

#### **IV.E. Narrative/Ranking Criteria**

##### **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a. Target Area and Brownfields** i. Overview of Brownfield Challenges and Description of Target Area Salt Lake City is the capital of Utah and its most populated city. The Central City neighborhood within Salt Lake is one of the City’s oldest and is the Target Area where the Target Site of this application stands. Originally laid out as an agrarian community in 1847, Central City followed Joseph Smith’s development style of ten-acre blocks divided by wide streets. By the 1880s, subdivisions serving as manufacturing worker housing began appearing, the railroad corridor and the introduction to Salt Lake of one of the United States’ first trolley lines having permanently changed its neighborhoods. As Salt Lake’s economy flourished and its population grew rapidly through the early 1900s, the Central City neighborhood became more and more industrial, its ten-acre blocks divided up for high-density living spaces.

In the post-Depression era, foreclosures hit all of Utah hard, and by the 1940s the Central City neighborhood found itself heavily redlined with very little new investment flowing to the neighborhood. The Homeowners Loan Corporation of the Federal Government assessed Central City as having “virtually no new development,” describing its residents as lower-class working families and calling negative attention to Salt Lake’s main Black neighborhood located within its boundaries. Central City being situated in the “smoke belt” of the railway and manufacturing was also detrimental to the outlook for the area; both in perception and environmentally. Disinvestment in the area continued into the 1950s, redlining having left lasting effects on access to education, economic opportunity, and environment. The neighborhood of Central City was left in decline and poverty into the 1990s.

Today the area is home to a high percentage of renters – 51% of all Salt Lake residents are renters, with over half of those households considered rent-burdened; meaning they spend 30% or more of their income on housing (per 2022 “Housing SLC” study by the City of Salt Lake). A scarcity of developable land has increased land values in areas where high density is allowed and made building new affordable housing a difficult prospect.

Housing prices in Salt Lake City have outgrown wages since 2005, and US Census data reveals more than half of the City’s workers are commuting in from another county due to displacement. The 2022 Housing SLC study underscored the mismatch between the community’s actual housing needs and the luxury housing that is dominating the market. Additionally, a key takeaway of the City’s 2023 underlying studies for its “Thriving in Place” plan is that Salt Lake no longer has any affordable neighborhoods, something not seen in other U.S. cities facing displacement. This combination of displacement and high land values has left behind buildings that are not being redeveloped due to rising costs, and asbestos contamination that must be addressed in order to facilitate the renovations needed to meet modern standards.

This grant will counter the effects of Brownfield issues by redeveloping a vacant, asbestos-impacted former commercial building into affordable housing for low and moderate income households; retaining opportunities to live and work in the Central City neighborhood and take advantage of existing infrastructure and transit-oriented development.

1.a.ii. Description of the Proposed Brownfield Site The Northwest Pipeline Building (Target Site), a 95,000 square foot, 8½-story office building and former home to the Salt Lake City Public Safety Department, is located just east of the heart of downtown at 315 East 200 South, in the aforementioned neighborhood referred to as Central City. Construction of the property began in 1957, with the new building opening in 1958 as petroleum supplier Pacific Northwest Pipeline Corporation’s main offices.

Pacific Northwest’s headquarters moved in the late 1970s, and the City of Salt Lake (Applicant – “the City”) purchased the site in 1988 to be their Public Safety Department, housing offices and labs. In 2011, the building was added to the National Register of Historic Places as an example of American

architect Slack Winburn’s work in the modernist International Style. In 2013, citing an inefficient layout, the City moved their Public Safety Department to a new site, and the Northwest Pipeline Building has been boarded up and unoccupied since.

As with many buildings of its era, asbestos containing building materials (ACM) were widely used in the construction of the Target Site, including spray-on fireproofing (83,400 sq ft), plaster/lathe (138,600 sq ft), wall systems (71,816 sq ft), thermal pipe insulation and other materials. Because of the building’s outdated layout and the needs in conversion from commercial use to housing, a complete renovation, or “gutting” of the interior is necessary. The removal of ACM is a necessity to safely accommodate redevelopment.

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

Cleanup of the ACM and redevelopment of the property into affordable housing aligns completely with the City’s three (3) main housing goals: closing a known 5,500-unit gap, increasing housing stability in the city, and increasing affordable homeownership opportunities. Reuse of the Northwest Pipeline building as housing units mitigates displacement, serves renters, offers much-needed family-sized housing, and avoids the issues of new construction and stretching of infrastructure.

The City’s intent has long been to combat rising housing and rent prices, while still welcoming families into the city. Creation of the Thriving in Place plan was a community-driven process around mitigating the impacts of new development. The City, as well as separate, outside organizations have been studying and planning around the housing situation in Salt Lake for years. Thriving in Place took into account “thousands of residents [giving] their time, perspectives, and ideas” per Salt Lake City Mayor Erin Mendenhall, and confirmed that available housing is lacking at every level, with a significant lack of affordable units for low-income families.

Independent research by the Utah Foundation shows current Salt Lake City housing prices have increased by 50% since 2020 and doubled since 2016, putting tremendous pressure on households at risk of displacement. By 2017, the City’s latest housing plan “Growing Utah” saw a city on the verge of a systemic housing crisis. At that time, the City estimated being short 7,500 affordable housing units while expecting to see an additional 30,000 new residents by 2029. Currently, more than half of all Salt Lake City families with children live in neighborhoods experiencing displacement risk.

*1.b.ii. Outcomes and Benefits of Reuse Strategy* Most of Salt Lake’s developable land is already built out. New multifamily housing construction is limited to certain areas of the city, while other areas are altogether undevelopable due to ecology or proximity to the Salt Lake City International Airport. This land scarcity, particularly near Downtown, has limited for-profit developers’ interest in affordable housing. The Target Site will be owned by Salt Lake City Corporation, a 501(c)(4), throughout the remediation process.

Research by the Urban Displacement Project done for the City’s Displacement Data Analysis specifically found that Central City’s extremely- and very low-income households are experiencing high displacement risk. The gentrification of this area will push workers farther from their jobs, making it more difficult for local businesses to find enough workers to thrive and resulting in increased greenhouse gas (GHG) emissions from travel.

A key point in the City’s Thriving in Place plan is the leveraging of sites like this one to ensure they provide for long-term affordability, helping stabilize neighborhoods at high-risk of displacement. Mayor Mendenhall describes the Northwest Pipeline Building project as “transforming the property back into a community asset.” Renovating the Northwest Pipeline Building for housing has the added benefit of preserving a registered historic site’s architectural legacy while once again giving it a functional purpose; capitalizing on existing infrastructure and building housing density. The redevelopment of the Target Site, in concert with the State Historic Preservation Office (SHPO), will assist in bringing 244 units of desperately-needed affordable housing to the neighborhood. In turn, this keeps workers near their jobs,

with positive returns for local businesses and the environment.

A coal-fired power plant shut down in May of 2019 in Magna, UT, located on the west side of Salt Lake City along the Great Salt Lake and about 10-15 miles from the site. This was the last coal-fired power plant owned by Kennecott Utah Copper to be closed, paving the way for renewable energy focused renovations like this project.

In the ultimate conversion to climate resiliency, this is the transformation of the former headquarters of fossil fuel pipeline into a LEED certified, all-electric building with low-carbon energy sources, using energy star appliances and a high efficiency heat pump, fostering the regional commitment to renewable energy and turning back the clock on climate change. The redevelopment plan chosen by the City proposes onsite renewable energy through the use of geothermal wells and solar photovoltaics, and continued analysis around achieving net zero energy use on the project.

Although contaminated with asbestos, windows will be upgraded to meet new energy efficiency standards. No fossil fuels will be used in the building, avoiding methane sources like stovetops that run on natural gas, and renovating the building will dramatically limit the creation of GHG compared to new construction.

The redevelopment will also result in job creation, with community-desired amenities such as ground-level childcare services, retail space including a cafe, a health clinic run by a Native American-owned organization, and access to free transit for K-12 students and their parents.

**1.c. Strategy for Leveraging Resources** *i. Resources Needed for Site Characterization* As part of previous site investigations, multiple, comprehensive asbestos surveys have been completed for the property. However, according to Utah requirement R307-801-9, an additional asbestos survey will be needed within three (3) years of abatement. This required survey has been committed to and will be conducted by the City prior to June 15, 2025.

*1.c.ii. Resources Needed for Site Remediation* EPA Grant funding requested in this application will be sufficient to complete the cleanup of the ACM at the Northwest Pipeline Building. The City will spearhead the cleanup process and hire a Qualified Environmental Professional (QEP) to manage remediation efforts. The cost of the cleanup required is \$3,716,304 and fits into the City’s available funding for site redevelopment. Partnership with the EPA will fulfill the City’s goal of remediation and allow it to move on to the reuse phase of development.

*1.c.iii. Resources Needed for Site Reuse* According to the Housing Authority of Salt Lake City’s (HASLC) winning response to the City’s Historic Northwest Pipeline Building & Site Request for Proposals, HASLC intends to redevelop the Target Site as part of 244 units with a range of affordability, including up to 63 rent-to-own units in the Northwest Pipeline Building. The HASLC has an expected budget of \$46,575,368 and has identified their intended sources of unsecured funding for reuse (named in table). In addition to these sources, HASLC has committed to providing up to \$100,000 in funding to the project development and will defer the developer fee to the City.

Name of Resource	Additional Details
Historic Tax Credit Equity	\$8,586,487 (\$136,293/unit)
Permanent Loan	\$15,100,000 (\$239,683/unit)
Bridge Loans	\$13,000,000 (\$206,349/unit)
Salt Lake City	\$4,000,000 (\$63,492/unit)
Deferred Developer Fee	\$1,825,332 (\$28,974/unit)
Utility Rebates	\$64,549 (\$1,025/unit)

*1.c.iv. Use of Existing Infrastructure* Reuse of the Northwest Pipeline Building itself is a key component to utilizing existing infrastructure. Having previously accommodated hundreds of employees, the Target Site has water, sewer, power, telecom, and internet already in place, and the City has determined that this existing infrastructure will meet the planned redevelopment’s demands. The Site is along major public transit routes, with a transit stop located directly outside of the building.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**2.a. Community Need** *i. The Community's Need for Funding* Analysis by the 2022 Urban Displacement Project showed that by 2019, Salt Lake City's rental housing market was only affordable to high-income households, with housing scarce and very competitive for the city's low-income renters. Extremely low-income (ELI) households in Salt Lake are the most likely to be rent-burdened or displaced altogether due to the deficit of housing. In 2022, The Urban Displacement Project found there is only one (1) affordable rental unit for every three (3) ELI households in Salt Lake City. In June of 2023, Housing Connect and the Housing Authority of Salt Lake City opened their joint waiting list for the Section 8 Housing Choice Voucher program and closed with 7000 applicants on September 22, 2023.

Additionally, the Urban Displacement Project's data analysis supposes that high-income households are further reducing the number of units affordable to low-income and very low-income households, especially in "desirable" neighborhoods, when they are unable to find housing at their own expected price-point. This further puts Salt Lake City's low-income and extremely low-income families at risk of homelessness. It is the goal of both the City and HASLC to commit to a mix of affordable and family housing in this project's development and mitigate effects of gentrification.

With Salt Lake's land prices increasing, building affordable housing has made less financial sense for outside developers in many areas. This is true of the Central City neighborhood, where gentrification has been the driver of new construction and the demolition of older buildings. Salt Lake cannot enact rent control ordinances or mandatory inclusionary zoning ordinances per Utah State Codes 57-20-1 and 10-9a-535, respectively. With disproportionate asbestos cleanup costs, along with the City's own limited budget, outside funding is needed to meet the City's long-term goals of equitable distribution of affordable housing in this disadvantaged Target Area.

**2.a.ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations** The City's five-year housing goals prioritize the households at the greatest risks – housing insecurity, displacement, homelessness. These at-risk residents are more likely to be low-income, people of color, seniors, single parents, and/or people with disabilities.

Sensitive populations identified in the Target Area of Central City include minorities, those living in poverty, persons with disabilities, the young and elderly, the undereducated, and foreign-born persons. The US Census indicates that Salt Lake City overall has a significantly higher percentage of residents living below the poverty line (14.1%) when compared to other communities in Utah (9.0%). The EJ Screen reports that 40% of the population is considered low income. Foreign-born persons comprise 15.4% of the community's population, and 24% of residents speak non-English languages at home. Persons of color comprise 33% of the Salt Lake community, and 23.6% of its have one or more disabilities, far exceeding both state and county averages. According to the US Census Bureau, the number of Salt Lake City residents under the age of 65 living without health insurance exceeds county, state, and national levels.

The median house value of owner-occupied housing units in Salt Lake City is \$458,600, well above state average of \$408,400. Displacement and gentrification are rampant in Salt Lake City, directly impacting the Target Area. The percentage of persons living in the same household as they were one year ago in the city is (78.8%) versus longer occupancies seen at county, state, and national levels (varying from 84.9% to 86.9%).

Between 2005 and 2021 median wages increased by 19% in Salt Lake, and median household income by 29%, but rent increased by 38% and home values by 83%, leaving disadvantaged, low-income community members unable to afford housing, with more than half of the residents severely cost burdened. The housing shortage and lack of affordable housing has created a pattern of displacement for disadvantaged communities.

*"Families of all types are impacted by displacement risk. [...] almost half of Salt Lake City's households that consist of a married couple with children (including owners and renters of all income levels) live in*

*tracts experiencing displacement risk, and single parents with children are even more vulnerable, with nearly 65% living in tracts experiencing displacement.*” – Urban Displacement Project’s Salt Lake City Displacement Data Analysis

Measure	US	Utah	Salt Lake County	Salt Lake City
Persons in Poverty	11.1 %	9.0 %	7.7%	<b>14.1%</b>
Foreign Born Persons	13.7%	8.4%	12.9%	<b>15.4%</b>
Age 65 and up	17.7%	12.2%	12.4%	<b>11.6%</b>
With a disability under age 65, 2018-2022	8.9%	7.4%	7.4%	<b>8.7%</b>
Owner occupied housing unit rate	64.8%	70.7%	67.1%	<b>47.0%</b>
Persons without health insurance under age 65 years	9.5%	9.0%	10.4%	<b>12.8%</b>
Living in same house 1 year ago, persons aged 1 year+ 2019- 2022	86.9%	84.9%	85%	<b>78.8%</b>
Median Household Income	\$75,149	\$86,833	\$40,969	<b>\$46,972</b>
Median value of owner-occupied housing units, 2018-2022	\$281,900	\$408,500	\$440,400	<b>\$458,600</b>
Language Other Than English spoken at home percent of persons age 5+ years, 2018-2022	21.7%	15.5%	21.1%	<b>24.2%</b>
US Census data - Population as of July 1, 2023				

Based on the EJScreen data, 11 of 12 environmental factors exceed national averages at levels ranging between the 93<sup>rd</sup> and 97<sup>th</sup> percentile for particulate matter, ozone, nitrogen dioxide, diesel particulate matter, toxic releases to air, traffic proximity, lead paint, Superfund proximity, RMP (Risk Mitigation Plan-proximity to facilities with RMPs in place), hazardous waste proximity, and underground storage tanks.

Especially detrimental to the health of Salt Lake City residents are the year-round air quality challenges, such as wintertime inversions (where stagnant cold air leads to the formation of particulate matter, with pollution levels doubling every day during an inversion event), summertime ozone episodes, dust storms with contaminated sediment from the drying Great Salt Lake, and wildfire smoke. In the summer, pollution from cars, industry, and a multitude of chemical products, combined with high temperatures and UV index lead to harmful ozone levels.

These air quality challenges negatively impact the health of the community’s residents with exposure to PM 2.5 (particles measuring 2.5 microns in diameter or less) and ozone, which can aggravate respiratory and cardiac diseases. During periods of poor air quality, residents are encouraged to limit time outside and take precautions to improve indoor air quality by keeping windows closed and routinely changing HVAC filters. When that is combined with high heat, and opening windows cannot be used to cool residences in the evening, health effects are exacerbated.

**2.a.ii. (2) Greater than Normal Incidence of Disease and Adverse Health Conditions** As in many urban areas, racial and ethnic health disparities are apparent in Salt Lake City. Poor health outcomes in our Target Area are linked to socio-economic, environmental, and geographic disadvantages. The report, *A Snapshot of Current Racial and Ethnic Health Disparities in Utah*, dated November 2021, prepared by the Utah Department of Health and Human Services (DHHS), reported statistically significant health disparities for racial and ethnic minority populations when compared to state averages for three (3) socio-demographic indicators: life expectancy at birth, poverty, and child poverty, all factors in our Target Area. The report also identified 10 indicators of statistically significant health disparities for racial and ethnic populations regarding healthcare services and systems. These included: Utahns without health

insurance, Costs as barrier to care, No primary care provider, Routine medical checkup, Routine dental checkup, First trimester prenatal care, Colon cancer screening, Prostate cancer, Influenza immunization, and Pneumonia vaccines. In addition, health disparities were found in Risk factors for illness or injury, Health of mothers and infants, and Infectious diseases.

According to the ALA, the Salt Lake area ranks 9<sup>th</sup> worst for high ozone days out of 228 metropolitan areas, 19<sup>th</sup> worst for 24-hour particle pollution out of 223 metropolitan cities, and 37<sup>th</sup> worst for annual particle pollution out of 204 metropolitan areas. The ALA states that 21,822 Salt Lake County children have pediatric asthma and 98,153 adults have asthma.

Environmentally friendly housing retrofitted with central cooling, high-efficiency, HVAC systems, powered by electricity sources from renewable energy will alleviate air quality issues for interior spaces that will also be free of lead-based paint and asbestos containing materials. LEED certification also means low-VOC materials will be used and indoor air quality will be a focus. This will improve the health of community members that are disproportionately impacted by wildfire smoke, contaminated dust, and air pollution from temperature inversions. The public will benefit from redeveloping a historic building to provide affordable housing serviced by public transportation. This will help to mitigate climate change impacts by decreasing carbon emissions from new construction and daily commutes.

*2.a.ii. (3) Environmental Justice (a) Identification of Environmental Justice Issues* Environmental justice issues for sensitive populations in Salt Lake City include a lack of affordable housing, displacement, and poor air quality. According to the Climate & Economic Justice Screening Tool (CEJST), the Target Area has historically seen underinvestment, while the revitalization of the area has negatively affected its diversity, as long-standing neighborhood businesses and homes are razed to make way for high end apartment developments.

An environmental justice study conducted at 142 Salt Lake City schools between 1999 and 2017 indicated residents live in elevated pollution levels primarily during winter, typically exceeding the National Ambient Air Quality Standard at 18 days per year. Results indicated that schools with higher proportions of racial/ethnic minority students were unequally exposed under all PM2.5 pollution scenarios, reflecting racial/ethnic disparities in exposure.

Air quality issues are particularly relevant for those living in Salt Lake City as the Great Salt Lake is drying up, exposing 800 square miles of lakebed. A study conducted by The University of Utah indicates that dust carried from the exposed lakebed is affecting communities in Salt Lake City disproportionately. Exposure to the particulates were highest among Hispanics (14% of the Target Area), and individuals without a high school diploma (6% of the Target Area), among others. This particulate matter is linked to reduced lifespans for those residing in Salt Lake City.

Residents in the Target Area will require affordable housing with modern innovations to combat natural hazards exacerbated by global climate change. Such housing would allow persons to remain living in their neighborhoods while providing a safe haven from elevated heat, harmful dust, lead paint, diesel exhaust, and air quality challenges. Securing this grant will improve living conditions and assist with tackling local environmental justice issues: lack of affordable housing, displacement, and poor air quality, while providing sustainable, safe affordable housing for residents of the Target Area.

Residents would have access to public transportation, as there is public transit access adjacent to the property. In addition, the affordable housing will offer a component of home ownership to 25% of the building's occupants, fostering housing stability that is not attainable with rental properties.

*2.a.ii.3 (b) Advancing Environmental Justice* Grant funding will allow the City to remove hazardous asbestos containing materials from the Target Site, which can then be renovated to include sustainable and thoughtful design practices, such as HVAC systems powered by low-carbon energy sources, to create healthy living spaces that will attract families and provide energy efficient, clean, and affordable housing to residents and workers in the Target Area. The building will also be all electric, with no fossil

fuel use. This will support local utility Rocky Mountain Power’s renewable energy efforts. The US EPA Brownfield Grant will set in motion the retrofitting of an historic building which will prevent displacement and result in energy efficient, climate resilient homes that are accessible to low-income families, the elderly, individuals with disabilities, other at-risk groups, and minorities as a positive step towards achieving environmental justice while preserving a long-established fixture of the Central City neighborhood. Because it will be an all-electric building, with Energy Star HVAC, and LEED certified, central cooling will be available to its residents, alleviating a major health concern related to ever-increasing temperatures due to climate change.

This project will offer climate resilient amenities such as an intended 20% of the site footprint is preserved as useable, open space with a mix of Waterwise and Xeriscape landscape elements, as well as welcoming, “third space” plazas that invite people to be in community – and that attract insects and urban animals to support the native ecology. Abundant outdoor shade via a tree canopy, with light-colored pavement, and porous pavers will help to reduce heat island effects. The building itself will be sealed up to keep out pollutants and particulates, while also increasing isolation from urban noise. Use of zero-VOC/low-VOC sealants, adhesives and paints will keep indoor air clean. All-electric appliances will eliminate combustion gases inside the buildings, making them healthier and safer. To optimize indoor health and counteract Salt Lake’s poor air quality, a multi-stage, dedicated outdoor air filtration system (DOAS) will scrub outdoor air of pollutants, particulate matter, and odors.

Renewable energy battery storage will provide power at these times to critical life safety systems. The redevelopment project is committed to using Energy Star rated roofing materials that reflect heat and an all-electric campus that will promote clean air. More than 25% of all building materials will be made with 25% minimum post-consumer recycled content to promote greater ecological benefits in the supply chains.

**2.b. Community Engagement** *i. Project Involvement and ii. Project Roles* The following partners will assist in the EPA Brownfield Cleanup project at 315 East 200 South. They will coordinate to achieve community outreach by sharing progress with area residents and updating the project master plans.

<b>Entity name</b>	Housing Authority of Salt Lake City (HASLC)
<b>Entity’s mission</b>	To provide rent subsidies and promote affordable housing for low-income persons residing in Salt Lake City
<b>Point of contact</b>	Daniel Nackerman, <a href="mailto:dnackerman@haslcutah.org">dnackerman@haslcutah.org</a>
<b>Specific involvement</b>	Serving as developer and post-remediation owner for “The Grove” (Target Site and accompanying buildings)
<b>Entity name</b>	Utah Non-Profit Housing Corporation
<b>Entity’s mission</b>	To improve quality of life through decent, safe, affordable housing; focusing on low- and very-low-income individuals and families
<b>Point of contact</b>	Marion Willey; <a href="mailto:mawilley@utahnnonprohousing.org">mawilley@utahnnonprohousing.org</a>
<b>Specific involvement</b>	Owner of numerous parcels adjacent to Target Site and redevelopment project supporter
<b>Entity name</b>	NeighborWorks
<b>Entity’s mission</b>	To revitalize SLC neighborhoods experiencing blight and decline
<b>Point of contact</b>	Maria Garcia; <a href="mailto:maria@nwsaltlake.org">maria@nwsaltlake.org</a>
<b>Specific involvement</b>	Assisting with project homeownership modeling and community development, especially as it relates to disadvantaged communities

*2.b.iii. Incorporating Community Input* A Community Involvement Plan (CIP) will be created to describe the project’s planned community-engagement activities, schedule, background, and key players. The CIP will be available for resident review online on Salt Lake City’s website, social media, and/or in hard copy at the Salt Lake City/County Building. Salt Lake City staff will continue to inform

the community about site redevelopment. All information gathered from the members of the community, local organizations, and entities during community outreach meetings will be presented at the annual public meeting and will be responded to within one month of the meeting taking place.

Public meetings will be held three (3) times throughout the grant period to inform and engage members of the public, and periodic updates will be made during Housing Authority of Salt Lake City meetings. Additionally, project updates and other grant project-related documents will be provided on social media pages and email distribution lists. Residents and property owners in the Target Area will be encouraged to join an email distribution list and follow the project on social media to remain informed of the latest news of the project’s progress and upcoming events. Partners will be encouraged to disseminate information to those without internet access.

Project partners committed to outreach assistance will be asked to help to publicize project progress, events, and accomplishments. If non-English speaking members of the community are present, translations will be made available through verbal translation at meetings and written translations in meeting notes, fliers, and outreach.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**3.a. Proposed Cleanup Plan** Based on previous assessments, the Target Site of 315 East 200 South is contaminated with asbestos that must be addressed in order to renovate the building safely. To address the contamination, a draft ABCA was developed for the site that evaluated three alternatives including a no-action alternative. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup is a full abatement of the site.

The City will oversee the removal and remediation in accordance with applicable standards. A qualified Project Manager will oversee the Site Contractor to ensure regulations are followed and to conduct visual inspections of asbestos abatement work areas. Following visual inspections, clearance testing will be conducted to confirm the work area can be deemed clean. Third-party oversight will be provided during the abatement activities to conduct air sampling and clearance sampling, per Utah regulations. All ACM will be properly disposed at a facility approved to accept such waste. Clearance sampled will be analyzed per the National Institute for Occupational Safety and Health (NIOSH) #7400 requirements and must show less than 0.01 fiber per cubic centimeter of asbestos on work area air. At the completion of abatement activities Operations and Maintenance (O&M) Plan will be prepared that addresses the management of ACM remaining in place.

**3.b. Description of Tasks/Activities and Outputs**

<b>Task/Activity: Grant Administration</b>
i. <i>Project Implementation:</i> The City (Applicant) will procure an environmental consultant (Consultant) to assist with technical aspects of the grant project in accordance with Federal procurement guidelines. Applicant’s Project Director and Grant Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. Consultant will assist Applicant in completing ACRES Database Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant.
ii. <i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1st quarter, Quarterly Reporting begins in the 2nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> quarters, and during final closeout.
iii. <i>Task/Activity Lead:</i> Catherine Wyffels, Project Director, will be assigned as the lead for the remediation task and will be accountable to Applicant for grant-related compliance. Applicant will also assign Amy Dorsey, Grants Manager, Finance Department, to manage the grant.
iv. <i>Outputs:</i> ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period, final comprehensive report.
<b>Task/Activity: Community Engagement</b>



i. <i>Project Implementation:</i> Community Engagement will engage both stakeholders and community members in the Brownfield Grant project. Communication will include disbursement of information through the Applicant’s and HASLC’s websites. Applicant’s Brownfield Project Director will develop a Community Involvement Plan (CIP), Brownfield project website, and social media posts with the assistance of the Consultant and HASLC staff. HASLC and Applicant staff will lead community meetings to keep the public informed on project updates.
ii. <i>Anticipated Project Schedule:</i> CIP created within 3 months of award. Annual Community Meetings will be held during the 2nd quarter of each year of the grant project. Stakeholder meetings will be held quarterly. Website and Outreach Materials created in the 1st quarter and posted quarterly throughout the grant project.
iii. <i>Task/Activity Lead:</i> HASLC staff will be assigned as the lead for Community Engagement.
iv. <i>Outputs:</i> A list of Stakeholder Group members, documentation from quarterly stakeholder meetings, project website, brochures/handouts, social media posts, and summary of public meetings, communication plan.
<b>Task/Activity: Cleanup Planning</b>
i. <i>Project Implementation:</i> Project Director will oversee Consultant in the preparation of a Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), and a Final Analysis of Brownfield Cleanup Alternatives (ABCA), specifications for asbestos abatement, preparation of bid documents, review of bids and contractor selection. Once approved, Consultant will prepare specifications for the removal of ACM.
ii. <i>Anticipated Project Schedule:</i> QAPP, HASP, and Final ABCA will be prepared within 3 months. Specifications for cleanup and contractor bidding will occur within three months of approval of the Final ABCA by the US EPA.
iii. <i>Task/Activity Lead:</i> Consultant, supported by the Construction Manager, and US EPA and with oversight from the Project Director.
iv. <i>Outputs:</i> Final QAPP, HASP, ABCA, Specifications, bidding documents, and completion report.
<b>Task/Activity: Cleanup</b>
i. <i>Project Implementation:</i> After US EPA approval of the cleanup plan, and contractor bidding and selection, the project will be scheduled. Project Director will oversee Consultant’s management of abatement activities. On-site oversight of the abatement contractor by Qualified Project Designer or Contractor/Supervisor, in accordance with qualifications as stated in Utah Air Quality Rule R307-801 will be provided by Consultant. A completion report will be prepared documenting the removal and proper disposal of all regulated materials, including surrounding air monitoring and personnel monitoring.
ii. <i>Anticipated Project Schedule:</i> The cleanup will occur after US EPA approval of the underlying plans. Contractor bidding will occur within 90 days of approval of all plans. Project startup is anticipated within 90 days of contractor selection. The project is expected to last 100 shifts, or about 5 months. The final report will be provided within six (6) months of cleanup completion.
iii. <i>Task/Activity Lead:</i> Project Consultant, supported by the Construction Manager, US EPA with oversight from Applicant’s Project Director.
iv. <i>Outputs:</i> Air and personnel monitoring, documentation of the amounts of regulated materials removed, and final approval of cleanup.

**3.c. Cost Estimates**

Below are anticipated cost estimates for this project, as based on past Brownfield cleanup projects and local market standards:

Project Tasks	Task 1	Task 2	Task 3	Task 4	Total
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Budget Costs		Grant Administration	Community Engagement	Cleanup Planning	Cleanup	
Direct Costs	Personnel					
	Travel	\$2,000				\$2,000
	Construction				\$3,139,304	\$3,139,304
	Contractual	\$50,000	\$65,000	\$45,000	\$415,000	\$575,000
<b>Total Budget</b>		\$20,000	\$65,000	\$45,000	\$3,554,304	\$3,716,304

**Task 1. Grant Administration:** Applicant does not possess internal staff to conduct grant administration and so will select a Qualified Environmental Professional (QEP) to engage in this work at an estimated \$50,000. A total of \$2000 is budgeted for travel to EPA grant training and conferences as appropriate.

**Task 2. Community Engagement:** Applicant will use the QEP to organize community engagement including quarterly stakeholder meetings (16) and public meetings (4) at an estimated \$2,000 per meeting. Additional activities and personnel associated with website updates, newsletters, CIP, and press releases are estimated at an additional \$25,000 over the course of the project.

**Task 3. Cleanup Planning:** Consultant will lead this Task conducting cleanup planning to include a Quality Assurance Project Plan (QAPP) (\$10,000), Site-Specific Health and Safety Plan (HASP) (\$5,000), Final ABCA (\$5,000), specifications for asbestos abatement, preparation of bid documents, review of bids and contractor selection (\$25,000) for a total budgeted cost of \$45,000. **Task 4. Cleanup:** QEP will lead this Task. The total estimated cleanup hard cost is \$3,574,304; comprised of: on-site cleanup supervision for 100 shifts (100 shifts x \$3,500/shift=\$350,000), project coordination \$50,000, completion report \$15,000, contractor costs for Asbestos abatement (\$3,139,304).

**3.d. Plan to Measure and Evaluate Environmental Progress and Results** The Work Plan will include a detailed schedule of project milestones. Applicant will track and evaluate progress in achieving outputs and milestones against the Work Plan schedule, in addition to communicating with the QEP and project contractors. Applicant will document the project in the quarterly progress report to US EPA and in EPA's ACRES database. Among others, the primary outcomes and results to be tracked include: amount of asbestos disposed, number of stakeholder and public meetings conducted, units of housing developed and square footage of commercial space created after project completion, amount of GHG reduced due to renovation instead of construction, and number of jobs created from the commercial space.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a. Programmatic Capability** *i. Organizational Structure and ii. Description of Key Staff* The City of Salt Lake (Salt Lake City Corporation) is a public employer, governed by a full-time Mayor and part-time City Council. The City will manage all facets of the grant and oversee the cleanup work via internal staff and outside consultants experienced in Brownfield cleanup activities.

The Project Director of this grant is Ms. Catherine Wyffels, Salt Lake City Corporation’s Air Quality & Environmental Program Manager. Ms. Wyffels will oversee and manage this grant, including contractor selection, project schedules, task implementation, and US EPA Brownfield grant reporting requirements. She will be responsible for day-to-day tasks, including coordination of grant cleanup activities with all involved departments, project partners, and consultants. Ms. Wyffels has served as the City’s Environmental Program Manager since 2021 and is responsible for assisting City departments with environmental compliance, assessment, and remediation tasks; coordinating with regulatory agencies; and managing the City’s on-call environmental contracts. Ms. Wyffels is a licensed Professional Engineer and, before working for the City, worked in consulting as an environmental engineer for nine years on a wide range of environmental projects.

Ms. Debbie Lyons, Director of the Sustainability Department, will be the Brownfields Project Director and will be responsible for the timely expenditure of funds and for overseeing that grant requirements are being met. Ms. Lyons serves as the City’s Director of Sustainability and has been with

Salt Lake City Corporation for over 25 years, having served as the City's Environmental Program Manager from 2013-2021. Originally awarded in 2012, she became the designated Project Manager for the City's North Temple Brownfields Grant from 2015 through completion in early 2016. During this time, she oversaw the completion of Phase I and Phase II Environmental Site Assessments for eight separate properties in the project area. She also served on the Wasatch Brownfields Coalition Revolving Loan Fund board from 2014 through 2021, and served as the Vice Chair of the Salt Lake County Brownfields Coalition from 2019 through 2021.

Ms. Britnee Dabb, Deputy Director at the Housing Authority of Salt Lake City, will be responsible for coordination with community and project partners, subcontractors.

Ms. Amy Dorsey, Grant Manager from the Salt Lake City Corporation Department of Finance, will act as the Brownfield Financial Manager and will be responsible for financial aspects of the grant including drawing down funds through the ASAP system, assistance with budget tracking, invoicing, and arranging payments to the proper entities.

A Qualified Environmental Consultant will be procured to handle the technical portions of this project.

*4.a.iii. Acquiring Additional Resources* Should additional resources be needed; the City will follow the competitive Procurement Standards in 2 C.F.R 200.317-326 when hiring contractors. The project team is familiar with running large development projects and has established relationships with technical experts in the local community. All remediation contractors will be selected through a public bidding process based on specifications generated in the assessment process, coupled with the City's procurement policy.

**4.b. Past Performance and Accomplishments** *i. Currently Has or Previously Received an EPA Brownfields Grant* The City was awarded an EPA Brownfields Cleanup Grant for FY23 for a Site other than the subject of this application. The awarded cleanup site for the prior application is known as the Former Schovaers Site, at 22 South Jeremy Street, Salt Lake City, Utah. Phase I Environmental Site Assessments (ESAs) and Phase II ESAs were conducted on the site under two prior EPA Brownfields Assessment Grant projects.

*4.b.i. (1) **Accomplishments*** To date, the Salt Lake City Redevelopment Authority (RDA) has hired an environmental contractor team for this project. RDA staff enrolled this Brownfields cleanup project in the State of Utah's Voluntary Cleanup Program.

*4.b.i. (2) **Compliance with Grant Requirements*** This EPA Brownfields Grant was awarded to Salt Lake City Corporation on August 11, 2023, for the period of performance of October 1, 2023 through September 30, 2027. Currently unspent funds from this grant have all been earmarked and will be fully spent during the project.

#### **IV.F. Leveraging**

Prior to June 15, 2025, the City will complete an updated asbestos survey to document current conditions, as required by the Utah Department of Air Quality, following regulation R307-801-9, which states that the survey must be completed within three (3) years of the proposed abatement. The cost for the survey is approximately \$10,000