

Coalition Assessment Grant - HRDC Coalition Assessment Grant Application

Initial Configuration

\$1,500,000

Initial Configuration

501 (c)(3) nonprofit, Organizations comprised of 501 (c)(3) nonprofit organizations

Initial Configuration

county, municipality, city, town, borough, 501(c)(3) nonprofit

Initial Configuration

I do not have an active EPA Brownfields Assessment or Multipurpose Grant

Initial Configuration

Yes

Initial Configuration

No non-lead coalition members have an active EPA Brownfields Assessment or Multipurpose Grant

1. | Eligibility of Lead and Non-Lead Coalition Members

Headwaters is a nonprofit organization. Attached is our tax-exempt status under section 501(c)(3) of the IRC.

2. | Target Areas

The **lead (Headwaters RC&D)** is defined as a **programmatic/administrative lead**, not a geographic service area competing with members.

Butte–Silver Bow Local Government

Target Area: City–County of Butte–Silver Bow, Montana (Uptown Butte Historic Commercial District and adjacent central business corridors)

City of Deer Lodge (Powell County)

Target Area: City of Deer Lodge, Montana (historic downtown)

Town of Twin Bridges (Madison County)

Target Area: Town of Twin Bridges, Montana (downtown and underutilized properties within town limits)

3. | Non-Lead Members that Never Received an EPA MARC Grant

Neither non-lead coalition member (Butte-Silver Bow t nor the City of Deer Lodge) has been awarded an EPA Brownfields MARC grant.

4. | Legal Authority to Expend Grant Funds on Behalf of Non-Coalition Members

I attest that Headwaters RC&D has legal authority to expend grant funds on behalf of the non-lead members, Butte-Silver Bow Community and Economic Development and the City of Deer Lodge, to conduct the proposed grant activities.

5. | Coalition Agreement

MOA attached. HRCD & City of Deer Lodge, signed January 22, 2026. HRCD & BSB, signed February 4. HRCD & Madison County, to be signed February 2026.

6. | Community Involvement

The Coalition will implement a visible, multi-channel communications and engagement strategy designed to inform, activate, and sustain participation in brownfields assessment, cleanup, and reuse. Active sites will display banners with “*Proud to Partner*” and “*Powered by EPA Brownfields & Montana DEQ*” messaging, logos, and QR codes linking to project information. Flags, tablecloths, and pop-up signage will be used at meetings and events to spark recognition and conversation and normalize redevelopment activity. The Coalition will use coordinated print, direct mail, partner newsletters, email, social media, digital media, radio interviews and PSAs, podcasts, earned media, and end-of-year highlights to reach property owners, residents, partners, and developers. Messaging will be localized, plain-language, and visually engaging.

Communications will elevate community and partner voices and will serve as an active pipeline tool by clearly explaining eligibility, next steps, and how to nominate sites or request assistance.

7. | Expenditure of Existing Grant Funds

No coalition member has an open EPA Brownfields Assessment Grant/Multipurpose Grant.

8. | Contractors and Named Subrecipients

n/a

B.1. | Applicant Identification

Headwaters Resource Conservation & Development Area, Inc. 65 E Broadway St, 5th Floor, Butte, MT 59701

B.2. | Website URL

<https://www.headwatersrcd.org/>

<https://www.co.silverbow.mt.us/130/Community-Economic-Development>

<https://www.cityofdeerlodgmt.gov/>

B.3.a. | Assessment Grant Type

Assessment Grant Type: "Coalition"

B.3.b. | Federal Funds Requested

Federal Funds Requested: \$1,500,000

B.4. | Location

The Headwaters region, including Beaverhead, Butte-Silver Bow, Anaconda-Deer Lodge, Granite, Powell, Jefferson and Madison counties, will be eligible for assessments and planning assistance. Priority to Butte-Silver Bow with secondary priority to Deer Lodge with all of the region eligible. Madison County will benefit from planning and grooming to take advantage of what we learn in future years. We will accept application from region for planning, assessment and site inventory and prioritization support.

B.5. | Coalition Members' Target Areas and Priority Site Information

Coalition Structure and Partners

Address	City	Notes
54 W Broadway	Butte, MT	CCCS Portfolio
68 W Broadway	Butte, MT	CCCS Portfolio
107 W Broadway	Butte, MT	CCCS Portfolio
105 W Broadway (Laurenz Building)	Butte, MT	CCCS Portfolio
120–124 W Broadway (Grant Hotel / Wheeler Block)	Butte, MT	Owner interest expressed
401 W Park (Old YMCA)	Butte, MT	Priority site
25 E Granite (Napton Apartments – 48 units)	Butte, MT	Housing reuse potential
501 W Granite (Mueller Apartments)	Butte, MT	Housing reuse potential

Sites were selected based on vacant/underinvested, redevelopment potential, building condition, strategic location, expressed owner interest, and alignment with community goals for housing, economic development, arts, and tourism. Deer Lodge: **Non-Lead Coalition Members and Emerging Target Areas****Powell County / City of Deer Lodge****Target Area:**
 ** Downtown Deer Lodge Historic Commercial District (six-block core)
 Priority / Emerging Sites:
 • Milwaukee Roundhouse property
 • Hotel Deer Lodge, 322–328 Main Street
 • 427 Main Street (example site from initial screening)
 In 2025, Headwaters RC&D, Powell County, the City of Deer Lodge, and Montana Tech students conducted a block-by-block “Bad Buildings / Hidden Treasures” assessment of 46 buildings within the six-block core. Buildings were scored and ranked based on condition, reuse potential, and redevelopment barriers. This dataset now serves as the foundation for owner outreach, prioritization, and advancement into the assessment pipeline. Senior Level Environmental Engineering students from Montana Tech did a BAD Buildings Assessment and ranked them on their criteria, which favored #26, 25, 32, 27, 29,31 and 28. (Map

attached)**Madison County / Town of Twin Bridges****Target Area:** Twin Bridges Main Street Commercial District and surrounding commercial core plus a formal inventory and prioritization activity in the region.**Priority Site:** • Upper floor of the Twin Bridges Library, 206 Main Street, and following status of Montana Children’s Center, Twin Bridges, MT. These sites represent strong opportunities for community, educational, or workforce reuse once environmental and structural conditions are better understood.

B.6.a. | Project Director

Melissa Wanamaker, Brownfields Manager, Headwaters RC&D, (406)533-6781 or cell (907)529-5332, mwanamaker@headwatersrcd.org

B.6.b. | Chief Executive/Highest Ranking Elected Official

Kelly Sullivan, Executive Director, Headwaters RC&D (406) 533-6765, ksullivan@headwatersrcd.org

Chief Executive JP Gallagher, Butte-Silver Bow, Jgallagher@bsb.mt.gov, (406) 497-6214

Mayor Jim Jess, City of Deer Lodge JJess@PowellCountyMT.gov, (406)846-2238

Duke Gilman, Chair, Madison County Board of Commissioners, dgilman@madisoncountymt.gov

B.7. | Population

From Census.gov:

Priority: Butte-Silver Bow: 35,133*

Secondary Targets: Madison: 8,623 & Powell: 6,946

Also Eligible: Anaconda-Deer Lodge: 9421, Beaverhead: 9371, Granite: 3309, Jefferson: 12,085

B.8. | Other Factors

Sample Format for Providing Information on the Other Factors	Page #
Community population is 15,000 or less.	6/7
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	x
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	x
The priority site(s) is in a federally designated flood plain.	x
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	x
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	x
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.a.2, for priority site(s) within te target area(s).	x
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

B.9. | Letter from the State or Tribal Environmental Authority

Please find attached a letter dated January 26 from Department of Environmental Quality Brownfields acknowledging our intent to apply for FY26 grant funds and conduct assessment activities.

B.10. | Releasing Copies of Applications

n/a



January 23, 2026

Kelly Sullivan
Executive Director
Headwaters RC&D
65 E. Broadway
Butte, MT 59701

RE: Letter of Acknowledgment: Headwaters Resource Conservation and Development's Application for a Brownfields Assessment Coalition Grant


Dear Ms. Sullivan,

I am writing to express Montana Department of Environmental Quality's (DEQ's) support for Headwaters Resource Conservation and Development's efforts to obtain a U.S. Environmental Protection Agency Brownfields Assessment Coalition Grant.

I understand that the assessment grant funds will be used to assess hazardous substance and petroleum contaminated sites in seven Montana counties include Beaverhead, Deer Lodge, Granite, Jefferson, Madison, Powell, and Silver Bow. DEQ understands that this funding is essential in Headwaters Resource Conservation and Development's efforts in redeveloping Brownfields properties in your area. DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about hazardous substance or petroleum brownfield sites, please feel free to contact Cort Walsh at (406) 444-6639 or Cortney.Walsh@mt.gov.

Sincerely,

DocuSigned by:

DB2E8B9096174A7...

Amy Steinmetz, Administrator
DEQ Waste Management & Remediation Division

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

C.1.a. | Coalition Members

Non-lead members and organization types:

- Butte–Silver Bow Local Government
- Powell County/City of Deer Lodge
- Madison County/Town of Twin Bridges

Rationale for Coalition structure: These communities are small, rural jurisdictions with limited staff and no dedicated Brownfields or environmental grant management capacity. The assessment coalition allows them to forward priority projects and focus limited administrative, technical, and financial capacity on other priorities. The Coalition model allows partners to pool capacity, avoid duplication and delays associated with multiple standalone applications, and deploy planning and assessment resources more efficiently at scale. It also strengthens regional Brownfields expertise, reduces burden on overextended state partners, and creates multiple local access points for communities and property owners.

C.1.b. | Brownfield Challenges and Target Areas Communities in the Coalition area face a convergence of aging building stock, legacy industrial and mining impacts, environmental uncertainty, and long-term underinvestment that together inhibit redevelopment of centrally located properties. Across the region, priority sites are historic buildings affected by deferred maintenance, hazardous building materials such as asbestos and lead-based paint, and unknown subsurface conditions that deter private investment despite growing demand for housing, commercial space, and community uses. In Butte–Silver Bow, decades of mining, smelting, rail, and industrial activity have left a legacy of actual and perceived contamination concentrated in and around Uptown Butte’s historic commercial district, where most buildings exceed 100 years in age. In Deer Lodge (Powell County), the six-block historic downtown core includes a high concentration of vacant and underutilized commercial and institutional buildings affected by aging infrastructure and environmental uncertainty associated with historic rail, industrial, and commercial uses. In small towns like Twin Bridges in Madison County, the frontier, micro-rural scale means that even one or two underutilized buildings can have an outsized impact on community vitality, yet limited access to technical resources makes assessment and reuse planning difficult without external support.

C.1.c. | Priority Brownfield Sites In recent community SWOT analyses, underutilized historic buildings consistently emerged as the top issue across all four categories -- strengths, weaknesses, opportunities, and threats — reflecting both their central importance to community identity and economy, and the scale of the challenge they pose when left vacant or blighted. HRCDD selected priority target sites based on high concentration of priority Brownfields and readiness/partner engagement.

Butte–Silver Bow — Uptown Butte Historic Commercial District & Adjacent Corridors

- 68 W Broadway, Butte, MT (CCCS)
- 54 W Broadway, Butte, MT (CCCS)
- 107 W Broadway, Butte, MT (CCCS)
- 105 W Broadway (Laurenz Building/CCCS), Butte, MT
- 120 & 124 W Broadway (Grant Hotel / Wheeler Block), Butte, MT
- 401 W Park (Old YMCA), Butte, MT
- 25 East Granite/Napton Apartment Building (48 apartments)
- 501 W Granite/The Mueller Apartment Building

Deer Lodge — Downtown Historic Commercial District

- 427 Main Street, Deer Lodge, MT

(plus, additional prioritized buildings identified numerically: 25, 26, 27, 29, & 32 on map from our BAD (Brownfields, Abandoned, Dilapidated) Buildings assessment project with Montana Tech students.

Madison County

- 206 Main Street (Twin Bridges Library upper floor), Twin Bridges, MT
- Montana Children’s Center, 5 Buckshot Lane, Twin Bridges, MT

- Broad community outreach, education, inventory, and prioritization.

Across all three areas, sites were selected based on: (1) redevelopment and community impact potential; (2) building condition and environmental uncertainty; (3) strategic location within historic or civic cores; (4) expressed owner or community interest; and (5) alignment with local goals for housing, economic development, historic preservation, and community services. Together, these sites form a realistic, high-impact pilot pipeline that can demonstrate the Coalition’s model and generate replicable lessons for the broader region.

C.1.d. | Identifying Additional Sites HRC&D will identify additional candidate sites through regional inventory expansion, targeted outreach, and partner referrals. Headwaters RC&D will expand the regional brownfields inventory by completing inventory and prioritization work in Madison County and recruiting at least one additional county during the grant period. Outreach will include coordination with local governments and planners; engagement with property owners, developers, lenders, and real estate professionals; public meetings and community visits; and referrals from state and federal agencies and housing and economic development partners. The Coalition’s approach will be designed to reach owners and communities that may not otherwise engage, including small, family-held, absentee, and rural property owners. Sites will be screened for basic eligibility, including location within the Coalition region, brownfield status, and eligible ownership criteria, and then prioritized based on community need and benefit; environmental and public health risk; impacts to sensitive or disproportionately affected populations; alignment with local plans; readiness and feasibility; degree of vacancy or underutilization; historic or civic significance; and the presence of a committed project champion. While the pipeline will remain open across the Coalition geography, priority will be given to Uptown Butte, Downtown Deer Lodge, and Twin Bridges, where partnerships and readiness efforts are already underway.

C.1.e. | Reuse Strategy and Alignment with Revitalization Plans The Coalition’s reuse strategy is designed to reduce early-stage redevelopment risk, unlock private and public reinvestment, and direct growth into existing town centers by stabilizing, assessing, and repositioning underutilized and brownfield properties—including saving the region’s vacant but spectacular historic building inventory—for productive reuse. This strategy is implemented through the Coalition’s Vacancy to Vitality framework, which advances sites through a phased process of assessment, cleanup planning, reuse and feasibility analysis, and alignment with financing and development partners. As part of this work, the Coalition will explore interim ownership and stewardship models that allow for temporary, mission-aligned control of properties to stabilize deteriorating sites, prevent further loss, and prepare them for transition to long-term ownership or redevelopment. Priority reuse outcomes include upper-floor and mixed-use housing (with an emphasis on workforce and attainable housing), ground-floor commercial and small business space, community and nonprofit uses, and tourism- and heritage-based uses that support local economies. The reuse strategy is aligned with local and regional plans in Butte–Silver Bow, Deer Lodge, and Twin Bridges, including comprehensive plans, downtown revitalization strategies, housing needs assessments, economic development plans, and historic preservation goals. By focusing on redevelopment within existing town centers and historic districts, the Coalition advances smart growth, supports walkable communities, reduces infrastructure costs and sprawl, and preserves historic character while adapting buildings for modern use.

C.1.f. | Outcomes and Benefits of Reuse Strategy Importantly, this strategy positions the region to proactively prepare for accelerating growth pressure driven by major economic investment elsewhere in Southwest Montana — including photonics, technology, and innovation hubs centered in the Flathead, Missoula, and Bozeman regions. As housing inventories in those markets have tightened and prices have become increasingly unaffordable, demand is beginning to spill into adjacent communities that still offer relative affordability. Housing prices across Southwest Montana have more than doubled over the past decade, and communities like Butte, Deer Lodge, and Twin Bridges now represent some of the last attainable markets along the Glacier-to-Yellowstone “Fire & Ice” corridor. This creates both an opportunity and a risk: growth can strengthen local economies, or it can overwhelm communities that are not prepared. By advancing assessment, stabilization, and reuse

planning now, the Coalition ensures that underutilized and brownfield properties are ready for housing, services, and community use before demand intensifies further. This allows communities to shape growth rather than be overtaken by it — protecting affordability, preserving historic assets, and ensuring that new investment strengthens existing communities rather than displacing them.

C.1.g. | Resources Needed for Site Reuse Successful reuse of brownfield properties in the Coalition area requires coordinated technical, financial, regulatory, and community resources to move sites from uncertainty to readiness. Technical resources include Phase I and Phase II Environmental Site Assessments; hazardous materials surveys; structural and engineering evaluations; reuse and feasibility studies; and cleanup planning documents such as Analysis of Brownfields Cleanup Alternatives (ABCAs).

Financial resources include access to cleanup and redevelopment capital such as EPA Cleanup and RLF funds, CDBG, RRGL, historic tax credits, Montana Historic Preservation Grants, C-PACE financing, USDA REAP programs, and philanthropic and private investment. Regulatory coordination will involve close collaboration with EPA Region 8, Montana DEQ, SHPO, and local permitting authorities to ensure work is aligned, sequenced efficiently, and compliant with applicable requirements. Organizational and community resources include local governments, mission-aligned nonprofits, housing and redevelopment partners, academic institutions, and community groups that provide outreach, data, local knowledge, and project champions.

C.1.h. | Use of Existing Infrastructure As described in C.1.e, the Coalition’s reuse strategy directs redevelopment into existing town centers and historic districts to reduce early-stage risk, leverage prior public investment, and avoid unnecessary infrastructure expansion. Priority sites are in areas already served by water, wastewater, power, broadband, transportation, emergency services, healthcare, and civic infrastructure. Concentrating assessment and reuse planning in these locations reduces infrastructure costs, shortens development timelines, and positions sites for feasible housing, commercial, and community reuse. By prioritizing infill redevelopment within established town centers, the Coalition ensures EPA investment supports efficient, climate-smart growth while strengthening existing communities.

C.2.a. | The Community's Need for Funding The Coalition’s target communities—Butte–Silver Bow, Deer Lodge (Powell County), and the Twin Bridges side of Madison County—lack the financial capacity to independently fund environmental assessment, remediation planning, and reuse readiness for brownfield properties. Small population size, low household incomes, limited tax base, and legacy environmental contamination suppress private investment and constrain local government resources. EPA Brownfields funding is therefore essential, not supplemental, to initiate revitalization that would not otherwise occur. All three communities are rural and small. Butte–Silver Bow County has approximately 36,000 residents; Deer Lodge has approximately 3,000 residents within a county of 7,000; and Twin Bridges is ultra-rural with approximately 375 residents. These population levels fall well below what is required to sustain local redevelopment, planning, or environmental programs through local revenues. Priority sites identified in Uptown Butte are located within a federally designated Opportunity Zone and low-income community. Median household income in the affected Census Tracts (1.01, 1.02 and 2) is approximately \$37,000, compared to \$57,504 in Butte-Silver Bow at large and \$70,243 statewide. In the Census Tract with the Broadway street targets (our top four), 50% live below poverty level, with unemployment near 8 percent, and a vacant housing rate of approximately 16 percent. These conditions significantly constrain the ability of local governments and property owners to finance environmental assessment or cleanup, provide match, or absorb redevelopment risk. Environmental assessment and cleanup are front-loaded, costly, and inherently risky, particularly in small rural markets. Property owners lack the capital or borrowing capacity to fund environmental due diligence; lenders and investors will not underwrite sites with unresolved environmental uncertainty; and local governments lack sufficient tax base to self-fund or match large environmental projects. State and federal redevelopment programs require environmental clearance before funds can be accessed. Without EPA Brownfields funding, projects cannot move beyond the first step. As a result, environmentally uncertain and deteriorated properties remain vacant or

underutilized despite strong community demand for housing, services, and economic activity. These brownfields suppress property values and tax base, increase public costs for monitoring and code enforcement, and eliminate opportunities for housing and business development in walkable downtown cores. This grant will provide the only feasible source of upfront environmental funding to remove uncertainty, unlock reinvestment, enable access to follow-on funding, and restore underutilized properties to productive community use.

C.2.b. | Health or Welfare of Sensitive Populations Sensitive populations within the Coalition area include low-income households, renters, seniors, children, people with disabilities, veterans, and other historically marginalized groups. These populations are more likely to live in or near deteriorated, vacant, or contaminated buildings and therefore face disproportionate exposure to environmental hazards. Across the target areas, common risks include lead-based paint and heavy metals associated with historic mining and older buildings, asbestos, mold, poor indoor air quality, and residual contamination from historic industrial, rail, institutional, and commercial uses. Structural deterioration and unsafe access conditions further increase risk. Children are particularly vulnerable to lead exposure, which is linked to developmental and long-term health effects, while seniors and people with disabilities face heightened risk from poor indoor air quality, unsafe building conditions, and limited accessibility. Public health indicators in the Coalition area reflect these cumulative burdens, including lower life expectancy, elevated asthma prevalence, a high proportion of residents with disabilities, and a substantial number of uninsured individuals. In rural and small-town contexts, these challenges are intensified by limited access to healthcare, transportation, housing options, and social services. Housing shortages further exacerbate these challenges by contributing to workforce instability in healthcare, education, and other essential services. The lack of safe, attainable housing for traveling nurses, teachers, and other critical workers directly affects service availability and continuity of care, undermining community health, and resilience.

C.2.d. | Economically Impoverished/Disproportionately Impacted Populations Socioeconomic vulnerability in the Coalition’s target areas compounds environmental and health risk. Communities across the region experience persistent economic distress driven by historic disinvestment, loss of industrial employment, environmental contamination, aging infrastructure, and limited access to capital. Indicators of hardship include high rates of cost-burdened renters; elevated eligibility for free or reduced-price school meals, including universal free meals in one district to avoid stigmatization; and ongoing food insecurity addressed by multiple nonprofit organizations in small communities. These conditions coexist with a high concentration of aging and deteriorated housing stock in historic downtown cores. Disproportionately impacted populations, including low-income households, renters, seniors, people with disabilities, veterans, and other historically marginalized groups, are more likely to live in underinvested areas near brownfield sites and bear cumulative environmental, health, and economic burdens. These pressures are intensified by regional growth spillover, which raises housing costs in historically affordable communities without corresponding wage growth or housing supply. Without initiative-taking intervention, revitalization risks exacerbating displacement rather than expanding opportunity. The Coalition intentionally prioritizes economically distressed and overburdened areas to ensure brownfields revitalization reduces inequities, expands access to safe and affordable housing, directs public investment to communities with the greatest need, and strengthens long-term economic resilience.

C.2.f. | Project Roles Coalition partners bring complementary expertise across environmental assessment, redevelopment planning, housing, economic development, historic preservation, financing, and community engagement. Local governments lead site identification and alignment with community priorities; technical consultants conduct environmental assessments and feasibility analyses; state agencies provide regulatory coordination; and nonprofit, housing, and economic development partners support outreach, readiness, and implementation. Roles and responsibilities are formalized through memoranda of understanding and ongoing coordination.

Organization / Entity	Type	Role in Project	Target Area(s) Served	Level of Commitment

Butte–Silver Bow Community & Economic Development (BSB CED)	Local Government	Core redevelopment partner; site identification; developer coordination; housing, infrastructure, and funding alignment	Uptown Butte	Formal Coalition Partner / MOU
Engineering and Architectural firms	Private / Technical	Reuse planning, feasibility studies, early-stage design concepts, stabilization strategies	Uptown Butte	Advisory partner
Montana Department of Environmental Quality (DEQ) – Brownfields Program	State Agency	Technical assistance; site eligibility screening; coordination with EPA	All	Ongoing programmatic support
Montana State Historic Preservation Office (SHPO)	State Agency	Review and guidance on historic properties; coordination on reuse	All (historic sites)	Regulatory coordination
Uptown Butte Business Improvement District (BID)	Business District / Quasi-public	Downtown business and property owner outreach; coordination with merchants and landlords; support for revitalization	Uptown Butte	Active implementation partner
Southwest Montana Superfund Advisory & Redevelopment Trust Authority	Regional Nonprofit	Business development; entrepreneurship support; technical assistance, Funding.	Region-wide	Active partner
Local Housing Authorities (Butte, Powell)	Public Agency	Housing planning; tenant engagement; alignment with affordable housing priorities	All	Coordination partner
Urban Renewal Authority (URA) – Butte	Local Government	Tax increment financing; redevelopment support	Uptown Butte	Active financing partner
Powell County / City of Deer Lodge	Local Government	Site identification; local engagement; alignment with community priorities	Deer Lodge	Coalition member
Town of Twin Bridges / Madison County	Local Government and County Commissioners	Site identification; community engagement; planning alignment	Twin Bridges	Coalition member
HRCDD Board and Brownfields Committees	Community-Based	Community input; prioritization guidance; regional coordination	All	Ongoing governance
BLDC Board (Butte Local Development Corporation)	Nonprofit / Economic Development	Business recruitment, market analysis, developer connections, capital stacking	Butte–Silver Bow	Strategic economic development partner
Rocky Mountain Board of Realtors	Business Association	Market insights, property identification, broker outreach, redevelopment matchmaking	Region-wide	Outreach and referral partner
Local and Regional Banks / Lenders and State and Federal Grant Funders	Private Finance	Construction, permanent financing, underwriting, financial feasibility	All	Project-specific financing partners
Property Owners / Developers (project-specific)	Private	Redevelopment champions; financing; implementation	All	Case-by-case engagement

C.2.G Community Engagement and Input Community input is integrated throughout the project lifecycle, beginning with early site identification and continuing through assessment, reuse planning, and transition to implementation. Over the past two years, HRCDD has engaged residents, property owners, local organizations, academic partners, and developers while advancing brownfields work in Uptown Butte and Downtown Deer Lodge. This sustained engagement has identified recurring

barriers and directly informed Coalition design and prioritization. The Coalition will continue to incorporate community input through public meetings, listening sessions, site tours, surveys, interviews, inventories, academic partnerships, collaboration with organizations such as Main Street Uptown Butte, the Uptown Butte BID, and the Deer Lodge Citizen Coalition, and ongoing coordination with local governments and housing providers. Community input will be revisited as sites advance to ensure reuse strategies remain aligned with evolving local needs and opportunities.

C.3.a. | Project Implementation

Task / Activity	Description	Lead	Schedule	Expected Outputs (with Acres / Buildings)
Site Inventory & Prioritization	Maintain and expand regional brownfields inventory; screen and prioritize sites		HRCD; Local Governments	Year 1-3 Inventory of up to 80 sites; prioritization of 12-17 sites
Phase I ESAs	Conduct Phase I Environmental Site Assessments on priority sites		Environmental Consultants; DEQ oversight	Year 1-2 10-12 Phase I ESAs
Phase II ESAs	Conduct sampling and site characterization where warranted		Environmental Consultants; DEQ	Year 2-3 5-6 Phase II ESAs; ~15 acres characterized
Hazardous Materials Surveys	Asbestos, lead-based paint, mold surveys in buildings		Qualified Inspectors	Year 1-3 8-10 buildings surveyed; ~250,000 sq ft
Structural & Engineering Assessments	Evaluate building condition and reuse feasibility		Engineers; Architecture	Year 2-3 6-8 buildings assessed; ~200,000 sq ft
Cleanup Planning / ABCAs	Prepare cleanup cost estimates and alternatives		QEPs; HRCD	Year 2-3 4-6 cleanup plans
PARs & Feasibility Studies	Reuse, market, and financial feasibility analysis		Architecture firms; HRCD	Late Year 1-3 6-8 PARs/feasibility studies
Community Engagement	Outreach, meetings, surveys, and stakeholder coordination		HRCD; Montana Tech Env. Engineering Students, Local Partners	Year 1-3 12-15 meetings; 300+ participants
Transition to Cleanup & Redevelopment	Align sites with funding and developers		HRCD; URA; Lenders	Year 3 3-5 sites advanced; ~6 acres ready for cleanup

C.3.e. | Cost Estimates

	Budget Categories	Task 1	Task 2	Task 3	Task 4	Total
		Program Mgmt & Coalition Oversight	Inventory, Outreach & prioritization	Assessment & Env. Due Diligence	Planning, Feasibility & Reuse Readiness	
1	Personnel	\$47,550	\$17,290	\$ 12,970	\$ 8640	\$ 86,450
2	Fringe Benefits	\$ 19,020	\$ 6,916	\$ 5188	\$ 3456	\$ 34580
3	Travel*	\$ 15,000	\$ 10,000	\$ 0	\$ 0	\$ 25,000
4	Equipment**	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
5	Supplies	\$ 5000	\$ 10,000	\$ 5000	\$ 5000	\$ 25,000
6	Contractual	\$ 145,000	\$ 210,000	\$ 393,000	\$ 392,000	\$ 1,140,000
7	Other	\$ 7,500	\$ 15,000	\$ 7,500	\$ 14,500	\$ 44,500
8	Total Direct Costs****	\$ 234,070	\$ 274,206	\$ 423,658	\$ 423,596	\$ 1,355,530
9	Indirect Costs****	\$ 23,407	\$ 27,421	\$ 42,366	\$ 51,276	\$ 144,470
10	Total Budget	\$ 257,477	\$ 301,627	\$ 466,024	\$ 474,872	\$ 1,500,000

Overall Budget Framing

The budget prioritizes environmental assessment and reuse readiness while maintaining restrained administrative costs and targeted outreach appropriate for a rural, multi-community coalition.

Task 1 – Program Management & Coalition Oversight Task 1 supports sufficient program management capacity for EPA compliance, procurement, reporting, partner coordination, and program learning, including participation in EPA-sponsored and brownfields-relevant conferences.

Task 2 – Inventory, Outreach & Prioritization Task 2 funds regional inventory development, site screening and prioritization, property owner engagement, and community outreach, including in-region travel and a Brownfields Road Tour to report findings back to participating communities.

Task 3 – Assessment & Environmental Due Diligence Task 3 represents the largest technical investment and supports Phase I and Phase II Environmental Site Assessments, hazardous materials surveys, and related environmental documentation necessary to characterize risk and inform cleanup and reuse decisions.

Task 4 – Planning, Feasibility & Reuse Readiness (30%) Approximately 30 percent of the total grant is allocated to planning, feasibility, and reuse readiness activities, including feasibility studies, Preliminary Architectural Reports, structural and engineering assessments, and cleanup planning, to ensure assessed sites advance into defined cleanup and redevelopment pathways.

Personnel & Fringe costs reflect a lean staffing model averaging a \$65,000 annual salary, charged at 0.50 FTE in Year 1 & Year 2 and 0.33 FTE in Years 3, with fringe calculated at 40 percent, ensuring adequate program oversight without diverting funds from assessment & planning activities.

Travell costs primarily support in-region mileage for site visits, community meetings, and partner coordination, with rare overnight travel and limited out-of-region travel for the EPA National Brownfields Conference and a targeted land-bank or interim ownership convening.

Contractual costs support the core technical work of the program, including environmental assessments, feasibility studies, cleanup planning, and professional outreach services directly tied to site identification and pipeline development.

Indirect costs are calculated using the 10 percent de minimis rate and support shared organizational systems necessary to responsibly administer federal funds.

Other direct costs support limited, non-personnel expenses necessary to conduct community engagement, site access, and reporting activities that cannot be categorized as personnel, travel, supplies, or contractual services. These costs include meeting and event expenses for community briefings and site tours; printing and mailing of required notices, fact sheets, and assessment summaries; accessibility and translation services where needed; modest participant support costs associated with community meetings; and costs related to reporting assessment findings back to participating communities through a structured Brownfields Road Tour. Other costs are distributed across tasks and years and are intentionally capped to support equitable access, transparency, and effective communication without substituting for professional services or staff labor. These costs are incidental to, but necessary for, successful implementation of assessment, outreach, and reuse-readiness activities in rural and frontier communities.

Plan to Measure and Evaluate Environmental Progress and Results Headwaters Resource Conservation & Development Area, Inc. (HRCDA), as Lead Coalition Member, will implement a structured, transparent, and performance-driven evaluation framework to measure environmental progress, program effectiveness, and community benefit throughout the grant period. The framework tracks both implementation outputs (what the program delivers) and environmental and redevelopment outcomes (what those outputs enable), recognizing that assessment and planning are early but essential steps in the brownfields reuse continuum. Evaluation activities are integrated into routine program management, EPA reporting, and partner coordination to support accountability, continuous improvement, and adaptive management. Metrics are directly aligned with the program's tasks and work plan deliverables and focus not only on activities completed, but on how those activities reduce environmental risk, clarify reuse pathways, and advance sites toward cleanup and

redevelopment. Measures are intentionally realistic and appropriate to a three-year Assessment Grant and are applied consistently across sites using standardized tools and reporting formats. Evaluation findings are used to inform prioritization, resource allocation, and program refinement over time. HRCD tracks progress using EPA reporting systems, including ACRES and required quarterly and semi-annual reports; a centralized internal project tracking database; standardized site prioritization, readiness, and feasibility scoring tools; consultant deliverables such as assessment reports, feasibility studies, and reuse plans; and structured partner and community feedback gathered through meetings and regular check-ins. Evaluation data are reviewed quarterly by HRCD and Coalition partners and used to adjust outreach, prioritization, and deployment strategies as needed to ensure the program remains effective, responsive, and aligned with community goals.

Key Metrics by Task

Task 1 — Program Management, Governance, and Compliance Evaluation will track timely submission of all required EPA reports; execution of MOUs with Coalition partners; and the frequency of partner coordination meetings. Outcomes include consistent compliance with federal requirements, improved coordination, and decision-making across the Coalition, and reduced administrative delays in project delivery.

Task 2 — Inventory, Community Engagement, and Prioritization Metrics include the number of sites inventoried or updated, outreach activities conducted, and sites scored and prioritized. Outcomes include increased identification of eligible and strategic brownfield sites, improved alignment between community goals and redevelopment opportunities, and development of a stronger, more diverse project pipeline.

Task 3 — Site Assessment and Environmental Due Diligence Outputs include the number of Phase I ESAs, Phase II ESAs, and hazardous materials surveys completed. Environmental results include improved identification and characterization of contamination, reduced uncertainty and exposure risk, and enhanced protection of human health and the environment.

Task 4 — Planning, Feasibility, and Reuse Readiness Metrics include the number of feasibility studies completed, reuse or redevelopment concepts prepared, and sites with defined cleanup and reuse pathways. Outcomes include an increased number of reuse-ready sites, reduced financial and technical barriers to redevelopment, and an increased likelihood that sites proceed to clean up and reuse. Housing-specific outcomes include the number of housing units planned or enabled through feasibility and reuse planning, sites evaluated for residential or mixed-use conversion, and the estimated share of planned units designated as affordable or workforce housing, where applicable.

Cross-Cutting Outcomes: Leveraging, Replication, and Pipeline Sustainability Through implementation of Tasks 1–4, the Coalition will track the amount of additional public and private investment leveraged; the number of sites advanced into cleanup, financing, or redevelopment; & the number of communities adopting elements of the Coalition’s model. Outcomes include increased rates at which sites move from assessment to cleanup, strengthened local capacity for brownfields redevelopment, & establishment of a sustainable, revolving redevelopment pipeline.

C.4.a. | Organizational Capacity The Coalition’s primary anticipated environmental result is the reduction of risks to human health and the environment by identifying, characterizing, and managing contamination on underutilized and potentially contaminated properties. The core function of this program is to remove environmental unknowns that create risk, delay, and inaction. Through systematic inventory, site assessment, and environmental due diligence, the Coalition will: 1. Identify and document contamination and hazardous building materials, 2. Prevent inappropriate reuse or disturbance prior to assessment and remediation, 3. Clarify cleanup needs, costs, and regulatory pathways, 4. Reduce uncertainty that discourages investment and prolongs environmental exposure. Environmental progress will be demonstrated by the number of sites assessed, the completeness and quality of environmental information generated, and the number of sites advanced into cleanup planning or remediation pathways. Although cleanup may occur beyond the Assessment Grant period, the program will produce lasting environmental benefit by converting unknown or unmanaged risks into known, manageable, and solvable conditions.

C.4.b. | Organizational Structure The Coalition will build existing inventories and prior prioritization work as a springboard for outreach and early conversations with property owners, partners, and community stakeholders. Coalition members will collaboratively develop outreach lists, assess owner interest, and conduct an initial screening of candidate sites using a shared prioritization grid. Sites tours will be evaluated for community needs, environmental risk, readiness, redevelopment feasibility, and affordable workforce housing potential, with particular attention to housing for teachers, nurses, college students, empty nesters, veterans, and seniors. Where sites cluster within a block, the Coalition will, as allowable under EPA Brownfields Assessment funding, assess shared, non-remedial barriers—such as utility capacity and subsurface conditions—to reduce uncertainty and improve redevelopment readiness. This coordinated approach ensures meaningful partner involvement, accelerates assessment, and creates greater certainty for investors while aligning redevelopment outcomes with local priorities.

C.4.c. | Description of Key Staff Headwaters Resource Conservation & Development Area, Inc. (HRCDA) has a small, experienced, and highly integrated team with demonstrated capacity to manage EPA cooperative agreements, oversee complex technical work, and coordinate multi-partner redevelopment efforts. The Brownfields Manager serves as the primary EPA point of contact and provides overall program leadership, including day-to-day workplan management, procurement and contract oversight, partner and consultant coordination, integration of assessment and reuse-readiness activities, and timely reporting, compliance, and quality control. This position brings experience in brownfields administration, redevelopment planning, and federal grant management. She is overseen by the Executive Director who stays current on Brownfields. The Fiscal Analyst provides financial oversight and internal controls, including budget management, expenditure tracking, invoicing and reimbursement, audit coordination, and compliance with 2 CFR 200 and EPA financial requirements, ensuring responsible and transparent stewardship of federal funds. HRCDA will procure and manage Qualified Environmental Professionals (QEPs) and other technical consultants to complete Phase I and II ESAs, hazardous materials surveys, and related environmental due diligence. Planning, architectural, engineering, market, and feasibility consultants will be engaged as needed to support reuse planning and redevelopment readiness. Local governments, housing organizations, economic development entities, and community partners support site identification, prioritization, and community engagement, providing local knowledge and implementation capacity that ensures the program is responsive and positioned for measurable outcomes.

C.4.d. | Acquiring Additional Resources The Coalition will use EPA Assessment funding as seed capital to unlock and align follow-on resources for cleanup and redevelopment. By producing credible third-party documentation, including site eligibility and access, Phase I/II ESAs, cleanup cost opinions and ABCA-ready cost ranges, reuse concepts, and feasibility and market analysis, the Coalition will reduce uncertainty and make priority sites financeable and grant-ready. The Coalition will actively explore, cultivate, and maintain relationships with public agencies, lenders, philanthropic and mission-aligned investors, and will develop a clear resource roadmap for property owners and project sponsors. This roadmap will identify applicable funding and financing tools, typical sequencing, and readiness thresholds, and will be paired with direct introductions to funders and technical partners to help projects move from assessment to cleanup and redevelopment. Assessment results will be structured to directly support pursuit of: 1. EPA Brownfields Cleanup Grants and RLF loans/subgrants, 2. State and local remediation and brownfields programs, 3. Housing and community development capital, including energy and code-compliance tools such as C-PACE where applicable, 4. Historic preservation incentives, and 5. Philanthropic and mission-aligned capital for housing and community-serving reuse. Coalition partners will multiply EPA investment through in-kind and programmatic contributions, including staff time, owner outreach, access facilitation, community engagement, local coordination, and planning and policy alignment. As sites advance, the Coalition will track leveraged public, private, and philanthropic commitments associated with EPA-funded assessment and readiness activities to demonstrate compounding impact and successful redevelopment outcomes.

C.4.e.1. | Accomplishments HRCDC has a record of administering EPA Brownfields funding and stewarding complex redevelopment processes through uncertainty, market shifts, and changing community conditions. HRCDC successfully administered an EPA Brownfields Coalition Grant in partnership with Anaconda–Deer Lodge in the early 2000s. Within Butte–Silver Bow, HRCDC addressed three properties. Two sites are successfully redeveloped and are now thriving businesses — including a Dairy Queen that employs 16 full- and part-time workers and a high-end industrial condominium project. The third Butte property was the former YMCA, a large, complex, and capital-intensive historic structure representing a “whale” project relative to the size and capacity of the local market. While the site was assessed, the scale of rehabilitation, financing requirements, and market risk associated with the building exceeded what the original developer could sustain under changing economic conditions. The developer recently placed their Butte properties on the market. This outcome reflects not a failure of assessment, but the reality that exceptionally large and complex projects often require specialized capital stacks, long time horizons, and multiple phases of de-risking beyond what assessment alone can provide. Of the three partner properties outside Butte, one property owner is continuing independently with plans to open a distillery. Two sites remain vacant, reflecting the reality that assessment is most effective when paired with planning, feasibility, and active readiness-building — lessons that directly informed the Coalition’s current integrated model. We have documented these outcomes in EPA’s ACRES system. HRCDC launched its original EPA Brownfields RLF Cooperative Agreement in January 2024 and received a one-year extension through September 2026 to complete deployment and closeout. During this period, HRCDC has: 1. Helped fund the first Brownfields cleanup in Powell County at the Milwaukee Roundhouse and supported the county's effort in their 2025 Cleanup Grant application, 2. Secured a grant/loan combination to support cleanup and reuse of the Clancy Old Red Schoolhouse, which is now nearing completion, 3. Executed a grant/loan transaction that will fully close the original Cooperative Agreement, meet the \$600,000 loan and loan-eligible contractual obligation, advance revitalization in Uptown Butte, and deploy a significant portion of the Supplemental RLF, 4. Advanced a second loan through the loan committee and is actively resolving scope and budget adjustments resulting from construction bids exceeding engineer estimates. These examples demonstrate HRCDC’s ability to navigate regulatory, financial, technical, and market challenges while continuing to move projects forward. Most recently, HRCDC executed a \$750,000 Brownfields RLF loan that catalyzed more than \$4 million in additional investment into a single Uptown Butte redevelopment project. This included: \$750,000 in low-income housing grant funding, \$2.4 million in mission-aligned debt financing secured by the nonprofit developer to complete the low-income housing component, \$200,000 from the Main Street Uptown Butte program, \$300,000 from the Urban Renewal Authority (URA), \$35,000 from the Superfund Advisory and Redevelopment Trust Authority (SARTA), \$75,000 from DEQ Brownfields and \$132,355 from HRCDC’s EPA Brownfields Community Grant Cleanup Program. Together, these resources enabled the stabilization and rehabilitation of one of Uptown Butte’s largest and most visibly deteriorated historic buildings with the goal of low-income housing and overnight and short-term accommodations on the vacant 3rd, 4th, 5th and 6th floors. The investment “sealed the envelope” of the building by replacing rotting, boarded-up windows with SHPO-approved, modern, energy-efficient windows — reducing deterioration, improving energy performance, and restoring the building’s historic character. This work directly supports the project’s redevelopment plan, which includes low-income housing, short-term and overnight accommodations, and continued activation of the building with arts, retail, office, studio, and community uses such as yoga and pottery studios. This example demonstrates HRCDC’s ability to strategically deploy EPA funds to de-risk complex historic properties, unlock layered public and private capital, and translate environmental and structural readiness into lasting community benefits. HRCDC’s experience has reinforced several key lessons: 1. That exceptionally large and complex “whale” projects require specialized approaches, longer time horizons, and layered risk-reduction strategies, 2. That early assessment is most effective when paired with feasibility, reuse planning, and capital strategy, 3. That sustained stewardship is necessary to keep projects alive through

changing conditions, 4. And that rural and historic communities benefit from tailored, proactive pipeline development. The proposed Coalition program directly incorporates these lessons by integrating assessment, planning, reuse-readiness, and active project stewardship into a unified, scalable model. HRCDC has demonstrated: 1. The ability to responsibly administer EPA cooperative agreements, 2. A proven capacity to move projects from concept to cleanup and toward reuse, 3. The ability to steward exceptionally complex projects as well as smaller, quicker wins, 4. A commitment to learning, adaptation, and continuous improvement.

C.4.e. | Currently has an EPA Brownfields Grant HRCDC currently administers two EPA Brownfields Revolving Loan Fund (RLF) Cleanup Cooperative Agreements—an original award and a supplemental award—and has no other open EPA Brownfields grants. HRCDC has maintained full compliance with the workplans, schedules, and terms of both cooperative agreements. All required quarterly and semi-annual reports have been submitted on time and accepted, with ongoing and accurate reporting maintained in EPA’s ACRES system. All grant funds have been used exclusively for eligible activities, and required deliverables, including loan and subgrant documentation, site eligibility determinations, cleanup documentation, and financial and performance reports—have been submitted in coordination with EPA Region 8 project officers. The original RLF agreement (January 2024–September 2026, with approved extension) is nearing closeout, with minimal remaining funds that are fully committed and scheduled for expenditure within the Period of Performance. The supplemental RLF award (September 2025) entered active deployment in January 2026, with funds committed to projects in the current pipeline through executed or pending loan and subgrant agreements. HRCDC has demonstrated measurable progress toward expected grant outcomes, including deploying RLF loans and subgrants, advancing sites from cleanup toward reuse and redevelopment, and leveraging additional public and private investment. Where schedules required adjustment, delays were attributable to documented and reasonable factors such as construction cost escalation, project re-scoping for feasibility, and procurement timelines. In all cases, HRCDC worked proactively with EPA to revise scopes, schedules, and budgets through approved amendments and updated ACRES reporting. HRCDC maintains an active and viable RLF project pipeline and has demonstrated the capacity to deploy funds efficiently while maintaining compliance, accountability, and financial integrity. The organization has no recent Brownfields grant closeouts other than an early Coalition grant administered in the early 2000s, which was closed in accordance with EPA requirements. EPA policy recognizes that RLF closeout outcomes are not penalized under the FY23 RLF Policy Memo. This record reflects strong administrative capacity, responsible stewardship of federal funds, and transparent, effective grant management.

C.4.f.1. | Purpose and Accomplishments HRCDC assumed administration of a USDA Specialty Crop Block Grant (SCBG 22-43) approximately six months prior to the end of the project period, inheriting a remaining balance of \$125,000. During that time, HRCDC successfully implemented core project activities, delivered key outputs, and responsibly expended \$103,133 on eligible, high-impact activities. The remaining \$21,867 was voluntarily relinquished back to the Montana Department of Agriculture because we could not ethically and effectively deploy it within the shortened timeframe. Rather than rush spending to exhaust the balance, HRCDC prioritized fiscal responsibility, compliance, and program integrity. This approach reflects HRCDC’s commitment to responsible stewardship of public funds and to delivering meaningful outcomes rather than simply maximizing expenditures.

C.4.f.2. | Compliance with Grant Requirements

Headwaters Resource Conservation & Development Area, Inc. has demonstrated excellent compliance with the workplan, schedule, and all applicable terms and conditions under its current and most recent financial assistance agreements, including EPA Brownfields Revolving Loan Fund (RLF) cooperative agreements. Although HRCDC initiated RLF lending activities approximately two years later than the other Montana peer programs, it has met or exceeded all required programmatic, financial, and reporting obligations and progressed efficiently toward expected outcomes. Notably, HRCDC is the first RLF program in Montana to reach the 50% loan/subgrant utilization requirement, reflecting strong pipeline development, effective underwriting, and successful project execution. All

required reports—including quarterly and annual performance reports, financial status reports, and drawdown documentation—have been submitted on time and accepted without findings by the awarding agency. HRCDD maintains strong internal grant management controls to ensure compliance with EPA requirements, including procurement standards, financial tracking, and subrecipient oversight. Working closely with our EPA Project Officer, HRCDD identified, documented, and received approval for necessary scope adjustments, ensuring continued compliance while advancing projects into active cleanup and construction phases.

HRCDD has made substantial and timely progress toward achieving expected results under its RLF agreement. Funds have been deployed to support eligible cleanup projects, and loan/subgrant funding has been strategically earmarked to both close out the original RLF award and support the recently awarded RLF Supplemental Grant, ensuring continuity and full utilization of federal resources. Program implementation aligns planned activities with achieved outcomes, including establishment of a viable cleanup pipeline, timely obligation and drawdown of funds, and measurable progress toward community redevelopment and reuse goals. No corrective actions have been required related to compliance, reporting, or performance. HRCDD has nevertheless continued to refine internal processes to accelerate deployment and reduce risk through enhanced partner coordination, early technical vetting of sites, and strategic planning across grant periods.