



December 15, 2016

Barbara Perkins
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Brownfield Hazardous Substance and Petroleum Community-Wide Assessment Grant
Project period: October 1 2017 to September 30, 2020

Dear Ms. Perkins:

Snowy Mountain Development Corporation (SMDC), a non-profit certified regional development organization chartered by the State of Montana, respectfully submits this Brownfield community-wide hazardous substance and petroleum assessment grant proposal. SMDC is requesting \$200,000 in hazardous substance and \$100,000 in petroleum funding to complete assessments on brownfield sites located in the target area of Fergus, Petroleum, Judith Basin, Wheatland, Golden Valley and Musselshell Counties and 14 incorporated "micro" communities; but primarily the largest "micro" communities in the region of Harlowton, Roundup and Lewistown.

As an applicant with an awarded EPA RLF grant, SMDC is applying for an assessment grant based upon the overwhelming need to conduct assessments that will support the excessive activity that we're experiencing in our Brownfields program. We have utilized the EPA Region 8 and MT Department of Environmental Quality Targeted Brownfields Assessment Program to assess ten (10) properties within our target area the past two years. We completed a Brownfield inventory in 2013 that identified 174 sites in the target area where contamination hinders the sale or redevelopment of property. With the inventory and outreach efforts, we have thirty high priority sites including three (3) sites that are in immediate need of assessments and a minimum of nine (9) sites within 12 months of award. Assessment and redevelopment of brownfields using an EPA grant will fulfill our regional planning goals to remove blight, rehabilitate housing, and catalyze commercial/industrial development in the target area. Redevelopment of brownfields will also promote sustainable and livable "micro" communities within the target area consistent with the HUD-DOT-EPA Partnership for Sustainable Communities grant, of which SMDC is a core partner and EDA/NACo/NADO's Innovation Challenge to help coal-reliant communities respond to related economic challenges.

GRANT SPECIFICS

- a. **Applicant Identification:** Snowy Mountain Development Corporation
613 Main, Lewistown, MT 59457 DUNS # 034292644
- b. **Funding Requested:** i.) Grant Type: Assessment
ii.) Assessment Grant Type: Community-wide
iii.) Federal Funds Requested: \$300,000
iv.) Contamination: Both Hazardous Substances and Petroleum
(\$200,000 Hazardous Substance and \$100,000 Petroleum)
- c. **Location:** Target area includes lands located in Montana within Fergus, Petroleum, Judith Basin, Wheatland, Golden Valley, and Musselshell counties and 14 incorporated "micro" communities; but primarily in the "micro" communities of Harlowton, Roundup and Lewistown.
- d. **Property Information:** Not applicable
- e. **Contacts:**
- i.) Project Director
Karen Sweeney, Regional Coordinator, 613 NE Main, Lewistown, MT 59457
(406) 535-2591 phone (406) 535-5036 fax
smdckaren@midrivers.com
- ii.) Chief Executive
Kathie A. Bailey, Executive Director, 613 NE Main, Lewistown, MT 59457
(406) 535-2591 phone (406) 535-5036 fax
smdcdist6@hotmail.com
- f. **Population:**
- i.) Six County Target Area Total Population: 21,461
- ii. Municipal Jurisdictions to be addressed: Harlowton in Wheatland County pop. 997; Roundup in Musselshell County pop. 1,788 and Lewistown in Fergus County pop. 5,901
- iii. Persistent Poverty: Golden Valley County in the target area
- g. **Regional Priorities Form: Other Factors Checklist:** Attached
- h. **Letter from State Environmental Authority:** Attached

Thank you for your consideration of this grant proposal. Should you have questions on this proposal, please contact me at (406)535-2591.

Sincerely,



Kathie A. Bailey,
Executive Director

Attachments

cc: Daniel Heffernan, EPA Denver

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1. Community Need

a. Targeted Community and Brownfields

i.) Targeted Community Description – Snowy Mountain Development Corporation (SMDC), a Certified Regional Development Corporation sanctioned by the State of Montana, is applying for a Brownfields Community-wide assessment grant to assist “micro” communities and businesses of Harlowton (population 997), Roundup (pop. 1,788) and Lewistown (pop. 5,901) in the larger target frontier area of Fergus, Judith Basin, Petroleum, Wheatland, Musselshell and Golden Valley Counties.

The target frontier area is some of the most beautiful country in the nation. It is a blend of natural resources, open space, agricultural prosperity, and friendly faces. There are blighted, asbestos, methamphetamine and lead contaminated properties; vacant or burned downtown historic structures; and natural disaster areas that pose challenges to economic progress and threaten the environmental health.

The target frontier area covers more than 12,328 square miles, an area nearly the size of the state of Maryland and larger than nine of our nation’s smallest states, yet has a population of only 21,742 (1.8 people/mile²). All 14 incorporated communities have a population of less than 10,000. Major historic industries in the region have included the railroad, agriculture, mining, oil and gas. Over the past 30 years, there has been a shift from economics supported by extractive industries to light manufacturing. Roundup lost 72 jobs due to the decline in the coal industry this past year. Micro-communities within the target area have a legacy of contaminated properties that once supported these extractive industries, including gas stations, repair shops, fuel storage plants, abandoned rail beds, vacant downtown historic buildings, elevators and round houses, abandoned mines, burned and blighted properties. The decline of these industries have contributed to the existence of numerous vacant gas stations, brownfields associated with the use of handling pesticides, lumber treating facilities, abandoned industrial properties such as mills and mines. These small communities are often located over an hour drive from one another.

In June 2011, President Obama declared that all of the counties in the target area were in the federal disaster declaration, FSA-USDA declared all six counties disasters areas in 2012, FEMA again declared three federal disaster counties in 2013 and four federal disaster counties in 2014. Flooding from the Musselshell River has rendered 40 Roundup homes uninhabitable, many businesses unable to reopen, and has destroyed scenic riverfront parkland due to erosion and bank instability. Most of the structures in the flood zone were at least half a century old creating a mess of asbestos, mold, and lead-related problems. These disasters have created a need for assessments primarily in the community centers of Harlowton, Roundup and Lewistown.

In these towns, highly visible brownfields degrade the social welfare, economic stability and property values, which in turn, reduces taxes to local government and private investment that would create jobs. The perceived or real environmental stigma of brownfields in our target area prevents investment out of fear of environmental liability. Unlike other states, Montana has not adopted the liability protections of the Brownfield Act for bona fide perspective purchasers, and as such, public and private entities have significant concerns about acquiring contaminated property. With assessment funds, SMDC could define the severity of the problem assisting potential developers in making an informed decision.

If awarded, SMDC will address issues of blight through public educational meetings and by working with existing partners such as municipalities, counties, local businesses, and non-profits. SMDC’s strong ties to the communities and experiences working with qualified environmental professionals ensure that a \$300,000 grant award would be spent in a timely manner. The funds would have a ripple effect as the redevelopment of just one parcel in a “micro” community could create an impact on an entire region.

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ii.) Demographic Information - Central Montana is characterized by a hardworking but aging population, often living on a fixed income. Wages tend to be lower than the national average but not necessarily below the poverty line. Five of the counties in the target area actually have a decreasing population. Younger family members move away after high school, leaving parents and grandparents behind.

As shown in the following table, the target frontier area has a total population of 21,742 residents. The demographic indicators point to the disadvantaged nature of the region. The median household income in this area is 60.1% to 81.8% of the national average and 56.7% to 77.2% of the state average. The rate of 12.4% (Lewistown) to 40.4% (Harlowton) of residents over the age of 65 years is significantly over Montana's percentage at 8.4% and the nation's at 9.4%. The following table presents demographic information for the SMDC target area:

	Lewistown in Fergus Co.	Harlowton in Wheatland Co.	Roundup in Musselshell Co.	Target Area's 6 Counties	MT (State)	United States
Population	5,901	997	1,788	21,742	989,415	308,745,538
Unemployment (Oct. 2016)	3.6%	4.8%	4.5%	4.0%	4.0%	4.6%
Poverty Rate	8.9%	8.5%	19.9%	13.5%	15.2%	15.4%
Percent Minority	4.6%	4.6%	4.3%	2.9%	10.6%	27.4%
Median Household Income	\$34,312	\$30,377	\$31,111	\$39,047	\$56,230	\$53,046
65 Years of Older	12.4%	40.4%	19.1%	10.9%	8.4%	9.4%

Data are from the 2009-2013 American Community Survey and are available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACA_13_5YR_DP03&src=pt

¹ Data from EDA StatsAmerica website <http://www.statsamerica.org/distress/distress.aspx> or calculated using county data.

Non-whites (Minority figures include Hispanics and Latinos)

iii.) Description of Brownfields – Historically, the demand for pesticides and herbicides to create agricultural opportunities in this area has created environmental problems. These pose a health threat to residents, irrigation water, groundwater, and on-site workers. Abandoned petroleum sites are present in every “micro” community within the area. Fuel stations sit vacant due to real and perceived environmental concerns.

Each “micro” community has abandoned burned and/or vacant buildings that contain asbestos and lead-based paint which is hindering private investments in communities. Solvents from old auto repair shops, roundhouses, and dry cleaners; metals (arsenic, lead, selenium) and cyanide from historic mining; and wood treatment compounds from old mills and rail facilities are prevalent throughout the area. The Musselshell County Shop is located on top of an abandoned mine in the community of Roundup. Groundwater, which is our drinking water supply, exists within 20 feet of the surface in most of our populated valleys, thus the risk of contaminants impacting drinking water, coming in contact with underground waterlines, and vapor intrusion are a threat to public health.

The MT Dept. of Environmental Quality (DEQ) online databases report that there are 129 leaking underground storage tank sites, more than 1,100 abandoned mines, 29 state superfund cleanup sites, 15 former methamphetamine labs, and 475 past and current permitted asbestos cleanup sites in the micro-communities. More than 30 additional brownfields have been identified for assessment or cleanup planning. Left vacant or underutilized, these sites generate less tax revenue, provide fewer jobs, and hinder private investment. Unlike major metropolitan centers, in rural communities the negative impact of a single site in the central square of a town can paint a picture of economic despair, cause a decrease in community involvement

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and limit the attractiveness to new residents or developers. Following is a list of sites that are ready for assessment and redevelopment once funds become available:

26 BROWNFIELD SITES WITH EXISTING/POTENTIAL REDEVELOPMENT PLANS NEEDING ASSESSMENTS			
Site Name	Location and Effect on Micro-Community	Potential Contamination	Proposed/Potential Development
Former Mountain Bell buildings (2)	Lewistown , Fergus County; currently 1912 and 1960's buildings (2) are both vacant. Owner to donate to a non-profit.	Asbestos and lead-based paint	Non-profit to use for offices and business development center
202,204 and 5 Main (3), Roundup	Roundup , Musselshell County; 1900's historical buildings (3) are vacant and abandoned.	Asbestos, lead-paint, solvents, pesticides, chemicals, etc.	Office space, executive suites, upstairs housing, commercial use, distillery
Four (4) Burned Buildings, Harlowton	Harlowton , Wheatland County; four (4) buildings are vacant, abandoned, burned, structure deemed unsafe for occupancy and uninhabitable, animal infestations	Asbestos, lead-based paint, chemicals in burned debris.	Commercial space, removed for green space, housing
13 Flooded properties, Roundup	Roundup , Musselshell County, properties vacated after 2011 flood, taxes delinquent	Asbestos, lead paint, solvents, mold unknown chemicals	Community greenspace for flood control measures
Milwaukee Railroad, Harlowton	Harlowton , Wheatland County; vacant, abandoned property redevelopment hindered by petroleum release, unknown contaminants.	Petroleum	Community greenspace, commercial use or redevelopment
1st Avenue E. Roundup	Roundup , Musselshell County, vacant, abandoned, sale hindered by petroleum release	Petroleum	Commercial space
Windham Services, Inc.	Vacant, abandoned gas station next to US Highway 87 in unincorporated Judith Basin Co.	Petroleum	Commercial space, MDT roadside parking
Taylor's Honey, Inc.	Stanford , Judith Basin County; Property re-use is hindered by petroleum release	Petroleum	Commercial expansion

iv.) Cumulative Environmental Issue

All of the Counties are accessed solely by two lane highways; including MT Highway 12 which runs east-west and follows the former Milwaukee Rail Line. The Milwaukee Railroad has not had passenger service in the area for half a century causing a population decrease over the last few decades. Railway operations have left a legacy of diesel and solvents in soil and groundwater, both on and off the immediate rail corridor. Many of these sites no longer have a viable responsible party for assessment and cleanup, as the companies no longer exist. A telltale scar of abandoned gas/service stations, petroleum bulk plants, chemical storage facilities as well as defunct railroad lines remain along this route. The town of Harlowton (pop. 2,100) has seven State listed leaking underground storage tank sites. According to the DEQ online database five of these releases are considered high priority and/or emergency response because of the presence of shallow groundwater. The entire downtown area of this small community is plagued with groundwater contamination and there is at least one abandoned property on every block. An inadequate tax base contributes to the legacy of these abandoned properties. Extent of contamination is unknown without proper assessments.

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Communities like Harlowton and Roundup follow Highway 12 and the Musselshell River. Recent natural disasters like the 2011 and 2013 floods caused all six counties to be FEMA designated disaster areas. Flooding causes structural damage, excessive mold, and can exacerbate other existing environmental issues. Flooding has caused groundwater contaminant plumes like the one in Harlowton to change in extent and magnitude due to flooding and rising ground water, thus requiring additional investigation and possibly greater cleanup measures. Harlowton residents don't have the financial resources available to address groundwater issues. They are being subjected to potentially serious health risks due to the long term effects of flooding and endless cycle of brownfield creation of abandoned and neglected properties.

The oil, gas, lumber, mining and coal industries have left negative environmental impacts on the region. Roundup lost 70 jobs due to a downturn in the coal industry and layoffs at Signal Peak Mine. The community of Roundup has abandoned coal mines located underneath the entire town with mine sinkholes appearing on a regular basis. Groundwater, soils, and surface water are contaminated with heavy metals, arsenic, and zinc. The severity of the contamination from mining sites like these not only impacts the health and well-being of area residents, but also leaves limited state and local tax dollars to be used on smaller brownfields sites within the area.

b. Impacts on Targeted Community

Brownfields, and the potential contaminants they release into the environment, can have a real impact on the health of the residents. Statistics from the MT Depart. of Health's Indicator-Based Information System for Public Health:¹ indicate a pattern of low income, poor food choices, poor health, reduced life expectancy, and reduced expectations for breaking out of the pattern of poverty in the target area.

The effects of blight and potential contamination associated with brownfield sites can weigh heavily on communities. Communities with multiple brownfields, such as we have, tend to have multiple public health issues: reduced property values, increased potential for exposures to harmful chemicals, increased crime rates, substance abuse, lack of green space or areas for recreation, decreased access to healthy foods, poor air quality, contaminated soil or water, and elevated blood lead levels or asthma prevalence. Because of lower educational attainment levels, our community residents may not be competitive in our meager labor force and may not receive the benefits available to full-time employees.

Exposure to harmful substances, such as those found in our brownfield sites or in old building stock, is one of many risk factors for diseases and adverse health effects (e.g., heart disease, obesity, diabetes). Environmental cleanups at our brownfield sites may reduce this risk of exposure to harmful substances, and renovation of old building stock and construction of newer buildings may help to further reduce exposures to harmful materials. The EPA Brownfield Assessment Grant will help us work toward such health improvements as reduced blood lead levels, fewer learning disabilities in children, fewer hospitalizations for asthma, less infant and adult mortality, and fewer low-birth-weight infants.

The presence of brownfield properties within our communities represents a significant environmental justice concern. As shown by data from the U.S. Census Bureau's American Community Survey, the population in our target six counties is not financially influential. The poverty rate in Roundup was 19.9% during 2009-2013, significantly higher than the nation's poverty rate of 15.1% in 2010. Sustained high poverty rates arise in part from high unemployment and falling household incomes, such as those in Roundup/Musselshell County due to the 70 layoffs at Signal Peak Coal Mine.

¹ Retrieved Dec. 7, 2015, from MT Depart. of Health website <http://dphhs.mt.gov/publichealth/Diabetes/Data.aspx>

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Affordable housing is a fundamental need in every community. Determining the need for affordable housing is tied to poverty level, which is tracked by the Census. Access to healthy food is a problem for many households. According to Feeding America, one in every seven Montana residents struggle with hunger. In 2013, 12.7% of the residents in Fergus County (Lewistown) were considered “food insecure,” with a food insecurity rate of 11.8% for Judith Basin County, and 12.9 % in Petroleum, 12.7% in Wheatland (Harlowton), 12.2% in Musselshell (Roundup), and 13.1% in Golden Valley County. Low food security is defined as reduced quality, variety, or desirability of diet while very low food security includes disrupted eating patterns and reduced food intake². Poverty, unemployment, and income, along with other demographic characteristics, are key drivers of individual and household food insecurity across the country and are particularly evident in our targeted six counties³.

The prevalence of diabetes among all Montana adults increased from 2.8% in 1990 to 8.8% in 2014⁴. Diabetes mortality rates are at or over twice the Montana mortality rates in Judith Basin, Petroleum, Wheatland, Musselshell, and Golden Valley. Fergus, Musselshell and Wheatland have significant mortality rates for vascular disease at 1.5 to 2 times the state rate; Judith Basin and Golden Valley with chronic liver disease at twice the state rate; and the entire 6 county area is well above the State rate in cancer mortalities. Our targeted six counties also have other significant health related issues. Work related deaths are a concern in Golden Valley, Musselshell, and Fergus Counties exacerbating our ability to live healthy lifestyles in the target area⁵. We can do our part to improve the health in our target communities besides issuing health alerts for susceptible segments of the population, such as those with asthma and other chronic lung diseases, to help to mitigate the health effects of poor air quality. Assessing and cleanup of contaminated properties, such as the asbestos and lead contaminated historic downtown properties in the micro-communities, will assist our populations through reduced exposure to contaminated air and water ingestion and inhalation.

Buildings throughout the target area are contaminated with asbestos, a known cause of asbestosis, mesothelioma, and lung cancer.⁶ Health statistics show target area residents face overall health concerns that may be linked to the presence of environmental contaminants. The rate of cancer exceeds the statewide average in the area at 440.2 per 100,000 compared to 439.8 for Montana.⁷

c. Financial Need

i. Economic Conditions

SMDC and the communities in the area do not have funds for brownfields assessment, unless awarded by EPA through community-wide assessment. Very little funding is available at the State level to assess contaminated properties due to significant budget pressures from other areas of State government. The area is made up of 14 micro- communities struggling to meet daily needs of their residents. The county’s median household income in this area is 60.1% to 81.8% of the national average and 56.7% to 77.2% of the state average. The region has a greater percentage of residents over the age of 65 years than the state or nation, with the micro-community of Harlowton at 40.4%. Most local governments are in debt the maximum amount allowed.

Communities in the area have an inability to raise revenue by increasing taxes, have no state sales tax to provide additional public assistance, and have already stressed budgets from natural disasters in 2011 in all

² <http://www.feedingamerica.org/hunger-in-america/impact-of-hunger/states/montana/> data accessed 12/7/2015

³ www.feedingamerica.org/mapthegap

⁴ Montana Behavioral Risk Factor Surveillance System 2014

⁵ <http://dphhs.mt.gov/publichealth/Epidemiology/OESS-CHD.aspx>

⁶ http://www.atsdr.cdc.gov/asbestos/asbestos/health_effects/#conditions

⁷ DPHHS 2015 Community Health Profile for Central Montana Health District

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six counties (DR-1996)⁸; flooding in Fergus (Lewistown), Petroleum and Musselshell (Roundup) counties in 2013 (DR-4127)⁹; ice jams and flooding Golden Valley, Wheatland (Harlowton) and Musselshell (Roundup) counties in 2014 (DR-4172)¹⁰ and severe storms, straight line winds and flooding in Petroleum and Musselshell (Roundup) counties in 2014 (DR-4198)¹¹. The USDA designated all six counties in the target area as a disaster designated county due to the damages and losses caused by several severe storms and hail that occurred in 2012 and destroyed large percentages of all crops¹². This economic climate is not suitable for small businesses already struggling with the volatile nature of resource based profits. In 2015, the only bank in Golden Valley County closed its doors, causing producers, businesses, and individuals to bank over 100 miles away.

ii. Economic Effects of Brownfields

One example of the economic effects of brownfields is in the community of Roundup. By the 1960's, mine operations were drastically reduced by conversion of trains to diesel power. Coal production has been in a state of flux creating an exodus of employees, vacant buildings, downturn in the economy and significant job losses, including 70 jobs lost in 2015. This economic uncertainty contributed to the number of vacant properties, decreasing the community vitality and eroding property values and tax base. The mine opening is in Roundup and abandoned contaminated mine buildings are found throughout the micro-community.

Further degradation of the economy occurred through natural disasters and another decline in the coal industry, with 70 layoffs at the Signal Peak Coal Mine in Roundup this past year. Thirteen properties in Roundup/Musselshell County are uninhabitable due to the flood of 2011 and may be acquired by the County due to tax delinquency. In Fergus County/Lewistown the Treasurer reports 300-800 properties are annually listed available for tax lien sale. Vacant properties in both communities, as well as those across the entire target area, are contaminated or perceived as contaminated, further exacerbating the negative economic perception of the community.

Cumulatively, Brownfields in the target area are tied to economic, environmental, and social hardship. The demise of the natural resource industries and the cyclical nature of agriculture have created a mosaic of vacant gas stations, illegal dumps, abandoned mills and mines, and industrial properties. The economic decline has created Brownfields that new investors are passing up, and the lack of investment causes a sense of loss and reduces the quality of life for residents in the region. Jobs are exported to larger urban centers in Montana and outside the SMDC target area. The reduced property value of one brownfield site in a small town can be hugely detrimental, bringing neighboring values down and affecting the micro-community, further hindering the already low property values. The cost to assess and cleanup the impacted property may exceed the property value of the site, offering little return on investment and making the project financially unfeasible for developers without this assistance.

2. Project Description and Feasibility of Success

a. Project Description, Project Timing and Site Selection

i. Project Description

SMDC is requesting a \$100,000 petroleum and \$200,000 hazardous substance community-wide Brownfields Assessment Grant for projects in the target area. Ten (10) Phase I and Phase II assessments through

⁸ <https://www.fema.gov/disaster/1996>

⁹ <https://www.fema.gov/disaster/4127>

¹⁰ <https://www.fema.gov/disaster/4172>

¹¹ <https://www.fema.gov/disaster/4198>

¹² <http://www.fsa.usda.gov/programs-and-services/disaster-assistance-program/index>

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SMDC's Brownfields program were conducted the past two years with EPA and DEQ assistance, with an additional 150 sites in need of assessments and 30 sites identified with immediate redevelopment potential. The requested grant funds will allow approximately 8 Phase I (2 petroleum, 6 hazardous substance) and 8 Phase II (2 petroleum, 6 hazardous substance) assessments to be performed. Phase I assessments will be conducted in accordance with ASTM E1527-13. The grant will also be used for community outreach including four public meetings, one-on-one landowner and developer meetings, social media updates, news releases and the development of brownfields educational materials. Cleanup planning will be conducted after Phase II assessments are complete to determine cleanup costs and remove the unknowns associated with redeveloping brownfields sites.

As stated in the region 2012 Comprehensive Economic Development Strategy (CEDS) document, SMDC will "advocate for and assist in the clean-up of environmental concerns through private and governmental resources to prepare properties for re-development." Re-development plans include office space for non-profit organizations and businesses, downtown housing, commercial space, greenspace and truck parking facilities along with recreational uses. SMDC with community input will prioritize sites whose redevelopment helps achieve the community's goals and objectives identified in the Northcentral Montana Plan, part of the HUD-DOT-EPA Partnership for Sustainable Communities Grant of which SMDC is a core partner (see Attachment). The HUD livability principles include providing transportation choices, promoting affordable housing, supporting existing communities, leveraging federal investment, and valuing communities and neighborhoods. Strategy 2.7 in the plan states, "Foster healthy neighborhoods and preserve small town character through community revitalization activities such as removal of blight, housing rehab, and property maintenance."

Under this strategy, assessment of properties like the closed gas station next to US Highway 87 in Judith Basin County will be a priority. The property is an eyesore and blight on the main north/south freight route between two of Montana's largest communities, Billings and Great Falls. The property is needed for parking of commercial trucks; especially trucks that are diverted off the highway in severe wind events in this location. Properties like the burned vacant downtown buildings in Harlowton or abandoned properties in Roundup will also be a high priority because they have potential to be redeveloped for housing or commercial spaces in communities with a shortage of both.

ii. Project Timing

This project will be managed by Karen Sweeney, Regional Coordinator, with oversight by Kathie Bailey, Executive Director of SMDC. They will ensure that the grant activities will be completed within the three year grant period. Within three months of award, SMDC will form a Steering Committee, develop a community outreach and education plan, issue a Request for Proposal and select Qualified Environmental Professional (QEP) consulting firm(s). SMDC with community input and existing planning tools will prioritize and select sites, and contact landowners to acquire access agreements to begin assessment. SMDC expects assessments efforts to begin four to six months following award. SMDC will update its list of sites and use the ranking process criteria and community input as the driving factors in site selection.

iii. Site Selection

SMDC has been conducting Brownfield community outreach meetings in the area over the past three years. As a result of these community outreach efforts, SMDC has a list of 30 priority project sites as identified with community input. SMDC also has a list of landowners interested in participating in the program. SMDC will target those landowners who wish to sell, expand, or redevelop their properties, and their properties are identified through community outreach efforts. In all cases, the landowner will be required to provide access even if the assessment request has come from a lender, realtor, or potential developer/purchaser. Sites

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chosen to be listed on the inventory are those for which the community has identified as a priority, redevelopment aligns with the organization's CEDS, and the HUD-DOT-EPA Partnership for Sustainable Communities. Criteria for the ranking process includes (1) eligibility, (2) sites with the greatest potential for reuse and/or redevelopment, (3) sites that provide the greatest benefit to the community, (4) owner access cooperation, (5) media affected and contaminants of concern, or potential health risks, (6) assessment and cleanup costs, (7) existing infrastructure, and (8) level of community support. Through the use of these Assessment funds and the cleanup RLF, SMDC will assist the region in achieving its defined economic goals.

b. Task Descriptions and Budget Table

i. Task Description – Following is a list of grant-funded work items and outputs by task:

Programmatic – SMDC staff will be responsible for outputs such as hiring a QEP and environmental contractors; working with governing bodies, landowners, and developers; developing a steering committee; tracking and measuring outputs, reporting in ACRES and coordinating with EPA and DEQ. SMDC will prepare EPA quarterly reports, update ACRES, facilitate site access, attend Brownfield trainings; and perform general grant management. Total estimated costs are \$10,752 (240 hours) for petroleum and \$7,392 (165 hours) for hazardous substance. Wages are calculated at \$35 per hour and fringe benefits are calculated at 28%.

Community Education-SMDC and the QEP will be responsible for outputs, such as preparing educational fact sheets; consulting with local affected property owners; expanding the Brownfields page on the SMDC website to include the assessment program; updating social media sites; developing news releases; meet with landowners; and holding public meetings. Total estimated costs are \$12,178 (120 hours @ \$35/hour + fringe @ 28%, supplies, website, etc.).

Site Assessment – SMDC's brownfield QEP has already completed an EPA approved Quality Assurance Project Plan (QAPP) for assessments. The selected QEP contractor(s) will be responsible for completing 8 All Appropriate Inquiry Phase I assessments (\$3,500 each; \$28,000 total); Sampling and Analysis Plans (SAP) (included in cost of Phase II assessment); 6 Phase II hazardous substance assessments (\$25,000 each; \$150,000 total); 2 Phase II petroleum assessments (\$35,000 each; \$70,000 total); 16 Reports of Findings (included as part of each assessment); and comparing site data to cleanup standards. Results will be tracked, measured and reported in ACRES. These are estimates, any additional funds or reductions in cost will result in additional assessments being completed. SMDC will ensure the best value at the best cost.

Cleanup Planning – The selected QEP contractor(s) will be responsible for identifying cleanup options and costs; identifying redevelopment options based on site data and community input; and working with the owner/developer on a cleanup plan. Estimated costs are \$20,000 for hazardous substance. Additional Petroleum Cleanup plans may be paid from the MT Petrofund if determined eligible.

ii. Budget Table

PROJECT BUDGET					
Budget Categories (programmatic costs only)	Project Tasks				
	General Programmatic	Community Education	Assessment Phase I & II	Cleanup Planning	Total
Personnel					\$18,375
Petroleum	\$5,775	-	-	-	\$5,775
Haz. Substance	\$8,400	\$4,200	-	-	\$12,600

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PROJECT BUDGET					
Budget Categories (programmatic costs only)	Project Tasks				
	General Programmatic	Community Education	Assessment Phase I & II	Cleanup Planning	Total
Fringe Benefits (28%)					\$5,145
Petroleum	\$1,617	-	-	-	\$1,617
Haz. Substance	\$2,352	\$1,176	-	-	\$3,528
Travel¹					\$2,288
Petroleum	-	-	-	-	-
Haz. Substance	\$788	\$1,500	-	-	\$2,288
Supplies²					\$2,192
Petroleum	\$108	-	-	-	\$108
Haz. Substance	\$882	\$1,202	-	-	\$2,084
Contractual³					\$272,000
Petroleum	-	-	\$92,500	-	\$92,500
Haz. Substance	-	\$3,000	\$156,500	\$20,000	\$179,500
TOTAL					
Petroleum	\$7,500	-	\$92,500	-	\$100,000
Haz. Substance	\$12,422	\$11,078	\$156,500	\$20,000	\$200,000
OVERALL TOTAL	\$19,922	\$11,078	\$349,000	\$20,000	\$300,000

¹Travel to brownfields-related training conferences is acceptable uses of these grant funds.

²Items costing less than \$5,000 are supplies. Equipment (over \$5,000 with life of more than one year) is not required for assessment grant.

³Applicant will comply with the OMB "Super Circular" 2 CFR 200 and 1500

c. Ability to Leverage

When determined that additional assessment or cleanup is required beyond this EPA program, SMDC will leverage other sources of funding. EPA Brownfields RLF funds are available and managed by SMDC for remediation. SMDC manages a USDA-Intermediary Relending Program and two CDBG-RLF programs, which provides gap financing to private business owners within the area. The Montana Main Street Project is also a source of leveraged funds. They award grant funding to communities focusing on downtown revitalization. SMDC works closely with Montana Petrofund and DNRC Reclamation and Development Grant (RDLG) Program, which provides funding for remediation of contaminated sites. SMDC may request Targeted Brownfields Assessment or Site-Specific Competitive Cleanup assistance from DEQ and EPA. MT State Revolving Loan Fund managed by the MT Dept. of Commerce has financing for cleanup. SMDC will access MT Commerce's Big Sky Trust Fund for planning grant assistance when appropriate. SMDC is able to access U.S. Dept of Commerce-Economic Development Administration, HUD Community Development Block Grant and/or U.S. Dept. of Agriculture funds as appropriate. The MT renewable energy RLF may be used for redevelopment efforts. Communities in the region also have local community foundations which might provide grants when projects fit their criteria. SMDC will maximize private contributions by requesting the property owner or potential developer to cover any shortfalls in assessment and cleanup funds.

3. Community Engagement and Partnerships

a. Plan for Involving Targeted Community & Other Stakeholders and Communicating Project Progress

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i. Community Involvement Plan

SMDC understands the importance of involving stakeholders in the Brownfields program and has demonstrated this by the successful community involvement in the current Brownfields program. SMDC will continue to conduct this community outreach while adding components of the assessment grant. SMDC will work with community stakeholders, request their input on site prioritization and sites selected for assessments, and all comments will be addressed one-on-one in meetings or in writing.

The following outlines the specific goals of each of our outreach methods.

Community Outreach and Education Plan: SMDC has prepared and implemented a Brownfields RLF outreach plan. We will prepare a plan for assessment funds within 3 months of award and it will detail the actions to be taken to involve stakeholders in site selection for assessments, cleanup decisions, or reuse planning. The steering committee approved plan will define outputs and milestones for public outreach.

Brownfields Steering Committee: SMDC will establish a Brownfields Steering Committee comprised of community members from across the area that includes the sanitarian, lenders, realtors, government officials, and community leaders. The Committee will meet quarterly to discuss program progress, prioritize sites, review site assessment requests, provide community feedback, and will report to their communities.

Fact Sheets and Newspaper Articles: Fact sheets and press releases will be developed to educate people about the program, provide project updates, and share results. Fact sheets will be distributed to local government offices and other facilities frequented by the public.

Webpage and Social Media: SMDC currently maintains a Brownfield webpage that will be expanded with regards to information about the assessment program and contact information. Social Media will provide interactive opportunities to update progress, communicate with community members and announce assessment findings about each project.

Public Meetings: Four Public meetings will be held to educate the public about the Brownfields program, solicit public input, and inform the community on assessment findings.

Landowner and Developer Meetings: SMDC staff will meet with landowners to market the assessment program, gain an understanding of landowners' current needs and goals for their property. Initial meetings have already occurred with landowners of 20 different sites.

ii. Communicating Progress – SMDC will continue to develop the Brownfields mailing list that is used to notify various stakeholders, steering committee representatives, interested persons and groups of upcoming events, milestones, etc. Due to the elderly and rural residents in the target area, a variety of means of announcing community progress will be used including physical mailings, internet, webpage, social media, community organizations, coffee and community club presentations. Communicating progress will be critical to the ongoing success of the SMDC Brownfields program. SMDC will work closely with local media through meetings with reporters, writing news releases and appearances on community radio programs. Residents of the target area primarily use three weekly or bi-weekly newspapers in the area. All programs will be held in ADA accessible facilities, and SMDC will accommodate hearing and sight concerns as needed with large print publications, sign language interpretation, and Montana Relay 711 for telephonic communication. The English language is predominantly used throughout the SMDC target area and all items will be printed in English. If a need arises, materials may be printed in other languages.

b. Partnerships with Government Agencies

i. Local/State/Tribal Environmental Authority

SMDC has developed relationships with local health department personnel and the Central Montana Community Health Center covering all 6 counties, DEQ Petroleum Board and regulatory and Brownfields personnel, EPA Region 8 personnel such as Stephanie, Shen and Ted Lanzano, have provided assistance with the Brownfields RLF program administered by SMDC. SMDC has hosted statewide and regional

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Brownfields trainings held in 2012-2016 with the support of EPA and DEQ staff. SMDC has monthly conference calls with DEQ Brownfields staff, Jayson Seyler, Brandon Kingsbury, and/or Jeff Kuhn to discuss the 33 Brownfields projects in various stages from TBA's to "No Further Action" letters. Deb Grimm of DEQ oversees the asbestos and methamphetamine hazardous substance division and SMDC will work closely with her to assure these assessments are done properly. DEQ and EPA staff has been key partners in SMDC's successful Brownfields program. Assessment grant funds will allow SMDC to build upon existing local government partnerships throughout the area. DEQ and local health department staff covering the 6 county area will serve on the steering committee and continue to have a role in identification and prioritization of sites, assessments and cleanup activities. Cleanup and closure of sites is overseen by DEQ, therefore SMDC will coordinate with DEQ to determine the best assessment approach to ensure success.

ii. Other Governmental Partnerships

SMDC has ongoing long-term relationships with agencies including the US Commerce-Economic Development Administration, USDA-Rural Development, NRCS, MT Department of Commerce, MT Department of Natural Resources, MT Department of Administration, MT Governor's Office, the local Conservation Districts, MT University Extension Services, MT Economic Developers Association, as well as local, state, and federal officials. Through involvement in the Vibrant Futures: Partnership for Sustainable Communities Program, SMDC works with HUD, DOT and EPA to implement livability principles within the target area.

c. Partnerships with Community Organizations

i. Community Organization Description and Role

The table below lists community-based organizations that SMDC has a history of working with, and are or have been involved in the Brownfields Program. Letters from these organizations and others are included.

COMMUNITY-BASED ORGANIZATIONS PARTICIPATING IN THIS PROGRAM		
Organization	Description	Role and Commitments
Lewistown Community Development Corporation	Community development, housing	Site identification and referral
Community Health Center	Public Health and Safety	Site identification and referral, public health education, Steering Committee, reviewing assessment information
1 st Security Bank, Roundup	Local lender, business leader	Referral of Brownfields property owners for assessment.
Realty Title Company	Title company, business leader	Community outreach and education, referral of brownfield properties for assessment.
Lewistown Chamber	Business Development	Community outreach and education, referrals
Central MT Medical Center	Public Health and Safety	Help identify sites, community outreach and education
Central MT Education Center	Education	Community outreach and education, referral of sites.
Big Spring Watershed	Environmental and Health	Outreach and Education, site identification and referral.
Wheatland Co. Chamber	Business Development	Community outreach and education; site identification, referral
Lewistown Downtown	Main Street Revitalization	Community outreach and education, referral
Central MT Health Dist.	Public Health and Safety	Community education and referral

ii. Letters of Commitment – The rural target area has few community organizations. The attached letters demonstrate the depth of involvement. Commitment letters are in Attachment.

4. Project Benefits

a. Health and/or Welfare and Environmental Benefits

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i. Health and/or Welfare benefits

A grant will assist us in promoting vibrant, equitable, and healthy communities through assessment leading to redevelopment of the brownfields found throughout the micro-communities that will:

- Eliminate blight such as vacant properties, former gas stations, chemical and rail facilities, and industrial properties, and increase the quality of life for residents with new housing opportunities
- Promote walkable communities and riverfront public access/flood control in natural disaster areas/greenspace areas by redeveloping property that is continually flooding and eliminate flood damage expenses to property owners and local, state and federal agencies.
- Create opportunities for sustainability through environmentally friendly developments, solid tax base and increased property values.
- Protect water resources and enhance the environmental quality, health, and safety by removing hazardous chemicals and petroleum products

The emphasis on community engagement that will accompany implementation of this grant will increase community awareness of potential public health and environmental contamination issues associated with the brownfield sites. As the extent and nature of environmental contamination is determined, community members will better understand how to limit their exposure to contaminants. Community engagement will facilitate the eventual redevelopment of these sites. As residents learn of the many benefits associated with reusing brownfield sites as opposed to expanding development to greenfield sites, projects will be proposed. Historic downtowns in the area communities have a number of blighted buildings that need assessment, cleanup and redevelopment in order to make the buildings useful once again. The creation of more jobs within these impoverished micro-communities will reduce transportation costs for low-income residents.

ii. Environmental benefits

Environmental benefits include removing actual and potential sources of land, water and air contamination and preserving greenfield land, which may be productive farmland or environmentally significant land. Creating in-fill in communities prevents urban sprawl, preserves agricultural lands, reduces traffic emissions, and provides open greenspaces and space for production of local food sources. SMDC continues to use green remediation Best Management Practices in the Brownfields program which reduces energy use, air pollutants, water use while improving materials management and reducing waste.¹³ SMDC promotes these practices to developers, property owners and in restoration projects on historic downtown properties as these green practices provides a long-term sustainable solution to maintenance of these buildings. An example is the Roundup flooded buildings which are remnants of the mining industry, now exacerbated by flooding. Assessing and cleaning up these properties will remove environmental issues such as mold, asbestos, lead and ensuring they won't be spread throughout the environment with another natural disaster event.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Policies, Planning, and other

We use planning as a key tool to encourage dense development within walking distance to public transportation infrastructure and to maximize the use of limited land area, particularly in our target communities. Dense land use development has the potential benefit of using existing infrastructure and reducing vehicle emissions by encouraging a greater share of pedestrian, bicycle, and transit use. These regulations are intended to promote pedestrian-friendly, compact, mixed-use development. Our current code establishes key design criteria for new development and adaptive reuse of existing structures. Our communities use local code which includes a streamlined approval process, density and mixed-use incentives, and reduced parking requirements. It takes advantage of existing infrastructure, including

¹³ <http://www2.epa.gov/superfund/superfund-green-remediation>

FY 17 COMMUNITY-WIDE ASSESSMENT GRANT FOR SNOWY MOUNTAIN DEVELOPMENT CORPORATION

existing power, sewer, and water infrastructure that has serviced the sites before. Linear trails and pedestrian pathways connecting the neighborhoods to key locations downtown will once again create a walkable community. Providing pathways for pedestrians and bikers will reduce impacts on local roadways while improving quality of life in our communities. Limited developable land in our Target Area constrains this area from new development (residential or economic). Our initiative must adapt or reuse brownfields to accommodate future growth.

Sustainable redevelopment is important to these rural communities. Funding sources to extend infrastructure are scarce. SMDC in partnership with communities developed specific goals and objectives in its Comprehensive Economic Development Strategy (CEDS) encouraging sustainable redevelopment. Goal 2, Objective A-D of the CEDS outlines a plan to “improve and enhance community infrastructure systems to position the region for sustainability and growth.” To achieve this goal, SMDC is applying for brownfields assessment funds to assess sites such as the downtown Roundup, Lewistown and Harlowton properties which will reuse an existing structure, renovate abandoned and blighted buildings, leveraging existing infrastructure, and ensuring infill in communities.

ii. Integrated Equitable Development or Livability Principles

SMDC is a core partner of the Vibrant Futures Consortium, a HUD Sustainable Communities Regional Planning Program made possible by the HUD-DOT-EPA Partnership for Sustainable Communities grant program (See Attachment). Our brownfield initiative will improve livability by promoting affordable housing; increase economic activity in our near downtown, and create new park amenities, improved housing stock, and cleaner water supplies. Redevelopment of residential neighborhoods will support existing healthy communities, as well as improve residential access to greenspace, recreational property, transit, and other institutional uses. Redevelopment of our many contaminated sites and abandoned properties and creation of new greenspace will specifically improve the quality and quantity of low-income, affordable housing for our downtown residents. New housing will include energy-efficient units to promote sustainability and help manage resident utility costs. Proximity to our target area park amenities, greenspaces, and associated revitalization projects will provide opportunities for residents to access low-cost resources.

c. Economic and Community Benefits (long-term benefits)

i. Economic or Other Benefits

Two primary goals of our brownfield redevelopment initiative are to create prosperous businesses in our downtown and to increase more public space and amenities. This assessment grant has the potential to benefit our communities in ways that trickle down or directly impact our neighborhood micro-economies.

Communities experience environmental, social and economic benefits from brownfield redevelopment. These include recovering desirable locations, allowing for smarter growth through urban intensification; renovating abandoned and derelict buildings, decreasing the risk of injury, vandalism and arson; preserving historical landmarks and heritage architecture; beautifying landscapes; protecting water resources; reviving older communities and surrounding areas; locating new development in areas where better use can be made of existing municipal infrastructure and services such as transit; and increasing property assessment values and the resulting tax base, leading to increased revenue for governments; reducing sprawl.¹⁴ These benefits are realized when a downtown historic property in any of the communities is assessed, cleaned up and re-developed creating a more viable business community and inviting area that enables the community to attract a workforce needed for businesses.

¹⁴ <http://cielap.org/brownfields/benefits.html>

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ii. Job Creation Potential, Partnerships with Workforce Development Programs

SMDC's goal is to create employment and business opportunities in brownfields work associated with its assessment program. Local contractors will be encouraged to participate in Brownfields training programs including those offered by Lewis & Clark County's 2014 EPA funded Job Training grant. College students will be encouraged to job shadow or be mentored by Qualified Environmental Professionals conducting assessment and cleanup planning projects in the area. We seek to partner with Montana Department of Labor and Industry; Division of Workforce Services (DWS)¹⁵ which provides job placement and training to individuals in Montana, helping to build a workforce to meet the changing demands of Montana's diverse businesses, citizens and economy. Montana is expected to experience a worker shortage in the years ahead as a large percentage of the population reaches retirement age, causing the size of the working-age population to stagnate. As the labor market tightens, employers may have difficulty finding workers depending on their specific labor force needs and the local availability of workers. Through our existing partnerships, we will seek to recruit local and regional developers for our reclaimed brownfield sites so as to take the best advantage of our existing workforce and skill sets so that we can become a part of the economic solution and not exacerbate the problem. The brownfield initiative will catalyze new employment (permanent, remediation, and construction), property investment, and value in our target area. As an example, since SMDC started the Brownfields program, two professional firms have moved into the community and are working with SMDC as QEP's on these projects. Also, contractors are participating in training to clean-up the hazardous materials in order to work closer with SMDC. As historic downtown buildings are assessed, cleaned up and re-developed a greater core of people gain knowledge in handling hazardous materials.

5. Programmatic Capability and Past Performance

a. Programmatic Capability - Created in 2001, SMDC operates as a Certified Regional Development Corporation (CRDC) sanctioned by the State of Montana and is a private, non-profit organization, independent of local, state and federal government entities. Over the last fifteen years, SMDC has managed millions of public funding from several sources, including the Economic Development Administration (EDA), Dept. of Interior-BLM, Defense Logistics Administration, EPA, Health Resources Services Admin., USDA-Forest Service, USDA-Rural Development, MT Depart. of Commerce, HUD Community Development Block Grant program, US Depart. of Homeland Security, Disaster Emergency Services, MT Depart. of Transportation, MT Depart. of Natural Resources and local governments.

SMDC has the expertise and capacity to manage the SMDC's Brownfields Assessment Grant and has demonstrated this with the management of the 2012 Brownfields Clean-up RLF with supplemental funding awarded in 2015 and 2016. Financial systems at SMDC are compliant with Generally Accepted Accounting Principles.

Kathie Bailey, Executive Director of SMDC, will continue to serve as the Brownfields Program lead. As lead, Kathie will serve as the program spokesperson, communicating with the public and landowners. She will ensure all project goals are on schedule and sites chosen for assessment meet the development goals and strategies for the region. Ms. Bailey has been with SMDC since it was formed. She has a M.A. in Community Education; and has completed extensive economic development, finance, and counseling training. SMDC manages the Fergus County RLF, City of Lewistown RLF, a six-county RLF, and the SMDC's EPA Brownfields RLF. Ms. Bailey recently managed a \$5 million freight rail transportation project from the disaster of 2011.

¹⁵ <http://lmi.mt.gov/>

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Supporting Ms. Bailey are 2.6 FTE's at SMDC and an 18-member board of directors who work together to achieve the economic goals of the organization. Karen Sweeney of SMDC is the Brownfields Coordinator. She will continue to oversee all of the day-to-day brownfields operations, meeting reporting requirements, and certifying that all program requirements, objectives and deadlines are met. She has an accounting degree and is a licensed CPA. She has corporate experience with financial statements, budgeting and audits. She also has experience in planning and facilitating financial workshops. Supporting Ms. Bailey and Ms. Sweeney at SMDC is Financial Director Diane Pennell. Ms. Pennell will maintain all record keeping and reporting for the grant. She has an accounting degree and 11 years of experience in federal grant administration as well as governmental, non-profit, and RLF accounting. Environmental expertise will be contracted to support certain public involvement functions, conduct the assessments, and prepare cleanup plans. SMDC has contracts with three (3) QEP firms that were selected through a competitive Procurement Process in compliance with the Super Circular.

b. Audit Findings - SMDC has not had adverse audit findings on any state or federal grant. SMDC has never received an adverse audit finding from an Office of Management and Budget Circular A-133 audit, federal, state, tribal, or local government inspector general or similar organization, or the U.S. Government Accountability Office. SMDC has never been required to comply with special "high risk" terms and conditions under agency regulations pursuant to OMB Circular A-102.

c. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

1. Compliance with Grant Requirements – SMDC received a Cooperative Agreement for a RLF Grant (Cleanup Funding) in the amount of \$1,567,428 in 2012; a supplemental of \$240,000 awarded in 2015; and a supplemental of \$300,000 awarded in 2016. SMDC is in compliance with the work plan, schedule, terms, conditions and reporting requirements. Upon award, SMDC drafted a MOA between partners, Policies and Procedures, Request for Proposals for a QEPs, and completed the Work Plan requirements for EPA. A 6-member Brownfields Steering Committee was formed and approved the MOA, Policies, Procedures, and hiring of three (3) QEPs. These documents have all been approved by EPA. SMDC regularly updates EPA's ACRES database with Brownfield RLF project statistics and accomplishments. SMDC encourages the use of the Montana Disadvantaged Business Enterprise Program when hiring subcontractors whenever possible. Through SMDC's Brownfield program and working with partners, SMDC has conducted an inventory of sites, completed fourteen (14) projects with nineteen (19) other projects in various stages or progress, established a brownfields committee, educated our partners and the public about the brownfields program, and with EPA or DEQ assistance completed assessments on ten (10) properties.

2. Accomplishments

On March 7, 2012, EPA issued a Cooperative Agreement to SMDC for a RLF Grant (Cleanup Funding) in the amount of \$1,567,428 with a supplemental of \$240,000 awarded in 2015 and a second supplemental of \$300,000 awarded in 2016. To date, SMDC has 19 projects with 14 projects receiving "No Further Action" letters from DEQ. These 33 projects represent nine (9) RLF Cleanup loans and eight (8) sub-grants creating approximately 35 jobs. Through the program, SMDC has worked with landowners and developers in completing ten (10) EPA and DEQ TBA's the past couple of years. At this time nearly all RLF funds are committed and a \$200,000 loan was repaid in 2016 and committed to revolve in 2017.

Attachment

Cover Letter Attachments

Appendix 3 -Regional Priorities Form/Other Factors Checklist

Name of Applicant: **Snowy Mountain Development Corporation**

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Assistance to small and underserved communities.

Page Number(s): 1-5

Assessment Other Factors Checklist

	Page #
Please identify (with an X) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process. Other Factor	
<input type="checkbox"/> <i>None of the Other Factors are applicable.</i>	
<input checked="" type="checkbox"/> Community population is 10,000 or less.	2
<input type="checkbox"/> Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
<input checked="" type="checkbox"/> Target brownfield sites are impacted by mine-scarred land.	2, 6
<input checked="" type="checkbox"/> Project is primarily focusing on Phase II assessments.	7,8
<input type="checkbox"/> Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
<input checked="" type="checkbox"/> Recent natural disaster(s) (2012 or later) occurred within community, causing significant community economic and environmental distress.	1,4,6
<input checked="" type="checkbox"/> Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	1,4,6,14

<input type="checkbox"/>	<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>
<input checked="" type="checkbox"/>	<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.</p>
<input type="checkbox"/>	<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>

7,8, 11, 13



December 1, 2016

Kathie Bailey
Executive Director
Snowy Mountain Development Corporation
613 NE Main
Lewistown, MT 59457

**RE: Letter of Acknowledgment: Snowy Mountain Development Corporation's
Brownfields Grant Application for Hazardous Substance Assessment and
Petroleum Product Assessment**

Dear Ms. Bailey,

I am writing to express Montana Department of Environmental Quality's (DEQ's) acknowledgment of Snowy Mountain Development Corporation's efforts to obtain a U.S. Environmental Protection Agency Brownfields Community-Wide Assessment Grant to address Hazardous Substance and Petroleum contamination in the six Montana counties of Judith Basin, Fergus, Petroleum, Wheatland, Golden Valley, and Musselshell.

I understand that the assessment funds will be used to assess hazardous substance and petroleum Brownfields sites within the aforementioned six counties. The DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

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

Sincerely,

A handwritten signature in cursive script that reads "Tom Livers".

Tom Livers

DIR-16205

cc: Jason Seyler, Brownfields Coordinator, Federal Facilities/Brownfields Section, jseyler@mt.gov
Brandon Kingsbury, Petroleum Brownfields Coordinator, Federal Facilities/Brownfields Section, bkingsbury@mt.gov

Attachment

Narrative Proposal Attachments

Kathie Bailey, Executive Director
613 NE Main
Lewistown, MT 59457

Dear Kathie,

Opportunity Link is pleased to support your EPA Brownfields application. As a core partner on the HUD Sustainable Communities Regional Planning Grant, Snowy Mountain Development Corporation has been instrumental in helping to identify strategies that address the needs and priorities of our residents and the Livability Principles set forth by HUD, EPA, and DOT. We feel strongly that your application is well aligned with the goals and strategies of Northcentral Montana's Regional Plan and if funded, will enhance economic competitiveness while valuing and supporting existing communities for the areas that we serve.

As a nonprofit organized to help reduce poverty in northern Montana, Opportunity Link's interest lies specifically in helping to identify properties whose development potential is stymied by environmental contamination or potential contamination. The assessment funds would provide Snowy Mountain with the ability to assess the needs of currently identified properties which are potentially contaminated. All six counties in this region were significantly impacted by the floods of 2011 and three were again impacted by flooding in 2013. Opportunity Link believes that the presence of a robust Brownfields Assessment Program through Snowy Mountain Development is crucial to assuring a focus on environmental justice issues for vulnerable, lower income populations.

We wish you well with your effort to establish a Brownfields Assessment Program. If successful, please know that our organization is keenly interested in assisting to promote this program and in the identification of properties in the region that would be good candidates for assessment work. The staff at Opportunity Link looks forward to continuing our partnership in this exciting way.

Regards,



Barb Stiffarm
Executive Director

Kathie Bailey
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Dear Ms. Bailey,

On behalf of the City of Harlowton, we would like to show our commitment to our partnership with Snowy Mountain Development Corporation by supporting your EPA Brownfields Assessment grant application.

The City of Harlowton is committed to partnering with Snowy Mountain Development Corporation in your efforts in promoting our region (Fergus, Judith basin, Golden Valley, Petroleum, Musselshell and Wheatland counties). The potential for redevelopment of blighted properties in our region could provide the opportunity for increased business and quality of life for the area's residents.

The most recent concern in Harlowton (a micro-community with a population of less than 1,000), is the possible contamination of a burned building immediately adjacent to the city hall. The property owner has been unable to proceed with cleaning up the burned remains of this business due to possible asbestos, lead paint, and other possible environmental contaminations. With the availability of EPA Brownfields Assessment Grant funds this property has the potential to be rebuilt into a viable business in our community.

The city of Harlowton supports SMDC's mission to improve economic and social conditions through conservation, utilization, expansion and development of all the resources in our region. We would welcome the availability of EPA Brownfields Assessment grant funds to help our community.

Respectfully,



Jeff Sell
Mayor, The City of Harlowton

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FRANK GREMAUX
DAVE BYERLY
First Ward Commissioners

DIANA HEWITT
PATTY TURK
Second Ward Commissioners

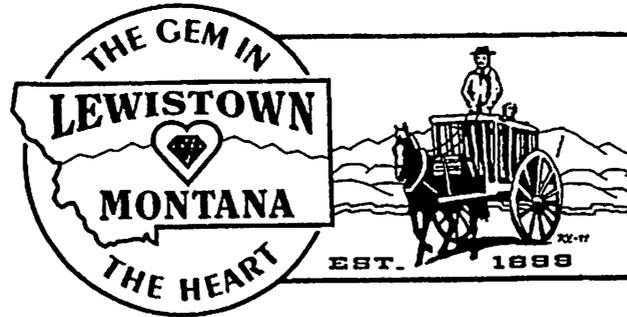
GAYLE DONEY
BETH PUTNAM
Third Ward Commissioners

RICK POSS
At-Large Commissioner

KEVIN MYHRE
City Manager

MONTE BOETTGER
City Attorney

CITY OF LEWISTOWN



305 Watson, Lewistown, Montana 59457
(406) 535-1760 Fax (406) 535-3323

JIM DANIELS
Park and Recreation Director

CORY BIRDWELL
Chief of Police

KEITH KUCERA
Fire Chief

HOLLY PHELPS
Director of Public Works

KELLYANNE TERRY
Library Director

DUANE FERDINAND
Planning Director

NIKKI BRUMMOND
Financial Officer

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Dear Ms. Bailey:

This letter is being written to offer support for an EPA Brownfields Assessment Grant application being submitted by Snowy Mountain Development Corporation. The brownfields assessment program has been a valuable resource to this community in aiding in the redevelopment of contaminated properties and we would like to see the program continued.

As is likely in other communities, the Lewistown area currently has properties that are vacant or under-utilized because of contamination concerns. Having funds available to for assessment for possible contamination would be a huge first step in the redevelopment of these properties for beneficial uses.

In the past few years, brownfields assessment funds have been successfully used in this community to restore properties to productive use. Examples include asbestos abatement at a former laundry/motel facility; the assessment and abatement of asbestos, contaminated soils and petroleum hydro-carbons at a former lumber mill site; asbestos and lead based paint abatement at a historic draft horse barn located on public property; assessment of an abandoned railroad property that has been rail banked for public use; and the assessment and cleanup of the former railroad roundup property that is now in public ownership; and the assessment of three former gasoline service stations that have been or are in the process of being remediated of contaminants.

The City of Lewistown has been successful in partnering with the Montana Department of Environmental Quality, the EPA, the Montana Department of Natural Resources and

Conservation and others to secure funding for cleanup of these various properties. These properties are now an economic and visual asset to the community rather than continuing as blighted properties.

We wish you success in securing an assessment grant. We will assist in publicizing the availability of assessment funds once in place as well as assisting in the identification of potential brownfields properties. Best wishes to your organization in this important undertaking.

Sincerely,



Duane Ferdinand

Planning Director/Historic Preservation Officer

CITY OF LEWISTOWN

FRANK GREMAUX
DAVE BYERLY
First Ward Commissioners

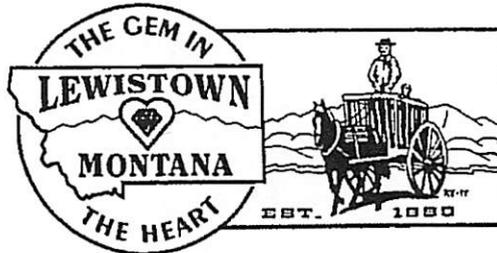
PATTY TURK
DIANA HEWITT
Second Ward Commissioners

ELIZABETH PUTNAM
GAYLE DONEY
Third Ward Commissioners

RICK POSS
At-Large Commissioner

KEVIN MYHRE
City Manager

NIKKI BRUMMOND
Finance Officer/City Clerk



305 W. Watson, Lewistown, Montana 59457
(406) 535-1760 Fax (406) 535-3323

JIM DANIELS
Park and Recreation Director

MONTE BOETTGER
City Attorney

CORY BIRDWELL
Police Chief

KEITH KUCERA
Fire Chief

HOLLY PHELPS
Director of Public Works

KELLYANNE TERRY
Library Director

DUANE FERDINAND
Planning Director

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation

RE: Snowy Mountain Development Corporation Brownfields Assessment Grant
Application

Kathie,

The City of Lewistown is greatly in support of the application prepared by Snowy Mountain Development Corporation (SMDC) for Environmental Protection Agency (EPA) Brownfields Assessment funding. The City of Lewistown has partnered with SMDC, the Montana Department of Environmental Quality (DEQ) and the EPA in the past to clean up contaminated industrial sites in the Lewistown area. Without funding and assistance from the EPA and DEQ, we would not have been successful in rehabilitating the sites. Lewistown is a micro-community (under 10,000 population) with limited funding sources. Brownfields funding is a valuable resource for the community.

Because SMDC currently manages cleanup funds under an EPA Brownfields Revolving Loan Fund, the City and SMDC worked together to clean up a former laundry facility site and a former lumber company property. I am pleased that we are currently working together to promote redevelopment of a former gas station site on Main Street. SMDC staff has proven that you have the experience and expertise needed to properly manage assessment funding.

In our experience, the cost to assess the extent and location of contaminants on the site is one of the largest hurdles in moving forward. I am aware of several sites in Central Montana that historic information indicates have environmental issues. The property owners are unable to proceed with remediation because they have no idea what the extent of those issues are or the costs involved with remediating the problems. For several years, our community has been trying to locate funds to help with the assessments with the long term goal of having the properties returned to a position of a community asset rather than liability. I will refer these sites to SMDC if assessment funding is awarded. City staff will assist SMDC with community outreach. City staff typically spends over 50 hours per year on Brownfields projects, and we commit to continue that effort.

We look forward to the successful funding of this application to help move our community into the future with a strong and healthy environment for our citizens. If you have any questions, please don't hesitate to contact me at 406-535-1760.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Myhre', written over a horizontal line.

Kevin L. Myhre
City Manager

JAMES SCHLADWEILER, President of Council
TANYA LANTER, Clerk/Treasurer
VIOLET OLSEN, Assistant Clerk
LON E. SIBLEY, Director of Public Works
DONNA MARSH, City Judge

SANDRA JONES, Mayor

City of Roundup

P.O. Box 660
Roundup, Montana 59072
Phone (406) 323-2804 • Fax (406) 323-2757
(406) 253-4091 (TTY) / (866) 253-4090 (voice)

ALDERMEN
THOMAS VANDEBERG, 1st Ward
JAMES SCHLADWEILER, 1st Ward
PAULETTE RAMSEY, 2nd Ward
RON SOLBERG, 2nd Ward
DAVID MARTIN, 3rd Ward
DAVE PICCHIONI, 3rd Ward
JOHN LAPIERRE, 4th Ward
LINDA YOUNT, 4th Ward

Kathy Bailey /Executive Director / Karen Sweeney / Regional Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown Montana 59457

RE: Letter of Support from the City of Roundup

It has come to our attention that the Snowy Mountain Development Corporation is applying for an EPA Browns Field Assessment Grant. The City of Roundup we would like to commit to partnering with SMDC in support of their effort in promoting our region.

The City has had a successful partner relationship with SMDC for the past several years. They have been a valuable resource for the City of Roundup in helping us to acquire funding for various infrastructure projects.

Recently a contaminated pipe had been discovered near the location of where a New Elementary School is being built in an undeveloped part of town. The piece of blighted property belongs to the city. Construction has begun and this EPA Browns Field project was fundamentally important to be resolved so that the school construction can continue to move forward in their scheduled time line. SMDC has aided in getting the issue resolved in a timely fashion.

In the past there have been other blighted properties located in the city that required funding for clean-up of contamination. There are currently other properties in the community that are not marketable because of contamination concerns.

SMDC serves the entire region of Fergus, Judith Basin, Golden Valley, Petroleum and Musselshell Counties. Lewistown and Roundup are micro-communities with a population of under 10,000. Funds for projects like these help communities such as ours with the challenges we face of having 100 year old infrastructure.

The City of Roundup is committed to continue partnering with SMDC in support of their effort in promoting our region with their focus of economic development.

Thank you for your time and consideration.

Sandra Jones



Mayor

Jake and Rachael Barth

Roundup, MT

Kathie Bailey
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Dear Ms. Bailey,

Please accept this letter of commitment to support the application for an EPA Brownfields Assessment Grant.

My wife and I own two historic commercial buildings on Main Street in Roundup, MT and would welcome access to funds to assess the possible contamination of the Pappas Loucas Building and the Bair-Collins Building.

We believe Snowy Mountain's Brownfields program could benefit not only us, but also our Main Street business partners. There are many of us who would benefit from the assessment Grant so we can keep our projects moving forward. Our buildings were built in the early 1900's, and we are concerned with contamination of lead paint and asbestos. We would like to repair, revitalize, and renovate our historic buildings, but are unable to move forward. We believe renovation of our Main Street buildings will promote economic development and community development in Roundup. If this grant is awarded, we would be very interested in participating in the program.

We strongly support the efforts of Snowy Mountain and we are committed to partnering and assisting with outreach, education and promotion. We support SMDC community partnerships, and are truly excited to see the continued growth of community pride in Roundup.

If we can be of further assistance please let us know.

Thank you,



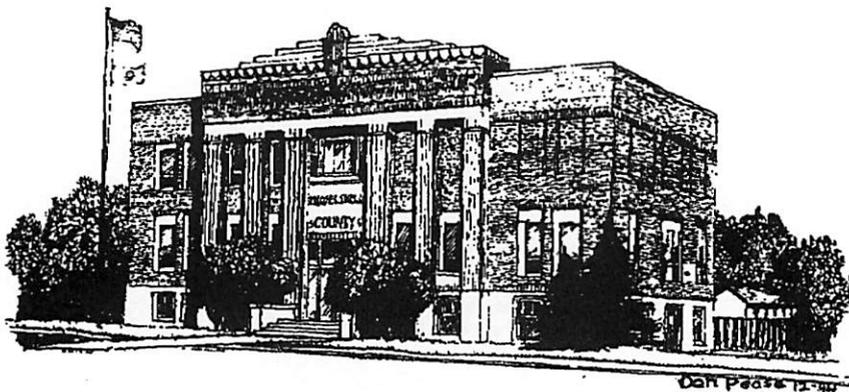
Jake and Rachael Barth

MUSSELSHELL COUNTY

BRYAN W. ADOLPH
ROBERT T. GOFFENA
NICOLE BORNER
COUNTY COMMISSIONERS
506 Main Street
406-323-1104

CHERYL TOMASSI
CLERK & RECORDER
506 Main Street
406-323-1104
FAX 406-323-3303

MARY C. NELSON
TREASURER
SUPT. OF SCHOOLS
ASSESSOR
506 Main Street
406-323-2504
FAX 406-323-3127



ROUNDUP, MONTANA 59072

MICHAEL H. THOMAS
SHERIFF
CORONER
820 Main Street
Fax 406-323-2566
406-323-1402

KENT M. SIPE
COUNTY ATTORNEY
506 Main Street
Fax 406-323-3458
406-323-2230

CONNIE MATTFIELD
CLERK OF DISTRICT COURT
506 Main Street
Fax 406-323-1710
406-323-1413

DONNA M. MARSH
JUSTICE OF THE PEACE
P.O. Box 660
406-323-1078

Dear Sirs,

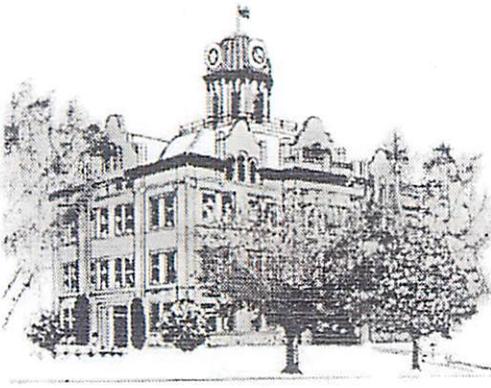
On behalf of Musselshell County, we commit a partnership with Snowy Mountain Development Corporation. They are applying for a Brownfield Assessment Grant which would give us access to funds that benefit the County, the City of Roundup and the town of Melstone.

The County has property that may be contaminated and if Snowy Mountain Development Corporation were to be awarded these funds the County would be very interested in participating in this program.

We strongly support Snowy Mountain Development Corporations commitment to Musselshell County and surrounding Counties. We strongly support their effort, if there is anything else you need, please do not hesitate to ask.

Thank You,

Bryan W. Adolph- Commission Chairman



FERGUS COUNTY

Kevin Myhre, Chairman
Snowy Mountain Development Corporation
613 NE Main St.
Lewistown, MT 59457

Mr. Myhre:

Fergus County Commissioners are pleased to once again offer our support of an application from our region for an U.S. Environmental Protection Agency Brownfields Program Assessment grant.

We were pleased to hear that a revolving loan fund grant for clean-up was awarded in 2009, and an assessment grant announced in 2011, but disappointed to learn that Northern Rocky Mountain RC&D (the applicant) was no longer eligible, leaving the Central Montana Brownfields Coalition without assessment funding, EPA transferred the RLF for cleanup to Snowy Mountain Development Corp., a Coalition member, and for that we are thankful, but as assessments are the first steps towards redevelopment, we are very hopeful that EPA will see the merits of your request for assessment funding.

Our county commission and SMDC's board of directors have had numerous discussions about the lack of activity at potential Brownfield sites. We have a number of properties where the threat for potential contamination has prevented the sale of the property, as potential buyers are fearful of contamination and the cost of clean-up. Having funds to assess these properties and, when necessary, funds for clean-up will help spur redevelopment. The Fergus County Planning Department will assist the coalition in identifying these sites.

We are writing to express our support of the ASMDC and Central Montana Brownfields Coalition effort to secure funding to address this problem and look forward to assisting this program as we move forward.

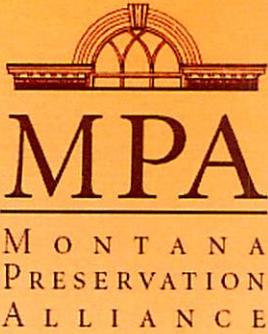
Sincerely,

Sandy Youngbauer
Fergus County Commission Presiding Officer

Fergus County Commissioners
712 W. Main St., Suite 210
Lewistown, MT 59457

commissioners@co.fergus.mt.us

Ross Butcher, District 1
Sandy Youngbauer, District 2
Carl Seilstad, District 3



December 20, 2016

Attn: Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 N.E. Main Street
Lewistown, MT 59457

Re: EPA Community Wide Assessment Grant Application

Dear Kathie,

It is our understanding that Snowy Mountain Development Corporation (SMDC) intends to apply for an EPA Community Wide Assessment Grant for your service area that includes Fergus, Petroleum, Judith Basin, Wheatland, Golden Valley, and Musselshell Counties in Central Montana. We are well aware of SMDC's success with managing your EPA Brownfields Revolving Loan Funds for cleanup projects, and your advocacy for proper assessment.

The Montana Preservation Alliance (MPA) deals exclusively with the rehabilitation of heritage properties. We see contamination as a common issue that is exacerbated by property owners' lack of proper assessment and of understanding their options. Having a property assessed prior to purchase is not considered part of normal due diligence in Montana, and it is not typically pushed by banks or realtors. This has resulted in many individuals and businesses being surprised when they discover hazardous materials, dealing with them improperly, and/or realizing they are not qualified for cleanup funds. The MPA strongly advocates for this process statewide, and we applaud SMDC's efforts to educate citizens as well.

Having assessment funds available locally will significantly help our communities effectively deal with contamination. Adding assessment funding to SMDC's package of resources for the region is needed, appropriate, and has our full support. We hope the EPA awards SMDC funding for community wide assessment funds that support your holistic efforts to address contamination.

Sincerely,

A handwritten signature in cursive script that reads "Chere Jiusto".

Chere Jiusto
Executive Director

120 REEDER'S ALLEY
HELENA, MT 59601
406.457-2822
www.preservemontana.org
info@preservemontana.org



Phone: 406-535-6545

Fax: 406-538-6549

Website: www.centralmontanachc.org

406 1st Avenue South, Lewistown, MT 59457-3020

Kathie Bailey, Executive Director
c/o Snowy Mountain Development Corporation
613 NE Main
Lewistown, MT 59457

Dear Ms. Bailey,

I am writing in strong support for the Snowy Mountain Development Corporation's application for Brownfield Assessment grant funds. As the regional economic development organization in our large, six county region of Central Montana, SMDC provides vital technical assistance, resources, and expertise to our businesses, property owners and developers.

The Central Montana Community Health Center (CMCHC) appreciates the commitment of SMDC's leadership and staff to provide these assessment, clean-up and re-development tools to Central Montanans.

CMCHC and SMDC have a long history of working collaboratively together. As a community health organization, CMCHC will assist this effort by referring potential brownfields sites to SMDC for assessment, reviewing assessment information, and ensuring the public health is protected through project activities. We are interested in a position on the Brownfields Assessment Steering Committee to be formed upon grant award.

CMCHC continues to play a leading role in delivering high quality, cost effective health care services to the underserved population of Central Montana. CMCHC offers its full support and strongly encourages the Environmental Protection Agency to award a Brownfields Assessment Grant to SMDC. Please do not hesitate to contact me if you require further information.

Sincerely,

A handwritten signature in blue ink that reads "Michele Foy".

Michele Foy,
Chief Executive Officer



CENTRAL MONTANA MEDICAL CENTER

408 Wendell Avenue ▪ Lewistown, Montana 59457 ▪ Phone (406) 535-7711

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Dear Ms. Bailey,

Please accept this letter of commitment to support SMDC application for EPA Brownfields Assessment Grant.

SMDC and CMMC have worked closely together, most recently, with SMDC being successful in securing large grant dollars for a new ambulance and emergency medical services 'lifeline' equipment and software. SMDC has allotted our rural communities to not only survive, but thrive.

As a hospital physician and representative of Central Montana Medical Center (CMMC), we fully support necessary assessment funds to government and non-profit organizations to help in the removal processes of hazardous materials present in the wide-area region that encompasses six Montana counties.

Property contamination clean-up is expensive, complicated and causes great concerns for not only redevelopment of property, but, health issues, as well. Locally-led efforts to ensure clean and sustainable waters and soils should be of high importance in keeping Montana clean, healthy and beautiful.

Central Montana Medical Center is committed in promoting good health and safety for the citizens of Central Montana. Public and private outreach, education and encouraging community interaction on this environmental development project are fully supported.

Sincerely,

Michael Sura, M.D.
Central Montana Medical Center

cc: Mike Dowdy, CMMC CEO

Big Spring Watershed Council
Lewistown, Montana

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Dear Ms. Bailey:

The subject of this letter is to offer support for an application to the EPA for a Brownfields Assessment Grant. The BSCWC fully supports the acquisition and use of funds for conducting assessments of potentially contaminated properties that have potential redevelopment opportunities.

The Big Spring Creek Watershed Council has been actively involved in the successful reclamation of other brownfields properties in the area. These efforts include the successful cleanup of Brewery Flats on Big Spring Creek and the former Berg Lumber Mill site. These efforts were successful because of the cooperation of local citizens, city and county governments, and non-government organizations such as the BSCWC. Support for these cleanup efforts also came from the EPA, Montana DEQ, and Montana DNRC. It is our continuing interest to support efforts to conduct assessments and implementation of reclamation when found appropriate. There are a number of properties in this area that have contamination issues and we support any effort that would reclaim these properties for beneficial use.

The Big Spring Watershed Council will participate in these efforts and will assist in the dissemination of information about the brownfields program.

Thank you for your involvement and interest in supporting the identification and cleanup of contaminated properties. These efforts will ultimately have significant economic benefits to central Montana.

Sincerely,



Don Pfau, Chairman
BSCWC
PO Box 780
Lewistown, MT 59457

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

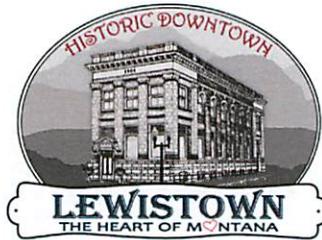
Dear Ms. Bailey,

On behalf of the six counties of Central Montana the Central Montana Health District fully supports the efforts of Snowy Mountain Development Corporation to reduce public health risks through their grant efforts for environmental contamination removal and the protection of our citizens.

Sincerely,

A handwritten signature in blue ink that reads "Scott Damby DVM". The signature is written in a cursive style with a large, stylized initial 'S' and a long horizontal stroke extending to the right.

Scott Damby, DVM
Health Officer
Central Montana Health District



Lewistown Downtown Association, 207 W. Main St, Ste 3, Lewistown, MT 59457

To Whom It May Concern,

I am writing on behalf of the Lewistown Downtown Association to voice support for the EPA Brownfields Assessment Grant Application. These funds would be used to assess properties, thereby allowing SMDC to provide grants and loans to organizations deemed eligible for cleanup of contaminated properties in SMDC's six county service area (Fergus, Judith Basin, Golden Valley, Petroleum, Musselshell, and Wheatland Counties).

The focus of the cleanup of the properties would be to boost economic development in the area by redeveloping blighted properties. SMDC works closely with local organizations and businesses in the redevelopment of unused and under-utilized properties in our area. Because Lewistown is a small community, assessment funding is limited. The grant would provide opportunities not otherwise available.

Thank you in advance for recognizing the importance of SMDC's grant application. Please don't hesitate to contact me if you need additional input.

Sincerely,

Chris Cooler
Board Chair
Lewistown Downtown Association

Central Montana Education Center

MSU-Northern Lewistown

P. O. Box 1144, 773 Airport Road, Lewistown, Montana 59457

Telephone 406-535-9022/Fax 406-535-5578

RE: Letter of Support for Snowy Mountain Development Corporation

To Whom It May Concern:

I am writing in support of Snowy Mountain Development Corporation of Lewistown, Montana and their pursuit of an EPA Brownfields Assessment Grant that would be utilized to serve this six county region of Central Montana.

Lewistown is a small but vital micro-community located in the center of the vast state of Montana. We are the hub for economic development, as well as many health and human services, for all six surrounding counties.

We here at the Central Montana Education Center/ Montana State University-Northern Lewistown campus are pleased to offer our full support and collaborative efforts to better serve this area, along with SMDC and many other community entities. We provide adult education, career counseling, high school equivalency diploma preparation and testing, an adult and student construction academy, professional development training opportunities, and are a satellite campus of Montana State University-Northern. We serve approximately 2,500 different adult enrollments per year through our five departments. We also assist entities that need to develop and deliver custom training courses for their incumbent or potential employees.

We fully support the efforts of Snowy Mountain Development Corporation to apply for this grant, receive these funds, and utilize them to make Central Montana a better place in which to live for all of us in this six county region.

Respectfully submitted,



Diane Oldenburg, Director

Central Montana Education Center/ MSU-Northern Lewistown

December 14

Kathie Bailey, Executive Director
Snow Mountain Development Corporation
613 NE Main Street
Lewistown MT 59457

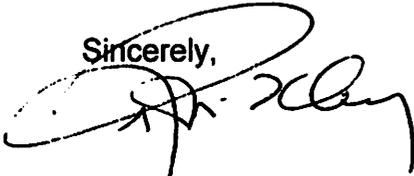
Dear Kathie:

The Lewistown Community Development Corporation would like to offer its support for Snowy Mountain Development Corporation's (SMDC) request to the U. S. Environmental Protection Agency Brownfields Program Assessment grant program.

We are pleased that SMDC is working to secure funding to address the brownfields problem in our region. Assistance through the EPA Brownfields Program has consistently demonstrated that communities throughout Central Montana are succeeding in revitalizing abandoned and contaminated properties. As a non-profit community development organization, we are convinced that brownfields redevelopment can propel economic growth and community revitalization.

Thank you for taking the initiative to investigate brownfields cleanup opportunities. We appreciate your efforts in striving to obtain brownfields funding for the repair of damage that has been perpetrated on our communities. The funding being sought is especially important for rural brownfields sites, where delivering an economically viable product is a real challenge.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin L. Fleming", written over a large, light-colored oval scribble.

Robin L. Fleming
Acting President – Lewistown Community Development Corporation

REALTY TITLE COMPANY, INC.

**201 6th Avenue South
Lewistown, MT 59457
Tel 406 535-8176/2326
Fax 406 535-5184**

rtc@midrivers.com

**Kathie Bailey, Executive Director
Snow Mountain Development Corporation
613 NE Main Street
Lewistown MT 59457**

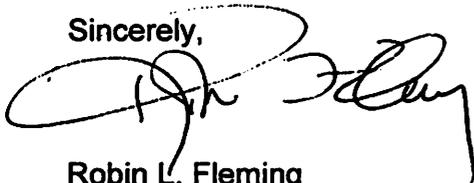
Dear Kathie:

Realty Title Company would like to offer its support for Snowy Mountain Development Corporation's (SMDC) request to the U. S. Environmental Protection Agency Brownfields Program Assessment grant program.

We are pleased that SMDC is working to secure funding to address the brownfields problem in our region. Our company has been serving Central Montana since 1896, and is closing agent and insurer of title for both residential and commercial properties. We work closely with both lenders, realtors and attorneys in a three county area, including the region served by SMDC. We are aware of properties what are sitting vacant and because of former uses of these properties, potential buyers opt out of purchasing said properties for fear of inheriting a costly contamination problem. Having funds available to assess these properties and, when necessary, clean the properties, will help spur redevelopment.

Lewistown has a history of slow and steady growth and we hope that trend will continue. We have seen land historically used for agriculture purposes being taken out of production for commercial and residential development. Although there is value in that type of development, we believe it would be beneficial to put existing sites back into use. We believe the brownfields funds would accomplish that goal and provide a better future for our area.

Sincerely,



**Robin L. Fleming
REALTY TITLE COMPANY, INC.**

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main St.
Lewistown, MT 59457

Dear Kathie,

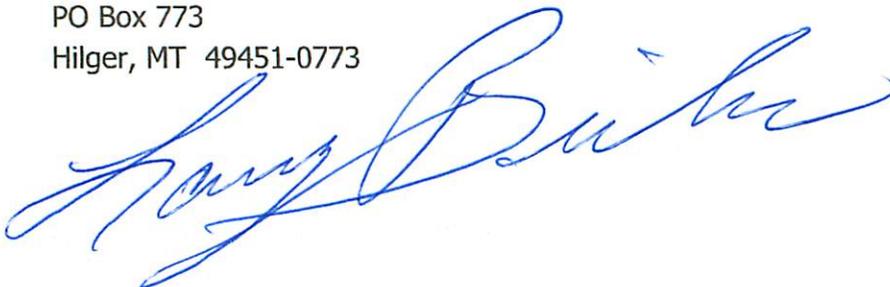
It is my understanding that Snowy Mountain Development Corporation (SMDC) is applying for an EPA Brownfields Assessment Grant. I am in full support of this application and can personally attest to the benefit of an assessment for redevelopment purposes.

As you are aware, I operate a meat processing business on a site that was formerly operated as a gas station. I do not have the financial resources needed to conduct an assessment and cleanup on my own. I am grateful that you and your staff worked with Montana DEQ to have a Targeted Brownfields Assessment conducted on my site earlier this year. The Montana Petroleum Tank Release Compensation Board just confirmed that I am eligible for reimbursement of cleanup costs on the property. With SMDC's assistance, I now have the assurance that the property will remain a viable commercial site in our tiny community (micro-community).

I fully support SMDC's application for assessment funding so that you and your staff can continue providing assistance for redevelopment of Brownfields sites throughout your six-county region.

Sincerely,

Larry Bielen
PO Box 773
Hilger, MT 49451-0773

A handwritten signature in blue ink, appearing to read "Larry Bielen", is written over the typed name and address. The signature is fluid and cursive.

Roundup Public Schools

"Learners For Life"

CARMEN EISELEIN

Business Manager

700 3rd Street West

Phone 323-1507

FAX # 323-1927



School District No. 55 and 55-H

700 3rd Street West

Roundup, Montana 59072

To Whom It May Concern:

Please accept this letter of support for a Brownfields Assessment Grant submitted by Snowy Mountain Development Corporation.

Roundup Public Schools operates three buildings with the newest building being constructed in 1957. With the age of these facilities there can be needs in the area of asbestos and lead paint remediation. Being able to access grant dollars or loans to help assess these needs is important to the School District and really the entire community of Roundup.

If I can be of further assistance to this process, please feel free to contact me at 406-323-1507.

Respectfully,

Chad Sealey
Superintendent
Roundup Public Schools

CHAD SEALEY
Superintendent of Schools
700 3rd Street West
Phone 323-1507
FAX # 323-1927

DANA QUENZER
High School Principal
525 6th Avenue West
Phone 323-2402
FAX # 323-1583

RICK GRIFFITH
Elementary Principal
600 1st Street West
Phone 323-1512
FAX # 323-1759

JIM BROWNING
Activities Director
525 6th Avenue West
Phone 323-2402
FAX # 323-1583



Kathie Bailey, SMDC Executive Director
Central Montana Brownfields Coalition c/o
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Subject: Brownfields Assessment Grant Letter of Support

To Whom It May Concern:

This letter is intended to provide background and support for the Brownfields program administered by Snowy Mountain Development Corporation (SMDC), on behalf of the Central Montana Brownfields Coalition (CMBC). Tetra Tech functioned as the Qualified Environmental Professional for CMBC's Brownfields Revolving Loan Fund since May 2012. During that time we have provided oversight for numerous brownfields sites in the project area, including:

1. Save the Barn, Lewistown: Provided oversight for lead paint abatement on a historic County Fairgrounds barn which allowed for a significant historic structure to be used safely by the public;
2. Methamphetamine Contaminated Property, Roundup: Assisted county government with demolition of a former meth lab also known to contain lead paint and asbestos to be redeveloped by the County Emergency Services program;
3. Caird Engineering Works, Helena: Conducted third party oversight for the demolition of a 100 year old former foundry and excavation of soils contaminated with metals and hydrocarbons to remove blight from the center of town;
4. National Guard Armory, Helena: Assist Montana Business Assistance Connection and the Montana Department of Administration with the abatement plan for the historic Montana National Guard Armory contaminated with lead dust from a firing range so State employees could utilize the building for offices;
5. Hilger Country Store, Hilger: Assisted CMBC and the Montana Department of Environmental Quality with a soil boring investigation and groundwater sampling at a former gas station to assist a small rural business with the sale of a commercial property.

It has been evident during each of these projects that the staff at SMDC have an intimate knowledge of their project area and the communities they serve. Each of their partners, Montana Business Assistance Connection, the City of Lewistown, and Prospera Business Network, has been instrumental in bringing these projects to fruition. Tetra Tech has attended community meetings in Central Montana, and at each event SMDC does an excellent job of ensuring that attendees are engaged and provided with new ways to allocate brownfields and other grant funds to local projects.

The CMBC has been acquiring a list of sites for redevelopment, unfortunately many of them cannot be investigated due to the lack of available funding. Often the contaminants, or perceived contaminants, are on properties owned by small towns or rural businesses that do not have the capital available to pay for environmental assessments. Without adequate funding these properties remain underutilized due to contaminants such as petroleum or hazardous substances in soil and/or groundwater, or from building materials containing

lead, asbestos, mercury, PCBs, etc. If CMBC were to win a Brownfields Assessment Grant it would allow them to leverage the existing RLF as well as other grant opportunities in the state.

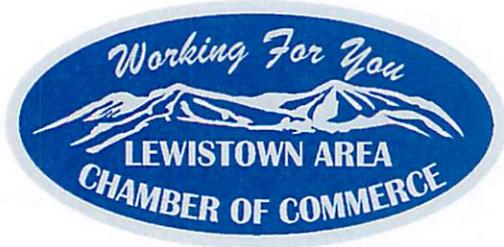
As the former Montana Department of Environmental Quality-Petroleum Brownfields Coordinator, I have worked with nearly every economic development corporation in Montana. SMDC and CMBC show the highest level of ethics and commitment to the communities they serve. Their level of achievement with the Revolving Loan Fund is unparalleled in the state, and the addition a Brownfields Assessment Grant to their organization would leverage an even greater number of projects to meet the needs of the region.

If you have any questions regarding this letter please do not hesitate to contact me at (406) 447-1450 or by email at nicholas.sovner@tetrattech.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicholas Sovner', with a stylized, cursive script.

Nicholas Sovner
Environmental Scientist / Project Manager



*408 N.E. Main
Lewistown, MT 59457
406-535-5436*

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

Re: EPA Brownfields Assessment Grant

Dear Ms. Bailey,

Please accept this letter of support on behalf of the Lewistown Area Chamber of Commerce with regards to the EPA Brownfields Assessment Grant. Snowy Mountain Development Corporation has the vision and expertise and the energy to make our community even better than we are today.

The Lewistown Area Chamber of Commerce is committed to the economic growth of our community and with this grant, under the expert knowledge and experience of Snowy Mountain Development Corporation, we have no doubt that this will improve our area and the entire outside communities.

The Lewistown Area Chamber of Commerce supports your request for funds and look forward to a successful working relationship with Snowy Mountain Development Corporation to ensure economic growth.

Working for Lewistown,

Connie Fry
Executive Director
Lewistown Area Chamber of Commerce

*lewchamb@midrivers.com
www.lewistownchamber.com*

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main Street
Lewistown, MT 59457

December 7, 2015

Dear Kathie,

The Wheatland County Chamber of Congress (WCC) would like to recognize Snowy Mountain Development Corporation (SMDC) for their continued commitment to community development in the Central Montana area. Specifically, SMDC provides continued support to cleanup efforts of the former Bob's Chevron property. This property was purchased by the WCC with the intent of cleaning up the site and eventually developing the property as a visitor's center.

The Chevron property is located in Harlowton, MT, a small rural town in Wheatland County with a population of approximately 1,000. The history of Harlowton indicates that several service stations previously existed within the city, each of them housing underground storage tanks (UST). The Chevron property housed eight UST, which were removed in 1991. It was determined that petroleum contamination was present at the site, which was resolved in 1992. The release was reopened in 2006 based on information obtained from several leaking UST in the general area.

In 2012 work began in Harlowton to determine the extent and magnitude of an underground contaminant plume. Work has been ongoing through cooperation between the City, Montana Department of Environmental Quality (DEQ), and environmental consultants. In addition, an investigation is ongoing at the site of the Milwaukee Roundhouse (city owned property). It is likely that the City would be eligible for Brownfields funds in the future.

The partnership between WCC and SMDC has been invaluable in providing coordination between the DEQ, Central Montana Brownfields, the Montana Petroleum Tank Release Compensation Board, and environmental consultants.

Sincerely,



Lauri J. Teig

Wheatland County Chamber of Commerce
PO Box 694
Harlowton, MT 59036

1ST SECURITY BANK



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TELEPHONE: 406-323-1100 FAX: 406-323-3772

December 1, 2015

Kathie Bailey, Executive Director
Snowy Mountain Development Corporation
613 NE Main St.
Lewistown, MT 59457

Dear Kathie,

It has been brought to my attention that Snowy Mountain Development Corporation (SMDC) is applying for an EPA Brownfields Assessment Grant on behalf of the six county region they serve. I fully support this application as I believe brownfields assessment funding would provide the first step toward redeveloping properties in our area. Musselshell County was severally impacted by flooding in 2011 and wildfires in 2012, and many blighted properties are scattered across the county. In addition, there are numerous commercial properties in Roundup that are potentially contaminated with petroleum, asbestos, lead paint, and other hazardous materials. I am aware that Montana DEQ has installed various monitoring wells in Roundup's commercial section due to petroleum contamination.

In the banking community, bank officials in our area are typically hesitant about lending funds for the purchase of commercial property due to the potential cleanup liability that exists. Assessment funding would enable property owners and investors to make informed decisions regarding redevelopment of commercial properties. SMDC staff has informed me that they manage Brownfields RLF funding that could be utilized for cleanup of contaminated properties, moving such properties into a marketable status.

I fully support Snowy Mountain Development Corporation's application for an EPA Assessment Grant as such funding would provide a valuable tool for economic development in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Dutton". The signature is fluid and cursive, with a large, looping initial "S".

Shawn Dutton, CEO

Attachment

Threshold Criteria Documentation



Snowy Mountain Development Corporation

December 15, 2016

Barbara Perkins
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Certified Regional Development Corporation

Dear Ms. Perkins:

SMDC is currently a Certified Regional Development Corporation through the Montana Department of Commerce as documented by the attached contract.

Should you have questions on SMDC's eligibility status, please contact me at (406)535-2591.

Sincerely,

A handwritten signature in black ink that reads "Kathie A. Bailey". The signature is written in a cursive, slightly slanted style.

Kathie A. Bailey,
Executive Director

Attachments

cc: Daniel Heffernan, EPA Denver

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"SMDC is an equal opportunity provider, and employer. Complaints of discrimination should be sent to USDA Director, Office of Civil Rights, Washington, D.C. 20250-9410." Dial 7-1-1 for Montana Relay