

1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields

i. **Background and Description of the Target Area:** The Libby Public School District (the School District) located in the town of Libby, Lincoln County, Montana, is requesting EPA funds to clean up the Former Asa Wood Elementary School property (the site). The town of Libby is no stranger to government-funded cleanup efforts. In 2002 Libby was designated as a Superfund site due to vermiculite and asbestos contamination. Twenty-five years ago, mentioning the town of Libby would evoke images of typical northwestern Montana splendor. Nearly two decades after its designation as an EPA superfund site, the town of Libby remains synonymous with terms like “vermiculite,” “superfund,” “asbestos” and “mesothelioma”.

Due to the efforts of the EPA and its partners over the past twenty years, enormous strides have been made in the cleanup and redevelopment of the Libby Asbestos Superfund site, which addressed the problems created by the vermiculite mine and resulting spread of asbestos dust throughout the community.¹ Despite the efforts made abating the Libby amphibole asbestos, non-Libby amphibole asbestos, as well as other environmental concerns, still plague buildings in the town of Libby.

In _____, we received \$_____,000 for assessment of the site. A Phase I analysis was completed in September of 2020, as were Phase II hazardous substance assessments. We developed a draft Analysis of Brownfields Cleanup Alternatives for the site and presented it at a public meeting in Libby, Montana on October 8, 2020. We are applying for a \$_____ brownfields hazardous substance cleanup grant to mitigate asbestos, lead-based (LBP) paint, lead-in-soil and mercury-containing thermostats. The plan for redevelopment is a 45-unit assisted living complex, construction of a new commercial kitchen for use by the Libby Public Schools and maintaining a community garden and 5,000 square foot food bank.

ii. **Description of the Brownfield Site:** The School Board seeks to redevelop the site as an assisted living facility for seniors. The site contains the former elementary school building, a single-story building of approximately 42,200 square feet. While the building has not been used as a school since 2011, it is currently home to the local food bank, the local Girl Scouts troop, a commercial kitchen supplying the Libby Public School System and a community garden.

A Phase II environmental site assessment (ESA) for the site prepared in September 2020 identified asbestos, LBP, lead-in-soil and mercury thermostat switches in numerous locations throughout the former school building. Vermiculite containing insulation was also identified in the walls of the building, although the abatement of those walls is not included in the scope of this grant.

b. Revitalization of the Target Area

i. **Reuse Strategy and Alignment with Revitalization Plans:** The cleanup and reuse of this site is vital to the Libby population. In 2019, a steering committee made up of a broad range of Lincoln County residents worked to update their Comprehensive Economic Development Strategy (CEDS).² In addition to input from the members of the steering committee, priorities were identified through a public outreach process which included open houses in the three incorporated cities in Lincoln County as well as a public survey that garnered 370 responses.³ Contemporaneously with the CEDS update, the citizens of Lincoln County updated their Growth Policy to assist further in identifying and implementing environmental change and economic growth as they worked to put the Superfund status in their rear view mirror.

¹ United States Environmental Protection Agency, Superfund Redevelopment Initiative; <https://www.epa.gov/superfund-redevelopment-initiative/superfund-sites-reuse-montana>, accessed October 6, 2020.

² Lincoln County 2019 Comprehensive Economic Development Strategy Update, p. 1

³ *Id.* p.2.

Due to decreasing timber harvests, the closure and destruction of wood product mills and the recent closure of the Troy mine, Lincoln County has seen high unemployment relative to Montana.⁴ As of 2018, the unemployment rate of Lincoln County, of which Libby is the county seat, was 7.4% compared to a 3.7% rate across the state of Montana.⁵ Unemployment is higher in the younger population, possibly due to the lack of entry level jobs in the area.⁶ In order to address the issue of unemployment or underemployment, the CEDS identified Goal 4: to ensure Lincoln County's labor force has the skills necessary to succeed.⁷

In order to achieve this goal, several action items are identified. Action 4.2 asks that following a labor force meeting (wherein representatives from local business, local government, economic development, workforce development, and education come together to discuss the needs and opportunities relating to preparing Lincoln County's labor force for success) partners work with employers on providing classes, apprentice programs and resources to prepare the labor force for local in demand jobs.⁸ Action 4.3 seeks to work with local schools on developing or strengthening mentorship programs that pair high school students with professionals in their field of interest.⁹

The assisted living facility proposed anticipates creating 22 jobs, including nurses' aides, food service workers and management positions. Some of these jobs are entry level jobs available for the young work force of Libby. Others are careers, whose holders could work with the schools to achieve the actions identified in the CEDS.

Affordable housing is also a concern in Libby. A housing cost burden is defined by the United States Department of Housing and Urban Development as paying more than 30% of household income on housing.¹⁰ In 2017, 50% of Lincoln County renters suffered a housing cost burden.¹¹ This was slightly above the state rate, but represented a 15% increase since 2010.¹² In 2017 26% of home owners in Lincoln County suffered a housing cost burden, a rate 4% higher than the state average.¹³

Commented [A1]: Is this accurate? The graph shows 5% above the state rate but the narration states that it is slightly below the state rate.

By creating 45 new assisted living units for seniors, and approximately 22 new year-round jobs, this project will also benefit issues identified in the "Strength, Weakness, Opportunity, Threat" (SWOT) portion of the CEDS. Lack of affordable housing for lower income and workforce populations was identified as a weakness.¹⁴ The "limited supply of available, affordable, quality housing for low income residents and middle-income workers" is most pronounced in the rental markets in Libby and the other incorporated cities.¹⁵ Specifically, lack of senior housing is also identified as a weakness.¹⁶ Lack of year round jobs is identified as a threat and providing alternative housing is identified as an opportunity.¹⁷

The 2019 Growth Policy also addressed the lack of housing by identifying Goal 16: Provide for availability of affordable housing.¹⁸ To achieve this goal, the policy suggests developing a housing needs assessment

⁴ *Id.* p.3.

⁵ *Id.* p.12.

⁶ *Id.*

⁷ *Id.* p. 36.

⁸ *Id.* pp. 36-37.

⁹ *Id.* p. 37.

¹⁰ *Id.* p. 17.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.* p. 18.

¹⁴ *Id.* p. 29.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.* pp. 30-31.

¹⁸ Lincoln County Growth Policy Update, 2019, p. 72.

to determine what type of housing is needed and how to address those needs, as well as supporting efforts of non-government entities to provide affordable housing.¹⁹ A market feasibility study has been conducted, so already this project is helping achieve goals of the Growth Policy, and at this time we are in negotiations with a private developer to work on the project, working towards the goal of non-government entities addressing the housing shortage.

ii. **Outcomes and Benefits of Reuse Strategy** The primary outcome of this project will be a 45-unit assisted living senior facility. Construction will consist of maintaining the current building structure and completely overhauling the interior of the building to create the living units; space for arts, crafts, entertainment, food preparation, meal service and further indoor socialization; and space for outdoor entertainment and socialization.²⁰

Commented [A2]: Correct? The market study made it sound like the old building would be demolished and new construction put in its place (perhaps this is just an old plan).

Presently the local food pantry is located within the site. The proposed project will set aside 5,000 square feet of the building in order to maintain the Food pantry operations. In 2019 the Libby Food Pantry served a total of 5,194 individuals comprising 2,650 households and including 1,198 children under the age of 18.²¹

Also located on site is the community garden, which allows residents to cultivate their own fresh vegetables. In 2019 there were 64 family memberships to the community garden. This has dropped in 2020 (likely due to the issues associated with the COVID-19 pandemic) but provides a valuable community resource nonetheless. The reuse strategy will preserve this greenspace and community benefit.

Lastly, the reuse strategy involves building a new structure to house a commercial kitchen for the Libby Public School System. Currently, the site houses a commercial kitchen that provides school lunches INSERT NUMBERS. This new building and commercial kitchen will continue to serve the children of the Libby Public School District.

Presently, Lincoln County, which includes Libby, is designated an Opportunity Zone. This project will bring construction jobs to this Opportunity Zone for the duration of the project, and will leave in its wake approximately 22 jobs for the future. Additionally, this project will turn a very large, mostly vacant property into a functioning property that serves the people of Libby by housing its seniors and feeding its students and those who seek assistance from the food bank.

c. Strategy for Leveraging Resources

i. **Resources Needed for Site Reuse:** In addition to the environmental contaminants identified for purposes of this grant, vermiculite containing insulation (VCI) has been found in at least two of the exterior walls of the building. The VCI will be abated through the Lincoln County Asbestos Recovery Program. After a preliminary review, they anticipate spending approximately _____ to abate this VCI. (Attachment ____).

ii. **Use of Existing Infrastructure:** The site is located within the city limits of Libby and has adequate water, sewer, power, phone, and internet service for the redevelopment purposes. No infrastructure improvements should be needed to carry out cleanup and redevelopment.

2. Community Need and Community Engagement

a. Community Need

¹⁹ *Id.* pp. 72-73.

²⁰ Marjorie Grimm Assisted Living Facility – Libby Montana – Market Study, p. 5, January 2020.

²¹ 2019 Recap, Libby Food Pantry.

i. **The Community's Need for Funding:** The town of Libby is quite small, with only 2,663 residents.²² 24% of the population in Libby is in the 65+ category; significantly higher than the concentration of the same population in Montana (17.6%) and the United States (15.2%).²³ The poverty rate in Libby is nearly 19%; higher than equivalent figures for Montana (13.7%), and the nation (14.1%).²⁴ Wages in the County are significantly lower than those across the rest of Montana, averaging \$34,438 in 2017 compared to \$44,470 for the State.²⁵ The median household income (\$30,217) is nearly half that of the United States (\$60,293) and significantly lower than the State (\$52,559).

In addition to the employment troubles faced by the area in light of the decrease in the timber and mining industries, unemployment is likely to rise as the recent resolution of the Libby Asbestos Superfund Site means that government jobs that have been a staple in the area for the past 20 years will disappear. Additionally, those in the 65+ category make up 28% of the county and represent the only group to experience a population increase since 2010.²⁶ As many of those residents presumably do not work, increased unemployment is a reasonably foreseeable result of this aging trend.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: ASBESTOS RATES

The Libby population is an elderly one. In 2017, the median age of the county was 52.1 years compared to 39.8 years across the state of Montana.²⁷ In addition to being at higher risk for illness, this aging population has different housing needs than younger, more able-bodied individuals.

This grant has the ability to provide substantial health benefits to sensitive populations in the community above and beyond removing the risks to human health due to asbestos and LBP. The community garden and food bank will continue to feed the town, as will the newly constructed commercial kitchen for the Public School System. The assisted living facility will provide the aging population with the living environment they need to thrive in their golden years, and will do so by surpassing the quality of most existing senior rental housing stock.²⁸

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The EPA considers the town of Libby an air quality non-attainment area for PM10 as well as PM2.5, which refers to particles of very small size.²⁹ As a result, the area is consistently unable to meet EPA Air Quality Standards. The main source of PM2.5 in Libby is _____; the main source of PM 10 in Libby is _____. In a three year period from 2013-2015, Libby had the second highest number of days (22) of particle pollution for 24-hour PM2.5 concentration greater than 35.5mg/m3, of the cities in the State.³⁰ Particle pollution can increase the risk of heart disease, lung cancer and asthma attacks and can interfere with the growth and work of the lungs.³¹ The particle pollution in Libby is due to _____. Our brownfields site may exacerbate air quality problems due to asbestos being released from a crumbling building.

²² 2018 American Community Survey Selected Population Characteristics data profile, available at <https://data.census.gov/cedsci/table?d=ACS%205-YEAR%20Estimate%20Data%20Profiles&tid=ACSDP5Y2018.DP05>.

²³ *Id.*

²⁴ 2018 American Community Survey selected Economic Characteristics data profile, available on <https://data.census.gov/cedsci/table?d=ACS%205-Year%20Estimates%20Data%20Profiles&tid=ACSDP5Y2018.DP03>.

²⁵ CEDS, p. 13.

²⁶ *Id.* p. 16.

²⁷ CEDS, p. 16.

²⁸ Mar

²⁹ <http://deq.mt.gov/AIR/SR/FederalStandards>

³⁰ Montana State Health Assessment, <https://dphhs.mt.gov/Portals/85/ahealthiermontana/2017SHAFinal.pdf>, p. 68.

³¹ <https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/particle-pollution>

(3) Disproportionally Impacted Populations: The town of Libby has long suffered the effects of asbestos related illness, resulting from the vermiculite mined in the town, and used in everything from building materials to turf on the school track. Unfortunately, this legacy is ongoing, as the local clinic in town continues to diagnose 15 to 20 new cases of asbestos-related illnesses every month.³² Due to the long latency period between asbestos exposure and the emergence of illness, patients are expected to be diagnosed at a similar rate for the next ten years.³³

According to the United States Department of Agriculture Natural Resources Conservation Services, Libby qualifies as an Environmental Justice Community.³⁴ To be classified as an environmental justice community, residents must be a minority and/or low income group; excluded from the environmental policy setting and/or decision-making process; subject to a disproportionate impact from one or more environmental hazards; and experience a disparate implementation of environmental regulations, requirements, practices and activities in their communities.³⁵ Environmental justice issues can surface as residents on limited incomes must live in substandard housing near contaminated property. The brunt of the impacts associated with brownfields is often absorbed by the poor and elderly in our communities. This project will mitigate this impact by cleaning up an environmental concern and providing safe housing for senior citizens

b. Community Engagement

i. and ii. Project Partners and Project Partner Roles: Although this project is yet in its infancy, we have been able to identify several community partners. The table below lists select organizations and their commitments for this grant.

Partner Name	POC (name, email, phone)	Specific Project Role
Lincoln County Asbestos Recovery Program	Virginia Kocieda 406.283.2446 vkocieda@libby.org	Abate the Vermiculite Containing Insulation found in the southern and eastern walls of the building
Kootenai River Development Council	Tina Oliphant, Executive Director 406.293.8406 tina@krdc.net	Serve as the grant administrator
Community Garden Libby Food Pantry		Increase awareness of the project through their newsletter

ii. Incorporating Community Input: Community involvement will be critical to the success of the proposed cleanups and redevelopment of the site. We will revise the existing fact sheet for each site and conduct public meetings in Libby. Project updates will be posted on the Libby Public Schools web site and provided at School Board Meetings. Proposed brownfields-related events include two community meetings, one before construction begins and one after the project is completed. We held an initial publicly-advertised community meeting in Libby in preparation for this grant application, and will follow a similar forum for future gatherings. We will engage local media outlets such as the Western News to spread the word about the cleanup plans. We will make accommodations for community members with disabilities, the elderly,

³² <https://www.mesotheliomasymptoms.com/libby-montana>

³³ *Id.*

³⁴ [https://www.nrcs.usda.gov/wps/portal/nrcs/mt/about/civilrights/nrcs144p2_057864/#:~:text=Montana's%20Environmental%20Justice%20Communities&text=Zortman%20Landusky%20Area%20\(Phillips%20and,HUD%20housing\)%20%2D%20contaminated%20building%20materials](https://www.nrcs.usda.gov/wps/portal/nrcs/mt/about/civilrights/nrcs144p2_057864/#:~:text=Montana's%20Environmental%20Justice%20Communities&text=Zortman%20Landusky%20Area%20(Phillips%20and,HUD%20housing)%20%2D%20contaminated%20building%20materials)

³⁵ *Id.*

and residents without telephones or Internet service. Given the current situation regarding the COVID-19 pandemic, we will hold the meetings at a location large enough to accommodate social distancing. The first public meeting was held in the KW Mackey Theater, which accommodates ____ individuals, therefore allowing sufficient room to socially distance. Additionally, for future meetings we can provide a Zoom link so that individuals may participate virtually. Public meetings will accommodate hearing and sight concerns through large print publications and the use of disabled-accessible facilities as needed.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS (60 points)

a. Proposed Cleanup Plan (10 points)

The former Asa Wood Elementary School building contains 13 building materials confirmed positive for asbestos at a concentration above the regulatory limit of one percent asbestos (>1%) by weight, and six (6) materials that were assumed to be asbestos-containing building materials (ACBM). Of these, the following materials are not classified as Libby Amphibole asbestos and would be abated under this grant: carpet mastic; chalkboards; fire doors; fire hose; floor tile; floor tile mastic; mudded fittings; pipe insulation; stair tread and mastic; vibration dampener; window glazing; and, roofing materials. Libby Public Schools will utilize a licensed asbestos abatement contractor to abate the ACBM and dispose of the materials in a Class II landfill.

Lead-based paint (LBP) was also confirmed above the Environmental Protection Agency (EPA) action level on the interior and exterior of the building. Exterior locations include doors, door frames and jambs, trim, walls, and window frames and sills. Interior locations include doors, door frames and jambs, walls, ceilings, baseboards, and window frames and sills of the boiler room, Wing A, Wing B, and Wing C. We will hire an abatement contractor to encapsulate all lead-based paint with a lead-encapsulating primer, which is more cost-effective than full removal of all LBP.

In addition to the asbestos and lead-based paint inspection, a total of four (4) mercury thermostat switches are present in the building. These switches will be removed and recycled at a designated recycling facility.

b. Description of Tasks/Activities and Outputs (25 points)

i. - iv. Program Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs

1. Cooperative Agreement Oversight – Given the developer would like to begin construction as soon as possible, our goal is to complete our cleanup project within one year of receiving grant funds. To do this, we will issue a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP) within one month of award. Submitted proposals will be reviewed and scored by members of our school board. Libby Public Schools, assisted by our local non-profit economic development corporation, Kootenai River Development Council (KRDC) will be responsible for updating the school board members on progress quarterly; coordinating with EPA and MDEQ; updating Assessment, Cleanup and Redevelopment Exchange System (ACRES) quarterly; preparing EPA quarterly reports; facilitating site access; attending national Brownfields conferences; and general grant management. *Anticipated Schedule:* December 2021 – September 2022. *Task Lead:* Grantee. *Outputs:* 1 QEP hired; 4 quarterly board updates; 4 EPA quarterly updates; 4 ACRES updates; 1 National Brownfields conference.

2. Marketing & Community Outreach – Libby Public Schools, KRDC, and the QEP will prepare 2 fact sheets; hold 2 public meetings; create opportunities to engage the local press; maintain project information on the our website (libbyschools.org); and hold monthly teleconferences with the developer to provide

updates on the project. *Anticipated Schedule:* December 2021 – September 2022. *Task Lead:* Grantee & QEP. *Outputs:* 2 fact sheets; 1 website; 2 public meetings; 30+ developer meetings.

3. *Cleanup Planning and Oversight* – Before initiating any work, the QEP will draft a Quality Assurance Project Plan (QAPP). Based on the information contained in the Phase II report, the QEP will finalize the draft ABCA; develop a Community Relations Plan (CRP); write a Clearance Sampling and Analysis Plan (SAP); create a project bid manual, and organize a bid walk. The QEP will assist with the bid solicitation and contracting, Federal Prevailing Wage Rate interviews, certified payroll report review, and general project oversight. Once cleanup is complete, the QEP will prepare a Cleanup Completion Report certifying all abatement and cleanup was completed in accordance with state and federal requirements. Libby Public Schools and KRDC will assist with cleanup planning by reviewing the QAPP, ABCA, CRP, Clearance SAP, and project bid manual before they are published, and will accompany the QEP on the bid walk. *Anticipated Schedule:* December 2021 – September 2022. *Task Lead:* QEP. *Outputs:* 1 QAPP; 1 final ABCA; 1 CRP; 1 Clearance SAP; 1 project bid manual; 1 contract; 1 Cleanup Completion Report.

4. *Cleanup* – Supervised or completed by the QEP, a licensed asbestos abatement contractor will remove ACBM, encapsulate LBP, and remove mercury thermostat switches. *Anticipated Schedule:* April 2022 – June 2022. *Task Lead:* QEP. *Outputs:* 13 ACBM abated; 2,800 linear feet and 6,300 square feet of LBP encapsulated; and 4 mercury thermostats removed.

c. Cost Estimates (20 points)

The following table presents the project budget. Libby Public Schools plans to contribute our personnel and fringe expenses toward the project as in-kind cost share. To assist our staff with community outreach and cooperative agreement oversight, our local non-profit economic development corporation, Kootenai River Development Council (KRDC), has agreed to donate personnel time as in-kind toward the cost share requirement. As shown in the table, 100% of the federal funds requested would go toward cleanup planning, cleanup, cleanup oversight, and site reuse visioning.

**Former Asa Wood Elementary School Cleanup Project
 Project Budget**

Budget Categories	Project Tasks (\$)				
	Cooperative Agreement Oversight	Marketing & Community Outreach	Cleanup Planning & Oversight	Cleanup	Total
Personnel	\$ 1,920	\$ 1,920	\$ 800	\$ -	\$ 4,640
Fringe Benefits	\$ 576	\$ 576	\$ 240	\$ -	\$ 1,392
Travel ¹	\$ 3,000	\$ -	\$ -	\$ -	\$ 3,000
Equipment	\$ -	\$ -	\$ -	\$ -	\$ -
Supplies	\$ -	\$ -	\$ -	\$ -	\$ -
Contractual ²	\$ 5,000	\$ 5,680	\$ 45,800	\$ 384,968	\$ 441,448

Commented [A3]: Possibly add architectural planning to this section and previous?

Former Asa Wood Elementary School
 FY21 EPA Brownfields Cleanup Grant
 Ranking Criteria

Other (KRDC Assistance)	\$ 12,480	\$ 1,440	\$ 1,200	\$ -	\$ 15,120
Total Direct Costs	\$ 22,976	\$ 9,616	\$ 48,040	\$ 384,968	\$ 465,600
Indirect Costs	\$ -	\$ -	\$ -	\$ -	\$ -
Total Federal Funding	\$ 8,000	\$ 5,680	\$ 45,800	\$ 328,520	\$ 388,000
Cost Share	\$ 14,976	\$ 3,936	\$ 2,240	\$ 56,448	\$ 77,600
Total Budget	\$ 22,976	\$ 9,616	\$ 48,040	\$ 384,968	\$ 465,600

¹Travel to brownfields-related training conferences is an acceptable use of these grant funds.

²The applicant will comply with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326

Former Asa Wood Elementary School Cleanup Project

Project Budget

Budget Categories	Project Tasks (\$)					Total
	Cooperative Agreement Oversight	Marketing & Community Outreach	Cleanup Planning & Oversight	Cleanup	Site Reuse Visioning	
Personnel	\$ 1,920	\$ 1,920	\$ 800	\$ -	\$ -	\$ 4,640
Fringe Benefits	\$ 576	\$ 576	\$ 240	\$ -	\$ -	\$ 1,392
Travel ¹	\$ 3,000	\$ -	\$ -	\$ -	\$ -	\$ 3,000
Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Supplies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Contractual ²	\$ 5,000	\$ 5,680	\$ 45,800	\$ 350,668	\$ 34,300	\$ 441,448
Other (KRDC Assistance)	\$ 12,480	\$ 1,440	\$ 1,200	\$ -	\$ -	\$ 15,120
Total Direct Costs	\$ 22,976	\$ 9,616	\$ 48,040	\$ 350,668	\$ 34,300	\$ 465,600
Indirect Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Federal Funding	\$ 8,000	\$ 5,680	\$ 45,800	\$ 294,220	\$ 34,300	\$ 388,000
Cost Share	\$ 14,976	\$ 3,936	\$ 2,240	\$ 56,448	\$ -	\$ 77,600
Total Budget	\$ 22,976	\$ 9,616	\$ 48,040	\$ 350,668	\$ 34,300	\$ 465,600

¹Travel to brownfields-related training conferences is an acceptable use of these grant funds.

²The applicant will comply with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326

The following explains how costs shown in the Project Budget table were developed:

Cooperative Agreement Oversight – Personnel costs: \$40/hour for 4 hours per month for 12 months = \$1,920; Fringe Benefits: 30% of Personnel Costs = \$576; Travel: \$2,000 per National Brownfields Conference for 1 conference = \$2,000, plus 2 regional workshops at \$500 per workshop, for a total of \$3,000; Contractual: \$125/hour for 40 hours for QEP to assist with reporting and EPA/grantee meetings; KRDC Assistance: \$30/hour at 8 hours a week for 52 weeks = \$12,480. Cost Share: Personnel (\$1,920) and Fringe (\$576) will be contributed as in-kind cost share and the KRDC Assistance costs (\$12,480) will be contributed as cash match for a total of \$14,976.

Marketing/Community Outreach - Personnel costs: \$40/hour for 4 hours a month for 12 months = \$1,920; Fringe Benefits: 30% of Personnel Costs = \$576; Contractual: \$85/hour for 4 hours per fact sheet for 2 fact sheets = \$1,180, Public meeting is calculated at 18 hours per meeting (includes meeting prep, travel, meeting) at \$125/hour for 2 meetings = \$4,500, for a total of \$5,680; KRDC Assistance: \$30/hour at 4 hours a month for 12 months = \$1,440; Cost Share: Personnel (\$1,920) and Fringe (\$576) will be contributed as in-kind cost share, and KRDC Assistance costs (\$1,440) will be contributed as cash match for a total of \$3,936.

Cleanup Planning and Oversight – Personnel costs: \$40/hour for 20 hours = \$800; Fringe Benefits: 30% of Personnel Costs = \$240; Contractual: Project Manager at \$125/hour for 232 hours (total \$29,000), field scientist at \$90/hour for 120 hours (total \$10,800), and a Senior Asbestos Inspector at \$150/hour for 40 hours (total \$6,000) for a total of \$45,800. KRDC Assistance: \$30/hour at 40 hours = \$1,200; Cost Share: Personnel (\$800) and Fringe (\$240) will be contributed as in-kind cost share, and KRDC Assistance costs (\$1,200) will be contributed as cash match for a total of \$2,240.

Cleanup – Contractual: Cleanup costs were estimated based on quantities of ACBM documented in the Phase II. ACBM abatement costs are estimated at \$154,225 for the interior of the building as well as an additional \$120,270 to abate roofing materials. LBP encapsulation is estimated at \$43,870. An additional \$32,303 has been included as a cleanup contingency. Total contractual budget for cleanup is \$350,668. Cost Share: Libby Public Schools anticipates contributing \$56,448 in cash toward the cleanup task.

Site Reuse Visioning: Site reuse visioning will include two design charrettes with the local community to determine plans to use for the new food bank and school kitchen to be constructed, as well as continued access to the community gardens in a way that provides the seniors in the assisted living center with interaction with the community in a safe and easily accessible way. It will also include architectural renderings to show the site reuse plan. Total contractual budget for site reuse visioning is \$34,300. Cost Share: Not applicable for this task.

Commented [A4]: Break out costs here.

d. Measuring Environmental Results (5 points)

Each quarter completed project deliverables and outputs will be compared to our quarterly schedule for the grant and be reported in our quarterly report. All outputs will also be reported in ACRES quarterly. If any obstacles arise in completing a deliverable, we will discuss the situation with our EPA project officer and develop a plan to achieve the output in our workplan. Outcomes will be tracked and measured by quarterly conversations with the developer, even after the grant has been closed out. Libby Public Schools will continue to be a stakeholder in the redevelopment of the property, as we will be the lessee of the new, onsite commercial kitchen for our school food service. This will allow us to continue to track key outcomes for the project and report these to EPA via ACRES. Anticipated outputs for this grant include: 2 fact sheets, 2 public meetings, 1 QAPP, 1 Clearance SAP, 1 bid manual, 13 ACBM abated, 2,800 linear feet and 6,300 square feet of LBP encapsulated, and 4 mercury thermostats removed. Anticipated outcomes for this grant

include: 22 new jobs created; assisted living units for 50 seniors in our community; over \$10.5 million leveraged; increased property tax revenue for the county; a new 5,000 square foot food bank to serve the 5,200 individuals currently suffering from hunger; and a new 3,500 square foot commercial kitchen to allow us to better provide food service to our 1,220 students.

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4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 points)

a. Programmatic Capability (15 points)

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

As a public school district sanctioned by the State of Montana, Libby Public Schools is well-qualified to manage an EPA Brownfields Cleanup Grant, as evidenced by our annual management of a \$8.3 million general fund. Currently, we operate a school administration staff of 12 full-time employees, and 203 employees district wide. Over the last XX years, we have secured \$XX dollars in competitive grant funding in addition to our standard operating budget.

Commented [A6]: Correct term? Confirm with Ron

Ron Goodman, Superintendent of Schools, has served as an educator since the mid-1990's and has filled the role of Superintendent since March 2020. Prior to becoming Superintendent, Mr. Goodman served as a principal in the Libby School District for XX years and received the Distinguished Principal Award from the Montana Association of Elementary and Middle School Principals in 2016. He is well-connected with project stakeholders including Lincoln County, Libby Food Pantry, Libby Community Gardens, as well as the developer, American Covenant Senior Housing Foundation. As Superintendent of Schools, Mr. Goodman will be responsible for overseeing the Brownfields Cleanup Grant and certifying that all program requirements, objectives, and deadlines are met.

Commented [A7]: Confirm with Ron

Mr. Scott Beagle serves as the Curriculum, Special Programs, and Federal Grant Coordinator in the Superintendent's Office in the Libby School district. For over 20 years, Mr. Beagle has served as a math teacher, vice-principal, and principal in the Libby School District and became the Grant Coordinator in 2016. He currently manages over \$XX million in grant funds for the school district. Mr. Beagle will oversee the weekly management of the grant, ensuring that all grant reporting and compliance is met, as well as measuring and tracking grant outputs and outcomes.

Commented [A8]: Roles/Responsibilities

Libby Public Schools' Business Manager, Ms. Leslie Forster, has worked with the school district for the last XX years. Ms. Forster is responsible for daily accounting functions and preparation of financial reports consistent with Generally Accepted Accounting Principles. As sub-recipients of multiple federal grants and state funds, Libby Public Schools has implemented internal controls consistent with OMB Circulars A-110, A-122 and A-133. Ms. Forster will ensure timely draws of grant funds on a monthly basis, as well as accurate financial reporting of grant expenses.

iii. Acquiring Additional Resources (5 points)

To gain additional grant management resources, Libby Public Schools will enter into a subaward with Kootenai River Development Council (KRDC), a local non-profit economic development organization, and will pay all KRDC's direct costs in cash toward the 20% cost share requirement. KRDC will be responsible for the daily management of the grant, act as an information source for the QEP, developer, and the public, and will ensure project goals are on schedule. Ms. Tina Oliphant, Executive Director, has worked in economic and community development since 2005 and has experience working for three different economic development organizations in northwestern Montana. She has successfully applied for and managed grants from USDA (IRP, RMAP, RBDG), EDA (Public Works and Economic Development), and the Department of Treasury (CDFI). As a private contractor, she provides grant peer review for the Department of Treasury

(NMTC, CDFI, and BEA). Ms. Oliphant also has direct experience with state funding through grant programs with the State of Montana (CDBG programs, Big Sky Trust Fund, Department of Tourism, Main Street and Board of Investments). Her economic development and risk assessment capacity is built upon an earlier career in the private sector as a commercial banking and financial accounting management as well as an MBA.

Commented [A9]: Expand acronyms

Environmental expertise will be contracted to support certain public involvement functions, conduct cleanup planning, cleanup oversight, cleanup, and cleanup reporting. All contracts with contractors who are selected as part of this program will be completed and consistent with applicable and competitive Procurement Standards in 40 C.F.R. Parts 30 or 31. The QEP selection will be overseen by a selection committee made up of Libby Public Schools school board members. Other products or services will follow these same requirements.

Commented [A10]: Add architectural planning, if needed

b. Past Performance and Accomplishments (15 points)

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (15 points)

Commented [A11]: Need a list of three recent grants. Waiting on information from Scott Beagle.

Identify and describe each of your current and/or most recent federally and non-federally funded assistance agreements (no more than three) that are most similar in size, scope and relevance to the proposed project. Demonstrate how you successfully managed the agreement(s), and successfully performed all phases of work under each agreement by providing the following information

(1) Purpose and Accomplishments (5 points)

Describe the awarding agency/organization, amount of funding, and purpose of the assistance agreement(s) you have reached.

Discuss the accomplishments (including specific outputs and outcomes) of the project supported by the assistance agreement(s), including specific measures of success for the project supported by each type of agreement received.

[The extent to which a similar past federal or non-federal assistance agreement(s) is identified (in terms of size, scope and relevance to the proposed project.)

The extent to which meaningful project accomplishments (including specific outputs and outcomes) were achieved under the assistance agreement(s), including specific measures of success for the project supported by each type of agreement received.]

(2) Compliance with Grant Requirements (10 points)

Describe your compliance with the workplan, schedule and terms and conditions under the current/prior assistance agreement(s) and discuss your history of timely and acceptable reporting, as required by the awarding agency/organization.

Include whether you have made and have reported on, or are making and reporting on, progress towards achieving the expected results of the agreement in a timely manner. If not, discuss what corrective measures you took, or are taking, and how the corrective measures were effective, documented and communicated.

[The extent of compliance with the workplan, schedule and terms and conditions under the current/prior assistance agreement(s), and the extent to which there is a demonstrated history of timely and acceptable reporting, as required by the awarding agency/organization.

The degree to which progress was made (and reported on), or is being made, towards achieving the expected results of the agreement(s) in a timely manner. If expected results were not achieved, the extent to which the measures taken to correct the situation were reasonable and appropriate.]