

ASSESSMENT WORKPLAN

City of Brighton, Colorado **Workplan for CERCLA Section 104(k) Assessment Cooperative Agreement** **Period of Performance: 7/11/2023 - 9/30/2027**

The activities to be funded under this award support EPA's FY 22-26 Strategic Plan Goal 6: Safeguard and Revitalize Communities; and the corresponding Objective 6.1: Clean Up and Restore Land for Productive Uses and Healthy Communities.

CFDA: 66.818 Assessment, Cleanup, and Revolving Loan Fund Grants

OBJECTIVE: The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. The Brownfields Utilization, Investment, and Local Development (BUILD) Act of March 2018 reauthorized and amended the Brownfields provisions of CERCLA. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients are selected from proposals prepared in accordance with the "Proposal Guidelines for Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants," and submitted in a national competition. The *City of Brighton, CO*, as a *general purpose unit of local government*, was selected for Assessment funding in the FY 2023 competition.

The City of Brighton was incorporated in 1887 and has held the Adams County seat since 1904. Located 15 minutes from Denver International Airport, Brighton is an outer northeastern suburb to the Denver Metropolitan area with agriculture/industry surrounding much of the city. The city has 3 major highways running through or into the city (I-76, CO Highway 7, US85). The city falls within two counties (Adams and Weld) and on the western boundary is the South Platte River, to the eastern boundary is Barr Lake State Park. There are also two major rail lines that run through the city, Union Pacific on the west (following SH 85) and Burlington Northern Santa Fe on the east (following I-76). With a 2021 U.S. Census estimated population of 42,143, Brighton is an industrious suburb with a large Hispanic community, comprising over 36% of the City's population. Our brownfield target areas comprise three census tracts; Census Tract (CT) 86.03; CT 86.04; and CT 86.06, all in Adams County, CO which is the only Opportunity Zone in Brighton. This CT 86.06 has a median household income of \$57,000 which is 26% below the remainder of Brighton as well as the State of CO and 14% below the U.S. average.

Brighton has roots in farming before eventually converting to development and becoming part of the second ring of development around the northeast quadrant of Denver and in proximity to the airport (DIA). This makes Brighton the primary growth outlet for DIA employees and future land development opportunities north of Denver. Specifically, our target area runs along our Main Street corridor, from Bromley Street north to Baseline Road, and is in proximity to US 85 and an active railroad line. We have a traditional downtown core, however recently, revitalization challenges are occurring as industrial properties are being repurposed and additional housing is being built which further exacerbates the presence of industrial uses. Our goal is to create a better life for our many minority and disenfranchised groups by brightening-up our blighted, underutilized, and contamination impaired properties in our downtown core. Our Brighton Brownfield initiative is designed to clean up our downtown core properties and explore safer connections to essential services, while creating new jobs and housing opportunities.

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the *Assistant Director of Community Development and the Business Development Manager of the City Manager's Office*, assisted by the *Director of Finance and City Attorney*, with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and the VCP.

1. FUNDING: \$500,000

2. BUDGET

	Task 1 Programmatic	Task 2 Inventory Outreach	Task 3 Area Wide Planning	Task 4 Enviro. Assessment	Total
Personnel					
Fringe Benefits					
Travel	\$4,025				\$4,025
Equipment*	- 0 -	- 0 -	- 0 -	- 0 -	- 0 -
Supplies					
Contractual	\$20,975	\$60,000	\$162,000	\$253,000	\$495,975
Other:					
Total Direct	\$20,975	\$60,000	\$162,000	\$253,000	\$500,000
Indirect Costs					
Total	\$25,000	\$60,000	\$162,000	\$253,000	\$500,000

* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

4. WORKPLAN TASKS

Task 1: Cooperative Agreement Oversight (Programmatic/Grant Management)

Task 1 - Cooperative Agreement Oversight (Programmatic/Grant Management) Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Obtain QEP and legal services (if necessary): • Prepare Request For Proposals/Qualifications, evaluate applications, conduct interviews, hire qualified environmental professional (QEP) • Conduct annual performance evaluations on QEP • Obtain legal services for title searches, regulation interpretations, etc. (plan is to generally use in house legal counsel/staff)	Outputs: • RFP/RFQ; documentation of meeting of open competition; contract for scope of services • Performance evaluation reports, and applicable corrective actions Outcomes: • High quality products and services to meet project needs • Maintain a high level of work effort	12/23; annual evaluations; obtain legal services as necessary	
Reporting: • Prepare MBE/WBE semi-annually, and FFR form at the end of the reporting period • Enter site data in ACRES • Prepare Quarterly Reports via ACRES • Prepare final report and grant closeout material	Outputs: • Quarterly reports and other forms; updated ACRES database; final report and closeout forms • “Success Story” fact sheets Outcomes: • Regular communication of project status and next steps; current database for congressional reporting	Quarterly reports every quarter; MBE/WBE forms March 30 and September 30; ACRES updated when site activities occur; ongoing for fact sheets; final report and closeout by 12/27	
Records: • Maintain grant files • Maintain site project files • Maintain financial records	Outputs: • Accurate and complete files suitable for audit purposes Outcomes: • High quality project records reflective of the work performed	10/23 and ongoing thereafter	
Requests for Reimbursements or Advances	Outputs: • Drawdowns from ASAP Outcomes: • Reduce unliquidated obligations	10/23 and ongoing thereafter	
Training: • Attend EPA Brownfields Conferences and other related workshops	Outputs: • Attend Colorado Brownfields Conference • Attend National Brownfields Conference in Detroit August 2023 with pre-award costs Outcomes: • Improve Brownfields knowledge and expand networking opportunities	6/25 7/23	

Task 2 – Site Inventory & Community Outreach Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
- Establish Brownfields steering committee - Ensure that commitments made by CBOs in proposal are implemented.	Outputs: - In-person meetings as needed with agendas, notes, and attendance lists; electronic updates as needed; Commitments from CBOs Outcomes: - An active and motivated workgroup driving Brownfields initiatives	12/23; at least quarterly	
Develop Marketing Materials: - Create brochure targeting private & public property owners, lenders and developers - Create FAQ fact sheet - Update website - Newsletters and Videos published	Outputs: 2 Color brochures; 2 FAQ insert(s); 1 easy to navigate and attractive website 6 newsletters and videos Outcomes: - Up-to-date marketing tools to promote project work and disseminate information	12/23 w/ newsletter and video publishing being ongoing	
Implement outreach strategy in target areas: - Meet w/ local community organizations and/or attend local town selectman meetings - Publish program info in local papers and post notices in town halls & community centers	Outputs: - Give BF presentations at two meetings (Public and Youth), minimum 2 round of ads/postings in local target areas Outcomes: - Improve community knowledge on BF issues and identify potential BF sites	12/23; continual throughout grant period	
Hold local public meeting on Phase II sites: Discuss Phase II results, and potential cleanup and redevelopment plans	Outputs: - Minimum 1 local public meeting, presentation materials, attendance list Outcomes: - Encourage public participation and support of BF project(s) going forward	6/25 and as needed and available throughout the grant period	

Task 3 – Area Wide Planning Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Site inventory: • Gather recognized and potential brownfields sites in target areas • Enter sites on GIS mapping tool	Outputs: • GIS map of potential BF sites Outcomes: • Graphical capturing of BF sites for planning and marketing work	Initial mapping 9/24; final mapping 9/26	
Site prioritization and eligibility determination: • Convene steering committee meeting to rank and prioritize sites • Choose initial sites for Phase I investigation • Evaluate site access issues • For each selected site, provide site eligibility information to EPA (or state) for review • Obtain EPA (or state) approval for Phase I	Outputs: • Planning meetings; 20 eligible sites identified in initial inventory search • Estimate 5 additional eligible sites identified during remainder of grant Outcomes: • 20 brownfields sites identified with the highest redevelopment and community benefit potential in target area(s)	3/24	
Area-Wide Planning: • Identify a brownfield-impacted area (neighborhood, district, city block, etc.) • Develop strategies for the reuse of existing infrastructure in the area • Brownfields Tour • Public Meeting 2: Community Connections Workshop • Public Meeting 3: 3-Day Design Workshop • Concept development – land use concept, visualizations, multimodal concepts, resource road mapping, incentives, and financial pro-form reports with website updates • Area wide planning summary created & distributed including redevelopment profiles for catalyst sites • Public Meeting 4: Review of Area Wide Planning	Outputs: • Produce an area-wide plan for the brownfield impacted area • Create a set of area-wide strategies for assessment, cleanup and reuse measures • Explore walkability, access, and design of a more connected downtown (PM 2) • Redevelopment visualization illustrating potential buildings, infrastructure expansion, exploration of redevelopment roadmap, housing opportunities and other key elements (PM 3) • Community feedback and revisions based on it (PM 4) Outcomes: • Future uses of at least fifteen properties in the area wide plan have been identified • Next steps to implement the plan have been identified • 1 concept map, 1 resource roadmap, 5 pro formas • 1 report published on area wide planning with redevelopment profiles for catalyst sites	Tour by 12/23, PM 2 by 3/24, PM 3 by 6/24, concept map, roadmap, proformas and area wide planning report by 9/24, and PM 4 by 9/24	

Task 3 – Area Wide Planning Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Phase I investigations: • Conduct planning meeting with QEP to discuss approved sites • QEP obtains access agreement and performs Phase I investigation • QEP submits draft Phase I report to project team members • Team reviews/comments on draft Phase I • QEP submits final Phase I report to project team members	Outputs: • Planning meetings • 12 Phase I Reports • updated ACRES database Outcomes: • 12 High potential Brownfields sites assessed through Phase I	Quarterly; Phase 1 assessments will be completed within 90 days	

Task 4 – Environmental Assessment Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Phase II preparation: • Meet with steering committee to review Phase I results and project direction • Obtain EPA approval to proceed with Phase II • Meet with QEP to Plan Phase II • Encourage QEP to maximize efficiencies and minimize negative impacts of site assessments by incorporating green and sustainable remediation (GSR) techniques that are applicable to Phase II assessment activities • QEP submits EPA approved generic QAPP w/ updated organization chart	Outputs: • Project planning meetings • 1 approved generic QAPP • 6 sites approved for Phase II investigation Outcomes: • 6 high priority sites identified for further investigation and potential redevelopment	As needed 6/23; targeting 6/24, 9/24, 12/24, and 3/25 to review the phase 1 reports and proceed with a phase 2	
Phase II investigation: • QEP submits draft site-specific QAPP addendum to project team for review and comments • EPA/state approval is obtained and QEP submits final site-specific QAPP addendum to team • QEP performs field work according to plan • Grantee monitors site work and communicates any concerns with EPA/state	Outputs: • 6 approved site-specific QAPP Addenda (delineating extent of site contamination on 1 Brownfield site) • Phase II report(s) documenting the results • Updated ACRES database • Green and sustainable efforts reported in quarterly reporting Outcomes:	Target dates of 9/24, 12/24, 3/25, and 6/25 for the 6 site-specific QAPP addenda; Phase II assessments will be completed within 180 days; we will conduct update meetings	

Task 4 – Environmental Assessment Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
• Grantee tracks green and sustainable site assessment efforts used during Phase II investigations • QEP submits draft Phase II report to project team for review and comments • QEP submits final Phase II report to project team • Project team & steering committee evaluate Phase II findings, and implement additional Phase II investigations as appropriate to delineate extent of contamination	• 6 high priority sites with complete Phase II assessments that and ready for cleanup and reuse planning • Greener and more sustainable site assessment techniques utilized	with the contractor at least bi-monthly	
Cleanup & reuse planning: • Throughout Phase II process, strategize with steering committee on reuse plans for the site • Conduct marketing to leverage developer/lender interest in the property • Meet with QEP to develop draft cleanup alternatives and remediation plans for the site • Incorporate GSR principles/techniques into Analysis of Brownfields Cleanup Alternatives (ABCA) • Perform public outreach and involvement in cleanup and reuse planning • Completion of closeout report	Outputs: • 6 or more internal cleanup and reuse planning meeting(s) • 6 draft cleanup alternatives plan • 6 draft remedial action plan • GSR language in ABCA • updated ACRES database • 1 public meeting on project results • Potential for developer / lender workshop and transaction forum Outcomes: • 6 properties assessed through cleanup and reuse planning, and ready for cleanup and redevelopment • Acres ready for cleanup & redevelopment • Greener and more sustainable plans for cleanup	By 3-12/25 for planning meetings, alternatives plans, and action plans; ongoing updates to ACRES database; 3/26 for public meeting on project results; closeout report by 9/26	

5. QUALITY ASSURANCE

Prior to undertaking Phase II assessments, the *City of Brighton, CO* will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of U.S. EPA Region I Brownfields Program. The QAPP will describe the project, the sampling and analytical strategies, and the methods and procedures that will be used in all Phase II assessments. QAPP approval will be obtained prior to performing any field activities.

6. PRE-AWARD COSTS

The City of Brighton, CO requests the approval of pre-award costs for this cooperative agreement. It is estimated City of Brighton will need \$1,500 to do the following activities: *Make travel*

arrangements, including airfare in July 2023, to send one employee to the National Brownfields Conference in Detroit, August 2023.

7. BUDGET DETAIL - Attachment 1