

Draft Brownfields Cleanup Grant Application for the Harlowton Roundhouse and Railyard

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields:

When the last Chicago Milwaukee St. Paul and Pacific (Milwaukee Road) train passed through Harlowton's Railyard in 1979 it signaled an end not only to the largest employer but also to the economic vitality of Harlowton and surrounding areas. Since that time, the population has dwindled from a peak of 1730 to 973. Unfortunately, the effects of the Milwaukee Road's bankruptcy in 1979 is still evident today in the shuttered main street store fronts and closure of the national historic registered Graves Hotel. The limited and ageing housing inventory, lack of public greenspaces, and a failing downtown discourages the establishment of new businesses, the attraction of younger families, and the retention of Harlowton's youth. Most importantly the lack of public greenspaces/Health-fields are affecting the mental and physical welfare of Harlowton's most venerable (the young and old) age groups.

In addition to the largest economic driver disappearing, the Milwaukee Road's bankruptcy burdened the City of Harlowton with the contaminated 180-acre nationally registered Milwaukee Road Historic Rail District and Roundhouse (Railyard). The community views the 180-acre Railyard as its largest untapped asset. Left unaddressed, the 180-acre contaminated Railyard will continue to undermine social cohesion, economic stability and property values, which in turn, reduces local tax revenues. This environmental stigma is preventing investment in the area out of fear of environmental liability. Unlike other states, Montana has not adopted the liability protections of the Brownfield Act for bona fide prospective purchasers. As such, investor developers have significant concerns about acquiring contaminated property. The cleanup, redevelopment, and restoring of public access to this City-owned 180-acre green-field/Health-field would reestablish the historic Railyard and prior wetlands; provide miles of trails along the Musselshell River; open 20 acres to the development of affordable and workforce housing; and would bring back tourism, investment, and families to our community.

1.a.ii. Description of the Brownfields Site(s) - The City of Harlowton involuntarily acquired 180-acre Milwaukee Road railroad property, historic buildings, and railroad structures through bankruptcy in 1979. Shortly after that a group of Harlowton residents successfully petitioned for the Milwaukee Road Historic District to be listed in the National Register of Historic Places. Unfortunately, for Harlowton's 973 residents, the thought of addressing the multimillion-dollar cleanup was beyond daunting. Since 2015, DEQ's Brownfields program has partnered with the City to apply for and receive over \$1,948,338 in Montana assessment and cleanup grants to investigate and remediate the 5-acre free-product petroleum plume which is bound by a residential neighborhood to the north and a wetland/tributary of the Musselshell River to the south. These investigations have also discovered approximately 3,500 cubic yards of asbestos debris and metals impacted soils within the 100-year floodplain and directly to the east of the historic 15,000 ft² roundhouse. The historic roundhouse (last remaining Milwaukee Road roundhouse in Montana) has also been assessed through a Snowy Mountain Development Corporation's (SMDC) EPA Brownfields Assessment Grant. The lead paint and asbestos abatement of these historic rail structures is estimated at \$366,000. Current cleanup cost estimates for the Railyard's petroleum, asbestos, and heavy metals contamination are approaching \$2.5 million. In 2017, the City also received a Montana Department of Natural Resources and Conservation (DNRC) planning grant

which allowed the Harlowton residents to illustrate their vision for the transformation of the contaminated Railyard into a protective wetland and nature-trail system.

1.b. Revitalization of the Target Area:

1.b.i. Reuse Strategy and Alignment with Revitalization Plans – The 2017 DNRC-funded community reuse strategy for the Harlowton Railyard protects the Musselshell river floodplain and allow the community to restore the former wetlands; create a regional nature trail/Health-field that expands the existing community trail system with historical railroad signage; provide public access to miles of once restricted Musselshell River shoreline; and allow for the redevelopment of the 15,000 ft² historic roundhouse into a community event center. The success of the 2017 wetland/nature park visioning session inspired the community and DEQ to apply for \$20,000 EPA Small Community Assistance (SCA) grant in 2019. The 2019 SCA grant has been combined with \$20,000 from Snowy Mountain Development Corporation’s (SMDC) Brownfields Assessment grant to pay for the creation of a 2021 Redevelopment Concept Plan for the entire 180-acre rail property. The 2021 redevelopment plan will expand on the 2017 wetland/nature park restoration plan and integrate the community’s and local government’s desire to increase public access to green spaces/Health-fields, attract investment and tourism to their community, and create affordable housing. The 2020 redevelopment plans will provide redevelopment and financial feasibility alternatives for creative reuse alternatives such as a community event center in the 15,000 ft² Roundhouse, a nature learning center in the former foreman’s office, and new affordable housing, bike/skate parks and even a community amphitheater within the 180-acre property. Harlowton residents now see the 180-acre rail property as an untapped resource to attract new businesses, families, and investment into their struggling community.

1.b.ii. Outcomes and Benefits of Reuse Strategy – The cleanup of the Harlowton Railyard will likely generate 5 cleanup and 20 redevelopment jobs observed at similar sites in Montana and will stimulate:

An increase in Health-fields and recreational opportunities:

- The cleanup of the 5-acre railyard will allow public access to 180 acres of formerly closed public lands and miles of historical railroad signage/interpretive trails within the proposed wetland/nature trail. This amounts to the generation of about 30 acres of green-space/Health-fields for every acre of brownfields cleaned up.
- The removal of contaminants from the Railyard will reduce aggravated health conditions in Harlowton’s most sensitive populations.
- Two of Montana’s leading skatepark foundations are interested in using the cleanup’s excess clean excavation overburden to create a world class skate park for the youth of Harlowton.

An increase in affordable housing:

- The City has designated 20 acres of clean rail property, that abuts existing city infrastructure (e.g. seware, water, electricity) and the proposed wetland/nature trail, as the potential location of new and much needed housing.

Increased community investment:

- The Harlowton Brewery plans to use excess excavation overburden and the Opportunity Zone to attract investment in a community amphitheater for its 3-year-old summer concert series.
- The Opportunity Zone designation will facilitate the restoration of the Roundhouse and foreman’s office into a community event and learning center, which will significantly increase tourism.

- Restoration of the 180-acre Railyard is also expected to result in an increase property values of blighted structures and adjacent properties by as much as 12.8% (Estimating the Impacts of Brownfield Remediation on Housing Property Values. 2012.), which will help Harlowton maintain its "rural character" while strengthening the local economy;

1.c. Strategy for Leveraging Resources:

1.c.i. Resources Needed for Site Reuse – Since 2015, The City of Harlowton and DEQ have been partnering to apply for and receive multiple cleanup and redevelopment funds for the Historic Rail District. The inclusion of this EPA Brownfields Cleanup Grant will fill a crucial funding gap for the abatement of the historic structures, as hazardous building materials are currently not eligible under the existing State of Montana grants, and allow for the completion of the final phase of petroleum soil cleanup. To date, the City and DEQ have partnered in receiving the following:

- Harlowton’s 2017 DNRC \$15,000 wetland planning grant stimulated DEQ to combine its 2019 SCA grant (\$20,000) with SMDC’s Brownfields Assessment grant (\$20,000) for a 2021 Redevelopment Concept Plan for the entire 180-acre city-owned rail property.
- The City, in partnership with DEQ, have been awarded \$1,755,000 in DNRC and DEQ funding for remedial investigations and cleanup of contaminated soils within the Railyard. This money is statutorily prohibited to address the lead paint and asbestos abatement of the historic Roundhouse, estimated to cost \$366,000. A Brownfields Cleanup Grant is critical to the rehabilitation of this historic community asset.
- In 2019, the City was awarded \$125,000 in state funding to implement the 2017 wetland/nature park restoration plan, post cleanup.
- The City has applied for a 2021 Montana Historic Preservation Grant (\$500,000) to assist in the preservation of the last remaining Milwaukee Road Roundhouse in Montana. If funded by the MT Legislature, this grant will repair the exterior walls, windows, doors, and provide a weather tight enclosure so the Roundhouse could be open to the public. A feasibility study will also be conducted on possible Roundhouse redevelopment alternatives identified in the 2021 Redevelopment Concept Plan.

The above indicates the City and DEQ’s commitment in returning the 180-acre rail district into a community asset. In addition, the City and DEQ have identified the following additional funding opportunities to assist with the redevelopment of the historic Railyard.

- The community will apply to the local Bair Family Foundation and Callant Family Foundation for funding to help restore the historic Roundhouse and build the new wetland/trail system.
- The City will attract private investors, looking to reinvest unrealized capital gains, through the combination of historical preservation tax credits and the site’s Opportunity Zone status.
- Through development of six affordable housing developments across Montana, Homeward Inc. has used \$540,000 in Brownfields assistance (grants and loans) to leverage over \$10 million. Homeward is committed to using their expertise in leveraging funds to transform 20 acres of former rail property into affordable housing.

1.c.ii. Use of Existing Infrastructure - Harlowton’s historic rail district is located within city limits. Planning efforts to date for the redevelopment of the 180-acre rail district areas has emphasized the reuse of existing infrastructure (utilities, structures, and roads) and incorporation of green practices for any new infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2. a. Community Need

2.a.i. The Community's Need for Funding - The City of Harlowton (population of 997) is the County seat to Wheatland County located in Central Montana. Like many small rural Central-Montana communities, Harlowton has absolutely no room in its dwindling budgets for anything other than basic services. This results in the stagnation of redeveloping its key Brownfields assets. Central Montana has been besieged by severe drought in 2017 and severe flooding in 2018, which President Trump declared as Federal Disasters (4388-DR; 4405-DR). All were accompanied by Secretarial Disasters of crop losses, which rendered a staggering blow to self-employed farmers, businesses and residents in the region's farming-dependent communities. Field crops including wheat were severely damaged and the lack of feed for cattle forced ranchers to sell off livestock. Between 2010 and 2017, Wheatland County has seen a loss of 50 jobs and an employment growth of -6.5%. From 1990 to 2000 the average annual labor earnings has decreased by 25.5% or -\$8,262. In addition, 24.4% of residents are 65 or older and living on reduced incomes, 4.1% of the elderly live in poverty and 7% of them live by themselves (U.S. averages 1.4% and 3.6% respectively). To make matters worse, Wheatland County is currently experiencing a 12% unemployment rate as of April 2020 due to the COVID-19 crisis. The albatross the 180-acre contaminated Railyard represents to the community of Harlowton undermines social cohesion, economic stability and property values, which in turn, reduces local tax revenues. This Brownfields Cleanup grant will provide critical funding and allow this declining community to address the final phase of cleanup at the historic Railyard. Once the contaminated Railyard, and its associated stigma, has been addressed we will finally be able to attract new businesses, families, and investment into our struggling community.

2.a.ii. Threats to Sensitive Populations

2.a.ii. (1) Health or Welfare of Sensitive Populations: In Harlowton, 24.4% of residents are 65 or older and living on reduced incomes, 4.1% of the elderly live in poverty and 7% of them live by themselves (U.S. averages 1.4% and 3.6% respectively). This declining and aging community struggles with providing its low-income seniors and families with safe and adequate recreational amenities that would allow them to practice critical preventative exercise. In addition, Harlowton, has higher percentage of families that are Single Mother Households and living Below Poverty (6.4% vs 4.5% for the US) and a higher percentage (14.4%) of the population without health insurance compared to 9.4% for the US. The contaminated open spaces of the Railyard are a frequently trespassed attractive nuisance for the nearby low-income children due to their central location, river access, and proximity (less than 4 blocks) to Harlowton's elementary and high schools. Restoration of the Railyard will allow safe access to a mile of the Musselshell River along with other planned amenities such as bike/skate park and walking/bike paths to all of Harlowton's residents but will be an especially critical health/recreational outlet for low-income single parent families, individuals without health insurance, and our seniors.

2.a.ii. (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions - By addressing the contamination associated with the Harlowton Railyard, the City aims to provide cost effective and preventative options to address the largest health issues plaguing its citizens: Chronic Lower Respiratory Disease (COPD), health effects associated with a sedentary lifestyle, suicide, and limited healthcare facilities. The contamination at the City owned Railyard restricts access to 180 acres of prime publicly-owned river front and limits open-space recreational opportunities for critical preventative/lifestyle modifications. Wheatland County incidents of COPD (12%) is not only the highest in Montana but nearly double that of the U.S (6.4%). Sedentary lifestyles result in heart disease being the leading cause of death for all Montanans at

21.6%. Sedentary diseases affecting Wheatland county include 45.8% of adults diagnosed with high cholesterol; 43.5% of adults diagnosed with high blood pressure; 26.4% of adults are considered obese; 12.3% diagnosed with diabetes; and 9.29% adults reporting asthma. Cumulatively Wheatland county has the highest percentage of adults reporting seven or more days of poor health at 28.29%. Conversely, increases in exercise has been directly tied to improvements in COPD, heart disease, blood pressure, obesity, diabetes and has been shown to improve mood, reduce anxiety, and enhance self-esteem. While the cleanup of the Railyard will not magically increase the number of primary care physicians, it will increase available medical services, housing opportunities, small business investment, jobs, and safe recreation spaces for the city of Harlowton. The transformation of the contaminated Railyard into a safe 180-acre open space/Health-fields will provide this socially and economically depressed community cost-effective and proactive solutions to combat Harlowton’s largest health issues.

2.a.ii. (3) Disproportionately Impacted Populations – The elderly and low-income youth of Harlowton are disproportionately exposed to health impacts from the historic Railyard and substandard housing conditions prevalent in Harlowton. Compounding these impacts was the lack of local governmental policies or planning efforts, which allowed these hazardous historic operations to be located adjacent to valuable community natural resources and residential areas. The historical planning practices, which sited the former Railyard along the shoreline of a centrally located recreational waterway, has disproportionately impacted underprivileged residents of Harlowton. These shorelines are frequently trespassed due to their central location, proximity to schools, and natural splendor. However, it is the underprivileged residents (especially children) who are more often exposed to the petroleum, asbestos, and heavy metal contamination in the soils, groundwater, and surface water as they do not have the means to recreate away from the city center. This Cleanup grant will allow Harlowton a mechanism to provide their sensitive or at-risk populations with access to free and safe recreational open-space.

2.b. Community Engagement

2.b.i. & 2.b.ii. Harlowton Railyard Cleanup Brownfields Partners and Roles – As described in Section 1.a.ii, the City and MT DEQ’s Brownfields Program have been working closely on the cleanup of the Railyard since 2015. Through our efforts we have included a local wetland stakeholder group; Snowy Mountain Economic Development Corporation (a regional Brownfields grantee); affordable housing and trails/open space organizations; and state natural resource experts.

List of Key Montana Brownfields Project Partners:

<u>Partner Name</u>	<u>Point of contact</u>	<u>Specific role in the project</u>
The City of Harlowton	Paul Otten, Mayor, 406-563-5259, ctyharlo@itstriangle.com	Owner and Brownfields Cleanup Grant Applicant
Harlowton Wetland Citizens Group	Lauri Tieg, Community Organizer, 406-749-3899, lteig@live.com ,	Providing local input into wetland redevelopment plan
DEQ’s Brownfields Program	Jason Seyler, Brownfields Coordinator, 406-444-6447, jseyler@mt.gov	Provide state-wide Brownfields outreach and grant expertise
Snowy Mountain Development Corporation	Kathie Baily, Executive Director, 406-535-4663, bailey@snowymountaindevelopment.com	Economic development organization and Harlowton Railyard Concept Plan funding partner.
Montana Dept. of Natural Resources & Conservation	Heidi Anderson-Folnagy, Grant Manager, 406-444-6691, handersonfolnagy@mt.gov	Provides grant funding and technical expertise
Homeword, Inc.	Andrea Davis, Executive Director, 406-532-4663, Andrea@homeword.org	Provides expertise as a State-wide affordable housing developer

2.b.iii. Incorporating Community Input: The local community, project partners, and interested citizen groups with ownership of this project have already been heavily involved in cleanup and reuse planning. The City and DEQ recently launched a ArcGIS HUB community engagement webpage (<https://harlowton-railyard-mtdeq.hub.arcgis.com/>) where the public can learn and share comments on the activities occurring at the Railyard. Starting on October 1, 2020, the City used the HUB webpage, along with an October 13, 2020 community meeting, to solicit feedback on the draft EPA Brownfields Cleanup Grant application and Analysis of Brownfields Cleanup Alternatives. Recent community participation has also been focusing on the Small Community Assistance grant funded redevelopment Concept Plan which was started in March of 2020. Despite meeting restrictions due to COVID-19, the Concept Plan's consultant has been having one-on-one discussions with numerous local stakeholders and business groups to solicit their vision and feedback on the cleanup as well as the redevelopment of the 180-acre rail property. Since cleanup started at the Railyard in 2015, DEQ and the City has hosted numerous open houses, city council updates, walking tours, and stakeholder visioning sessions providing updates on the environmental investigation and cleanup progress. Moving forward with cleanup planning, implementation, and Concept plan development, the City will continue robust community engagement, including (1) stakeholder and small group outreach (e.g., to the Harlowton Wetland Citizens Group); (2) at least two public meetings/open houses or virtual meetings during the cleanup process; (3) a continuation of one-on-one and virtual community meetings for the redevelopment Concept Plan; (4) update the ArcGIS Hub community engagement web page dedicated to this project that will host cleanup updates/presentations and allow for the solicitation of public feedback; and (5) outreach to the local media.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The Harlowton Railyard is listed as a State Superfund Site by DEQ; contamination includes petroleum, heavy metals, and asbestos debris in the soils as well as hazardous building materials in structures. Prior to excavating the subsurface petroleum contamination, the City will first excavate and dispose of approximately 3,500 cubic yards of overlying heavy metals/asbestos contaminated soil. The asbestos and heavy metals cleanup is funded through a DEQ Orphan Share Account grant which will serve as match to the EPA Brownfields cleanup grant. The Brownfields grant will then allow the City to hire licensed contractors to abate the 15,000 ft² Roundhouse and excavate and dispose of 6,500 cubic yards of petroleum contaminated soils at the Railyard's existing permitted landfarm. All tasks will be directed and overseen by DEQ's Brownfields Program ensuring that the cleanup meets all DEQ and EPA standards for recreational reuse and are designed to result in the delisting from the State Superfund program. We anticipate completion of a Cooperative Agreement with EPA in September of 2021; cleanup planning and workplan approval in March 2022; asbestos abatement will commence in the spring while soil excavation will wait until the water table is at its lowest in the fall; final reporting will occur in the winter of 2022 and the delisting process could begin as early as spring of 2023 (see Table 3).

Table 1. Harlowton Roundhouse Implementation Schedule

	2021 Q2	2021 Q3	2021 Q4	2022 Q1	2022 Q2	2022 Q3	2022 Q4	2023 Q1	2023 Q2
EPA Cleanup Grant Award Notice									
Cooperative Agreement and Work Plan Complete									
Roundhouse Abatement and Soils Cleanup SOW and Bid Specs Development; DEQ Review and Approval									
Building Materials Abatement									
Soil Cleanup									
Reporting, DEQ Review and Approval									
Project Closeout									

3.B. Description of Tasks/Activities and Outputs:

Task/Activity: Community Engagement
i. Implementation <ul style="list-style-type: none"> Conduct community meetings to inform and obtain public feedback on cleanup plans and implementation. Develop and update the project web site and printed materials
ii. Anticipated Project Schedule: Community meetings and web page updates will occur throughout the project.
iii. Task/Activity Lead(s): The City and DEQ will use their combined expertise to oversee all task/activities
iv. Output(s): Three public meetings, small group outreach, the project website, and on-site outreach.

Task/Activity: Cleanup Planning
i. Implementation <ul style="list-style-type: none"> Based upon the numerous investigations at the Railyard and Roundhouse, the project’s Qualified Environmental Professional (QEP) will draft a cleanup plan for the abatement of the Roundhouse and the excavation of petroleum contaminated soils for DEQ’s review and approval.
ii. Anticipated Project Schedule: A DEQ approved cleanup plan can be completed by March 2022
iii. Task/Activity Lead(s): The QEP and DEQ will work cooperatively to produce an approved cleanup plan
iv. Output(s): A DEQ approved cleanup plan and a final Analysis of Brownfields Cleanup Alternatives (ABCA).

Task/Activity: Building Materials Abatement and Contaminated Soils Cleanup
i. Implementation <ul style="list-style-type: none"> Supervised or completed by the QEP, a licensed abatement contractor will remove and properly dispose of over 23,700 ft² of ACM and 8,000 ft² of lead-based paint (LBP) from the Roundhouse. A licensed contractor will excavate approximately 3,500 cubic yards of asbestos and heavy metal contaminated soils and dispose of them at a licensed landfill. (DEQ funded matching activity) A licensed contractor will excavate approximately 6,500 cubic yards of petroleum contaminated soils and dispose of them at a Railyard’s existing permitted landfarm. All remedial activities will be documented (including confirmation samples) in a DEQ approved Construction Completion Report.
ii. Anticipated Project Schedule: <ul style="list-style-type: none"> Hazardous building materials will be abated by June 2022 Soil excavations completed by December 2022 Final DEQ approval of the Construction Completion Report in March 2023.
iii. Task/Activity Lead(s): The QEP and DEQ will ensure the hazardous building materials abatement and contaminated soils excavation will be completed to DEQ and EPA standards.
iv. Output(s): <ul style="list-style-type: none"> A Roundhouse asbestos and LBP clearance sampling and abatement report.

- A DEQ approved Construction Completion Report indicating cleanup complete at the contaminated Railyard.

Task/Activity: Project Oversight	
i.	Implementation <ul style="list-style-type: none"> • The City will be responsible for oversight of the project and compliance with all state and federal requirements. Subtasks include procurement of a QEP consistent with federal regulations, quarterly reports, ACRES reporting, support for EPA Endangered Species Act and SHPO consultation, etc.
ii.	Anticipated Project Schedule: September 2021 to May 2023
iii.	Task/Activity Lead(s): The City with assistance from DEQ will be responsible for all oversight and compliance.
iv.	Output(s): Clear procurement records, quarterly reporting, ACRES reporting, and documentation of compliance with all Cooperative Agreement provisions.

3.c. Cost Estimates:

Budget Categories		Project Tasks				
		Task 1. Community Engagement	Task 2. Cleanup Planning	Task 3. Roundhouse Abatement and Soil Cleanup	Task 4. Project Oversight	Total
Direct Costs	Personnel	\$1,508			\$3,770	\$5,278
	Fringe Benefits	\$646			\$0	\$646
	Travel					\$0
	Supplies	\$100				\$100
	Contractual		\$8,669	\$703,498		\$712,167
Total Direct Costs		\$2,254	\$8,669	\$703,498	\$3,770	\$718,191
Total Indirect Costs						\$0
Total Federal Funding		\$2,254	\$8,669	\$485,307	\$3,770	\$500,000
Cost Share				\$218,191		\$218,191
Total Budget		\$2,254	\$8,669	\$703,498	\$3,770	\$718,191

3.c.i Cost Per Unit Breakdown:

Task 1: Community Engagement

Personnel costs – Community engagement activities for Mayor, City Clerk, and Public Works Director = 80 hours at \$26.93/hr = \$2,154

Contractual – Public meeting support from QEP = 36 hours at \$122.72/hr = \$4395.24 (QEP wages derived from previous phases of excavation)

Supplies - \$100 printed materials such as posters and handouts

Task 2: Cleanup Planning

Contractual – Cleanup plan preparation by QEP = 90 hours at \$96.32/hr = \$8,668.72

Task 3: Building Materials Abatement and Soil Cleanup

Contractual – QEP Asbestos/LBP abatement and soil excavation oversight, confirmation sampling, and construction completion reporting = 164 hours at \$96.32/hr = \$56,539; Abatement subcontractor and direct expense costs: \$273,550 for 23,700 ft² of ACM and 8,000 ft² of LBP. Excavation subcontractor and direct

expense costs: \$367,816 (\$218,191 of this is match) for excavation, removal, and disposal of 3,500 cubic yards of asbestos/heavy metals and 6,400 cubic yards of petroleum contaminated soil.

Task 4: Project Oversight

Personnel costs – Compliance with all federal and Cooperative Agreement Requirements Mayor, City Clerk, and Public Works Director = 200 hours at \$26.93/hr = \$5,386.

3.d. Measuring Environmental Results

The City will track, measure, and report project performance through its quarterly reports, the ACRES database, and the project website. For each task, Project Outputs, Project Outcomes, and

Tracking Methods are described below:

Tasks	Methods of Tracking and Measuring Progress
1. Community Engagement	Outputs --2 public meetings; small group outreach; project website; on-site outreach. Outcomes --Informed, engaged community; two-way information flow. Tracking Methods --Recording and reporting community outreach elements.
2. Cleanup Planning	Outputs --Hazardous Building Materials and Soil Cleanup Plan approved by DEQ; final ABCA. Outcomes --Clear cleanup plan the implementation of which will result in delisting. Tracking Methods --Set dates for deliverables, document achievement of deadlines, and provide EPA with copies of deliverables.
3. Building Materials Abatement & Surface Soil Cleanup	Outputs --Cleanup of 5 acres (9,900 cubic yards of contaminated soils) to recreational standards; clearance of hazardous building materials for the 15,000ft ² Roundhouse; state superfund delisting. Outcomes --Reduction of environmental and public health risk; restoration of Roundhouse and historic wetlands; opening 180 acres to public access and open space. Tracking Methods --Set construction schedule, biweekly updates on construction progress, confirmation sampling, DEQ approved Construction Completion Report.
4. Project Oversight	Outputs --Clear procurement records, documentation of compliance with federal requirements, quarterly reports, and ACRES updates. Outcomes --Accountability for use of public funds and confirmation that site meets state and federal cleanup standards Tracking Methods --Documented compliance with municipal policies, timely copies of deliverables to EPA

4. Programmatic Capability & Past Performance

4.a. Programmatic Capability:

4.a.i & 4.a.ii. Organizational Structure and Description of Key Staff

The City’s Public Works Director, Bob Schuchard, will oversee cleanup of the Site and implementation of the Cleanup Grant. Mr. Schuchard will work closely with the Railyard team, which also includes Paul Otten (Mayor), Kathie Newland (City Clerk), and DEQ’s Brownfields coordinator Jason Seyler. The City has been collaborating with DEQ’s Brownfields Program at the Railyard since 2015 and has successfully managed \$1.7 million in state assessment and cleanup grants during that time.

Bob Schuchard, Public Works Director, has served in the City’s Public Works Department for XX years (1 of them as Director). He will be responsible for project management, community outreach, and coordinating the City and DEQ’s remedial actions at the Railyard.

Paul Otten, has served as City Mayor since 2017. In addition to focusing on community outreach, Mt Otten will ensure compliance with all federal and Cooperative Agreement requirements.

Lara Brisco, just recently started working for the City but has 5 years of administrative experience. Lara will be responsible for financial management and reporting.

Please note that the City has been working closely with DEQ's Brownfields Program since 2015 at the Harlowton Roundhouse Site. Jason Seyler, Brownfields Coordinator since 2009, has assisted the City with applying, managing, and overseeing the remedial and planning efforts at the Railyard. DEQ's close involvement and oversight will ensure that the project's result is full cleanup and delisting of the State Superfund site.

4.a.iii Acquiring Additional Resources

The City will contract for any additionally-needed services or expertise utilizing its own procurement policy: The City's policy is compliant with federal requirements.

The City keeps a meticulous procurement record for all grants; documenting outreach, MBE/WBE good faith efforts, cost/price analysis, rationale for decision, etc. The City intends to procure and contract with a QEP to oversee technical aspects of the cleanup.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

4.b.ii.1. Purpose and Accomplishments – Since 2015 The City and the DEQ Brownfields Program have partnered to apply for and receive seven Montana DNRC reclamation and development grants (totaling \$1,094,992) and two DEQ Orphan Share grants (totaling \$698,191) for the assessment, cleanup, and restoration of the Railyard. In addition, The City has also received two DNRC Renewable Resource grants (totaling \$30,000) which allowed for a community led post-cleanup visioning session and wetland design/permitting for the Railyard's future wetland and nature trail. Over the course of several assessments grants, the City and DEQ discovered a 5-acre free product petroleum plume and 3,500 cubic yards of asbestos and metals contaminated soil at the Railyard. This thorough assessment allowed for the cleanup planning and successful excavation/treatment of over 14,000 cubic yards of petroleum soils in a nearby landfarm. This application will allow the City to proactively address the remaining 9,900 cubic yards of contaminated soils within the 100-year floodplain (6,400 cubic yards of petroleum contaminated soils and 3,500 cubic yards of asbestos/metals debris) and the 31,700 ft² of hazardous building materials remaining within the historic Roundhouse. This lingering contamination continues to prevent access to 180 acres of publicly owned open-space and the restoration and reuse of the historic 15,000 ft² Roundhouse.

Outside of environmental cleanup, between 2016 and 2018, The City has successfully applied for and received three U.S. Army Corps of Engineers Water Resource Development Act (EWRDA) grants (totaling \$870,000) to replace a total of 17,500 linear feet of aging water distribution system line. The 2016 EWRDA grant has already replaced the first 10,000 linear feet of water line and was successfully closed out in 2018. The 2017 and 2018 grants are still open and the replacement of the remaining 7,500 feet of waterline is scheduled to be completed in 2021.

4.b.ii.2. Compliance with Grant Requirements – The City has consistently maintained compliance with all state and federal funding award terms and agreements, including following all appropriate procurement requirements, quarterly invoicing and progress reporting requirements, work plans approvals, meeting timelines, tracking budgets, reporting final project outcomes, and providing final reports with grant closeout documentation.