

**Big Sky Economic Development
FY25 Brownfields Community-Wide Assessment Grant Application
Narrative Information Sheet**

1. Applicant Identification: Big Sky Economic Development (BSED)
201 North Broadway
Billings, Montana 59101
2. Website URL: <https://bigskyeconomicdevelopment.org/>
3. Funding Requested:
Grant Type: Community-Wide Assessment
Federal Funds Requested: \$500,000.00
4. Location: Yellowstone County, Montana
5. Target Area and Priority Site Information:
 Our target areas include three neighborhoods in Billings, Montana including the Southside Neighborhood (Census Tracts 30111000300 and 30111000902), the Midtown Neighborhood (Census Tract 30111001100), and the East Billings Urban Renewal District (Census Tract 30111000200). The map with the location of each target area and our five priority sites therein is attached to this application for visual reference.

Site Name	Address	City, State, Zip
Colonial Apartments	223 S 27 th Street	Billings, MT 59101
Skyview Apartments	NE Corner of King Avenue E & Jackson Street	Billings, MT 59101
Yellowstone Valley Animal Shelter	NE Corner of Riverside Road & Hannon Road	Billings, MT 59101
Eagle Seeker Community Center	1125 Broadwater Avenue	Billings, MT, 59102
Innovation District	4 Block Area bounded by 4 th Avenue N (north), Railroad Tracks (south), N 13 th Street (west), and N 12 th Street (east)	Billings, MT 59101

6. Contacts:
Project Director: Thom MacLean – Community Development Senior Project Manager
 Big Sky Economic Development (BSED)
 201 North Broadway, Billings, MT 59101
 406.869.8407
 thom@bigskyeda.org

Chief Executive: Steve Arveschoug -- Executive Director
Big Sky Economic Development (BSED)
201 North Broadway, Billings, MT 59101
406.869.8401
stevea@bigskyeda.org

7. Population (source: www.census.gov)

BSED's Brownfields project area covers all of Yellowstone County, Montana (170,843 residents). Within Yellowstone County lies the City of Billings (120,864 residents) which contains our three target areas: the Southside Neighborhood (8,893 residents), the Midtown Neighborhood (5,055 residents), and the East Billings Urban Renewal District (3,795 residents).

8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2, 3
The reuse of the priority site(s) will incorporate energy efficiency measures.	1, 2, 3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	6

9. Letter from the State or Tribal Environmental Authority:

BSED has attached a letter of acknowledgement from the Montana Department of Environmental Quality.

10. Releasing Copies of Applications

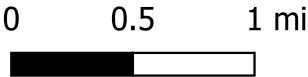
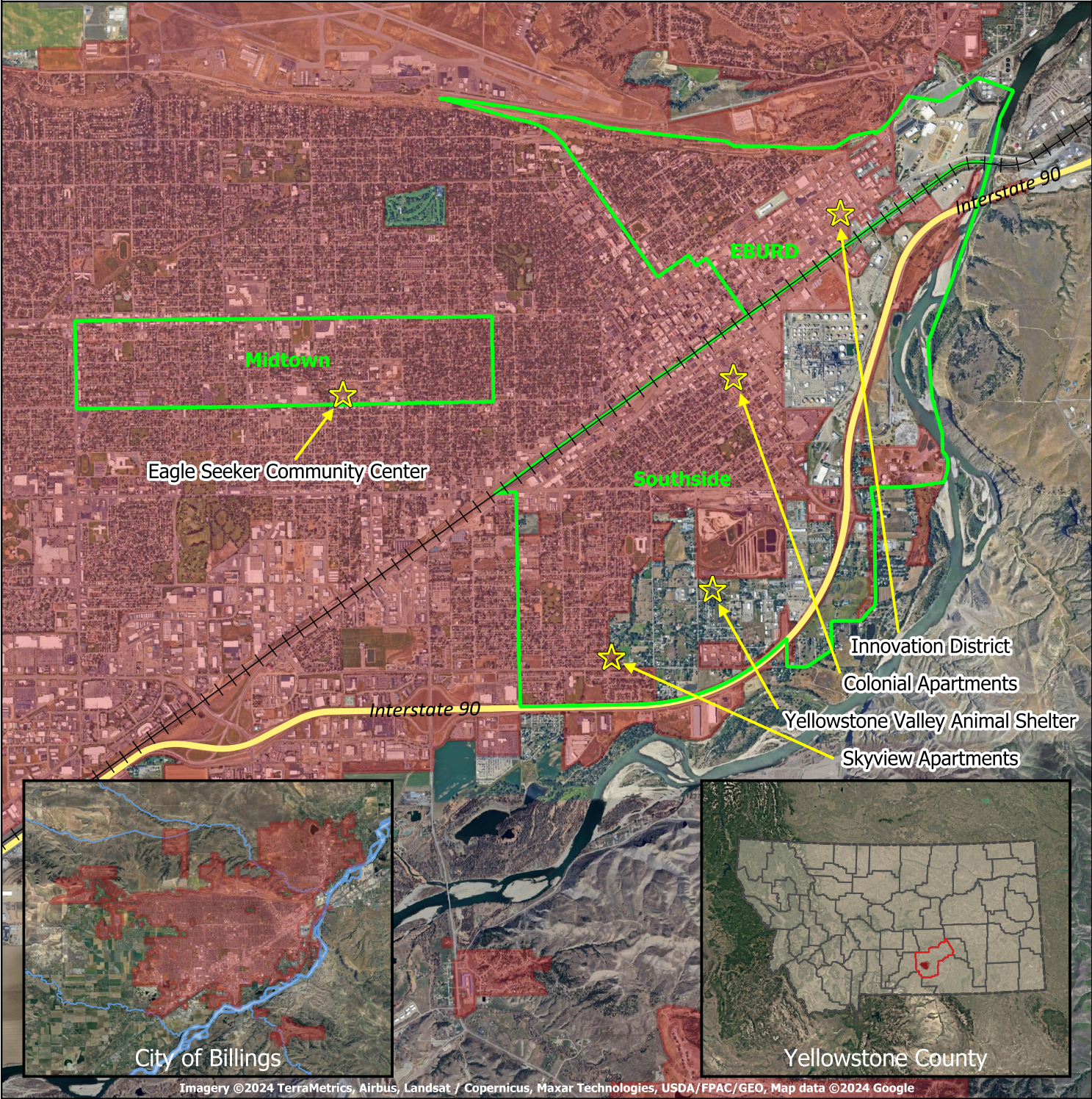
Not Applicable – The application does not have confidential, privileged, or sensitive information.

Narrative Information Sheet Attachments

Map of Target Areas and Priority Sites

Letter of Acknowledgement – Montana DEQ

Big Sky Economic Development
FY25 EPA Brownfields Community Wide Assessment Grant Application
Target Areas & Priority Sites



☆ Priority Sites
--- Railroad

Target Areas
Billings City Limits





November 6, 2024

Steve Arveschoug
Executive Director
Big Sky Economic Development
201 North Broadway
Billings, MT 59101

RE: Letter of Acknowledgment: Big Sky Economic Development's Application for a
Brownfields Area-wide Assessment Grant

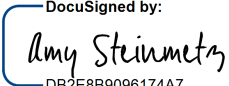
Dear Mr. Arveschoug,

I am writing to express Montana Department of Environmental Quality's (DEQ's) support for Big Sky Economic Development's efforts to obtain a U.S. Environmental Protection Agency Brownfields Area-wide Assessment Grant.

I understand that the assessment grant funds will be used to assess hazardous substance and petroleum contaminated sites throughout Yellowstone County and will initially target disadvantaged communities in Billings, MT. DEQ understands that this funding is essential in Big Sky Economic Development's efforts in redeveloping Brownfields properties in your area. 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 hazardous substance or petroleum brownfield sites, please feel free to contact Jason Seyler at (406) 444-6447 or jseyler@mt.gov.

Sincerely,

DocuSigned by:

DB2E8B9096174A7...
Amy Steinmetz, Administrator
DEQ Waste Management & Remediation Division

cc: Jason Seyler, DEQ Brownfields Coordinator, jseyler@mt.gov

Narrative and Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Big Sky Economic Development (BSED) of Billings, Montana is applying for a \$500,000 EPA Brownfields Community-Wide Assessment Grant to evaluate environmental conditions and catalyze the redevelopment of underutilized properties throughout Yellowstone County, Montana. With a population of 170,843, Yellowstone County covers an area of 2,649 square miles and contains the state's largest urban area, the City of Billings. Throughout the 20th century, Billings was a hub for rail line transportation and industry, serving communities within a 500-mile radius. The city grew around this industrial line of work with entire neighborhoods being built on distinct sides of railroad corridors. As the rail industry diminished, Billings was left with a city divided between railroad tracks with entire neighborhoods, such as the Southside Neighborhood and the East Billings Urban Renewal District (EBURD), that are now characterized by abandoned, blighted buildings that were once dependent on a bygone industrial era. The decline of the rail industry in Billings led to disinvestment in surrounding residential communities that have since transformed into low-income areas with aging buildings and diminished community services, such as the Midtown Neighborhood.

To revitalize such adversely impacted neighborhoods within our geographic area of Yellowstone County, we will prioritize assessment activities in three Billings neighborhoods including the Southside Neighborhood (Census Tracts 30111000300 and 30111000902), Midtown Neighborhood (Census Tract 30111001100), and the EBURD (Census Tract 30111000200). Per the Climate and Economic Justice Screening Tool (CEJST), each of the identified census tracts are considered disadvantaged and have relatively small populations ranging in size from 3,453 to 5,540 residents. Although these neighborhoods may be small in population, they offer an extensive inventory of commercial/residential infill development opportunities both on and near former industrial sites which may be impacted by chemicals, petroleum products, and/or hazardous building materials such as asbestos or lead-based paint, depending on the nature of the site. A Brownfields Community-Wide Assessment Grant will allow us to facilitate redevelopment efforts in our target areas to create updated affordable housing options, an animal shelter and veterinarian clinic, a community center with expanded healthcare facilities and cultural programming options for underserved community members, and an up-and-coming green, walkable live/work/play community district.

ii. Description of the Priority Brownfield Site(s)

This application highlights five priority sites within our target areas based on input from our community partners, redevelopment potential, and community need. Each priority site is described below:

The Colonial Apartments (Southside): This 0.16-acre site located off South 27th Street, a major corridor linking Billings' southside to the downtown area, currently contains a blighted, 24-unit apartment building constructed in 1918. The structure is in disrepair, has multiple code violations, and is a local crime hotspot, generating over 1,512 emergency 911 calls in the past five years.¹ The City of Billings plans to acquire and demolish the building to create new energy-efficient, low-income housing. However, due to its age, hazardous building materials must be assessed and abated to allow for safe redevelopment.

Skyview Apartments (Southside): This 3.52-acre undeveloped parcel in the South Billings Boulevard Urban Renewal District (SBBURD) is the proposed site for a \$9.8 million energy-efficient, low-income housing project led by an experienced local developer. The plan includes 26 energy-efficient residential units and several community amenities such as a playground, dog park, and outdoor gathering spaces. However, environmental assessment is needed to ensure safe residential reuse due to the site's location in a historically industrial area.

Yellowstone Valley Animal Shelter (Southside): This 15-acre site, owned by the City of Billings and currently only used for snow stockpiling, is adjacent to the SBBURD and Western Sugar Co-Op Factory. The City plans to donate the land to the Yellowstone Valley Animal Shelter for the development of a new shelter to expand services to a

¹ https://billingsgazette.com/news/local/government-politics/billings-files-lawsuit-against-colonial-apartments-owner/article_874032da-e25d-11ee-935a-83e1e7ea463e.html

previously underserved community. Additionally, Rocky Vista University's College of Veterinary Medicine, currently under construction in Billings, intends to build a veterinary clinic on-site to provide student training in partnership with the animal shelter. However, the \$12 million expansion project is at risk due to environmental contamination from ice melt agents and petroleum products, along with slag from the nearby factory.

Eagle Seeker Community Center (Midtown): This 5.48-acre site, managed by the non-profit Native American Development Corporation (NADC), includes a 50,000 ft² auditorium and office building (built in 1949) and a 5,000 ft² warehouse (built in 1980). The center serves as a hub for Native healthcare, behavioral health services, community events, and cultural programs, addressing critical needs for the urban Native American community in Yellowstone County. NADC is planning a \$60 million property redevelopment including assessing and remediating hazardous materials and constructing medical and dental clinics, mental health facilities, a pharmacy, and expanded support services. A multi-use space will support athletic activities and educational and cultural programming.

The Innovation District (EBURD): This site covers four blocks in the EBURD, designated as the Innovation District by the Billings Industrial Revitalization District (BIRD). Bounded by 4th Avenue North and the rail corridor, nearly half the properties in the District have already been assessed through BSED's Brownfields Program and are ready for redevelopment. However, several properties in the southern portion, including retail stores, commercial businesses, a veterinarian clinic, and a public auction yard, remain unassessed. This lack of assessment hinders further investment, as these properties may contain hazardous building materials and contamination from mid-20th-century industrial activities. Redevelopment plans for the Innovation District include a walkable, green community with mixed-use buildings featuring state-of-the-art energy efficiency measures and solar lighting where residents can live, work, and play. Brownfields assessments have already facilitated a \$2.5 million multi-use redevelopment in the District, and assessing previously unassessed properties would further this progress.

iii. Identifying Additional Sites

BSED currently has a site inventory of 26 sites located within their geographic area with 18 of these sites located in the target areas. If funds remain after assessing the sites located within our target areas, including our priority sites, we will then consider projects within our greater project area which includes all of Yellowstone County. To solicit community input on additional sites not yet on our site inventory, we will issue a press release, communicate with our board of directors, steering committee members, and local bankers and realtors. When selecting additional sites, we will prioritize projects based on redevelopment plans, community need, feasibility of cleanup and reuse, landowner investment in the project, and community partners involved in the project. Projects that benefit disadvantaged census tracts, as identified by CJEST, neighborhoods with environmental justice challenges, and/or those near state and federal superfund sites will be given preference for assessment funding.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Reuse of our priority sites closely aligns with area plans adopted by the City of Billings. Redevelopment of the Colonial Apartments and Skyview Apartments sites as low-income housing units aligns with the South Side Neighborhood Plan which identifies lack of affordable housing and dilapidated housing structures as issues to be addressed through comprehensive planning and redevelopment activities in the neighborhood. These projects both correspond to the Home Base, Prosperity, Strong Neighborhoods, and Community Fabric goals outlined in the 2016 City of Billings Growth Policy (CBGP), as plans for both projects include safe housing options, infill development, energy efficient features, and community amenities such as a playground, dog park, and outdoor community gathering area. Redevelopment of the Skyview site also aligns with the 2012 SBURA Master Plan which includes objectives such as enhancing the desirability of living and investing in the neighborhood, creating neighborhoods with diverse housing choices, and encouraging public and private investments to provide long-term uses of vacant or underutilized land. The Yellowstone Valley Animal Shelter project aligns with the Essential Investments goal of the CBGP by creating additional commercial and professional services for the Southside Neighborhood and the Prosperity goal by providing both professional jobs and professional job training for students associated with the on-site veterinary clinic. Redevelopment and expansion of The Eagle Seeker site aligns with

the CBGP's Home Base goal by expanding essential healthcare services in a residential area and the Prosperity goal by creating professional jobs, a competent workforce being paid living wages, and equitable and affordable access to professional services for an underserved population. Because of the multifaceted and in-depth vision of the Innovation District, assessment and site redevelopment align with multiple CBGP goals including Essential Investments, Place Makers, Community Fabric, Strong Neighborhoods, Home Base, Mobility and Access, and Prosperity. The infill development project will create community amenities such as a career center, outdoor gathering spaces, local eateries, recreational facilities, and other locally owned commercial businesses. The redevelopment of the Innovation District also supports the redevelopment goals outlined in the 2009 EBURD Master Plan which prioritize green and sustainable development of inclusive, connected communities offering a variety of affordable housing, commercial stores, jobs, and entertainment options.

ii. Outcomes and Benefits of Reuse Strategy

Redevelopment of our priority sites will result in numerous benefits to both our target and geographic areas. The Colonial Apartments reuse will provide new affordable housing units in the Southside Neighborhood and remove the public safety hazard associated with the blighted building that is a hotspot for crime. The development of Skyview will create 26 affordable housing units featuring energy-efficient fixtures and appliances. Both housing development projects will stimulate the local economy by attracting residents to the Southside Neighborhood, increasing the local tax base, and providing jobs to construction workers during development phases. The expansion of the Yellowstone Valley Animal Shelter will result in a new animal shelter and increased access to veterinarian services for downtown and southside residents who may have historically had limited access to these specialized services. The project will bolster higher-education opportunities for local veterinarian school students and will create approximately five permanent jobs with several other construction jobs being created during the development phases. The redevelopment and expansion of the Eagle Seeker Community Center will enhance and expand services available to the Native American community in Yellowstone County through the expansion of the existing IHS medical and behavioral health clinics and through the creation of dentist offices, a physical therapy suite, a pharmacy, and a multi-use space for educational and cultural programming. The project will serve as a hub for culture and healing that is open to everyone but focuses on serving the region's historically underserved native populations. The redevelopment of sites within the Innovation District will help create a smart, walkable community with energy-efficient housing, jobs, and entertainment all contained within the 4-block district with a special emphasis on green, efficient building designs and practices such as incorporating solar energy. The project, located in an area identified as a tree desert for the City of Billings, would incorporate vibrant outdoor spaces with special attention to locally relevant landscaping practices to help mitigate climate change impacts in the EBURD. Sites identified for assessment through this grant may be transformed into a career center for the local school district, a mixed-use building with ground-level commercial space and upper residential units, and an outdoor space for community gatherings and entertainment such as an amphitheater.

c. **Strategy for Leveraging Resources**

i. Resources Needed for Site Reuse

As the economic development organization in Billings, BSED has a long history of leveraging resources for community development projects, including those within the Brownfields Program. All priority projects featured in this application would be eligible for cleanup funding through our Brownfields Revolving Loan Fund (RLF) Grant. Redevelopment costs for the Colonial Apartments will be financed with Low-Income Housing Tax Credits (LIHTC) and Community Development Block Grant (CDBG) funds. The Skyview developer is well versed in funding resources available for developing housing communities in Billings and intends to combine sources such as LIHTC, Tax Increment Financing, HOME funds, and private investments to complete the \$9.8 million housing development. The City of Billings agreed to gift the land for the new animal shelter to the Yellowstone Valley Animal Shelter. In addition to this gift, Rocky Vista University intends to finance the construction of an animal clinic on the site to provide hands-on educational experiences for their veterinarian students and to offer expanded services to the community. Additional funding to complete the \$12 million expansion project includes private donations, of which \$5 million have already been secured. The Eagle Seeker Community Center would be eligible

for additional grant money through Indian Health Services (IHS) to expand their current medical and behavioral health facilities and create new spaces such as dentist offices, a physical therapy suite, and a pharmacy. The Innovation District plans to leverage a variety of different funding sources for redevelopment, including tax increment financing, new market tax credits, and private financing. Additionally, the City of Billings was recently awarded a \$1 million tree grant to add landscaping in the EBURD, and the BIRD is applying for a \$20 million green infrastructure grant. If awarded, the funds will help fuel eco-conscience redevelopment efforts within the Innovation District.

ii. Use of Existing Infrastructure

Redevelopment of each priority site offers an opportunity to leverage existing infrastructure and public services. All priority sites are either already serviced by public water, sewer, electricity, gas, high-speed internet, etc. or can easily be tied into nearby mains. No new infrastructure is required for redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Although our geographic area of Yellowstone County is one of the largest population centers in Montana with 170,843 residents², each of our target areas represents a very small population with the largest being the Southside Neighborhood, which is home to only 8,893 residents spread across two census tracts. Each target area is considered low-income with an average median household income of ~\$50,226 in the Southside Neighborhood (31% below that of Yellowstone County), ~\$55,061 in the Midtown Neighborhood (24% below), and ~\$42,215 in the EBURD (42% below)³. According to EJ Screen, 72% of the Southside population is considered low-income, and 24% of the population does not have a high school diploma. Residents within the target area are struggling to make ends meet with no discretionary funding to allocate to environmental assessment or cleanup. Furthermore, the Southside Neighborhood and EBURD are historically industrial corridors that have seen many businesses close in the past two decades, driving the workforce out of these neighborhoods and into other, more desirable areas around Billings. Between the high instances of low-income households and declining businesses in these neighborhoods, there simply is not enough local funding generated or cash available to attract and leverage large-scale developments that will stimulate growth and redevelopment in our neighborhoods. Outside funding sources, such as Brownfields grants, are necessary to catalyze redevelopment in these low-income communities.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations – The prioritization of grant activities in the Southside and Midtown Neighborhoods as well as the EBURD will benefit those most in need in our community, including our Native American population. American Indians are an important sensitive population within all our target areas. American Indians account for 14% of the population in the Southside census tracts and 15% in the EBURD. While socioeconomic data was not available for American Indians in the target areas due to low sample size, data for American Indians in Billings, where all three target areas are located, demonstrates significant welfare concerns for this sensitive population. For example, over a third of American Indian children (35.4%) in Billings live below the poverty line in comparison to their white counterparts (9.1%). Residents lacking health insurance coverage have higher mortality rates than those without coverage. In Billings, 38.6% of the American Indian population reported having no health insurance compared to 9.5% of white residents without insurance. Among pregnant women in Billings, 38.8% of American Indians reported receiving prenatal care in the first trimester compared to 82.5% of white women. The proportion of women receiving no prenatal care at all was 8.1 times that of white women. Infant mortality for American Indians in Billings was 13.4 per 1,000 live births compared to 4.9 per 1,000 for white births with American Indian infants being 2.7 times more likely to die within their first year of life than white infants. Data also suggests the mortality rate for American Indians in Billings is 46.0% higher than their white counterparts with a homicide rate for American Indians six times that of homicide deaths among whites. By leveraging funds to

² U.S. Census Bureau (census.gov)

³ EPA Environmental Justice Screening and Mapping Tool (EJScreen)

increase the tax base of our low-income communities and through redevelopment of sites such as the Eagle Seeker Community Center, our vulnerable Native populations can experience an increased quality of life with better access to community resources and healthcare services. Redevelopment of sites like the Colonial Apartments will help eliminate the source of over 1,512 emergency 911 calls in the past five years with complaints ranging from noise complaints, to aggravated assault, to reports of homicide and help create safe, healthy, and sustainable communities for Native Americans within the target area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions – Brownfields and their associated contaminants can negatively impact the health and wellbeing of community members. Asbestos, a common building material contaminant, is a carcinogen frequently found alongside another hazardous building material, lead-based paint, in aging buildings typical of long-established neighborhoods such as Southside, Midtown, and the EBURD. Other contaminants common of Brownfield sites are volatile organic compounds (VOCs) which are linked with petroleum products often associated with leaking underground storage tanks and are known to cause various types of cancer, including leukemia. Very little cancer data is available for residents within the target areas due to sample/population size as well as the fact that many of the residents within the target areas do not seek healthcare due to lack of health insurance. However, state cancer profiles show that Yellowstone County, where the target areas are located, has a much higher cancer rate of 505 cases per 100,000 compared to the state (456) and the US (444). American Indians also suffer from higher rates of cancer within Yellowstone County (986 cases per 100,000) as compared to American Indians in other parts of the state (609) and country (409). Leukemia rates for Yellowstone County are higher for all residents at 18.3 cases per 100,000 compared to the state (15.4) and the US (14.0). Lung cancer rates are also high within Yellowstone County for all races at 49 cases per 100,000 compared to the state (46.2). American Indians within Yellowstone County suffer from lung cancer at a much higher rate of 114.2 cases per 100,000 compared to American Indians in Montana (95.4) and the US (54.3).⁴ EJScreen shows the Southside and EBURD neighborhoods rank in the 95-100th percentile for low life expectancy while the Midtown Neighborhood ranks in the 50-80th percentile. Assessment of sites such as the Colonial Apartments, Innovation District, and the Skyview Apartments site will help evaluate potential health risks to area residents. The redevelopment of the Eagle Seeker Community Center will help American Indians in the target areas access more services through IHS, resulting in earlier detection, treatment, and improved life expectancy.

(3) Environmental Justice

a. Identification of Environmental Justice Issues – Our target areas, which contain each of our five priority sites, consist of low-income communities that are disproportionately impacted by several environmental factors. According to CEJST, all four census tracts comprising our three target areas are disadvantaged. The northern half of the Southside Neighborhood is disadvantaged due to a low life expectancy (98th percentile), its proximity to Risk Management Plan (RMP) facilities with legacy pollution (97th percentile), the number of underground storage tanks and releases (98th percentile), high amounts of toxins in wastewater discharge (99th percentile), and a low median income (91st percentile) paired with a high rate of adults without a high school education (11%). The southern half of the Southside Neighborhood is disadvantaged due to its projected flood risk (92nd percentile), its proximity to RMP facilities with legacy pollution (91st percentile), and high amounts of toxins in wastewater discharge (99th percentile) all paired with a low income (88th percentile). The Midtown Neighborhood is disadvantaged due to the number of underground storage tanks and releases (96th percentile) and the high amounts of toxins in wastewater discharge (96th percentile) both paired with a low income (68th percentile). Finally, the EBURD is disadvantaged due a low life expectancy (98th percentile), its proximity to RMP facilities with legacy pollution (93rd percentile), the number of underground storage tanks and releases (97th percentile), high amounts of toxins in wastewater discharge (98th percentile), and a low median income (92nd percentile) paired with a high rate of adults without a high school education (13%). In addition, the Southside Neighborhood contains the former J.E. Corette Coal Plant, a 173-megawatt coal-fired power station active from 1968 to 2015. Residents nearby, including those in the

⁴ State Cancer Profiles > Incidence Rates Table

Southside (<1 mile), EBURD (~1 mile), and Midtown (~2 miles) neighborhoods, were likely exposed to harmful fine particle pollution containing soot, heavy metals, sulfur dioxide, and nitrogen oxides that can bypass lung defenses, enter the bloodstream, and reach vital organs. A 2010 Clean Air Task Force study found that communities near coal plants, especially children and the elderly, face disproportionately severe health impacts from fine particle pollution⁵. Many people living and working in these disadvantaged communities cannot afford to leave unhealthy situations where they are routinely exposed to the chemical, toxins, and dangers posed by these environmental justice issues.

b. Advancing Environmental Justice – Redevelopment of our five priority sites is a crucial step toward advancing environmental justice in our three target areas while minimizing displacement of residents and businesses. The redevelopment of the Colonial and Skyview Apartment sites will create new, safe, low-income housing with access to community amenities such as a playground, dog park, and outdoor gathering spaces. Current residents of the Colonial will be temporarily relocated during the demolition of the old building and construction of the new one; however, the City plans to connect residents with alternative low-income housing options, and dispersing residents prone to substance use or criminal activity is seen as a beneficial outcome. New housing options will ensure that low-income residents in the target areas are not exposed to hazardous building materials or metals and dioxins in surface soils. Expansion of the Eagle Seeker Community will allow Native American residents in the target area to have greater access to IHS healthcare and wellness services in new facilities that are free from contaminants. Redevelopment of the Innovation District aims to remove the risk of environmental contamination to an area spanning four city blocks while also providing trees in a tree desert, green building and landscaping design, as well as new jobs and housing. The creation of housing developments and new businesses in the Southside Neighborhood and EBURD will attract new residents to move to these neighborhoods and create jobs with livable wages, which will in turn increase local tax bases to provide more funding options to address environmental justice issues at a local level. Similarly, the expansion and creation of healthcare services and community spaces at the Eagle Seeker Community Center will not only stimulate job creation and increase the tax base in the Midtown Neighborhood, but it will also allow for more accessible healthcare options to combat low-life expectancy statistics for underserved and disadvantaged members of the community.

b. Community Engagement

i. Project Involvement and ii. Project Roles

As a community-based economic development organization, we strive to collaborate with local partners and community leaders in each of our projects. Specific project partners, their roles, and how they will support BSED's Brownfields Program are outlined in the table below.

Select Project Partners		
Partner	Point of Contact	Specific Role in Project
Billings Industrial Revitalization District (BIRD)	Michelle Harkins, Director 406-545-7007 michelle@billingsbird.com	BIRD manages the tax increment financing for the EBURD and encourages business expansion and new development in the area. BIRD will be an important partner for outreach/marketing, site identification and selection, and implantation of assessment and cleanup projects in the EBURD.
Downtown Business Alliance (DBA)	Katy Schreiner, CEO 406-294-5060 katy@downtownbillings.com	The DBA works with businesses, creatives, and civic leaders to provide the economic, cultural, and social opportunities Billings requires to realize a prosperous and exciting future. They will promote the Brownfields Program as a tool for redevelopment in Billings along with other redevelopment resources.
South Billings Urban Renewal Association (SBURA)	Dick Zier, Board Chair [REDACTED]	SBURA manages the tax increment financing for the SBBURD and aims to assist with expansion and development projects in the area. SBURA will be an important partner for outreach/marketing, site identification and selection, and implantation of assessment and cleanup projects in the Southside Neighborhood
City of Billings	Chris Kukulski, City Administrator 406-657-8222 kukulskic@billingsmt.gov	The City of Billings is responsible for land use decisions within its boundaries. City Council is the ultimate authority for use of TIF funds in redevelopment districts and are important partners for BSED and private developers regarding community outreach, economic development, and reuse planning.

⁵ "The Toll from Coal: An Updated Assessment of Death and Disease from America's Dirtiest Energy Source," Clean Air Task Force, September 2010.

Select Project Partners		
Partner	Point of Contact	Specific Role in Project
Billings Metropolitan Planning Organization (MPO)	Wyeth Friday, Director 406-247-8676 fridayw@billingsmt.gov	The Billings MPO works to increase access to housing, support capacity building for local non-profits, and revitalize neighborhoods. MPO will help identify potential projects for BSED and promote our Brownfields Program.
HomeFront	Patti Webster, CEO 406-237-1916 pattiw@homefrontpartners.org	HomeFront is a housing developer that promotes self-sufficiency and homeownership for lower income individuals, often in disadvantaged census tracts. HomeFront will be an important partner in identifying upcoming affordable housing projects in each of our target areas.
Native American Development Corporation (NADC)	Heather LaTray, ERC Fellow 406-690-6147 hlatray@economicrecoverycorps.org	NADC is a non-profit organization that manages the Eagle Seeker Community Center. NADC specializes in providing professional and financial support to Native American entrepreneurs. NADC will advocate for the needs of this underserved community through the use of Brownfield assessment funds.

ii. Incorporating Community Input

For over 17 years, BSED's Brownfield Program has refined our community involvement strategy to maximize engagement with landowners, developers, and community members. We engage our community by attending and hosting public meetings, holding stakeholder sessions with landowners, developers, community members, and pertinent organizations, distributing quarterly email updates to local partners, and continuing our quarterly Brownfields Steering Committee meetings which are open to the public. Brownfields updates will be incorporated into our board meetings, comprised of local bankers, developers, Brownfield site owners, government employees, and educators. Project updates will be shared regularly on our website, social media pages, and via press releases, encouraging the community to contact our Brownfields team directly with any questions. Our Brownfields Coordinator will facilitate input and provide written responses to concerns when needed. Public meetings will inform the community of our Brownfields work, invite feedback on objectives and concerns, and will be announced on our website, in the newspaper, and through quarterly partner emails. These meetings will feature fact sheets and visual aids showcasing achievements. We will also meet individually with landowners to understand their needs and promote targeted use of Brownfield funds. All meetings will offer online login and call-in options for those with limited internet access, and visual, auditory, and ADA accommodations to ensure community inclusion.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1 – Grant Management – i. Project Implementation – BSED will be responsible for hiring a Qualified Environmental Professional (QEP) within two months of award; routinely updating their Brownfields site inventory; prioritizing sites using their Site Priority Matrix tool; coordinating with landowners and developers, local governments, EPA, and DEQ; meeting with the Brownfields Steering Committee quarterly; updating project information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) quarterly; preparing EPA quarterly reports; completing annual financial reports; finalizing and submitting a final grant closeout report; attending two EPA National Brownfields Conferences and 2 Brownfields Regional Workshops; and general program management. ii. Anticipated Project Schedule – October 2025 – September 2029 iii. Task/Activity Lead – BSED (grantee) iv. Outputs – 1 QEP contract; 16 ACRES updates and quarterly reports; 1 final closeout report; 4 annual financial reports; 2 national conferences and 2 regional workshops attended.

Task 2 – Community Outreach – i. Project Implementation – BSED and the selected QEP will be responsible for creating a community outreach plan; maintaining BSED's Brownfields webpage; sharing quarterly social media updates; preparing fact sheets and a programmatic brochure; fostering relationships with regional developers; consulting with participating landowners; creating opportunities to engage the local press; and hosting public meetings. ii. Anticipated Project Schedule – October 2025 – September 2029 iii. Task/Activity Lead – BSED with assistance from their QEP, as directed iv. Outputs – 1 community outreach plan; 1 updated website; 16 social media updates; 4 fact sheets; 1 programmatic brochure; 6 public meetings/workshops; 40+ stakeholder meetings.

Task 3 – Site Assessment – i. Project Implementation – BSED will collect program participation forms prior to beginning an assessment, fill out site eligibility determination forms to submit to DEQ and EPA, and facilitate site

access. They will then coordinate with their QEP to update BSED's current EPA-approved Quality Assurance Project Plan (QAPP) and complete site-specific assessments. ii. Anticipated Project Schedule – December 2025 – June 2029 iii. Task/Activity Lead – BSED for project coordination tasks and their QEP for all technical tasks, including completing assessments iv. Outputs – 10+ program participation forms; 10+ approved site eligibility determination forms; 10+ access agreements; 1 updated QAPP; 5 AAI-compliant Phase I ESAs; 10 SAPs; 10 HASPs; 10 Phase II Report of Findings (including abatement cost estimates for hazardous building material sites).

Task 4 – Cleanup/Reuse Planning – i. Project Implementation – The QEP will be responsible for identifying cleanup options and costs consistent with redevelopment plans based on site data and community input. The QEP will complete cleanup plans for selected sites to help facilitate redevelopment. Cleanup planning documents may include Analysis of Brownfield Cleanup Alternatives (ABCAs), project designs, clearance SAPs, and bid specifications for each site. Additionally, a conceptual planning contractor will complete a site reuse plan for selected sites, which will describe community outreach, reuse visioning, site renderings and 3-D models, and any necessary infrastructure needed for a redevelopment project. ii. Anticipated Project Schedule – October 2026 – September 2029 iii. Task/Activity Lead – QEP iv. Outputs – 4 ABCAs, 4 cleanup plans, 2 bid specification documents, 2 conceptual site reuse plans, 2 3-D models, 2 site renderings.

b. Cost Estimates

The following table displays our budget breakdown by task for the proposed project with written rationales below. 85% of funding is allocated for site-specific assessment and planning activities.

PROJECT BUDGET					
Budget Categories	Project Tasks (\$)				
	Grant Management	Community Outreach	Site Assessment	Cleanup & Reuse Planning	Total
Personnel	\$33,280	\$8,320	\$0	\$0	\$41,600
Fringe Benefits	\$9,984	\$2,496	\$0	\$0	\$12,480
Travel	\$8,000	\$0	\$0	\$0	\$8,000
Supplies	\$1,000	\$1,000	\$0	\$0	\$2,000
Contractual	\$2,000	\$8,400	\$337,120	\$88,400	\$435,920
Total Direct Costs	\$54,264	\$20,216	\$337,120	\$88,400	\$500,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$54,264	\$20,216	\$337,120	\$88,400	\$500,000

Task 1: Grant Management – Personnel Costs: \$40/hr for 4 hours/week for 4 years = \$33,280; Fringe Benefits: 30% of Personnel Costs = \$9,984; Travel Costs: Assumes sending 2 employees to 2 National Brownfields Conferences and 2 regional workshops with rates of \$350 for airfare + \$475 for lodging + \$125 for per diem + \$50 for transportation = \$1,000/employee/conference or workshop for a total of \$8,000; Supplies: \$1,000 for file management supplies such as desktop scanners, printers, and ink; Contractual: \$2,000 for legal consult on contracts.

Task 2: Community Outreach – Personnel Costs: \$40/hr for 1 hour/week for 4 years = \$8,320; Fringe Benefits: 30% of Personnel Costs = \$2,496; Supplies: \$1,000 for printing brochures and fact sheets; Contractual Costs: \$120/hr for 5 hours/public meeting for preparation, travel, and attendance of 6 public meetings = \$3,600 and \$120/hr for 40 one-hour meetings with landowners/stakeholder = \$4,800 for a total of \$8,400.

Task 3: Site Assessments – Contractual Costs: Assumes \$5,000 for QAPP Update; \$4,900/Phase I ESA x 5 sites = \$24,500; \$22,799/Phase II Building Materials Investigation x 5 sites = \$113,995; and \$39,725/Phase II Subsurface Investigation x 5 sites = \$198,625 for a total of \$337,120.

Task 4: Cleanup & Site Reuse Planning – Contractual Costs: 4 ABCAs at \$3,660 each = \$14,640 + 4 cleanup plans at \$6,540 each = \$26,160 + 2 bid specification documents at \$8,200 each = \$16,400 for a total of \$57,200 for Cleanup Planning; 2 redevelopment plans at \$6,000 each = \$12,000 + 2 3-D redevelopment models including 2

site renderings at \$9,600 each = \$92,160 for a total \$31,200 for Redevelopment Planning. Grand total for task = \$57,200 + \$31,200 = \$88,400.

c. Plan to Measure and Evaluate Environmental Progress and Results

Our Brownfields Coordinator will be responsible for tracking and measuring progress toward site assessment and eventual cleanup, redevelopment, and reuse. The coordinator will review the commitments of our EPA work plan each quarter and document progress via quarterly reports and ACRES. Furthermore, our extensive network of community partners and established local relationships will allow us to maintain communication regarding final outcomes and achievements for each site to report in ACRES even after the conclusion of the assessment project. Any challenges or difficulties relating to the proposed project will be discussed promptly with the EPA Project Officer to develop a solution and plan of action to achieve the desired outcome(s) described in the work plan. We are confident assessments will be completed within the four-year grant timeline. Final outcomes will include 40+ new affordable, energy-efficient housing units; 30+ permanent jobs; 1 new animal shelter; 1 expanded healthcare facility; 1 expanded community center; 3+ new businesses created; 1 significantly expanded tax base; and removal of blight and environmental hazards from 10+ properties in 3+ local neighborhoods.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity, ii. Organizational Structure, iii. Description of Key Staff

BSED is highly qualified to manage a new EPA Brownfield Community-Wide Assessment Grant. Operating as a quasi-public organization, BSED has successfully managed local and federal grants since 1989. Over the past 35 years, we have administered over \$100 million in public and private funds from sources such as the U.S. Economic Development Administration (EDA), U.S. Department of Agriculture (USDA) Rural Development, Montana Department of Commerce, and other local funding sources. Our executive director, community development team, and controller bring extensive experience in managing community projects and administering local, state, and federal grants.

To ensure that all grant requirements, objectives, and deadlines are met within the four-year performance period, the team will rely on the expertise of Dianne Lehm, BSED's Director of Community Development. Ms. Lehm brings 26 years of experience in fund development and marketing, with 23 of those years at BSED. She will oversee the Brownfields Program, ensuring compliance with all requirements and timelines outlined in the Cooperative Agreement. Ms. Lehm holds a bachelor's degree in marketing from the University of Maryland and a master's degree in business management from the University of Mary. She has managed numerous state and federal grants, including a \$1 million FEMA Project Impact grant, Homeland Security grants for Yellowstone County, and U.S. EDA grants supporting business expansion. She has been involved in BSED's Brownfields Program since 2008.

Thom MacLean, Community Development Senior Project Manager and Brownfields Coordinator, has been with BSED for seven years and has managed the Brownfields Program since 2021. With bachelor's degrees in finance and political economy from the University of Montana, Mr. MacLean is well-equipped to support Ms. Lehm by overseeing the daily operations of the Brownfields Program, including administration and reporting for the assessment grant. Mr. MacLean plays a key role in identifying sites and engaging with landowners and community partners to facilitate site assessments. As the manager of BSED's Brownfields RLF grant, he provides a seamless transition for landowners eligible for RLF cleanup funds, moving from assessment to cleanup. Additionally, he will actively engage the community and promote both the Brownfield Assessment and RLF Programs as essential tools for the redevelopment and revitalization of Yellowstone County.

Tami Fleetwood, Director of Finance, joined BSED two years ago and brings 17 years of professional accounting experience. Her background includes five years managing non-profit finances and 12 years conducting financial audits for non-profit, government, and for-profit organizations. Ms. Fleetwood holds a bachelor's degree in business administration with concentrations in accounting and information systems from Montana State University

Billings. She will oversee the timely quarterly draws of grant funds from ASAP, maintain accurate financial records, and ensure all required financial reporting of grant expenses is completed.

iv. Acquiring Additional Resources

BSED is committed to promoting strong labor practices, supporting local and disadvantaged businesses, and investing in our local economy. These principles will be maintained throughout all proposed project activities such as procurement of professional services, including a QEP and legal assistance for contracting, and solicitation of subcontractors for site-specific assessment and planning activities to ensure an equitable selection process. Upon receiving a signed cooperative agreement from EPA, BSED will hire a QEP to assist with community outreach, site assessments, and cleanup and reuse planning tasks. To encourage local workforce development, we will work to educate the selected QEP about local subcontractors who may be able to assist with project tasks such as drilling, laboratory work, excavation, etc. We will also educate local contractors about our program and possible training opportunities to gain the qualifications to assist with Brownfields assessment, cleanup, and reuse planning.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) *Accomplishments* – Over the last 17 years, BSED has successfully managed \$2.6 million in EPA grant funds. Our three most recent grants include \$300,000 and \$500,000 Brownfields Community-Wide Assessment Grants in 2017 and 2022, respectively, as well as a \$1 million Brownfields RLF Grant in 2023. Our closed 2017 grant produced the following outputs: 1 Updated QAPP; 1 Building Materials Sampling Guide; 12 Phase I ESAs; 6 Phase II ESAs; 2 cleanup plans; and 20+ public meetings in our target area. Although our 2022 grant is still in progress, we have already assessed nearly a dozen properties and produced the following outputs: 1 Updated QAPP; 1 Updated Building Materials Sampling Guide; 9 Phase I ESAs with 2 more currently in progress; 4 Phase II ESAs with 1 more currently in progress; 1 cleanup plan; 1 programmatic brochure; 4 fact sheets; and 40+ public/landowner meetings. To date, these two assessment grants combined have achieved the following outcomes: 13 properties sold; 4 properties fully redeveloped; 6 properties currently undergoing redevelopment; 3 No Further Corrective Action Letters issued by Montana DEQ; \$175,000 leveraged in additional assessment and cleanup funding; nearly \$14 million leveraged for fully realized development projects; an additional \$119.5 million in anticipated leveraged funds for in-progress redevelopment projects; 38 new housing units created with an additional 334 units planned; and 151 jobs created with an additional 409 jobs planned. Fully realized project accomplishments are reflected in ACRES at the time of application submittal. With our RLF program still in its infancy, there have not been any cleanup projects completed through this grant yet. However, BSED is still making progress toward completing our outreach and marketing goals and have produced the following outputs: 1 Updated QAPP and Building Materials Sampling Guide; 1 programmatic brochure; and 3 public meetings.

(2) *Compliance with Grant Requirements* – BSED has a proven history of completing and exceeding the requirements and goals in our Cooperative Agreements and is in good standing with EPA Region 8. Our Brownfields Program has complied with all reporting requirements including the filing of technical reports, quarterly reports, and annual financial status and DBE forms. All funds have been expended appropriately to achieve the expected grant outputs and outcomes. All site-specific information for assessments is recorded in ACRES and is continuously updated, as needed, as redevelopment continues. All funds from our closed grants, including our 2017 Assessment Grant, were expended completely. Our 2022 Assessment Grant is still open and in progress; however, as of 10/1/2024, we have expended over 71% of our grant funds with nearly 80% of total grant expenditures going toward site-specific assessment activities, community outreach, and area-wide planning. With several projects currently in progress, we anticipate expending all our assessment grant funds and completing the goals and requirements of the grant by 9/30/2025. Furthermore, several landowners with properties being assessed through our Brownfields Program have expressed interest in our RLF financing options. Between these sites and our ongoing community outreach efforts, BSED is confident that we will complete the goals and requirements of our RLF Grant by the end of the project period in 2028.

Attachment A

Threshold Criteria Response

ATTACHMENT A: THRESHOLD CRITERIA RESPONSE

1. **Applicant Eligibility:** Big Sky Economic Development (BSED) is an eligible applicant for an EPA Brownfields Community-Wide Assessment Grant as we are a local public authority which fulfills the definition of a General Purpose Unit of Local Government. Pursuant to Section 7-14-1101 of the Montana Code Annotated, BSED is a local port authority created by the Yellowstone County Board of Commissioners which constitutes a “public body”. This statutory language mirrors that of 42 U.S.C 5302(a)(1) which defines a “unit of general local government” as including a “public body or agency”.

Documentation of our organizational status from the Yellowstone County Attorney is provided in **Attachment B**. BSED is not organized as a 501(c)(4) entity.

2. **Community Involvement:** BSED highly values stakeholder involvement in the Brownfields assessment process. We will inform and involve community members and stakeholders during planning and implementation of this project.

We will develop a community outreach plan to provide guidance for public and community participation in our program. We will inform and educate our citizens and provide opportunities to learn more about our Brownfields Program, as well as give opportunities for input on our site inventory and platforms to address concerns regarding contamination on specific sites. Planning efforts will also be instituted as site redevelopment plans are finalized to allow the community to have a voice in site cleanup, redevelopment, and reuse.

We will engage our community by attending and hosting public meetings, holding stakeholder sessions with local landowners, developers, community members, and pertinent community organizations, distributing quarterly email updates to local partners, and continuing our quarterly Brownfields Steering Committee meetings which are open to the public. Brownfields updates will also be incorporated into our board meetings, which include a diverse group of community members such as bankers, developers, Brownfield site owners, local government employees, and representatives from educational institutions. Project and program updates will also regularly be shared on our website, social media pages, and via local press releases and will encourage the community to reach out to the Brownfields Program team directly with any questions or concerns. Our Brownfields Coordinator will facilitate community input, providing written responses to concerns when needed.

When participating in and hosting public meetings, we inform the community of our Brownfields work, inviting feedback on objectives and addressing any concerns. Public meetings will be announced on our website, in the newspaper, and through quarterly partner emails. At these meetings, we will provide informational fact sheets and visual aids showcasing our program’s achievements. We will also meet individually with landowners to understand their needs and promote targeted use of Brownfield funds. To maximize participation, all meetings will offer both an online login and call-in options for those with

limited or no internet access, and all sessions will accommodate visual, auditory, and ADA needs to ensure accessibility for everyone in our community.

The following actions and deliverables outline our community outreach goals for this grant:

- a. Community Outreach Plan
 - b. Brownfields Steering Committee
 - c. Site-specific fact sheets
 - d. Programmatic brochure
 - e. Landowner meetings
 - f. Updated Brownfields webpage
 - g. Social media updates
 - h. Engage local press
 - i. Public meetings
3. **Expenditure of Existing Grant Funds:** BSED currently has an open FY22 EPA Brownfields Community-Wide Assessment Grant (#95821402) which was awarded for \$500,000. As of September 17, 2024, \$356,760.60 has been drawn down from the Automated Standard Application for Payments (ASAP) and appropriately disbursed. The amount drawn down totals 71.4% of the total grant. An ASAP.gov Account Settlement Report is included as **Attachment C**.
4. **Contractors and Named Subrecipients:** Not Applicable – BSED has not selected any contractors or subrecipients to conduct any work proposed in this application. Once an EPA cooperative agreement is awarded, BSED will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 prior to beginning any assessment activities.