1 hour per landowner meeting for 12 meetings, for a Total = $1,500; Grand Total Contractual = $6,750. Cost Share: Grantee contributes 120 hrs. of in-kind labor for Director at $50/hour = $6,000.

**Establish & Service RLF** – Personnel costs: $40/hour for 520 hours (2 hours per week) = $20,800; Fringe Benefits: 30% of Personnel Costs = $6,240; Travel: $50 per project (10 projects) to conduct Davis-Bacon wage interviews and meet with landowners, Total = $500. Contractual: $125/hr for an average of 35 hours per site for 10 sites (350 hrs total) = $43,750.

**Cleanup Planning and Oversight** – Personnel costs: $40/hour for 520 hours (2 hours per week) = $20,800; Fringe Benefits: 30% of Personnel Costs = $6,240; Travel: $50 per project (10 projects) to conduct Davis-Bacon wage interviews and meet with landowners, Total = $500. Contractual: $125/hr for an average of 35 hours per site for 10 sites (350 hrs total) = $43,750.

**Cleanup** - Contractual: Cleanup costs for 10 sites at an average cost of $105,594 each, with an average of $87,094 per site coming from federal funding and $18,500 from cost share.
Southeastern Idaho Council of Governments  
EPA Brownfields RLF Ranking Criteria FY22

3.d. Measuring Environmental Results

Each quarter completed project deliverables and outputs will be compared to our quarterly schedule for the grant and reported in our quarterly report. All outputs will also be reported in ACRES quarterly. If any obstacles arise, we will discuss the situation with our EPA project officer and develop a plan to achieve the desired outcome in our workplan. Anticipated outputs for this grant application include: 1 QEP hired; 1 QAPP; 1 brochure; 4 fact sheets; 10 public meetings; 30+ landowner/developer meetings; 20 EPA quarterly reports; 20 ACRES updates; attendance at 3 National Brownfields Conferences; 10 ABCAs; 10 CPRs; 10 SHPO reviews; 10 FWS reviews; 7 loan agreements; 3 subgrant agreements; 10 cost-share documents; 10 cleanup plans; 10 bid specifications; 10 MBE/WBE solicitations; 10 federal debarment checks; 10+ reviews of certified payroll reports; 10+ Davis-Bacon wage interviews; and 10 Cleanup Completion Reports. After project closeout, outcomes will be measured and reported to EPA on an annual basis through the ACRES reporting system. Landowners will be contacted once a year to provide an update on leveraged funding, jobs created, increased revenue, business expansion, and additional services offered. Anticipated outcomes from this grant include increased Opportunity Zone investments in Pocatello; 30 jobs created; 72 preschool children served; 120 high school and adult students served; 1 new youth soccer complex; 8 new soccer fields; and approximately $3.4 million in additional dollars leveraged.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. – 4.a.ii. Organizational structure and Description of Key Staff

Created in 1984, SICOG is well-qualified to administer a Brownfields RLF 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 State Revolving Loan Fund, and numerous foundations.

To ensure all grant requirements are met for this RLF grant within the five-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 RLF Program, and will ensure all program requirements, objectives, and deadlines are met.

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, helping our communities identify regional strategies and priorities. Ms. Dance will be responsible for the daily management of the Brownfields RLF Program, reporting, grant compliance, budget tracking, ensuring cooperative agreement requirements are fulfilled, and leading community outreach.

Mr. Mark Blancett will fulfill the role of SICOG Brownfields 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 colleagues, developers, and investors in Idaho and Utah. He will be responsible for SICOG’s loan underwriting activities, including outreach to business owners and developers, and will evaluate borrower’s credit criteria, develop financing solutions, and ensure loan repayment and revolution of the Brownfields RLF funds.
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.

4.a.iii. 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.

4.b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments- SICOG’s RLF program was initially established in 1984 with a grant from U.S. EDA to establish a RLF program. Our initial grant was $1,050,000, and this was supplemented in later years with an additional $850,000 in grant funding based on our exemplary performance. Our EDA RLF was established to provide small businesses in the SICOG district with the financing that cannot be found through other traditional lending activities to alleviate long-term unemployment challenges. In 1996, we were also successful in obtaining USDA Rural Development Intermediary Relending Program (IRP) loan funds to establish a $500,000 IRP RLF. The goal of the USDA IRP RLF is to re-lend these funds to local businesses to improve economic conditions and create jobs in our rural communities. Utilizing these RLF programs, we have successfully lent out $11,895,388 in loan funds to small businesses, created 936 jobs, retained 1,233 jobs, and assisted with the establishment and retention of 164 businesses in our region. A specific example of our RLF success is Hess Pumice Products. One of the largest employers in our region, Hess was facing challenges meeting EPA environmental and air quality emissions standards and was considering relocation outside the SICOG district. Using our EDA RLF funds, we were able to assist Hess with its expansion efforts and necessary upgrades to its equipment and infrastructure. Thanks to our RLF, we were able to help Hess retain 85 quality jobs and create 50 new positions in our region.

(2) Compliance with Grant Requirements - SICOG manages each grant received according to the cooperative agreement, scope of work plans, requirements, and deadlines as agreed upon. We have lent out EDA and IRP funds in the required amount of time. We have followed rigorous loan documentation requirements as well as detailed credit underwriting criteria. We have maintained impeccable records of marketing efforts, borrower communication, disbursements, repayments, collections, and programmatic income, all of which have been included in our quarterly reports to EDA and USDA. On an annual basis, we have conducted a site visit to each business within our RLF and have reported on job retention and creation. Both EDA and USDA conduct regular onsite audits of our loan files to ensure compliance, and SICOG conducts an annual audit using a third-party accounting firm to confirm we are following all federal requirements. We have completed all reports on time and continue to comply with all regulations and guidelines for the EDA and IRP RLF Programs. Our ability to comply with grant requirements and effectively track federal grant funds makes SICOG a dependable and trustworthy grantee for an EPA Brownfields RLF 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. Demonstration of Previous RLF Grant Status: SICOG affirms that we have not had, or been a part of, a cooperative agreement for a Brownfields RLF in the past.

3. Expenditure of Existing Multipurpose Grant Funds: SICOG affirms that we do not have an open EPA Brownfields Multipurpose Grant.

4. Description of RLF Boundaries: SICOG is applying for a $1,000,000 Brownfields RLF Grant to assist communities and businesses within the geographic boundaries of Bingham, Power, Bannock, Caribou, Oneida, Franklin, and Bear Lakes Counties in southeastern Idaho. The RLF boundary excludes the Fort Hall Indian Reservation, as SICOG does not have lending authority on tribal lands.

5. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund:
   a. Cleanup Oversight: RLF funds will be available to a borrower or sub-grantee in accordance with the work plan and cooperative agreement between SICOG and EPA. All loan and grant applications will be reviewed by a qualified environmental professional (QEP) for compliance with applicable DEQ and EPA rules and regulations. In addition, the borrower or sub-grantee will be required to sign a commitment to clean up the site, comply with EPA grant requirements, and to enroll in the DEQ response program. On sites where the DEQ is the lead enforcement agency, this commitment may require the borrower or sub-grantee to enroll in the DEQ Voluntary Cleanup Program and prepare a Voluntary Cleanup Plan or other state-approved cleanup plan.

   SICOG plans to acquire the technical expertise to manage and oversee the cleanup by contracting with an environmental consultant (QEP). This contract will be completed through SICOG’s procurement process, with solicitation and bids reviewed by a committee consistent with procurement provisions of 2 CFR 200.317 through 200.327 prior to beginning any cleanup activities. Prior to beginning cleanup activities, SICOG will work with its environmental consultant, EPA, and DEQ to ensure the site is eligible for cleanup; the alternative selected from the Analysis of Brownfields Alternatives (ABCA) is protective of human health and the environment; and the necessary permits and/or cleanup plans have been approved by EPA and/or DEQ.

   b. Legal Opinion: A letter from SICOG’s legal counsel concerning the organization’s legal authority to access and secure sites in the event of an emergency or default of a loan agreement or nonperformance under a sub-grant and to demonstrate SICOG’s authority to perform the actions necessary to manage an EPA Brownfield RLF is included in Attachment C.
6. Statutory Cost Share: SICOG will provide the 20% cost share of the total RLF federal grant on a site-specific basis through the following:

- SICOG in-kind staff time and legal fees: Programmatic staff time and legal expenses are anticipated to facilitate loan marketing, servicing, and cleanup planning. SICOG will provide in-kind staff time for eligible and allowable expenses.

- Private funds: Borrowers will be required to provide at least 10% cash investment into a project prior to consideration for approval.

- Idaho Petroleum Storage Tank Fund (PSTF): The Idaho PSTF is a state-created, not-for-profit insurance organization that provides coverage for approved petroleum cleanup costs and valid third-party claims resulting from covered accidental releases commencing during the policy period. Information on the Idaho PSTF is found at: https://www.idahopstf.org/.

- Idaho Community Development Block Grant (CDBG) for infrastructure improvements within the seven-county area.

- SICOG RLF Funds: SICOG operates an RLF established 37 years ago with funds from the Economic Development Administration and US Department of Agriculture. These funds can be used as match for eligible cleanup expenses being funded by SICOG’s Brownfields RLF.

- For cities and counties, match may be provided by supplying gravel for backfill and equipment and labor to complete cleanup activities.

7. Named Contractors and Subrecipients (other than borrowers and site cleanup subgrantees): 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 cleanup activities.