



1. Applicant Identification

City of Tucson
255 West Alameda Street
Tucson, Arizona 85701

2. Funding Requested

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

3. Location

a) City of Tucson b) Pima County c) Arizona

4. Target Area and Priority Site Information

(Bold indicates CEJST-identified disadvantaged areas.)

- Target Area 1: “Thrive in the 05” (Thrive05)
 - Census Tracts: **04019001200, 04019001302, 04019001303, 04019001304, 04019002603, 04019004515**
 - Priority Site: Bum Steer, 1910 North Stone Avenue, Tucson, AZ 85705
- Target Area 2: 29th Street Thrive (Thrive29):
 - Census Tracts: 04019003502, **04019003503, 04019003505, 04019003506**
 - Priority Site: Town Central Business Park (TownCentral), 4917 East 29th Street, Tucson, AZ 85711
- Target Area 3: Central-equitable Transit Oriented Development (Central-eTOD)
 - Census Tracts: 04019000100, 04019000200, **04019000300, 04019000401, 04019000402, 04019000800, 04019005400**
 - Priority Site: 300 East 7th Street, Tucson, AZ 85705 (7th St.)

5. Contacts

a. Project Director

Ursula Ginster, Environmental General Services Department, Environmental Scientist
(520) 330-7917

ursula.ginster@tucsonaz.gov

255 West Alameda Street, Tucson, AZ 85701

b. Chief Executive/Highest Ranking Elected Official

Regina Romero, Mayor

(520) 791-4201

Mayor.Romero@tucsonaz.gov

255 West Alameda, Tucson, AZ 85701

6. Population

City of Tucson, AZ: 542,629 (US Census: 2017–2021 American Community Survey)

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	4
The priority site(s) is impacted by mine-scarred land.	NA
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).	NA
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3,6
The reuse of the priority site(s) will incorporate energy efficiency measures.	2, 3, 6
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3,6
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	8–9
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

Not Applicable.



Katie Hobbs
Governor

ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY



Karen Peters
Cabinet Executive Officer
Executive Deputy Director

November 3, 2023

Carlos De La Torre, PE
Director
Environmental and General Services
5300 E Los Reales Rd
Tucson, AZ 85756

Re: City of Tucson - Brownfields Communitywide Assessment Grant Support Letter

Dear Mr. De La Torre,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for the City of Tucson for the Brownfields Assessment Grant (FY24) application to the Environmental Protection Agency (EPA) for the assessment of hazardous substances in the Tucson area.

The three target areas for the grant application include: 1) The Thrive in the 05, 2) the Central study area of the equitable-Transit Oriented Development project (Central-eTOD), and 3) the 29th Street Thrive. Each of these target areas are centered around historic industrial corridors and some of Tucson's most disadvantaged communities. The grant will provide funding to conduct property inventories, planning, and phase I and/or phase II environmental site assessments in those communities. City of Tucson has a proven track record of utilizing federal funds to help revitalize these disadvantage communities and eventually provide needed economic benefits to our state.

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

Sincerely,

Travis Barnum

Travis Barnum, Brownfields Coordinator
Waste Program Division

Phoenix Office

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

Southern Regional Office

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

azdeq.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

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

Target Area: Funding provided by this grant will focus on **three target areas within the geographic boundary of the city limits** of Tucson (the City). The three target areas consist of 17 census tracts (CTs), **12 of which are Justice40 Disadvantaged CTs** according to the **Climate and Economic Justice Screening Tool (CEJST)**.¹ The three target areas represent vulnerable communities, comprised largely of minority groups with health disparities due to living near former automotive and industrial hotspots and subsequent contamination.^{2,3} Target-area brownfields redevelopment will remove sources of contamination and incentivize further economic investment to address long-standing environmental justice issues.

The first target area, known as Thrive in the 05 (Thrive05), is a 2.3-square-mile area in the 85705 zip code (total population 21,269).² This target area includes six CTs (04019001200, 04019001302, 04019001303, 04019001304, 04019002603, 04019004515). All target-area CTs are identified as **Justice40 Disadvantaged CTs**.¹ Thrive05 centers around a historic commercial corridor, the infamous “Miracle Mile.” In the 1950s, the Miracle Mile consisted of storefronts, motels, and service stations alternating in rapid succession. Affordable property values and non-deed-restricted developments enabled minorities and low-income families to establish homes in this area. Interstate 10 rerouted traffic, and by 1970, Thrive05 had become known for high vacancy, dilapidated service stations, and motels notorious for sex work, drugs, and criminal activities.³ The change in transit routes has resulted in economic disinvestment in this area. The communities of Thrive05 have been left with ubiquitous automotive service properties with likely petroleum contamination and old dilapidated 1950s buildings with a high likelihood of asbestos and lead in the building materials.

The second target area, **29th St. Thrive (Thrive29)**, consists of approximately 2.7-square miles surrounding 29th St. between Alvernon and Craycroft Roads (population 12,758).² Three of the four target-area CTs (04019003502, 04019003503, 04019003505, 04019003506) are **Justice40 Disadvantaged CTs**.¹ Thrive29 has been identified through City-led planning efforts as one of the City’s more vulnerable communities based on factors such as **low household income, educational attainment, and owner-occupied housing**.⁴ Along 29th St. lie underused retail plazas, automotive and industrial warehouses, and vandalized apartment complexes, vacated during the COVID-19 pandemic. The industrial properties, which adjoin retail and housing facilities, have likely caused contamination due to the duration of operations (since 1970) and lack of historical regulatory oversight. The blight lining 29th St. contributes to the distressed neighborhoods and creates barriers to jobs, retail, and community services.

The final target area is the central portion of the equitable transit-oriented development project (**Central-eTOD**) created through the Federal Transit Administration’s Pilot Transit-Oriented Development (TOD) Planning Program grant. The Central-eTOD is a 3.5-square-mile area centered on 6th Ave that begins at the southern-most portion of Thrive05, extends south two miles, and ends at 25th St. (population: 10,603).² Three of the seven CTs (04019000100, 04019000200, 04019000300, 04019000401, 04019000402, 04019000800, 04019005400) are **Justice40 Disadvantaged CTs**.¹ Zoning within this area resulted in industrial facilities that adjoin residences and community services and contain potential contamination due to the materials used in past operations (since the 1950s). Environmental assessment and planning work through this grant will

¹ CEJST; screeningtool.geoplatform.gov

² US Census: 2017–2021 American Community Survey

³ <https://www.thriveinthe05.com/place-1>

⁴ <https://mapzdashboard.arizona.edu/article/neighborhood-vulnerability-study>, 2020

enable the City to assist property owners, guide redevelopment in accordance with the community's needs, and enhance accessibility through assessment and future redevelopment.

ii. Description of the Priority Brownfield Site(s): The priority site within Thrive05 is known as **Bum Steer**. Originally operated as an automotive salvage yard, the site was redeveloped as the Bum Steer Bar in the mid-1980s. The restaurant has been vacant since 2010, and the structures were demolished in 2020 after a fire in 2017. Demolition reduced the physical hazards of the structures. However, previous assessment work identified the presence of soil vapors, the potential presence of historic underground tanks, and hazardous waste dumping. As such, there is a high likelihood that petroleum products, volatile organic carbons (VOCs), and polycyclic aromatic hydrocarbons (PAHs) contaminated the soil. Asbestos-containing materials (ACM) may have also contaminated the soil due to the fire. The City has site access from the owner to perform additional assessments and a developer interested in creating an **affordable energy-efficient housing complex**. This site sits along a prominent thoroughfare adjacent to student housing and across the street from the Pima County Youth Development office.

The priority site within Thrive29 is a 5.5-acre business and retail plaza known as **Town Central Business Park (TownCentral)**. TownCentral is located on 29th St. across the from Freedom Park, which is a central gathering place for the community, especially the youth. TownCentral contains approximately 35 retail suites, 40% of which are vacant, and one that is partially burned. The retail plaza was built in the 1970s, and ACM and lead-based paint (LBP) pose an environmental health hazard to those who work and shop the plaza. The abandoned suites present an additional access and safety hazard as glass windows are frequently broken, and unhoused individuals may use the structure illegally. Youth in the community are especially at risk from these hazards, as sensitive populations living and congregating near this plaza (e.g. Freedom Park).

The **Central-eTOD** priority site is located at the southwest corner of 7th St. and 5th Ave. within the federally designated **Tucson Arroyo floodplain (Zone AE)**. This site is currently developed with a paved parking lot but was historically developed with multiple industrial warehouses. To the south it adjoins an automotive storage yard that has been in operation since the 1980s. The blocks that surround this site have been rezoned and are slowly being redeveloped as the City's transit, infill incentive, and community planning efforts of the past 10 years begin to take shape. Environmental assessment of the 7th St. site will identify whether the site has been impacted by historic or adjoining industrial uses, which may have used chlorinated solvents and petroleum products.

iii. Identifying Additional Sites: The City has successfully identified sites such as the Thrive05 priority site through brownfields inventories from previous EPA grants. A new inventory will focus on three target areas. Additional site identification, prioritization, and selection will be coordinated through community outreach. The City will seek community input in accordance with the target-area specific-involvement plan developed as a part of this grant. The City will coordinate with community partners and neighborhood organizations in each target area for site prioritization. Prioritization will be based on potential health hazards identified through regulatory records reviews, community reconnaissance, and the EJ Screen Report and CEJST data. Criteria used to prioritize sites will consist of proximity to underserved communities, greatest likelihood of benefit to sensitive populations, and potential for successful redevelopment (community vision, interested investor, existing usable structure(s), existing infrastructure). Initial site inventory will be provided to community partners to review/approve and assist in prioritization.

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

The City's General Plan aims to create a stabilized local economy with opportunities for diversified jobs and economic growth supported by high-quality public infrastructure and services. Additionally, the Housing Affordability Strategy for Tucson (HAST) outlines the master plan for affordable housing.⁵ The Choice Neighborhoods Program leverages public and private dollars to support locally driven strategies that address struggling neighborhoods with distressed housing.⁶ These existing planning efforts have driven initial interest in the Bum Steer priority site. **A prospective developer is proposing to redevelop the Bum Steer priority site in Thrive05 with affordable energy-efficient housing.** A hazardous material survey and reuse planning at TownCentral will enable remodeling and revitalization efforts of this property in alignment with the General Plan goals. **The TownCentral reuse strategy is intended to keep existing local businesses, provide a safer, more energy efficient and accessible retail hub, create additional jobs, and enable greater access to service resources for the community.** Finally, the City's Downtown Infill Incentive District Plan (2010) offers a wide range of assistance to developers interested in reuse and redevelopment that aligns with the City's revitalization goals (targeted toward the underused areas within Central-eTOD and Thrive29).⁷ The plan offers a development agreement process between the City and developers when a proposal would contribute to the downtown fabric. Based on a community outreach-based planning process conducted in 2007, the 7th St. site was identified as a candidate for high-density infill mixed-use redevelopment.⁸ **This site's potential reuse will create jobs, revenue, and community access to jobs and services.**

ii. Outcomes and Benefits of Reuse Strategy: Tucson lost 45,500 jobs between February and March 2020.⁹ **As the City recovers from the COVID-19 pandemic, some of the greatest target-area issues are lack of affordable housing and jobs and the large unhoused population.** The proposed affordable housing project in Thrive05 will include housing for the elderly with units set aside for unhoused people 55+ years. This project is important to the City's goals of serving vulnerable populations, especially very low income older adults who have been greatly impacted by the housing crisis and the COVID-19 pandemic. Revitalization of the TownCentral priority site will incentivize new tenants and provide improved operating conditions for existing tenants, a majority of which are local businesses. New tenants will provide more jobs in this target area, which has a 5.6% unemployment rate¹. Additionally, the revitalization of TownCentral will reduce the physical, environmental, and criminal hazard currently creating an access issue for the community's youth, who congregate at Freedom Park across the street. Finally, the proposed reuse of the **7th St. site** as a high-density mixed-use facility aims to create jobs to address the 6.2% unemployment rate¹ and connect to the existing Central-eTOD rail stop one block to the east. **The City also encourages property redevelopment to include green spaces and the use of green stormwater infrastructure, solar energy, and energy-efficiency incentives through the Tucson Resilient Together programs (Storm to Shade, Solar Tucson, and Resilient and Efficient Codes Implementation [RECI]).**¹⁰ These initiatives will be applied to sites addressed by this grant to improve the climate resiliency of these target areas.

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The City plans to leverage various funding sources to support multiple public projects within its community.

⁵ HAST. 2021. <https://housingaffordability.tucsonaz.gov/>

⁶ <https://www.thriveinthe05.com/choice>

⁷ <https://tucson-infill-incentive-district-iid-cotgis.hub.arcgis.com/pages/latest-information>

⁸ Transit on the Move TOD planning report, 2007

⁹ Hammon, George. Arizona's Economy. 2022

¹⁰ <https://climateaction.tucsonaz.gov/pages/caap>

	Agency	Funding Purpose
Federal	HUD Community Development Block Grant: Choice Initiative Program (Awarded \$50,000,000)	Funds allocated to reuse in Thrive05 along the area of original settlement with the Pascua Yaqui tribe and ensure housing for older adults and those with disabilities.
Federal	RAISE Grant (Awarded \$25,000,000)	Enhance connectivity between downtown and eastern communities (including Central-eTOD and Thrive29).
Federal	ADOH Low Income Housing Tax Credit (Awarded \$2,000,000)	Provides a significant incentive for developers who want to develop affordable housing (Thrive05 and Central-eTOD).
State	ADEQ State Response Grant (will apply)	Fund cleanup of hazardous brownfield sites; all target areas.
Local	City of Tucson Brownfields RLF (Awarded)	Fund the cleanup of hazardous brownfield sites; all target areas.
Private	Gorman & Company (approx. \$17,000,000 in dedicated private funds)	Affordable housing development (Thrive05 and Central-eTOD).

ii. Use of Existing Infrastructure: The priority sites are served by existing infrastructure including water, sewer, electricity, and gas. Existing infrastructure at the TownCentral site will be assessed and used if sufficient for the proposed revitalized use. In the event additional infrastructure is needed for redevelopment, the City will use state/federal grant funding for improvements.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community’s Need for Funding: These target-area communities have some of the highest poverty rates and lowest median household incomes in the City.¹¹ The poverty rate is approximately 20–30% in the target areas.¹² The median household income is approximately \$33,000 for all target areas, which is about half the median household income of the City (\$51,160) and well below half of that of Arizona and the US (\$64,227/\$67,521, respectively).¹² Unemployment is also a significant issue within the three target areas with unemployment rates 6–10%.¹²² The City has allocated most of its budget to staffing, service delivery, public safety, and multiyear investment plans for dedicated City initiatives such as the Thrive zones, climate change planning, and the fare-free transit program.¹³ However, the City’s population had historically been reliant on the service-driven tourist industry, which was dramatically impacted by the COVID-19 pandemic. Tucson’s recovery from the pandemic has been slow partially because Tucson had one of the highest poverty rates prior to the pandemic (17.8% in 2018).¹⁴⁴ The high poverty rate has been estimated to cost the Tucson economy nearly \$2.2 billion every year.¹⁴ Focusing on these disadvantaged communities will greatly benefit Tucsonans in the long term, but the City lacks the budget to address the widespread poverty issue.

US Census	T05	T29	CET	AZ	US
Hispanic	51%	55%	57%	32%	18%
Native American	6%	3%	3%	4%	0.8%
Unemployment Rate	6.5%	3.9%	4.2%	3.4%	3.5%
Median Household Income	\$33K	\$33K	\$33K	\$64K	\$67K
SNAP/Food Stamps	27%	33%	15%	10%	11%
All people in poverty	30%	32%	34%	14%	13%
All families in poverty	27%	30%	20%	10%	9%
All families w/ children 18 and younger in poverty	27%	41%	26%	15%	14%
Female head of household w/ kids 18 and younger in poverty	46%	53%	54%	32%	33%
Population over 25 w/ less than high school education ¹⁸	24%	21%	9%	12%	12%

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: As referenced in the table, sensitive populations in the three target areas are minorities and the impoverished, especially the youth.¹²² **For example, the Pascua Yaqui tribe, fleeing violence in Mexico, settled in this target area in a neighborhood now known as San Ignacio Yaqui.**¹⁵ The target areas suffer from low income with high unemployment. Approximately 27% of people and children

¹¹ Tucson, AZ Economy at a Glance https://www.bls.gov/eag/eag.az_tucson_msa.htm

¹² US Census: 2017–2021 American Community Survey

¹³ <https://www.livingstreetsalliance.org/news/free-transit-in-tucson>

¹⁴ “Poverty is costly, and not only for Tucson’s poor,” *Tucson Sentinel*, 2020

¹⁵ <https://www.thriveinthet05.com/place-1>

in Thrive05 and Central-eTOD live under the federal poverty level¹⁷. Over 40% of the children living within the Thrive29 live below the federal poverty level, which is a rate of childhood poverty higher than 91% of US neighborhoods.¹⁶ **A significant threat to the health and welfare of these sensitive populations is lack of affordable housing.** The target areas have owner-occupied housing vacancy rates as high as 5.2%.¹⁷ This is higher than the rate of vacancies in 88% of all US neighborhoods.^{15,16} Nearly half (46%) of households within Thrive05 spend 30% or more of their monthly gross income on housing costs.¹⁶

Another health and welfare concern is low educational attainment. Education is a key determinant of income and economic opportunity¹⁸. Over 20% of Thrive05 and Thrive29 have less than a high school education (US 12%).¹⁶ An average of 8% of households are limited English speaking (US 5%).¹⁷⁶ Additionally, 46–54% of target-area households are run by single mothers.¹⁷⁶ Research shows strong statistical correlations among high rates of children living in single parent households and neighborhood crime, particularly violent crime. According to the Tucson Police Department, Thrive29 had a higher rate of violent crimes (such as homicide, rape, robbery, and aggravated assault) than the city average in 2021. The reuse of the target sites directly addresses these welfare issues by providing desperately needed affordable housing (Bum Steer and 7th St.) and jobs (7th St. and TownCentral).

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: All three target areas and associated priority sites are in areas of historic industrial operations. Poor housekeeping of hazardous material storage and waste due to lack of regulation was historically commonplace, and the existing structural remnants of these operations create opportunities for illegal dumping, violence, and crime. **Sensitive populations within these communities are at greater risk of disease and health-related conditions from exposure to these toxins such as asthma, heart disease, and cancer.** The target-area communities have a higher incidence of **asthma** and are above the 90th percentile among the US.¹⁹ While target-area specific studies are not available, statewide studies show Arizona children at increased risk. Data from 2021 shows 9.4% of children in Arizona suffer from asthma (compared to the national rate of 6.5%), and the hospitalization rate for children younger than 17 years old was 8.5 per 10,000 in 2019 (compared to 5.2 per 10,000 nationally).²⁰ These asthma rates are a symptom of the environmental health burdens of the communities. The target areas are on average in the **86th percentile in traffic proximity and the 81st percentile for diesel particulate matter** in the US.¹⁹ Additionally, all target areas are above the **90th percentile for proximity to wastewater discharge points** in the US.¹⁹ The Central-eTOD target area is also in the **89th percentile in the US for proximity to underground storage tanks**.¹⁹ Cancer is a leading cause of death within the county with an estimated 155 deaths per 100,000.²¹ The death rate for cancer within the county is higher than the state of Arizona (142.2 per 100,000).²¹ Furthermore, the target areas are within an area of higher cancer mortality within the county at 165.3 cancer related deaths per 100,000, and the mortality rate within the Pascua Yaqui Tribe was as high as 283.8 per 100,000.²¹ Assessments of the priority sites will enable the City to identify the presence (7th St. and TownCentral) or extent of the known contamination (in the case of Bum Steer) and develop cleanup plans to remove environmental health hazards. The proposed planning activities will 1) outline the path to revitalize these sites for beneficial uses for the

¹⁶ <https://www.neighborhoodscout.com/az/tucson/myers,alvernonheights>

¹⁷ US Census: 2017–2021 American Community Survey

¹⁸ Education as a Rural Development Strategy. USDA. 2005

¹⁹ EPA EJ Screen Mapping Tool; <https://ejscreen.epa.gov/mapper/>

²⁰ California Breathing County Asthma Data Tool

²¹ Pima County Community Needs Assessment, 2018

community such as affordable housing, retail, and services with additional jobs and 2) include strategies to incorporate energy efficient measures and renewable energy sources such as solar.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: Residents in the three target areas live within a high density of industrial and automotive facilities established 30–50 years ago when environmentally conscious business practices were not the norm. The degraded physical infrastructure such as vacant industrial structures and dilapidated housing causes additional environmental hazards due to the historic use of hazardous building materials. Of the 17 CTs included in these target areas, **12 are Justice40 Disadvantaged CTs.**²² It is vital the City provide these communities with more jobs and safe working environments by identifying the presence and extent of the environmental hazards in their surroundings. The target areas were developed with haphazard zoning that addressed the needs of the past. Additional target-area environmental justice challenges due to historical disinvestment include poor street conditions, inadequate lighting, limited public transportation, and insufficient health care facilities. The perception of (as with the Central-eTOD priority site) or actual contamination (Bum Steer within Thrive05) deter potential investment, which has a compounding effect on target-area properties.

(b) Advancing Environmental Justice: The target areas represent some of the City’s most disadvantaged communities. **Target-area residents suffer from low-income, high persistent poverty and unemployment, ethnic discrimination, linguistic isolation, substandard housing, and disproportionate burden of environmental stressors.** The presence of target-area blighted properties, such as Bum Steer and TownCentral, present environmental hazards such as subsurface petroleum contamination and hazardous building materials. These blighted priority sites have additional negative consequences of decreased property values and taxable revenue for the City. The City’s General Plan outlines and **prioritizes measures that create affordable, sustainable, and resilient neighborhoods and honor the shared history and cultural identity of their unique communities.**²³ Reuse of the priority sites is intended to address the environmental justice issues of the community (i.e., affordable housing/job creation) which **will combat displacement.** The assessment of Bum Steer will reduce the risk of losing further investment in the property and enable much-needed affordable housing within Thrive05. Environmental assessments and reuse planning of TownCentral will create jobs and safer work environments, increase connectivity between the community and jobs, and incentivize existing and new businesses. The assessment of 7th St. will incentivize further investment and bring jobs and affordable housing to a high-density area of Tucson. Use of climate change resilient measures in all new developments within the City is incentivized by a number of programs (i.e., RECI). Therefore, the proposed revitalization of these priority sites will not only address the Justice40 Initiative but also address climate change, enhance climate resiliency, and not displace any businesses or residents in the process of redevelopment.

b. Community Engagement i. Project Involvement & ii. Project Roles: These community partners will assist the City with site selection, prioritization, and reuse planning.

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Thrive in the 05 Active Neighborhood Associations	Barrio Blue Moon: Jose Rivera 520-256-4239	These associations represent minority groups within Thrive05. They will facilitate community involvement by providing neighborhood-specific contact mechanisms. They will assist in site selection and prioritization, disseminate outreach information, and provide input during reuse planning.
	Bronx Park: Kristina Scholz bronxparktucson@gmail.com	
	Miracle Manor: Grace Aranda antrnweb@ahsc.arizona.edu	

²² CEJ Screening Tool; screeningtool.geoplatform.gov

²³ Plan Tucson, Chapter 3, 2013

Southwest Folk Alliance	Leia Maahs; leijamaahs@arizona.edu ; swfolklife@gmail.com	Social equity advising for reuse planning activities within Thrive05.
Pascua Yaqui Development Corporation	Daune Cardenas, 520-330-9355, daune.cardenas@pydcorporation.com	Provide guidance regarding Pascua Yaqui cultural requirements/topics and needs, coordinate outreach with Pascua Yaqui, and assist in site selection and reuse planning.
Boys & Girls Clubs of Tucson	Sabrina Lobato-Gonzales sabrina@soazbig.org 520-300-5715	Outreach (newsletter, website, planning meetings, community engagement). Provide community input during planning activities (Thrive29).
Sabino Community Development	David Wohl drwohl@sabinohousing.com	An active affordable housing developer interested in continued efforts within Tucson (Thrive05 and Central-eTOD).
Planning Center Tucson	Norte-Sur Community Ambassadors Selina Barajas sbarajas@azpc.com	Outreach support, site selection, and planning within the Central-eTOD.

iii. Incorporating Community Input: Using community organizations to co-convene their networks in deeper conversations will assist the City in tailoring outreach to interest specific groups while also removing barriers to engagement. The City’s Community Engagement Program, adopted in 2022, provides a road map for outreach within the city. Following that road map, Ms. Ginster, Brownfields Project Manager, will coordinate meetings and outreach materials that will provide program background and solicit input at the initiation of this Brownfields Grant. The City has had great success with community surveys hosted on its website and publicized by community partners. Websites and handouts will provide contact information where community input can be sent. Community input will be addressed in real-time during in-person meetings or within one week of receipt. Surveys will be compiled and findings made publicly available within three months after the survey window closes. The existing community outreach plan will be revised to include target-area outreach as advised by community partners. Public outreach information and events will be communicated to the public via the website, newsletter, social media, and through local partner groups such as the active neighborhood associations of each target area, the Boys and Girls Club, and the Transit Oriented Development Planning Committee (Central-eTOD). Additionally, each target area has existing dedicated webpages where information will be provided and community meeting announcements will be posted. **Presentations and educational handouts will be updated annually and offered to the public at critical junctures during the grant period to inform the public of activities being conducted as part of the brownfields redevelopment work.** As an alternative to in-person community engagement for those with access restrictions (e.g., senior citizens), community input will be collected via the City’s website, mail, and email. Information will be provided in English and Spanish, and interpreters will be present for meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Description of Tasks/Activities and Outputs:

Task 1: Outreach	
i.	<i>Project Implementation:</i> The City’s Brownfield (BF) Project Director will develop a Community Involvement Plan (CIP) and Site Inventory with the assistance of an environmental contractor (EC). Partner organizations will advise specific and unique outreach needs for the three target areas (contact people and methods, language needs, coordination with existing programs, etc.). Outreach materials and BF Project website updates made with the assistance of the EC. The City BF team will coordinate with stakeholders and Outreach Consultant and lead the community meetings to keep the public informed about project plans and updates. Supplies are budgeted for the printing of outreach materials.
ii.	<i>Anticipated Project Schedule:</i> CIP created in the 1 st quarter. Site inventory begins in the 2 nd quarter. Six community meetings held within each target area beginning in the 1 st quarter. Website and outreach materials created in the 1 st quarter and posted quarterly throughout the four-year grant project (more often if needed).

iii.	<i>Task/Activity Lead:</i> City: Ms. Ursula Ginster, BF Project Director.
iv.	<i>Outputs:</i> CIP, Site Inventory, BF Website and posts on existing dedicated target area websites, 6 Community Meetings (2 per target area), Brochures/Handouts (specific to each target area), Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Assessment	
i.	<i>Project Implementation:</i> The EC will conduct Environmental Site Assessment (ESA) activities at sites as directed by the BF Project Director, starting first with the three priority sites listed in this application. ASTM-AAI compliant ESAs; Generic Quality Assurance Project Plan (QAPP); Phase IIs which will include the SS-QAPP. Site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Assessment activities begin in the 2 nd quarter and will continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects with oversight from the City: Ms. Ginster, BF Project Director, will coordinate site assignments with the EC. Mr. Frank Bonillas, BF Quality Manager, will conduct technical reviews of completed assessments to ensure compliance with City and EPA quality control requirements.
iv.	<i>Outputs:</i> 30 Phase I ESAs, 1 Generic QAPP, 6 Phase II ESAs including SS-QAPPs, Site Access Agreements and Property Eligibility Determinations.
Task 3: Remediation/Reuse Planning	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for BF Cleanup Alternatives (ABCA). ABCA will include evaluating cleanup alternatives, calculating cleanup costs, and determining site-appropriate remediation to reduce health/environmental risks. A planner will create Reuse Plans for 7 th St. and TownCentral target sites, community-wide health assessments (CWHA), and infrastructure evaluation (IE) for the TownCentral target site. Pima County Health Department will provide data and guidance, i.e., health impacts or syndromic surveillance in Thrive29 and Central-eTOD target areas.
ii.	<i>Anticipated Project Schedule:</i> ABCA/Planning/CWA/IA to begin in the 6 th quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with coordination and oversight from the City: Mr. Bonillas, BF Quality Manager, and Ms. Ginster, BF Project Director.
iv.	<i>Outputs:</i> 3 ABCAs; 2 Site Reuse Plans (7 th St. and TownCentral priority sites), 2 CWHA (Central-eTOD and Thrive29 target areas), 1 IE (TownCentral priority site).
Task 4: Programmatic Support	
i.	<i>Project Implementation:</i> The City’s BF Program Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The BF Project Director will coordinate procurement of the EC and other technical assistance. The BF Project Director will complete ACRES Database Reporting, and overall Programmatic Support for the four-year term of the grant. The EC will assist in Quarterly Reporting. The BF Finance Manager will assist in financial and MBE/WBE reporting. The City staff travel budget allows for two staff to attend two national/regional/grantee BF training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 st quarter, and Quarterly Reporting begins in the 2 nd quarter and continues throughout the grant. Annual Reporting and Forms will be created in the 5 th , 9 th , and 13 th quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> City: Overall programmatic oversight to be conducted by Mr. Carlos De La Torre, BF Program Manager, with day-to-day support from Ms. Ginster, BF Project Director. Ms. Maggie Crowdes, Finance Manager, will manage the ASAP.gov account and Financial Reporting.
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend two conferences.

b. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects and local market standards with contractual hourly rates based on the skills needed for the specific tasks*. The budget includes travel, supplies, and contractual costs. **The City will spend 52% of the budget on site-specific work through the Assessment Task and 40% of the budget on eligible planning activities.**

Category	Tasks	Totals
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	Outreach	Assessment	Remediation/Reuse Planning	Programmatic Support	
Travel				\$8,000	\$8,000
Supplies	\$940				\$940
Contractual	\$27,400	\$260,000	\$198,660	\$5,000	\$491,060
Total	\$28,340	\$260,000	\$198,660	\$13,000	\$500,000

Task 1 Outreach: Contractual: 1 CIP \$3,000 (30hrs x \$100); 1 Site Inventory \$10,000 (100hrs x \$100); BF website and target-area websites updated routinely, outreach brochure/handouts, social media posts \$6,000 (est. \$2,000/target area); 6 community outreach meetings \$8,400 (\$1,400/meeting). Supplies: outreach supplies (software, printouts) \$940. **Task 2 Assessment:** Contractual: 30 Phase I ESAs \$3,200 each for a total of \$96,000; 1 Generic QAPP \$5,000; 6 Phase II ESAs including SS-QAPP at est. \$26,500 each for a total of \$159,000. **Task 3 Remediation/Reuse Planning:** Contractual: 3 ABCAs (55hrs x \$100) for a total of \$16,500; 2 Site Reuse Assessments \$70,400 (Planner: 320hrs x \$110/ea.); 1 Infrastructure Assessment \$14,960 (to include property condition assessment; 136hrs x \$110); 2 Community-wide Health Assessments \$96,800 (Planner: 440hrs x \$110 ea.). **Task 4 Programmatic Support:** Contractual: Quarterly Reporting \$3,200 (2hr x \$100/quarter) and MBE/WBE tracking \$1,800 (4.5hrs/year x \$100). All ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting Review, MBE/WBE Forms, and Programmatic Support for the four-year grant period will be conducted by City staff as described in the above table as in-kind contribution. Travel: Two staff to attend two conferences \$8,000 (flights at \$800, 3 nights in hotel at \$300/night, incidentals and per diem at \$100/day [3 days] x 2 attendees x 2 events).

c. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this EPA Brownfield Project is on schedule, the City internal Brownfields Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the four-year time frame. Site specific information will be entered and tracked in the ACRES database. Tracked outputs include the number of neighborhood meetings, public meetings, meetings with community groups and community partners, environmental assessments, ABCAs, and planning projects. Tracked outcomes include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. The City will make monthly calls to their EPA Project Officer and, if needed, will create a Corrective Action Plan to help the project to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: The Environmental General Services Department (EGSD) has a well-established team, with experience in Brownfields Grant management since 2005. Mr. Carlos De La Torre, PE, EGSD Director, will serve as the **Brownfields Program Manager** and provide overall direction and leadership of this Brownfields Grant. Mr. De La Torre has worked for several cities and Cochise County in capacities ranging from Senior Engineering Associate to City Manager and has been with the City since 2014. Mr. Frank Bonillas, CHMM, EGSD Administrator, will serve as the **Brownfields Quality Manager**. Mr. Bonillas will provide senior technical review and administrative oversight. Mr. Bonillas has 30+ years of experience in environmental regulatory compliance and solid waste management, including environmental site assessments, site remediation operations, groundwater remediation systems, landfill operations and sustainability programs. Mr. Bonillas has over four years of experience in providing senior project management to the City's Brownfields Program. Ms. Ursula Ginster, PhD, EGSD

Environmental Scientist, will serve as the **Brownfields Project Director**. Ms. Ginster will handle the day-to-day management of the grant including oversight of brownfields projects, public outreach, and contract management. Ms. Ginster has more than nine years of experience in regulatory compliance, remedial investigations, and action alternative analysis. She has three years of experience in climate change mitigation. Ms. Ginster has worked with the City's Brownfields Program for over a year, successfully coordinating the activities of the 2018 Assessment Grant. Ms. Maggie Crowdes, MS, EGSD Finance Manager, will accept the grant payments and ensure they are allocated only to allowable expenditures under the terms of the grant. Ms. Crowdes will be responsible for all ASAP.gov drawdowns, financial budget tracking, and reporting. Ms. Crowdes has worked for nearly 10 years managing fiscal compliance over a wide range of federal grant funds in the local government environment, first at Pima County and then for the City.

iv. Acquiring Additional Resources: The City is committed to open competition and fairness and is the proud recipient annually of the "Achievement of Excellence in Procurement" (AEP) award.²⁴ The City has established an on-call environmental contract with multiple environmental contractors. Additional contractors will be procured as necessary. The City's procurement process was and will continue to comply with the fair and open competition requirements in 2 CRF § 200 and 2 CFR § 1500. Good faith efforts will be made by the City and any contractors to contract with disadvantaged business enterprises (DBEs) whenever procuring construction, equipment, services, and supplies. Additionally, when applicable the City will follow EPA-provided guidance on purchasing preferences such as Build America, Buy America (BABA), the Uniform Grant and Recovered Materials guidance for purchasing preferences. The City partners with workforce development agencies to assure residents are provided an opportunity to obtain employment and benefit from revitalization and environmental cleanup. The City will meet with these agencies annually to identify potential job opportunities for their clients.

b. Past Performance and Accomplishments Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments: The accomplishments of three recent grants include: **Community-Wide Brownfields Assessment (FY18–23):** \$300,000 (open; \$64,364.47 remaining). Completed 2 Target Area Inventories, 16 Phase I ESAs, 6 Phase II ESAs, 4 ACM and LBP Surveys, and leveraged \$469,150 in redevelopment investment in the assessed properties. The remaining funds are obligated to 1 Phase II ESA and 1 ACM & LBP Survey. **Community-wide Brownfields Assessment (FY14–18):** \$400,000 Completed 31 Phase I ESAs, 16 Phase II ESAs, and 2 Cleanup Plans. **Community-wide Brownfields Assessment (FY10–14):** \$400,000 Completed 82 Phase I ESAs, 16 Phase II ESAs, and 1 Remediation Work Plan; updated Brownfields Site Inventory; leveraged over \$5 million in downtown redevelopment projects; and created 161 jobs.(2) Compliance with Grant Requirements: The City is currently managing one open grant: **Community-wide Brownfields Assessment (FY18–24).** The City was awarded \$300,000. As of October 1, 2023, \$64,364.47 remains. This grant was impacted by the COVID-19 pandemic. Extension requests throughout the grant period were made to the EPA in a timely manner, and the grant period has been extended to June 2024. Since June 2022, the City has spent close to \$200,000 of the grant. ACRES has been consistently updated and quarterly reports submitted on time. The remaining FY18 funds have been allocated for conducting 1 Phase II ESA for a site to be revitalized from a boarded-up elementary school to a community garden (known as La Siembra) and a ACM and LBP Survey as a part of renovations to a Community Cultural Center (known as Dunbar Pavilions). All grant funds will be exhausted by March 2024. No funds from the FY18 grant will be available for projects in the target areas.

²⁴ <https://www.tucsonaz.gov/Departments/Business-Services-Department/Procurement>

Threshold Criteria

1. Applicant Eligibility

- a. The City of Tucson, Arizona, is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a local government as defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Community Involvement

Using community organizations to co-convene their networks in deeper conversations will assist the City in tailoring outreach to interest specific groups while also removing barriers to engagement. The City’s Community Engagement Program, adopted in 2022, provides a road map for outreach within the city. Following that road map, Ms. Ginster, Brownfields Project Manager, will coordinate meetings and outreach materials that will provide program background and solicit input at the initiation of this Brownfields Grant. The City has had great success with community surveys hosted on its website and publicized by community partners. Websites and handouts will provide contact information where community input can be sent. Community input will be addressed in real time during in-person meetings or within one week of receipt. Surveys will be compiled and findings made publicly available within three months after the survey window closes. The existing community outreach plan will be revised to include target-area outreach as advised by community partners. Public outreach information and events will be communicated to the public via the website, newsletter, social media, and through local partner groups such as the active neighborhood associations of each target area, the Boys and Girls Club, and the Transit Oriented Development Planning Committee (Central-eTOD). Additionally, each target area has existing dedicated webpages where information will be provided and community meeting announcements will be posted. **Presentations and educational handouts will be updated annually and offered to the public at critical junctures during the grant period to inform the public of activities being conducted as part of the brownfields redevelopment work.** As an alternative to in-person community engagement for those with access restrictions (e.g., senior citizens), community input will be collected via the City’s website, mail, and email. Information will be provided in English and Spanish, and interpreters will be present for meetings.

3. Expenditure of Existing Grant Funds

Seventy percent (70%) of the funding for the City of Tucson’s FY2018 Assessment Cooperative Agreement was spent by **October 1, 2023**. A **copy of the THR ASAP financial record displaying the amount of cooperative agreement funds drawn down** is attached.

4. Contractors and Named Subrecipients

The City is committed to the principles of open competition and fairness and is the proud recipient annually of the “Achievement of Excellence in Procurement” (AEP) award.¹ The City advertised an On-call Assessment, Remediation and Regulatory Consultant Services for Brownfields solicitation in accordance with the Tucson Procurement Code, Chapter 28, which was posted publicly on Opengov on April 4, 2023. A Pre-proposal conference was held on April 11, 2023.

¹ <https://www.tucsonaz.gov/Departments/Business-Services-Department/Procurement>

City of Tucson, AZ
FY2024 US EPA Brownfields Assessment Threshold Criteria

The solicitation was posted for 30 days. In response to the RFP, the City received **four** responses. Upon evaluation of all submissions, **three environmental contracting firms (Terracon Consultants, SCS Engineers, and Engineering and Environmental Consultants, Inc. (EEC))** were selected and the City sent Intent To Negotiate letters on June 1, 2023.

The City of Tucson affirms that it does not have subrecipients associated with this grant application.

See attached RFP solicitation.

Upon an award of EPA Brownfields grant funding, the City and their selected contractors would enter into a formal executed contract for project implementation at that time. In the interim, there is not a contract available to attach.