

1. NARRATIVE PROPOSAL (18 pages maximum)

1.a. Cover Letter

October 11, 2007

Environmental Management Support, Inc.

Attention: Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Spring, MD 20910

Dear Mr. West:

Big Sky Economic Development Authority (Big Sky EDA) is pleased to submit this proposal requesting funds for a community-wide assessment grant to characterize brownfields in Billings, Montana. Of special focus is a Tax Increment Finance District that abuts the downtown core and extends eastward to a county-owned 10,000-seat expo-entertainment center. The District comprises industrial, commercial, professional, and residential uses. Business and property owners in the neighborhood successfully launched a grass-roots effort beginning in June of 2005, forming the Billings Industrial Revitalization District (*BIRD*) and participating in development of an Urban Renewal Plan for the District.

The area has, in the past, been home to a meat-packing plant, a gas company, and other industrial enterprises. In order to effectively make use of available Tax Increment Finance program funding and spur revitalization, *BIRD* members, community groups, local government officials, and Big Sky EDA find it imperative to assess possible petroleum contamination in the District, educate the community about perceived or documented contamination, and develop appropriate clean-up plans.

1. Applicant Identification: Big Sky Economic Development Authority
222 North 32nd Street, Suite 200
Billings, MT 59101-1948

2. Funding Requested: a. Grant type: Assessment
b. Amount: \$200,000
c. Contamination: Petroleum contamination
d. Community-wide

3. Location:

City of Billings, Montana *City Administrator:* Christina Volek
Address: 210 N. 27th Street; P.O. Box 1178; Billings, MT 59103-1178
Phone: 406-657-8433 *FAX:* 406-657-8390

County of Yellowstone *Chair, Board of County Commissioners:* Jim Reno
Address: 217 N. 27th Street; P.O. Box 35000; Billings, MT 59107-5000
Phone: 406-256-2701 *FAX:* 406-256-2777

4. Contacts:

Project Director: Patty Nordlund, Community Development Manager
Phone: 406-256-6871 ext. 111 *FAX:* 406-256-6877 *Email:* nordlund@bigskyeda.org
Mailing Address: Big Sky EDA; 222 N. 32nd Street, Suite 200; Billings, MT 59101-1948

Executive director responsible for the project proposal: Joseph P. McClure
Phone: 406-256-6871 ext. 106 *FAX:* 406-256-6877 *Email:* mcclure@bigskyeda.org

Mailing Address: Big Sky EDA; 222 N. 32nd Street, Suite 200; Billings, MT 59101-1948

5. Date Submitted: October 11, 2007
6. Project Period: September 2008 – December 2011 (will not exceed three years)
7. Population: **a.** Big Sky EDA serves the City of Billings and Yellowstone County, with a population of 138, 213 (*Table 1: Annual Estimates of the Population for Counties of Montana: July 1, 2006 (CO-EST2006-01-30) Source: Population Division, U.S. Census Bureau. Release Date: March 20, 2007.*) **b.** The area of focus for brownfields assessment is in Census Tract 30-111-0002, with a population estimated at 3,624, a minority population of 18.07%, and estimated 2007 median family income of \$28,147. (www.ffiec.gov/geocode/CensusDemo.aspx).
8. Other: Big Sky EDA is NOT a federally recognized tribe; federally designated Empowerment Zone/Enterprise Community; federally designated Renewal Community; or a community with an Official Recognition (OR) from the Department of Justice for its Weed and Seed strategy.

9. Cooperative Partners:

Ted Kylander, Dir. of Enviro. Health; Yellowstone City-County Health Dept.; 406-256-2770
John S. Armstrong, Neighborhood resident/business owner; 406-670-3985
Brenda Beckett, Community Development Manager, City of Billings; 406-657-8281
John Brewer, President/CEO, Billings Chamber of Commerce; 406-245-4111
Lucy Brown, Executive Director, Housing Authority of Billings; 406-245-6391
Jack Capps, Superintendent, Billings Public Schools; 406- 247-3777
Gordon Tryan, President, Billings Industrial Revitalization District; 406-259-4008
Rod Wilson, President, Billings Association of Realtors, Inc.; 406-248-7145
Randy Hafer, A.I.A., President, High Plains Architects, P.C.; 406-896-0255
Greg A. Krueger, Executive Director, Downtown Billings Partnership, Inc.; 406-294-5060
Chris Mehus, Brownfields Program Coordinator, Beartooth Resource Conservation and Development Area, Inc.; 406-962-3914
Lynda Moss, Executive Director, Foundation for Community Vitality and Montana State Senator; 406-254-8970
Kristen Prinzing, Director of Operations, MusEco Media and Education Project; 406-294-2260
Mark Sewell, Northwest Industrial; 406-248-1151
Gary Sievers, Project Manager, CTA Architects Engineers; 406-728-9522
Ronald P. Sexton, Ph.D., Chancellor, Montana State University – Billings; 406-657-2300
Lisa Harmon, Executive Director, Downtown Billings Association; 406-259-5454

Big Sky EDA looks forward to working with the supporters listed above, along with EPA and Montana Department of Environmental Quality, to assess brownfields in our community.

Sincerely,

Joseph P. McClure
Executive Director
Big Sky Economic Development Authority
222 N. 32nd Street, Suite 200
Billings, MT 59101-1948
406-256-6871 Ext. 106

1. b. Project Description

Threshold Requirements:

A. Applicant Eligibility. Big Sky Economic Development Authority (Big Sky EDA) is eligible to apply for EPA Brownfields funds as a local public authority (see attachment 1, letter from the Yellowstone County Attorney’s Office regarding jurisdictional character of Big Sky EDA). Eligibility was confirmed by Stephanie Wallace, EPA Region 8, Montana office, with an email message on November 20, 2006.

B. Letter from the State or Tribal Environmental Authority. The Montana Department of Environmental Quality has provided a letter of acknowledgement regarding Big Sky EDA’s brownfields assessment application. Please see attachment 2.

C. Site/Owner Eligibility. This section is not applicable, because this application is for community-wide, not site-specific, assessment funds.

Ranking Criteria:

A. Assessment Grant Proposal Budget *(a maximum of 10 points may be received for this criterion)*

Budget (please see activity detail on next page)

Budget Categories (programmatic costs only)	Inventory and Site Selection	Assessment Activities	Community Education & Outreach	Clean-up Plan Development	Total
Personnel	\$1,100	\$3,300	\$1,760		\$6,160
Fringe Benefits	\$286	\$858	\$458		\$1,602
Travel		\$2,500 <i>(2 staff to Brownfield Conference)</i>	\$75		\$2,575
Equipment					
Supplies			\$240 <i>(paper, copier, meeting supplies)</i>		\$240
Contractual	\$9,614	\$128,745	\$12,000	\$35,000	\$185,359
Other		<i>(At least 12 Phase I assessments @ \$3800/site and up to 5 Phase IIs @ \$15,000 to \$50,000 per site)</i>	\$4,064 <i>(Postage, meeting room rental, newspaper notices for 4 meetings,)</i>		\$4,064
Total	\$11,000	\$135,403	\$18,597	\$35,000	\$200,000

Budget Activities Detail

TASK	ACTIVITIES
A. Programmatic	<ol style="list-style-type: none"> 1. Coordinate hiring of contractors 2. Participate in Billings Brownfields Task Force 3. Work with local governing bodies and landowners 4. Coordinate with U.S. EPA and Montana Dept. of Environmental Quality 5. Prepare progress update reports for U.S. EPA 6. Provide for travel by two staff to professional Brownfields Conference to learn strategies for assessment, cleanup and redevelopment
B. Community Outreach & Education	<ol style="list-style-type: none"> 1. Prepare education fact sheets on Billings Brownfields program 2. Consult with local affected property owners 3. Update Big Sky EDA, City and County web pages regularly with Brownfields information 4. Hold at least four public meetings throughout the process 5. Participate in educational presentations to the owners and public on issues and cleanup options 6. Summarize public comments and respond to all comments
C. Phase I Assessment	<ol style="list-style-type: none"> 1. Inventory and prioritize at least 12 sites for Phase I Assessment @ \$3,800 per site 2. Complete assessment of 12 or more sites using American Society for Testing and Materials (ASTM) publication E 1527-05 as guidance [new All Appropriate Inquiry (AAI) rules] 3. Identify recognized environmental conditions 4. Provide focus for prioritizing up to 5 Phase II site assessments per site selection process as noted in Section C.1 (page 7), @ \$15,000 to \$50,000 per site depending on site conditions
D. Phase II Assessment	<ol style="list-style-type: none"> 1. Prepare Data Quality Objectives and Quality Assurance Project Plan for up to 5 sites selected for Phase II assessment 2. Prepare Sampling & Analysis Plan (SAP) for EPA review and approval 3. Complete Phase II Assessments on selected sites 4. Prepare a report of findings for regulatory review
E. Cleanup Planning	<ol style="list-style-type: none"> 1. Compare site data with appropriate cleanup standards 2. Identify cleanup options and costs based on site data 3. Identify redevelopment options (residential, recreational, commercial) based on site data and community input

B. Community Need *(a maximum of 15 points may be received for this criterion)*

B.1. TARGET COMMUNITY. The target assessment community is located east of downtown Billings, Montana (Yellowstone County), in the East Downtown Urban Renewal District (the District). The District is part of U. S. Census Tract 13740-30-111-0002.00, with a tract population of 3,624. Slightly more than 18 percent of the tract population is minority, while only 7.7 percent of the overall population of Yellowstone County is minority. The Median Family Income for the tract, \$28,147, is at just 51.27 % of the 2007 U.S. Housing and Urban Development (HUD) Estimated Median Family Income. The Census 2000 *Poverty Profile* shows that 31.5 percent of the tract population has income

below poverty level, while the county overall has only 11.1 percent of the population with incomes below poverty level. The tract contains 473 owner-occupied units, and 1,390 one- to four-family units. The District lies within a Historically Underutilized Business (HUB) Zone designated by the U.S. Small Business Administration. (Sources: <http://www.ffiec.gov/geocode/CensusDemo.aspx>; U.S. Census Bureau, Census 2000 Table DP-1; Census 2000 Summary File 3, www.census.gov/02DEC02)

The District abuts the downtown core and extends eastward to a county-owned 10,000-seat expo-entertainment center. It is characterized by mixed uses, comprising industrial, commercial, professional, and residential land uses. Blighted conditions in the District are highlighted in the *Urban Renewal Plan*. Per the Montana Codes Annotated 2005, determination of blight establishes the grounds to justify an urban renewal plan supported through a tax increment finance district. To this end the following blighted conditions were documented during development of the Plan for the District:

- the substantial physical dilapidation; deterioration; defective construction, material, and arrangement; or age obsolescence of buildings or improvements, whether residential or nonresidential;
- inadequate provision for ventilation, light, proper sanitary facilities, or open spaces as determined by competent appraisers on the basis of an examination of the building standards of the municipality;
- inappropriate or mixed uses of land or buildings;
- defective or inadequate street layout;
- faulty lot layout in relation to size, adequacy, accessibility, or usefulness;
- unsanitary or unsafe conditions, including lack of sanitary sewer connections;
- deterioration of sites;
- improper subdivision or obsolete platting;
- existence of conditions that endanger life or property by fire or other causes.

The area has, in the past, been home to a meat-packing plant, an oil and gas company, and other industrial and commercial enterprises that are likely to have used or generated petroleum contamination. Dilapidated buildings are unsightly and dangerous, and lack of sanitary sewer connections are a detriment to health and safety. Lack of storm drains allows water to collect in deep pools around buildings. Vacant buildings are not only attractive to transients, but also contribute to economic decline and decay. Pedestrian safety is endangered not only by lack of sidewalks, but also by the flow of traffic on busy one-way streets with few crosswalks or traffic signals.

Business and property owners in the neighborhood successfully launched a grass-roots effort beginning in June of 2005, forming the Billings Industrial Revitalization District (*BIRD*) and participating in development of an Urban Renewal Plan for the District. In order to effectively make use of available Tax Increment Finance program funding and spur revitalization, *BIRD* members, local government officials, and Big Sky EDA find it imperative to assess possible petroleum contamination issues in the District, educate the community about such issues, and develop appropriate clean-up plans.

B.2. COMMUNITY BENEFITS. The East Downtown Urban Renewal District will benefit from Brownfields assessment grant funding by learning which sites should be evaluated for presence of petroleum contamination, leading to knowledge of where the greatest opportunities for protection of public health and property revitalization exist within the District. Assessment of possible Brownfields sites is a crucial “first step” toward achieving goals identified through the Urban Renewal Plan process, which align with goals that were included in the Billings Growth Policy Plan.

Urban Renewal Plan Goals:

Urban Renewal Plan Objectives:

<p><i>An economically and culturally vibrant East Downtown Billings.</i></p>	<ul style="list-style-type: none">• Encourage current businesses to flourish.• Encourage adaptive reuse development for vacant buildings and infill development for vacant lots.• Through mixed-use development create a rich and inviting environment.• Preserve and promote economic development of East Downtown Billings.
<p><i>To create a vibrant and cohesive extension of the core Downtown Billings area.</i></p>	<ul style="list-style-type: none">• Adopt where it makes sense the positive aspects of the downtown core.• The East Billings Urban Renewal District becomes known as a part of downtown rather than a separate area.• Create pedestrian links to the MetraPark facility and possibly the Billings Heights.
<p><i>Improve traffic patterns to further enhance the business experience for the owner and the consumer.</i></p>	<ul style="list-style-type: none">• Slow down traffic to facilitate more shopping opportunities and business exposure.• Reconfigure traffic patterns where it makes sense to encourage two way traffic and theoretically double business exposure.• Improve the pedestrian environment by adding well designed streetscape and sidewalks.
<p><i>Create a Destination Place where people will want to repeatedly visit.</i></p>	<ul style="list-style-type: none">• Through streetscape and street front improvements to manufacturing and industrial uses, create a friendly and aesthetically pleasing environment.• Be conducive to out of town customers to obtain goods and services that cater to trucks and trailers.• Provide a Hotel and Entertainment and/or a Lifestyle Center for the district.
<p><i>Maintain and enhance housing in the district.</i></p>	<ul style="list-style-type: none">• Create a sense of pride through home ownership.• Improve quality of life. Encourage more live-work environments.• Reduce commuting and subsequent drain on natural resources.• Develop more self-contained neighborhoods.• Reduce crime in the area.

<i>Have state of the art, updated utilities and infrastructure.</i>	Bring water, sanitary sewer, storm sewer, and electrical services up to code.
<i>Provide infrastructure for high tech businesses.</i>	<ul style="list-style-type: none"> • Provide base infrastructure to become an attractive district for high tech businesses. • Fiber optics, digital subscriber line (DSL) copper, coaxial cable and wireless. • Actively recruit high tech businesses to the area (e.g. Software, biotech, pharmaceutical, entertainment, electronics).

Brownfields assessments are paramount to successful implementation of the Urban Renewal Plan Objectives noted above, and will result in a vibrant neighborhood, redeveloped with mixed uses, pedestrian-friendly amenities, and affordable housing where workforce families can live and work. The former Montana Dakota Utilities plant has potential to become a site for ancillary medical services, which is ideal because the neighborhood is adjacent to two regional medical centers. The former Chevrolet dealership could house financial services back-office operations or a much-needed child care center. As an example, a medical services and a back-office support operation could create as many as 400 new jobs, and provide a boost to the tax base as well. Because the area is designated as a Tax Increment Finance District, the incremental increase in tax base will be allocated for improvements within the District. Assessment of potential Brownfields is an important first step.

B.3. EXTENT AND IMPACT OF BROWNFIELDS. The East Downtown Urban Renewal District was selected for a community-wide assessment of Brownfield sites because of its conditions of blight as documented in the Urban Renewal Plan for the District, and because of its potential for redevelopment and reuse. The extent of brownfields sites in the Urban Renewal District has not been inventoried to date. However, a visual drive-through survey of the District indicates that there are numerous abandoned and dilapidated properties, as well as several enterprises that would best be located on the fringe of the community. Past and present industries have polluted the air, soil and groundwater in the target area. Residents continue to be exposed to air emissions from current industries and past chemical releases to soil and groundwater, from known and suspected contaminant sources.

A land-use map prepared as part of the Urban Renewal Plan indicates that 24 percent, or 65 of the 276 properties, are vacant or abandoned. Scattered throughout the area are a number of neglected multi-family rental apartment buildings, along with scattered single-family residences. Several unoccupied or partially-used commercial buildings are evident, one of which was a former meat packing plant known to contain contamination (on Montana DEQ superfund list). Past land uses as reported by long-time residents indicate that a gas company and the Yale Oil Refinery operated in the area, as did at least ten service stations selling fuel and repairing vehicles. Other uses included car dealerships and service shops, as well as a paint and wall coverings business. Vacant, run-down buildings and marginalized commercial-industrial businesses operating in the area have a negative impact on developer interest and commitments. In fact, a recent inquiry by a Fortune 50 company that was at first interested in East Downtown resulted in the company rejecting the vacant East Downtown site and instead electing to build a new facility on the edge of town, using former farmland that has now become a business center. A Brownfields grant would allow us to identify

those properties that hinder economic development and that represent the greatest environmental and health risks to residents in our community – and allow us to spur private investment in those properties that have the greatest potential for appropriate infill redevelopment.

C. Site Selection Process *(a maximum of 6 points may be received for this criterion)*

C.1. SITE SELECTION. To select sites, Big Sky EDA will establish a Brownfields Steering Committee that will direct the completion of a site inventory and site prioritization effort in the District, based on specific site selection criteria: health and environmental effects; potential for redevelopment and commercial/residential re-use; and the willingness of the owner to provide site access. A simultaneous planning effort will be underway at the same time as the inventory process to identify those sites that represent “anchor development properties” in the District. Once the inventory and planning processes are in place, Big Sky EDA project managers will work with the contractors, community partners, the general public, and District stakeholders to select sites for assessment based on the site selection criteria, carefully following guidelines of the EPA Brownfields program. Site eligibility questionnaires for the selected sites will be completed before any assessment is initiated, to obtain EPA approval for assessment.

C.2. PREVIOUS ACTIVITIES. Big Sky EDA is not aware of any previous activities in the District that were aimed at assessing possible brownfields sites or prioritizing those sites. However, the Montana Department of Environmental Quality does list 36 sites in the District on its Leaking Underground Storage Tank Facilities list, as well as two sites on its Voluntary Cleanup and Redevelopment Act Registry. The Urban Renewal Plan for the District, the result of 18 months of public and stakeholder meetings held in the District, brought together consultants, property owners, community residents, and other interested participants to develop a vision for the area. This group decided upon desirable goals and objectives aimed at spurring revitalization of the area and at addressing blighted conditions.

C.3. ACCESS ISSUES. Big Sky EDA will obtain written permission from each property owner to assess sites in the District. Property owners and business operators were enthusiastic participants in development of the Urban Renewal Plan. The possibility that brownfields exist in the area was discussed during stakeholder meetings, and noted in the Plan. Public outreach sessions regarding this community-wide assessment application involved discussion with many of the same property owners and business operators. Several indicated that they would be willing participants should EPA funding become available through the Big Sky EDA Brownfields project. Big Sky EDA is confident that access issues will not be a barrier to assessment activities in the area. Should funding be granted, education and outreach activities will ensure that property owners are well informed about the advantages of learning whether contamination does exist. Big Sky EDA will contract with an experienced professional firm for assessment activities, and the contractor will provide valuable expertise in accomplishing positive outcomes with property owners.

Should there be a case where a property owner is recalcitrant, Big Sky EDA will, in an effort to obtain access, meet one on one with the owner to explain the benefits of participation in the program. At this meeting, discussions will emphasize the “no cost” component to getting an assessment completed, and our long-term objective to apply for and obtain cleanup funds through EPA to address contamination on the properties should it be found. The discussion will also emphasize the potential for lowering an innocent property owner’s environmental liabilities.

D. Sustainable Reuse of Brownfields *(a maximum of 12 points may be received for this criterion)*

We believe that assessment of potential brownfields sites in the East Downtown Urban Renewal District is the first step toward redevelopment and reuse of dilapidated or abandoned buildings in the area. Right now, real or perceived environmental problems are complicating investment in the

District. Redevelopment activities in the District will follow guidelines that are consistent with the current Yellowstone County Growth Policy Plan, with Smart Growth principles, and with the urban renewal initiatives developed in the Urban Renewal Plan to sustain reuse of the Brownfield sites. The Plan calls for development of formal Urban Renewal Design and Economic Guidelines that will provide the framework for redevelopment and reuse. Over the past two years, more than 60 business and property owners in the District have been planning and discussing potential redevelopment and reuse opportunities for their particular sites and for the district as a whole. Mixed income housing, retail and tourist destination uses, and commercial/office developments have been discussed. The Urban Renewal Plan has been officially adopted by the local policy body, the Billings City Council, and specific development plans are now being created including financing options and timelines, all of which will lead to the sustainability of development on the Brownfield sites.

D.1. PREVENT POLLUTION AND REDUCE RESOURCE CONSUMPTION. Preservation and reuse of existing infrastructure is a vital component to the growth of Billings as it becomes more and more expensive and wasteful to sprawl into neighboring farmland. In-fill development in the heart of the city reduces sprawl and lowers consumption of natural resources, and would result in cleanup of contamination that represents a health risk to the community. Brownfield funds would allow the City and the community to focus revitalization in the District, fostering mixed use development that houses residents close to their work places. The Urban Renewal Plan for the District notes that the District has infrastructure and utilities deficiencies that need to be resolved. The Plan states that water and sewer issues need to be addressed due to out of date installations or increases in impacts to existing structures. Big Sky EDA will target environmentally friendly businesses to redevelop in the District, and is looking into incentives for implementation of best management practices for handling petroleum contamination.

The storm water and drainage issue is particularly troublesome in the eastern part of the district. Backups are common and lack of positive drainage to holding areas has caused flooding. Big Sky EDA and its cooperating partners believe that assessment of brownfields sites is important in highlighting awareness about the problems, leading to a reduction in pollution caused by the inadequate infrastructure, and promoting reduction in wasteful resource consumption. As specific Urban Renewal Design and Economic Guidelines are developed, strategies will encourage innovative alternative stormwater management techniques and resource-friendly design standards, including green building and passive solar options. Native landscaping is also a priority as the property owners are interested in developing a more pedestrian friendly part of town. Big Sky EDA personnel have researched stormwater management options, and found that stormwater management can improve urban wildlife habitat, improve neighborhood aesthetics, reduce heating and cooling costs, decrease landscape maintenance and water use, and add property value. Methods to be considered include swales that infiltrate and store stormwater runoff; lowered planter strips; permeable surfaces, such as porous paver blocks and pervious asphalt or concrete; and street trees. Addition of alternative transportation options (bicycle lanes, walking corridors) and use of the existing Met Transit bus system will not only reduce resource consumption, but will enhance the attractiveness and livability of the neighborhood. Progress toward using innovative resource management techniques hinges on obtaining EPA Brownfields funds that would initiate improvement of current conditions.

Re-use of existing infrastructure is important to the framers of the plan, as is revitalization and preservation of historic buildings. Developers of the Urban Renewal Plan learned that while some infrastructure in the District is up to standards, other areas of the District are sorely lacking basic services such as sewer and storm drains. The City of Billings Met Transit bus system serves the area well, but there are no schools, churches, or neighborhood centers. Sidewalks are deteriorated or do not exist in parts of the District, but those that are in acceptable condition will be preserved and reused. A comprehensive bicycle-pedestrian plan for Yellowstone County, the Heritage Trail Plan, is

currently being implemented as funding allows. To date, none of the planned trail facilities have reached the East Downtown Urban Renewal District, but the Alternate Modes Coordinator participated as a stakeholder in developing the Urban Renewal Plan and is enthusiastic about bringing trail connections to all areas of the City.

The District represents part of historic Billings, and the character of vintage buildings is an integral part of the fabric of Billings. The Plan states that, as part of the Urban Renewal Design and Economic Guidelines effort, an inventory of historic buildings in the area should be conducted, in conjunction and collaboration with the Yellowstone Historic Preservation Board. The Urban Renewal Plan for the District states that existing land uses shall be honored, and that distinct design guidelines shall be developed to account for each land use. Stakeholders who participated in development of the Plan concurred that design guidelines will not discriminate against an evident land use with the intention to drive it out of the district, but expectations are that unsightly or hazardous land uses be improved for the benefit of everyone in the District and for the city as a whole.

Big Sky Economic Development Authority and its cooperating partners are committed to achieving energy and resource efficiency during redevelopment phases in the East Downtown Urban Renewal District. Several Billings architectural and engineering firms have been involved in successful reuse and redevelopment of existing buildings. In fact, CTA Architects Engineers, a supporter of this application, is housed in a former warehouse on the eastern edge of the downtown core. CTA reused the entire warehouse, and added appropriate space in keeping with the original character of the building. A large contingent of volunteers from the CTA firm volunteered to walk the East Downtown neighborhood and visit with property owners during development of the Urban Renewal Plan. Kim Olsen of O2 Architects, another firm in Billings active in reuse and redevelopment activities, participated on the advisory task force during development of the Urban Renewal Plan. High Plains Architects of Billings recently celebrated the grand opening of the city's first U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) certified commercial building, for which High Plains served as design contractor. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development; water savings; energy efficiency; materials selection; and indoor environmental quality. High Plains has also been involved with several other reuse and redevelopment projects in the Billings Historic District, and has come forth to support this Brownfields application. Big Sky EDA is confident that these and other green-building-conscious firms will continue their involvement as revitalization occurs in the East Downtown Urban Renewal District.

D.2. PROMOTE ECONOMIC BENEFITS. The brownfields assessment grant money is a vital first step in moving forward with economic growth in the District, because the possibility of site contamination is deterring development in the area. As part of the Urban Plan, the District has been designated as a Tax Increment Financing (TIF) District, an ideal tool with which to improve conditions in the District. The Billings City Council formally approved creation of the East Downtown TIF during its November 13, 2006 Council session. Use of tax increment financing will encourage urban renewal through private enterprise, which will further encourage economic growth in the District. Improvements will spur that economic growth and will help to create employment opportunities, as well as to increase the tax base of the City and other taxing jurisdictions. If the 65 properties in the District that are now abandoned or vacant were to become thriving enterprises or residential centers once again, the tax base would definitely increase. The former Montana Dakota Utilities plant has potential to become a site for ancillary medical services, which is ideal because the neighborhood is adjacent to two regional medical centers. The former Chevrolet dealership could house financial services back-office operations or a much-needed child care center. A medical services and a back-

office support operation could create as many as 400 new jobs. The incremental increase in tax base will be allocated for improvements within the District. Billings has a successful history of using TIF in the core of downtown, and the TIF tool has been met with enthusiasm from local property owners. A variety of private landowner investments have been identified which will no doubt greatly expand the tax base. Pedestrian and greenspace enhancements will buffer manufacturing uses from residential uses, with the added benefit of increasing property values.

D.3. PROMOTE A VIBRANT, EQUITABLE, HEALTHY COMMUNITY. The necessary first step to redevelopment of the District is to alleviate contamination concerns affecting residents, business owners and developers. Assessment funds will help to alleviate these concerns by identifying contaminated sites for cleanup as well as determining that certain sites suspected of contamination are, in fact, safe and ready to be re-developed. Big Sky EDA envisions a vibrant healthy community, and subscribes to Smart Growth principles. The Urban Renewal Plan calls for redevelopment that accounts for urban systems and components that interact, link, or travel through the different land uses within the District. Specifically, the Plan urges pedestrian links from the downtown core through the District toward the MetraPark entertainment complex, noting that these links will transverse many land uses. The Plan also encourages that redevelopment efforts consider ways to buffer manufacturing uses from residential uses. One important desire reflected by stakeholders involved in the Plan is that improvements to the area include mixed-use development, with a mixture of housing types close to places of employment. This creates a “live-work” environment where current residents remain welcome, rather than a gentrification of the neighborhood, and is also conducive to conservation of resources such as fuel, auto purchases, and other commodities.

Urban Plan developers brought forth transportation and pedestrian circulation as issues that should be a major focus during redevelopment of the area, noting that traffic patterns and access issues can affect the function and livability of a community or neighborhood. Stakeholders recommended that two of the major streets in the District be changed from one-way streets to two-way streets. Participants said that the wide one-way streets create a “highway-like” atmosphere, precluding pedestrians from safely crossing streets, and encouraging “drive-through” traffic that discourages visitors or patrons from stopping in the District. The Plan advocates for safe and attractive pedestrian amenities, such as sidewalks, boulevards, crosswalks, improved signage, and shelters or benches to enhance experiences for those using mass transit.

The Urban Renewal Plan conforms to the City-County Growth Policy Plan, and especially meshes with three relevant Growth Policy goals: (1) An economically and culturally vibrant Downtown Billings; (2) More housing and business choices within each neighborhood, to improve the quality of life, encourage more live-work environments, reduce commuting and drain on natural resources, and develop more self-contained neighborhoods; and (3) Rational consideration of all city neighborhoods and county town sites for public funds expenditures, with objectives to identify and prioritize neighborhood needs, empower the public to provide direction on capital improvements expenditures, and leverage public funds with other resources.

The Urban Renewal Plan states that the design guidelines for each land use within the district shall take into account and consider, at a minimum, the following specific systems and urban elements: building placement and orientation; lot size and setbacks; open space; vehicular circulation; pedestrian circulation; accessibility; streetscape; utilities and infrastructure; sidewalk treatments; landscaping; fences and walls; grading; storm water management; refuse and storage; outdoor lighting; signage.

With an inventory of possible brownfields in the Urban Renewal District, redevelopment proponents will be armed with the knowledge to communicate with property owners and other stakeholders who participated in development of the Urban Renewal Plan. Moreover, active communication lines were

established during development of the Plan, between and among property owners, business operators, community groups, architects and engineers, city and county officials, neighborhood task force groups, and revitalization proponents. Cooperation and collaboration during development of the Plan generated enthusiasm and commitment to moving forward with the next steps in reuse and redevelopment of the East Downtown Urban Renewal District. Meetings about this brownfields assessment application between Big Sky EDA personnel and property owners revealed that the owners recognize that sustainable, environmentally sound practices are the standards by which to operate, especially if they one day wish to sell their properties. Simply put, if the property owners want to redevelop their sites themselves or sell their properties to others for redevelopment, environmental contamination needs to be dealt with AND prevented from occurring again.

E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose *(a maximum of 5 points may be received for this criterion)*

The Urban Renewal Plan for the East Downtown District advocates for creation of park and greenway facilities in the District, noting that currently there is only one City Park in the vicinity, on the north boundary of the District. The sidewalks in the District – when they exist at all – are deteriorated. This brownfields assessment grant would help to determine where within the District redevelopment efforts might find the best locations for creating public green space and walkways, and best corridors for extending the Heritage Trail multi-use paths now under construction throughout the Billings area. There are no publicly-owned lands available for green space, but some of the vacant properties might be ideal candidates for linear parks or trail connections. Locations where stormwater runoff is an issue might be considered for wetlands-type parks along the trails. Since the District lies within the City limits of Billings, any new parks and recreation facilities would be included in the regular facilities management and maintenance plans for the City, typically funded through creation of a park maintenance district.

F. Pre-Award Community Notification *(a maximum of 12 points may be received for this criterion)*

F.1. COMMUNITY NOTIFICATION. Big Sky Economic Development Authority participated in a Billings Brownfields Task Force meeting hosted by personnel from the Montana Department of Environmental Quality, and then met with a group of property owners who operate businesses in the District. Those property owners expressed support for moving forward to access brownfields assessment monies. Big Sky EDA then scheduled three public outreach sessions to which it invited the general public as well as business owners, city officials, stakeholders who participated in development of the Urban Renewal Plan, and other community groups. The first two evening meetings took place on October 26, 2006 and November 2, 2006, in the Billings Community Center, which is located just one block from the District boundary. The third meeting was a Brownfields Open House hosted at the Big Sky EDA conference room from 4:00 until 6:00 p.m. on September 11, 2007. Invitations took the form of email messages, phone calls, and a press release to the city's only daily newspaper, *The Billings Gazette*, as well as to the Associated Press and other print and electronic media outlets. In addition to the *Gazette* announcement, notice of the meetings was also published in the weekly *Yellowstone County News*. Big Sky EDA, in hosting the three public meetings prior to proposal submittal, provided copies of this draft application requesting EPA funds within the newly-created East Downtown Tax Increment District. At each meeting, Big Sky EDA reviewed the main objectives of the applications, provided time for oral comments, and provided hand-outs upon which written comments were invited. Betsy Hovda of the Montana Department of Environmental Quality attended both the October 26th public meeting and the September 11th Open House to share expertise and answer questions about brownfields programs. The draft proposal was also available on Big Sky EDA's website for review; comments were encouraged and could be emailed, sent via the US Postal Service, or hand delivered to EDA staff.

Should EPA Brownfields funding be awarded to Big Sky EDA, we will publicize and hold four public meetings to explain opportunities for assessment of hazardous contamination. In addition to press releases, email messages and phone calls, we plan to mail via U.S. Postal Service notices of meetings to property owners and residents in the targeted East Downtown Urban Renewal District (the District).

F.2 NOTIFICATION IN THE MOST APPROPRIATE WAY. Big Sky EDA believes that use of multiple notification methods – print, electronic, phone, and postal mail – is most effective and appropriate in reaching community members in the targeted District, because some people don't read newspapers, while others do not have electronic communication avenues. Moreover, information has been and will be disseminated through the property owners group, the Billings Industrial Revitalization District (*BIRD*) as well as through the North Park Neighborhood Task Force.

It is appropriate to communicate in English, the language of the District and of the broader community. In Yellowstone County as well as in the East Downtown Urban Renewal District census tract, 95 percent of the population age five years and over speaks only English at home (3,180 people out of 3,363 in the tract). In the tract, 183 of the 3,363 people over age five (5%) speak a language other than English at home; of those 183 people, 157 (86%) speak English well or very well and 26 speak English, but not well (14%). Zero people indicated that they do not speak English at all. (*Source: Census 2000 Summary File 3, U.S. Census Bureau 2002, www.census.gov 02DEC02.*)

F.3. COMMENT PERIOD. Big Sky EDA accepted comments beginning on October 25th, 2006, when the draft Brownfields proposals were first posted on the organization's web site, and again beginning September 11, 2007 for 30 days. We specified that comments were encouraged and would be accepted until the final proposals would be prepared for submittal to EPA. Should EPA award Brownfields funding to Big Sky EDA, we will continue to solicit community input, and will allow at least 30 days for public comment on Brownfields assessment activities and plans. Prior to submission of this proposal, Big Sky EDA employed outreach through press releases, phone calls, email messages, meetings with property owners, and public meetings. If Brownfields funding is awarded to Big Sky EDA, we will, in addition to previous outreach methods, employ the U.S. Postal Service to deliver meeting notices to property owners and residents within the targeted District.

F.4. ADDRESSING COMMENTS RECEIVED. During the pre-award comment period, we received four written comment sheets during public meetings, and visited that evening with the comment writers. Two of the writers requested that they be listed as cooperating partners in accomplishing Brownfields assessments in the District; three requested to be added to our email update list; and one inquired about including adjacent properties during an assessment process. Big Sky EDA will collaborate with contracted professionals and the Brownfields Steering Committee to individually address each comment received. Responses to comments will include a phone call, a personal visit, or a letter, as appropriate. Comments received post-award will become integral to planning assessment activities and developing cleanup and re-use plans. If selected for EPA Brownfields funding, Big Sky EDA is prepared to summarize major comments received and its responses to those comments.

G. Ongoing Community Involvement (*a maximum of 16 points may be received for this criterion*)

G.1. PLAN FOR INVOLVING THE AFFECTED COMMUNITY. Along with property owners and governing entities, organizations such as the North Park Neighborhood Task Force, the Yellowstone Valley Citizens Council (an environmental advocacy group), the Billings Industrial Revitalization District (property owners within the District), the Housing Authority of Billings, the Downtown Development Corporation, the Yellowstone City-County Health Department, BikeNet (a pedestrian-bicycle advocacy group), MusEco Music and Education Project, the Yellowstone County Historic Preservation Board, architectural and engineering firms, developers, and the general public have been and will be encouraged to participate in decisions about cleanup plans and reuse opportunities.

Should EPA brownfields funding be made available to Big Sky EDA, community development staff will continue seeking input from stakeholders who developed the Urban Renewal Plan, as well as from additional interested citizens and groups. Big Sky EDA will execute community notification plans no later than September 12, 2008.

Community involvement activities that have already taken place over the past two years include meetings with community stakeholders, including business and property owners, neighborhood task forces, city elected officials and city staff to develop the Urban Renewal Plan, of which brownfield assessment and cleanup was an integral part. In addition, three public meetings about this application took place (October 26, 2006, November 2, 2006, September 11, 2007). As the further refinement of development opportunities begins to take shape, Brownfields re-use will play a major role. Big Sky EDA has budgeted for at least four education and outreach meetings in order to invite participation from property owners, and to follow up with results of testing and develop cleanup plans. Methods of invitation to public meetings will include postal mailing, e-mail lists, media advertising, phone calls and press release announcements. Big Sky EDA will periodically review and assess communication efforts and strategize ways to involve more stakeholders.

G.2. DEVELOPING PARTNERSHIPS. Early in the planning stages for revitalization of East Downtown, Big Sky EDA relied on partnerships with property owners and other stakeholders in the District, along with City of Billings and Yellowstone County officials, to collaborate for the good of the community and the area. Local stakeholders were the driving force in development of the Urban Renewal Plan for the District, and Big Sky EDA has invited input and participation from those local stakeholders as well as additional community groups. On the state level, Big Sky EDA contacted the State of Montana's Department of Environmental Quality to discuss plans for brownfields assessment dollars through EPA, and to learn more about eligibility and allowable activities. Big Sky EDA also invited Montana DEQ personnel to participate during the pre-application public meetings.

G.3. COMMUNICATING BROWNFIELDS PROGRAM PROGRESS. Big Sky Economic Development Authority is committed to a successful information and outreach strategy that invites community cohesion and encourages community involvement. Big Sky EDA will communicate the progress of the brownfields assessment activities by means of e-mail lists, press releases, phone calls, and public meetings. One or more of those meetings is likely to include a walk-through of redevelopment opportunities within the District. The Billings Industrial Revitalization District (BIRD), the local non-profit organization comprised of more than 60 business and land owners, is also a major vehicle by which to disseminate information. In Yellowstone County as well as in the East Downtown Urban Renewal District census tract, 95 percent of the population age five years and over speaks only English at home (3,180 people out of 3,363 in the tract). In the tract, 183 of the 3,363 people over age five (5%) speak a language other than English at home; of those 183 people, 157 (86%) speak English well or very well and 26 speak English, but not well (14%). Zero people indicated that they do not speak English at all. (*Source: Census 2000 Summary File 3, U.S. Census Bureau 2002, www.census.gov 02DEC02.*) Therefore, it is appropriate to communicate in English, the language of the District and of the broader community.

G.4. COMMUNITY-BASED INVOLVEMENT. The organizations listed below are involved with Brownfields reuse and redevelopment planning:

Billings Chamber of Commerce (member association promoting Billings); John Brewer,
President/CEO, 406-245-4111

Housing Authority of Billings (nonprofit affordable housing advocacy group and provider); Lucy
Brown, Executive Director, 406-245-6391

Billings Public Schools (K-12 school district); Jack Copps, Superintendent, 406-247-3777

Billings Industrial Revitalization District (nonprofit property owners association); Gordon Tryan, President, 406-259-4008

Billings Association of Realtors, Inc. (professional association); Frosty Erben, President, 406-248-7145

High Plains Architects, P.C. (commercial firm dedicated to green building practices); Randy Hafer, A.I.A., President, 406-896-0255

Downtown Billings Partnership, Inc. (nonprofit group operating TIF District, promoting downtown redevelopment and revitalization); Greg A. Krueger, Executive Director, 406-294-5060

Beartooth Resource Conservation and Development Area, Inc. (Certified Regional Development Corp.; Economic Development District); Chris Mehus, Brownfields Program Coordinator, 406-962-3914

Foundation for Community Vitality (nonprofit advocacy group); Lynda Moss, Executive Director, 406-254-8970

MusEco Media and Education Project (nonprofit environmental/sustainable development advocacy group); Kristen Prinzing, Director of Operations, 406-294-2260

CTA Architects Engineers (commercial firm dedicated to green building practices); Gary Sievers, Project Manager, 406-728-9522

Montana State University – Billings (public university); Ronald P. Sexton, Ph.D., Chancellor, 406-657-2300

Downtown Billings Association (membership association); Lisa Harmon, Executive Director, 406-259-5454

H. Reduction of Threats to Human Health and the Environment *(a maximum of 26 points may be received for this criterion)*

H.1. ADDRESSING THREATS TO HUMAN HEALTH AND THE ENVIRONMENT. Brownfields funding will allow for the assessment of properties that have perceived impairment that prohibits them from being redeveloped or fully utilized. This critical funding will enable confirmed sources of contamination to be properly managed. These sites will be enrolled in the state voluntary cleanup program to assure compliance with applicable regulations and requirements, and to receive a recordable “no further action” certificate that will enable redevelopment. The end result will be the elimination of a contaminate source that threatens the community. Assessments will consider:

- *Safety* (e.g. abandoned and derelict structures, open foundations, other infrastructure or equipment that may be compromised due to lack of maintenance, vandalism, deterioration, controlled substance contaminated sites (i.e., methamphetamine labs), or abandoned refinery sites)
- *Social and economic factors* (e.g. blight, crime, vagrancy, reduced social capital or community 'connectedness', reductions in the local government tax base, and private property values that may reduce social services)
- *Environmental health* (e.g. environmental dangers that may be biological, physical, or chemical, and can be the result of site contamination, groundwater impacts, surface runoff, migration of contaminants, or wastes dumped on sites)

Brownfields funding that allows development of cleanup plans to remedy contaminated sites will bring the District closer to proposed end uses in the District, including mixed use developments as advocated in the Urban Renewal Plan. Brownfields funding will facilitate evaluation of some of the 65 vacant properties within the District, making those properties more attractive to redevelopment efforts, and leading to reduction in vandalism, blight, vagrancy and crime. Brownfields funding will also reduce costs for those property owners that are engaged in the Billings Industrial Revitalization

District (*BIRD*) activities, thus encouraging them to invest private dollars in redevelopment of their own business enterprises.

H.2. WORKING WITH STATE ENVIRONMENTAL AUTHORITY AND PUBLIC HEALTH DEPARTMENT. Big Sky Economic Development Authority personnel participated in a “Billings Brownfields Task Force” meeting during which representatives of the Montana Department of Environmental Quality (DEQ) reviewed opportunities for addressing brownfields issues. Community development staff has kept in contact with Montana DEQ personnel in seeking advice and support for this assessment application, and was pleased to include Betsy Hovda from the Montana DEQ office on its agenda for two of the public outreach sessions regarding this application. On the local level, Big Sky EDA has met with the Yellowstone City-County Health Department to apprise them of the opportunity to assess possible brownfields sites in the area east of downtown, and to seek the Department’s guidance and cooperation to ensure protection of human health and consideration of public health issues throughout the project. Ted Kylander, Director of Environmental Health, participated in the September 11, 2007 public meeting, and the Department has committed to have at least one person serve on the Brownfields Steering Committee.

Because it is likely that many of the properties that are found to be contaminated will need to move through the Montana Voluntary Cleanup Program (VCP) in order to obtain regulatory closure, we will work directly with Montana DEQ staff involved with the VCP. In addition, Big Sky EDA will select an environmental contractor that is knowledgeable about and experienced with the Montana VCP process, and will work with the contractor to assure that proposed assessment activities result in the collection of data necessary to prepare technically-sound cleanup plans.

I. Leveraging of Additional Resources (*a maximum of 10 points may be received for this criterion*)

I.1. COMMITMENT TO MEET ASSESSMENT NEEDS. Big Sky Economic Development Authority will commit in-kind staff time to accomplish assessment tasks not met through the EPA brownfields grant. Executive Director Joe McClure and the Community Development team carry out Big Sky EDA’s mission to facilitate business that supports our community and quality of life, and will see the brownfields project through to completion. Staff members, whose time is valued at \$65 per hour, will organize and publicize meetings, contact stakeholders and media, coordinate with EPA and Montana DEQ, provide contractor oversight, respond to public comments and concerns, and collaborate with cooperating partners and local government officials to advance the project. While Big Sky EDA itself cannot commit Tax Increment Financing (TIF) District funds, those funds are designated for redevelopment and revitalization in the very District where the Brownfields project is proposed to occur. In a process driven by property owners who are members of the Billings Industrial Revitalization District (*BIRD*), TIF District funds will certainly be directed toward desirable end uses in the District.

I.2. ABILITY TO LEVERAGE FUNDS. Big Sky Economic Development Authority has a history of successfully leveraging funds from a variety of sources. The agency is funded in part through Yellowstone County mill levy dollars, and is supported as well through private business partners – the Big Sky Economic Development Corporation – that choose to invest in promoting a vibrant, healthy economy for the area. Big Sky EDA has, for the past 18 years, successfully garnered and leveraged Federal funds for economic development projects, and will continue to seek all appropriate funding sources to help revitalize East Downtown. Big Sky EDA is confident that local dollars will be readily available should additional funding be needed to complete the brownfields assessment process for the East Downtown Urban Renewal District. We will coordinate the use of EPA Brownfields funding with planning dollars that are pending through the U.S. Department of Commerce Economic Development Administration (EDA). An EPA assessment grant would

complement not only the EDA funds, but also the redevelopment activities funded through the Tax Increment Finance District program.

J. Programmatic Capability (a maximum of 20 points may be received for this criterion)

J.1. ABILITY TO MANAGE THIS GRANT SUCCESSFULLY. Big Sky Economic Development Authority has the ability to manage a brownfields grant, and will contract with a professional firm to complete assessment activities and to assist with education and community outreach endeavors. Big Sky EDA’s personnel, including the executive director, community development team and controller, are experienced in managing a variety of community projects. The community development team includes Steve Zeier, whose degree in environmental studies is from Montana State University-Billings. Zeier will bring this environmental expertise to managing the Brownfields project, along with knowledge gained through earning his Master’s degree in Planning from Kansas State University. Rebekah Wales, who earned her Juris Doctorate from University of Alabama, brings legal expertise to the team. Community development veterans Dianne Lehm and Patty Nordlund have applied for and administered grants from the U.S. Department of Commerce, NASA, FEMA, Department of Energy, SBA, HUD, and Department of Homeland Security.

J.2. HISTORY OF MANAGING FEDERAL FUNDS. Big Sky Economic Development Authority has demonstrated a history of successfully managing federal funds, as summarized in the table below. Big Sky EDA has not ever experienced any adverse audit findings from an OMB Circular A-133 audit or audits conducted by the U.S. General Accounting Office. Big Sky Economic Development Authority has not ever been required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

<u>Fiscal Year/s</u>	<u>Amount</u>	<u>Department/Program</u>	<u>Use of Funds</u>
1993 - present	\$500,000/yr	Dept. of Defense, DLA	Procurement Technical Assistance Program
1999-2004	\$200,000	Small Business Admin.	Business Information Center
1999	\$900,000	NASA	Business incubator for NASA technology
1999	\$1,000,000	Dept. of Commerce, EDA	Infrastructure for business park
1999	\$350,000	Dept. Of Energy	Fuel Cell research and analysis
2000	\$298,000	Dept. Of Energy	Fuel Cell research and analysis
2001	\$350,000	Dept. Of Energy	Fuel Cell research and analysis
2002	\$870,601	Dept. Of Energy	Fuel Cell research and analysis
2004	\$894,690	HUD-EDI Special Projects	Economic Development outreach
2005	\$694,400	HUD-EDI Special Projects	Economic Development outreach
2006	\$396,000	HUD-EDI Special Projects	Economic Development outreach

J.3. PRIOR EPA BROWNSFIELDS AGREEMENTS. Not Applicable; Big Sky Economic Development Authority has *not* previously been a recipient of EPA Brownfields cooperative agreement funding.

J.4. TRACKING AND MEASURING PROGRESS. If selected for funding, Big Sky EDA plans to rely on its Brownfields Steering Committee to track and measure progress. Once inventory and prioritization of sites takes place, the Committee will review metrics regarding expected numbers of Phase I and Phase II assessments, along with a reasonable timeline for completion of each task. The Committee

will track progress through weekly written reports from contractors completing the assessment activities, and will hold regular Steering Committee Meetings to assure progress toward stated outcomes. Outputs that will definitely be measured include:

Accomplishment:	Measurement:
Public Outreach & Education Meetings	4 public meetings
Postal Service mailings to District residents/property owners	2 post cards or flyers
Newspaper display ads	2
Education for at least 2 staff at Brownfields Conference	1 conference
Preparation of educational Brownfields fact sheets	1
Update Big Sky EDA web site with pertinent Brownfields project information	At least once per month
Summarize and respond to all public comments	Respond to 100% of comments received
Accomplishment:	Measurement:
Phase I Assessments	At least 12 sites
Phase II Assessments	Up to 5 sites
Identify cleanup options and costs for each site as appropriate	Up to 5 sites
Identify redevelopment options for each site	Up to 5 sites

Big Sky Economic Development Authority, should it be awarded EPA Brownfields funds through a cooperative agreement, will submit quarterly progress reports to the EPA Project Office within thirty days after each reporting period. These reports shall cover work status, work progress, difficulties encountered, preliminary data results and a statement of activity anticipated during the subsequent reporting period. A discussion of expenditures along with a comparison of the percentage of the project completed to the project schedule and an explanation of significant discrepancies shall be included in the report. The report shall also include any changes of key personnel concerned with the project.

Additionally, Big Sky Economic Development Authority agrees to submit to the EPA Project Officer a final report at the close of the grant. The final report will address goals and objectives, performance measurements, and lessons learned, along with information about any other resources leveraged during the project and how they were used.

Please see attachments as follows:

1. Letter from the Yellowstone County Attorney's Office regarding jurisdictional character of Big Sky EDA.
2. Letter of acknowledgement from the Montana Department of Environmental Quality.
3. Letters of support.
4. Public meeting publicity.
5. Public comment sheets.
6. Public participation sign-in sheets.
7. Maps.