



RO8-26-C-006

January 21, 2026

Environmental Protection Agency Region 8
Attn: Melisa Devincenzi
1595 Wynkoop Street (EPR-B)
Denver, CO 80202-1129
Via email: devincenzi.melisa@epa.gov

Re: City of Greeley, CO, Cleanup Grant Application for Arroyos del Sol Natural Area, Narrative Information Sheet

Dear Ms. Devincenzi:

The Arroyos del Sol Natural Area is located between Greeley, Windsor, and Loveland adjacent to 10611 Spur 257, Greeley, CO. This beautiful natural area is a remarkable 978-acre addition to Greeley's portfolio of natural spaces, recently acquired by the city and envisioned as a haven for outdoor recreation and wildlife conservation. However, the potential of this site is currently hindered by the presence of asbestos contamination and other environmental hazards. Securing funding for cleanup is crucial to transforming this space into a vibrant community resource. As Greeley, Colorado's tenth largest city, continues to grow, expanding by 17% between 2010 and 2020, the demand for accessible outdoor recreation has never been greater. This is particularly true for lower-income residents who currently must travel 20 to 30 miles to reach comparable outdoor spaces. With planned developments including 12+ miles of trails, the Arroyos del Sol Natural Area could close this gap, enhancing the quality of life for all Greeley residents and preserving vital ecological habitats. Therefore, the City of Greeley is seeking \$1,488,931 in funding through the USEPA Brownfield Cleanup Grant to address the environmental concerns and unlock the full potential of this space for the community's health, wellness, and environmental stewardship.

Narrative Information Sheet

1. Applicant Identification: The applicant for the EPA Brownfields Site-Specific Cleanup Grant is the City of Greeley, 1000 10th Street, Greeley, CO 80631.
2. Website URL: City of Greeley (greeleygov.com)
3. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$1,487,431
4. Location: City of Greeley, Weld County, Colorado.
5. Property Information: The property consists of two parcels of land (Parcel #095702000004 and 095703000018) measuring approximately 978 acres of prairie and riparian ecosystems located in Sections 34 and 35, Township 6 North, Range 67 West; and Sections 2,3,10, and 11, Township 5 North, Range 67 West of the 6th Principal Meridian in Weld County, Colorado.

The City of Greeley recently acquired the property and proposes expanding its Open Space use with green space to expand hiking and trail access. Natural Areas & Trails Division of the Culture, Parks & Recreation Department of the City of Greeley provides oversight.

6. Contacts:

- a. Project Director(s): Don Threewitt (Deputy Director of Community Development) and Karen Scopel (Environmental Planner), 1000 10th Street, Greeley, CO 80631; Phone: 970.350.9802; Email: Don.Threewitt@Greeleygov.com and Karen.Scopel@Greeleygov.com
- b. Chief Executive Officer: Mayor Dale Hall, Mayor, 1000 10th Street, Greeley, CO 80631; Phone: 970.350.9772; Email: Dale.Hall@greeleygov.com

7. Population:

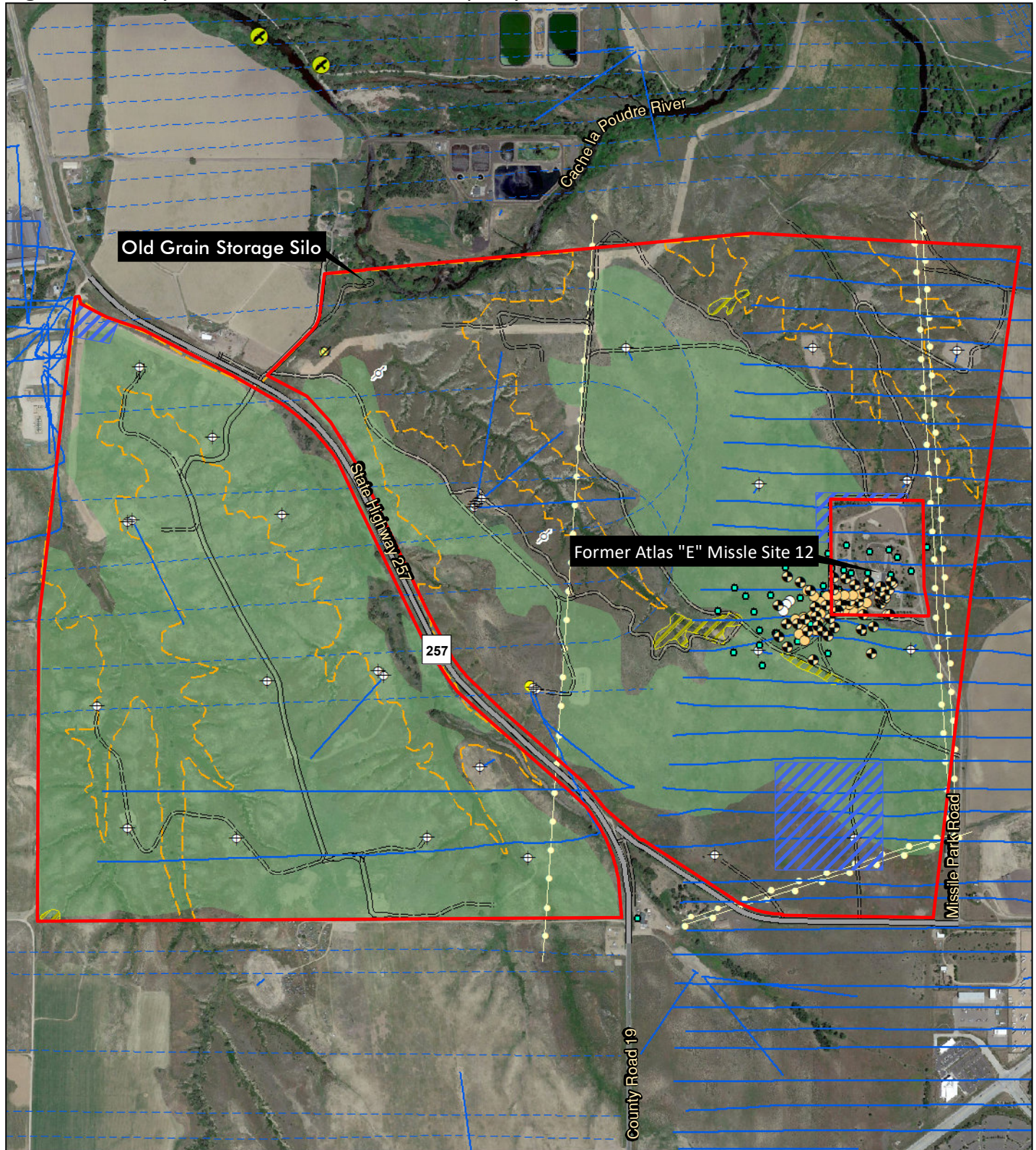
- a. The City of Greeley is estimated at 108,795 (Population, Census, 2020, QuickFacts, Greeley, Colorado, U.S. Census Bureau, available at www.census.gov).

8. Other Factors Checklist

Other Factors (TBD)	Page #
Community population is 15,000 or less.	--
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	--
The proposed site(s) is impacted by mine-scarred land.	--
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	4,5
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	1,2,3
The proposed site(s) is in a federally designated flood plain.	2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2,3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	2,3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	--

Thank you for your consideration of our grant application materials. We trust you will find them complete and, we hope, worthy of an award.

Figure 1. Arroyos Del Sol Natural Area Property



Arroyos Del Sol Natural Area Property Baseline Inventory

July 25, 2024

- | | | |
|-----------------------------|---|---------------------------|
| Property Boundary | Abandoned Oil and Gas Well Location | Gravel Road |
| Potential Building Envelope | Plugged and Abandoned Oil and Gas Well Location | Two-Track Road |
| Raptor Nest Location | Producing Oil and Gas Well Location | Overhead Electric Line |
| Constructed Water Well | Temporarily Abandoned Oil and Gas Well Location | Solid Waste Disposal Site |
| Dual Phase Extraction Well | Directional Wellbore | Arroyo Habitat |
| Monitoring Well | Planned Wellbore | Prairie Dog Complex |
| Proposed Injection Well | Asphalt Road | |



Information on this map is provided for purposes of discussion and visualization only.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields:

1a. Overview of Brownfield Challenges and Description of Target Area: The City of Greeley, Colorado, is a rapidly growing community of approximately 108,795 (2020 Census) in northern Colorado, located about 50 miles northeast of Denver. Between 2010 and 2020, the City experienced a 17% increase in population, significantly outpacing the national growth rate of 7.4% during the same period. This rapid expansion reflects Greeley's strong economy and quality of life, but also places increasing pressure on public infrastructure and amenities. This trend is only expected to continue, with an estimated 6,000 new housing units in preliminary development in 2025.

As Greeley's population has expanded, investment in public recreational amenities and accessible natural spaces has not kept pace. Many residents, especially those in historically underinvested neighborhoods, currently must travel 20–30 miles to reach open spaces and outdoor recreation areas comparable to what is envisioned for this project. This disparity in access to green space has become a critical quality-of-life concern for Greeley's residents. The revitalization of parks and addressing brownfields and environmental issues are crucial for improving access to outdoor spaces, ultimately fostering a healthier, more resilient community for Greeley's varied and evolving population. Moreover, Greeley's economic challenges highlight the need for targeted investment in its open spaces. Deemed a "high poverty area" by the EDA-Census Poverty Status Viewer, 15% of Greeley residents live in poverty, and many families struggle with rising housing costs, spending over 30% of their income on housing. As one of Colorado's most culturally diverse cities, with 40.2% of its population being Hispanic ([Census.gov](https://www.census.gov)), Greeley's communities would benefit enormously from revitalizing the Arroyos del Sol Natural Area. Brownfields and environmental issues continue to be a barrier for these populations, limiting their access to outdoor spaces and stifling their opportunities for success. The funding to clean up this land would protect the community's health and safety and provide much-needed access to green space and recreational opportunities.

Brownfield sites across the City, including properties with legacy environmental contamination, represent both a challenge and an opportunity in addressing these needs. Without environmental cleanup, contaminated land cannot be repurposed safely for public use, effectively locking valuable acreage out of service to the community. The presence of asbestos-contaminated soils and other hazards on the target property severely limits public access and use of the property, highlighting the need for federal investment to remove these barriers and protect public health.

Because the benefits of remediating these sites extend throughout the City, by expanding equitable access to outdoor spaces and supporting healthy lifestyles, the entire City of Greeley (Greeley) is defined as the Target Area for this Cleanup Grant. Brownfield remediation in Greeley is not simply a site-specific need; it is central to expanding safe, accessible natural areas that serve all residents.

One such property, the [Arroyos del Sol Natural Area](#), exemplifies the opportunity and challenge before the City. Located on the west side of Greeley, adjacent to CO-257 Spur, this 978-acre landscape has been identified by the community and City leadership as a key future natural and recreational asset. However, lingering environmental hazards from past land use currently prevent the full realization of the site's public benefit. Without funding for environmental cleanup, the vision for Arroyos del Sol Natural Area to serve as a vibrant and safe community resource is at risk.

The project has generated strong community interest and positive discussion on the online forum [Speak Up Greeley \(speakupgreeley.com\)](https://speakupgreeley.com). This project goes beyond environmental remediation; it will improve residents' quality of life, strengthen community bonds, and contribute to Greeley's long-term economic and social vitality. By addressing these environmental challenges now, the City can unlock the full potential of this natural space, allowing its population to thrive. The Arroyos del Sol Natural Area offers a unique opportunity to address the long-standing gap in access to outdoor spaces. Cleanup of the site is essential not only to remove contamination but also to ensure the property can be safely enjoyed by current residents and preserved for future generations while maintaining its ecological and scenic value ([article from The NoCO Optimist](#) and [Greeley Tribune](#)). Investing in the cleanup and redevelopment of this important property is an investment in Greeley's future, enhancing public health, preserving ecological and historical assets, and providing sufficient recreational opportunities for the city's rapidly growing population.

1b. Description of the Proposed Brownfield Site: The Arroyos del Sol Natural Area consists of approximately 978 acres of prairie and riparian ecosystems located on the west side of Greeley, Colorado, adjacent to 10611 CO-257 Spur. The site encompasses portions of Sections 34 and 35, Township 6 North, Range 67 West, and Sections 2, 3, 10, and 11, Township 5 North, Range 67 West of the 6th Principal Meridian in Weld County. The property comprises two contiguous parcels situated along the Cache la Poudre River corridor. The owner of record is the "City of Greeley," which took ownership of the property in 2025 after a long partnership with the [Trust for Public Lands \(TPL\)](#). TPL and Greeley had previously entered into a Lease Purchase Agreement, granting the City site control in 2022, allowing the City time for due diligence activities prior to purchase in 2025.

Arroyos del Sol Natural Area represents a remarkable addition to Greeley's portfolio of natural spaces and is envisioned as a future hub for outdoor recreation, environmental education, and wildlife conservation. The site's topography gently slopes from south to north and is characterized by a network of steep arroyos and ravines. Elevations across the property range from approximately 4,770 to 4,970 feet above sea level. The site forms a critical component of the distinctive bluff system along the Cache la Poudre River corridor, shaped over thousands of years by river processes. Rising more than 200 feet from the

river to the Colorado Piedmont, the bluffs create a dramatic landscape of rolling hills, ravines, and arroyos that support diverse native habitats.

The property contains a largely intact, high-quality shortgrass prairie ecosystem and provides critical habitat for a wide range of wildlife, including mule deer, white-tailed deer, bald eagles, river otters, coyotes, and the rare Colorado American bumblebee. The rim portions of the site support the rare Platte milkvetch, while the riparian areas along the Cache la Poudre River provide additional habitat. More than four miles of ephemeral drainages span approximately 650 acres of the site, conveying stormwater and offering shelter for wildlife, while approximately one-third of a mile of the Cache la Poudre River defines the northern boundary and supports nearly 20 acres of riparian and wetland habitat. These natural features make the site well-suited for birdwatching, hiking, mountain biking, running, walking, river access, and ecological education, and the property is already used by local high schools for field-based environmental training.

Historically, the land was used for sheep grazing and, most recently, winter wheat production. Following the 2008 Windsor tornado, agricultural operations ceased due to widespread debris in the fields, allowing much of the landscape to begin reverting to its natural condition. While production agriculture is no longer practical given the property's planned role as public open space, grazing remains compatible with surrounding land uses, as neighboring properties continue ag operations.

Despite its exceptional ecological, recreational, and educational potential, the revitalization of the Arroyos del Sol Natural Area site is constrained by environmental contamination from illegal dumping. During site walks conducted in June 2022, multiple dump sites were discovered across the property. Greeley and TPL coordinated with the Colorado Department of Public Health and Environment (CDPHE) to initiate environmental inspection and asbestos sampling. A Site Assessment and Asbestos Inspection was conducted in 2021 and 2022 by a Qualified Environmental Professional (QEP), confirming the presence of asbestos-containing materials (ACM) and regulated asbestos-contaminated soil (RACS).

A subsequent Baseline Inventory Report completed on July 26, 2024, documented existing environmental conditions and identified four discrete illegal dumping areas containing asbestos-contaminated material on the soil surface. Approximately 34,508 square feet of RACS and 61,955 square feet of solid waste areas were identified. Based on CDPHE guidance, remediation will require removal of ACM and approximately six inches of underlying soil. Cleanup will be logistically challenging due to the location of dump sites within deep, steep-sided ravines.

CDPHE has determined that the Arroyos del Sol Natural Area property, formerly known as the Shurview Property, was used as an illegal solid waste disposal facility without a required Certificate of Designation, in violation of Colorado Revised Statutes §30-20-102. No known responsible party has been identified. CDPHE issued a Compliance Advisory in September 2022 requiring that dumped materials be removed, with no option for capping or leaving materials in place, and requested preparation of a Corrective/Remedial Action Plan.

The presence of asbestos-contaminated soil currently restricts safe public access and prevents the City from opening the property for its intended use as a public natural area. Without funding for environmental cleanup, the vision for Arroyos del Sol Natural Area as a vibrant, safe community resource remains at risk. Cleanup funding is essential not only to remove contamination, but to protect public health, preserve the site's ecological and scenic value, and ensure this significant landscape can be safely enjoyed by residents of Greeley for generations to come.

[Revitalization of the Target Area:](#)

[1c. Reuse Strategy and Alignment with Revitalization Plans:](#) Once the property is cleaned up, the next step is to prepare the site for public use. Following more than a year of extensive public engagement to create the site master plan, now is the time to begin implementing the improvements identified in the plan, especially those that will attract the public to the site with amenities that provide safe and enjoyable outdoor recreational experiences. This will help fulfill one of the purposes of the [Land and Water Conservation Fund \(LWCF\)](#), which provided partial funding for the purchase of the property, by providing meaningful recreation opportunities for current and future generations. The master plan vision is ambitious, and implementation will require collaboration between Greeley and its partners to secure the needed funds to move the site towards meeting its vision to conserve the shortgrass prairie, arroyos, bluffs, and wetlands as a hub supporting biodiversity, wildlife habitat, and outdoor recreation. Note, northern portions of the property are within the flood plain along the Cache La Poudre River (08123C1484F, 08123C1495F, 08123C1503F, and 08123C1511F fema.gov).

The City and TPL led the development of this long-term master plan. Key guiding documents include the [Greeley Trails Master Plan Update \(2024\)](#), [Greeley on the Go 2045 Transportation Master Plan \(2023\)](#), [Get Outdoors Greeley Strategic Plan \(2021\)](#), [Parks, Trails and Open Lands Master Plan \(2016\)](#), [Imagine Greeley Comprehensive Plan \(2018\)](#), [Culture, Parks and Recreation Master Plan \(2025\)](#). These plans have informed the priorities, design, and reuse strategy for Arroyos del Sol Natural Area, ensuring that the project supports long-term community goals for recreation, conservation, and connectivity. Input from more than 4,100 participants, which included city staff, partners, community members, and technical experts, guided the development of the shared vision and the recommended ecological and recreational improvements. The plan was prepared through an open and transparent year-long planning process. This included extensive engagement with city staff, TPL, partners, stakeholders, technical advisory committee members, and local and regional community members. The following describes the project's three phases and highlights the outreach process. Phase 1: Discovery included outreach, review of related planning initiatives and studies and documentation of existing conditions, Discovery Concepts, Final Concept Plan, Ribbon Cutting, Site Tours, Stakeholder Meetings, online surveys (2), Naming Campaign, Pop-up Event, Technical

Advisory Committee Meetings (2), several Community Outreach events, and Project Completion Assessment. [Phase 2: Concepts](#) addressed issues and opportunities identified in previous stages. Facilitated discussions with city staff, partners, stakeholders, and the community to identify the preferred program, two alternatives, and a vision for further development. [Phase 3: Concept Plan](#) documented the preferred concept and vision.

Our reuse plan centers on enhancing the site's natural ecosystems while creating recreational spaces and educational facilities. Key areas, including 700 acres of shortgrass prairie and 11 acres of riparian floodplain, will be conserved as high-quality habitats for wildlife, creating opportunities for visitors to experience these unique ecosystems firsthand. Designated hubs will reuse previously disturbed areas to minimize impact on natural habitats, providing picnic areas, interpretive trails, and nature play zones that encourage low-impact engagement with the landscape. One of the higher areas, known as the Hilltop Hub, will act as a gateway, equipped with amenities like picnic shelters, seating, and interactive programming that highlights the site's ecological and scenic value. A trail network, integrated with regional connections, will provide accessible pathways across the landscape, offering routes for exploration while preserving unfragmented habitat areas. This reuse approach aims to balance conservation with community access, enabling a meaningful connection to the shortgrass prairie and riparian environments.

As part of the redevelopment process, the City and TPL, in collaboration with GOCO and the Colorado Department of Natural Resources, have adopted the Colorado Parks and Wildlife (CPW) State Comprehensive Outdoor Recreation Plan ([SCORP](#)) to maintain eligibility for federal funding and guide further investments from federal, state, local, and private sources. The acquisition of the Arroyos del Sol Natural Area, partially funded by the LWCF, presents a rare opportunity to implement all the priorities of the SCORP in one location. The Arroyos del Sol Natural Area directly supports Priority I: Sustainable Access and Opportunity by transforming a contaminated brownfield into an accessible outdoor space that expands recreational opportunities for all Greeley residents and addresses gaps in access to nature. Through extensive community engagement and planning, the project fosters Priority II: Stewardship, building a lasting ethic of care and ownership that will sustain the site long-term, and Greeley's collaboration with Colorado Parks and Wildlife and other partners ensures continued stewardship capacity. By remediating contamination and protecting intact prairie, riparian, and wetland habitats, the project advances Priority III: Land, Water, and Wildlife Conservation, safeguarding vital ecosystems along the Cache la Poudre River corridor. Finally, cleanup funding will leverage prior investments from the City and partners and unlock the site's full potential, fulfilling Priority IV: Funding the Future by ensuring long-term safe use, enhanced public health, and sustainable community benefits. The Arroyos del Sol Natural Area acquisition and cleanup aligns with numerous statewide plans and national strategies, including the [2015 CPW State Wildlife Action Plan](#); the Colorado Water Conservation Board, [Colorado Water Plan](#); Conservation Colorado's [Climate Blueprint](#); and the Department of Interior [Conserving and Restoring America the Beautiful](#). This project conserves prairie and riparian habitats, protects wildlife (including threatened species), prevents soil erosion and stormwater runoff that could impact a critical water source, and mitigates climate change impacts. Achieving so many goals with one project is rare, making Arroyos del Sol Natural Area an exemplary demonstration of SCORP's benefits for other Colorado communities.

[1d. Outcomes and Benefits of Reuse Strategy](#): Greeley's efforts to enhance outdoor recreation opportunities present an exciting opportunity for community growth and connectivity. The development of new trails for mountain biking, running, and hiking will address the current lack of access to close-to-home outdoor activities. In addition to recreational benefits, this project will improve local resilience to extreme weather events by integrating natural landscapes that help manage stormwater, reduce erosion, and mitigate flooding during heavy rain events. The Arroyos del Sol Natural Area's vision, as a central outdoor recreation hub, is especially promising, with planned connections to the 30+-mile regional Poudre River Trail and surrounding neighborhoods, offering residents greater access to nature and promoting a healthier, more connected community. By restoring and maintaining arroyos and natural corridors, the project will strengthen the area's ability to absorb and slow runoff, reduce heat impacts during extreme temperature events, and protect nearby infrastructure and neighborhoods from climate-related stresses.

In a recently released 2024 statistically valid community survey by ETC Institute, multi-purpose trails were ranked in 2nd place for desired recreational amenities, and nature programs/environmental education was ranked 4th for programs. 84% of survey respondents indicated a need for multi-purpose trails, with only 51% stating that this need is fully or mostly met. Natural areas and trails were ranked as the city's two highest priorities for investment, while nature programs were ranked 4th highest for programming investments. This project can create an interconnected park and trail system while fostering a sense of community. These investments in natural infrastructure not only meet community demand but also enhance long-term resilience by preserving open space that can adapt to flooding, extreme heat, and other natural hazards.

We will ensure that all residents can benefit from outdoor spaces. Collaborating with local families on the cleanup and development of the Arroyos del Sol Natural Area is an excellent way to incorporate the residents' voices into the planning process. In addition to community engagement, preserving and enhancing the natural arroyos and open spaces helps manage stormwater, and reduce flood risks. By maintaining these natural systems, the project also strengthens the neighborhood's ability to recover more quickly after storms or other weather-related disruptions. Overall, these efforts will enrich Greeley's recreational landscape, strengthen community ties, and support local well-being. This initiative represents a meaningful step toward integrating Greeley into Colorado's vibrant recreation-based economy!

Strategy for Leveraging Resources:

1e. Resources Needed for Site Characterization: The site has undergone significant characterization as defined in the July 2024 Baseline Inventory Report and outlined in the ACM Site Plan Figures. Greeley has an active EPA Assessment grant that will be used to complete any further characterization or planning necessary during the cleanup process. In addition, we have reached out to remediation contractors and used that information to further refine our Analyses of Brownfield Cleanup Alternatives (ABCA) and proposed approach.

1f. Resources Needed for Site Remediation: The project actively seeks to engage funders to support the necessary cleanup efforts. This grant specifically covers remediation costs, and initial estimates suggest that additional funding should not be needed. The City contacted 3 remediation contractors for bids. Our analysis shows that the lower cost estimate aligns with project needs. Should additional resources be required for cleanup or waste removal, the City will first seek supplemental resources from partners, followed by requests for additional funding through the CDPHE, if necessary.

1g. Resources Needed for Site Reuse: Our plan vision is ambitious, and implementation will require collaboration between Greeley and its partners. However, we have been successfully working with GOCO, TPL, Colorado Open Lands, the LWCF, and others to ensure that we have the support of the local community and government. This project builds directly on recommendations from a series of local master plans, translating the vision for improved trails, parks, and outdoor spaces into concrete actions. Greeley and TPL have provided \$8.3 million for property acquisition and master planning, with additional contributions including \$250,000 from the Town of Windsor and \$200,000 from the North American Wetland Conservation Act (NAWCA).

The City is working with TPL to deploy the “Community Outreach with Resident Experts” (CORE) Strategy, hiring three resident experts from East Greeley to ensure community voices are incorporated into project implementation. This project serves as a model for collaboration among local, state, and federal agencies, as well as nonprofit conservation partners, to advance environmental cleanup and the safe recreational reuse of sites.

Strong relationships have also been formed with the University of Northern Colorado through their Environmental & Sustainability Studies program and Greeley-Weld School District 6 to provide education and research for the site. District 6 is excited about using this site as a STEM learning environment through the Poudre Learning Center and area high schools. Volunteers will play a key role in implementing this vision. Volunteers for Outdoors Colorado (VOC) employs a Weld County volunteer coordinator at Greeley Natural Areas & Trails Division to provide structured volunteer projects, many of which include educational components that teach participants about habitat restoration, ecology, and trail stewardship. These volunteer efforts will directly support the reuse strategy while engaging the community in hands-on revitalization work directly on the Arroyos del Sol Natural Area.

Name of Resource	Is the Resource for (1.g.i.) Assessment, (1.g.ii.) Remediation, or (1.g.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource (Attachment B)
USEPA	Assessment	Secured	If limited additional assessment activities are needed to characterize contamination, the EPA Brownfield grant for Greeley will be used.
GOCO – Generation Wild Grant Program	Reuse and Programming	Secured	The Generation Wild Grant Program offers free, culturally relevant outdoor programs that expand access to nature for Greeley families, supporting health, connection, and stewardship - \$1.75M
Colorado Fish and Wildlife	Trail Head Improvements	Secured	\$200,000 towards trailhead improvements
National Fish and Wildlife Foundation	Reclamation	Secured	Greeley has also received notification that it has secured a \$250,000 grant from the National Fish and Wildlife Foundation to address weed management, fire plans, etc.
Colorado Open Lands	Reuse Development	Secured	Conservation Easement Deed held by COL (see deeds)
Int'l. Mountain Biking Assoc. (IMBA)	Reuse Development	Unsecured	The IMBA plans to provide \$250,000 in in-kind services to design trails.
Colorado Parks & Wildlife	Reuse Development	Unsecured	Applied for a grant of \$200,000 toward the trailhead project.

1h. Use of Existing Infrastructure: Remedial activities will use existing infrastructure, including roads for hauling waste and municipal water for dust control. Future redevelopment will rely on existing roads, utilities, and services, minimizing costs and environmental impact while reducing new impervious surfaces and preserving intact prairie, riparian, and wetland habitats. The Missile Site Park Trailhead will serve as an access point, linking visitors to Arroyos del Sol Natural Area and the 30+-mile

Poudre River Trail, enhancing recreation, stewardship, and quality of life. Community volunteer programs, coordinated through Volunteers for Outdoors Colorado, will support trail maintenance and habitat stewardship, building local capacity.

The City's long-range transportation master plan outlines several multimodal transportation projects to provide alternative access methods, including public transit routes that will improve access for community members in other parts of the city. However, limited local funding, tied up by rapid population growth, infrastructure needs, and social services, makes full implementation difficult. Many surrounding neighborhoods have below-average household incomes, making low-income residents particularly dependent on accessible transit and trail connections. Efficient use of existing infrastructure, volunteer engagement, and integrated transportation and trail access maximize community benefits while minimizing city costs and supporting long-term site stewardship.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

2a. The Community's Need for Funding: The city's funds are burdened with many demands, and the resources available to carry out cleanup for the Arroyos del Sol Natural Area are not available. Greeley is also focused on revitalizing downtown and industrial areas, where many properties are owned by absentee landlords with little incentive to invest in maintenance, environmental assessments, or cleanup. As a result, limited city resources must be prioritized, creating competition among important projects and leaving some critical cleanup and redevelopment needs, like those at Arroyos del Sol Natural Area, without adequate funding. Greeley is one of the fastest-growing cities in Colorado, and many parcels around the Arroyos del Sol Natural Area will be developed into residential subdivisions in the next few years. Over 6,000 residential units have been approved, resulting in an estimated 16,000+ new residents, a 14% population increase. As a result, Greeley's current population estimate has risen to 108,795 (2020 Census). Greeley's median household income of about \$63,526 (2023 ACS estimate) is significantly lower than Colorado's median of about \$92,911 and well below the U.S. median, while about 15.9% of Greeley residents live in poverty, a rate notably higher than Colorado's approximately 9.3% and the national rate, highlighting the city's greater economic need and more limited local financial capacity for redevelopment without outside assistance. The property is currently accessible by car from Greeley, Windsor, and other nearby communities. The city needs assistance because our resources are tied up keeping pace with growth through necessary infrastructure improvements, social services, and investment in downtown, which also faces contamination issues.

2b. Health or Welfare of Sensitive Populations: In Greeley, children and the elderly are among the most vulnerable populations. Approximately 32% of children and 37% of seniors over 65 live in poverty (2020 Census). This indicates a high concentration of low-income families, with 16.4% of adults lacking a high school diploma (2020 Census), roughly 10% of residents with limited English proficiency (2020 Census), unemployment around 4.5% (2020 Census), and life expectancy slightly below the state average (Weld County Public Health 2022).

Greeley's pre-car-centric planning history placed housing stock close to industrial sites, and many residents continue to live near active rail lines and heavy traffic corridors. Local air quality data show elevated exposure to pollutants, including particulate matter and nitrogen dioxide, in these neighborhoods (CDPHE 2022).

The proposed Arroyos del Sol Natural Area will help address these impacts by expanding safe, accessible outdoor spaces for children, seniors, and other vulnerable populations. Trails, picnic areas, and natural play spaces promote physical activity, social interaction, and mental health, while preserving prairie, riparian, and wetland habitats that buffer air pollution and heat exposure (CDC 2021; CDPHE 2022).

Low-Income Indicators (2020 Census)	Greeley	Weld County	State (CO)
Population	108,795	359,442	5,877,610
Low Income	15.9%	9.0%	9.3%
Under Age 5, > 64	19.8%	19.9%	21.3%
No HS Diploma	16.4%	11.7%	7.5%

2c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Health outcomes in Greeley and Weld County show significant disparities compared to state and national averages:

- Asthma (ages 18–34): 13.7% vs Colorado 8–9%, U.S. 8–10% (Weld County Public Health 2022; CDC 2021)
- Chronic pain (all ages): 25.7% vs Colorado ~20%, U.S. ~20% (Weld County Public Health 2022; CDC 2021)
- Depression or anxiety (all ages): 28.1% vs Colorado ~21%, U.S. ~20% (Weld County Public Health 2022; CDC 2021)
- High blood sugar (all ages): 28.9% vs Colorado ~9%, U.S. ~11% (Weld County Public Health 2022; CDC 2021)
- Obesity (all ages): 64.3% vs Colorado 24–26%, U.S. ~32% (Weld County Public Health 2022; CDC 2021)

Environmental exposures also elevate risk: the County's average daily density of fine particulate matter (PM 2.5) is 9.2 µg/m³, compared to 5.4 µg/m³ statewide, which increases risks of cardiovascular disease, lung cancer, and all-cause mortality (CDC 2011). Diesel particulate matter from traffic and industrial sources has been linked to premature death in those with heart or lung disease.

Other social determinants compound these risks:

- Linguistic isolation in Greeley is at the 87th percentile (ACS 2020), indicating many households where few over age 14 speak English well.
- Insurance coverage: 9.75% uninsured, 23.4% on Medicaid, 9.86% on Medicare.
- Disability: 9% in Greeley vs 7.5–7.6% statewide.
- Poverty-related service use: Among residents below the poverty level, 49% used food assistance, 40% financial assistance, and 38% housing services; 1 in 3 report unstable housing.
- Community concern about pollution: 49.5% report pollution from agriculture and 48% from industry as a problem. Nearly 1 in 4 report having no regular place of healthcare (Weld County Health Survey 2019).

By increasing access to safe, outdoor spaces, the Arroyos del Sol Natural Area supports physical and mental health, mitigates pollutant exposure, and provides equitable recreational opportunities, addressing these health disparities for the city's most vulnerable populations ([2019 Weld County Health Survey](#) findings).

[2d. Economically Impoverished/Disproportionately Impacted Populations:](#) Lower-income populations in Greeley face limited access to quality outdoor spaces and increased environmental stressors. Citywide, 15.9% of residents live below the poverty level, compared to 9.3% statewide (Census 2020). Approximately 32% of households spend more than 30% of their income on housing (ACS 2021 5-year estimates), limiting discretionary resources for recreation and healthy living. Certain neighborhoods also have less than 1 acre of parkland per 1,000 residents, well below national recommendations, highlighting inequitable access to green space (Greeley Parks & Trails GIS Data, 2023; NRPA 2022).

Historical development patterns in Greeley placed residential areas near industrial corridors and major transportation routes. State environmental data (CDPHE EnviroScreen 2.0, 2023) show that many low-income neighborhoods are located near industrial facilities, rail lines, and highways, increasing cumulative environmental burdens. Citywide air quality monitoring demonstrates that PM2.5 levels in some neighborhoods exceed the national standard, further illustrating disproportionate environmental exposure risks.

Investing in the Arroyos del Sol Natural Area addresses these disparities by providing safe, accessible outdoor space for recreation and education. The project includes 700 acres of preserved shortgrass prairie, riparian areas, and wetlands, integrated trails, and habitat-focused amenities that increase greenspace access for underserved populations. Community engagement and volunteer programs ensure that improvements benefit existing residents without displacement.

As part of Greeley's citywide strategy, Arroyos del Sol Natural Area complements other revitalization and recreation projects, supporting community resilience, economic opportunity, and environmental equity. By transforming a previously abandoned and contaminated site into a safe and environmentally rich natural area, the project directly improves quality of life, recreational access, and environmental conditions for economically impoverished populations.

Community Engagement:

[2e. Project Involvement:](#) Greeley has demonstrated a strong and sustained commitment to community engagement for the Arroyos del Sol Natural Area. Prior to the proposed cleanup, the City invested significant funding and staff effort to advance the site, including opening approximately 2.5 miles of dirt trails for walking, biking, and running. With leadership from the Trust for Public Land (TPL) and funding from Great Outdoors Colorado (GOCO) and the LWCF, the City secured site control and advanced long-term planning. TPL initially acquired the property using a combination of City and GOCO funds and confirmed Greeley as the long-term owner and manager. A revised Lease Purchase Agreement executed in June 2023 outlines conveyance to the City, with ownership taking place in early February 28, 2025.

Community input has played a central role in shaping the vision for Arroyos del Sol Natural Area. Public engagement conducted in 2022 and 2023 included collaboration with local youth through the Weld County Youth Conservation Corps and broad community outreach that resulted in renaming the property from the Shurview Property to Arroyos del Sol Natural Area, which was presented to City Council for approval. The master plan was developed through a year-long, open, and transparent process involving City staff, TPL, partners, stakeholders, technical advisory committees, and local and regional residents. TPL's CORE program and GOCO's Fellowship Program ensured inclusive participation, with more than 4,100 community members, advisors, and stakeholders contributing through surveys, meetings, site tours, and pop-up events conducted in three languages. This inclusive engagement approach will continue through the cleanup and implementation phases. The master plan was accepted by City Council in 2025 and construction plans are underway to be completed following cleanup and securing additional funding. A public meeting was held on January 7, 2026 to present the ABCA and grant application.

The project has generated strong community support and enthusiasm, reflected in positive coverage by *The NoCO Optimist* and *The Greeley Tribune* and discussion on the City's online engagement platform, Speak Up Greeley. Residents consistently identify Arroyos del Sol Natural Area as an important opportunity to expand access to outdoor recreation, preserve ecological and historical resources, and improve the quality of life for Greeley's growing population.

The City maintains strong educational and workforce partnerships to support environmental education and stewardship. Greeley West High School students have developed interpretive signage highlighting site ecology, and the City collaborates with the University of Northern Colorado on GIS, natural resource management, and site planning projects. Partnerships with the Poudre Learning Center and Greeley-Evans School District 6 support curriculum-aligned programming, including participation in the Caring for Our Watershed program. Youth engagement is further supported by the City's Summer Teen

Employment and Career Explore programs, which offer paid work experience and internships in natural resource management. Volunteers for Outdoors Colorado assist with organizing volunteer projects, and the City's Natural Areas and Trails staff regularly lead field trips and community site visits.

The City intends to continue these outreach efforts throughout the cleanup process. While direct participation in asbestos remediation is not appropriate, the cleanup will be used as an educational opportunity through project-based learning, case studies, and interaction with environmental professionals. These efforts will ensure continued community involvement and help build understanding of environmental cleanup, public health, and land stewardship while advancing the safe reuse of the Arroyos del Sol Natural Area.

2f. Project Roles: Community-based organizations have been instrumental in creating a vision for revitalizing the Arroyos del Sol Natural Area. The following community organizations will provide support and be deeply involved in implementing this grant:

Name of organization/entity/group and Point of Contact (name and Email)	Entity's mission	Specific involvement in the project/assistance provided
Poudre Learning Center Linda Sears plc@greeleyschools.org	To awaken a sense of wonder and inspire environmental stewardship and citizenship by educating all students through outdoor experiences and inquiry learning.	Provide career development, internships, and curriculum.
Weld County Youth Conservation Holly Bernhardt hbernhardt@weldgov.com	The Weld County Youth Conservation Corps empowers young people through hands-on conservation and community service projects that protect natural resources while building job skills and civic responsibility.	Educational opportunities and Outreach
Trust for Public Land Wade Shelton wade.shelton@tpl.org	To "create parks and protect land for people, ensuring healthy, livable communities for generations to come".	Outreach and Coalition Building, Feedback
School District 6 Jill Matlock jmatlock@weld.gov	Engages every student in a personalized, well-rounded, and excellent education, preparing students to be college and career ready.	Student participation in planning and promotion. Youth voice.
Weld County Dept. of Public Health and Environment Olga Gonzalez ogonzales@weld.gov	To protect human health.	Public engagement and promotion. Feedback.
Greeley Culture, Parks & Recreation Jill Krantz, Deputy Director jill.krantz@greeleygov.com	Provide services, experiences, and spaces that promote community, health, and well-being for all.	Planning, development, and implementation.
Colorado Parks and Wildlife Jackson Davis, AWM, jackson.davis@state.co.us	Our mission is to manage wildlife, maintain a quality state parks system and provide outdoor recreation opportunities that inspire the people of Colorado and our visitors.	Redevelopment and trail systems, protection of wildlife
Weld County Youth Conservation Corps Dave Woolman dwoolman@weld.gov	The Weld County Youth Conservation Corps (WCYCC) engages its corps members in meaningful community and conservation (land, water, energy) service projects throughout Weld County.	Youth engagement

2g. Incorporating Community Input: We are integrating community input through a structured, multi-format engagement process that includes online surveys, in-person meetings, pop-up events, and educational workshops. Feedback from these activities directly informs the site vision, guiding the design of trails, scenic viewpoints, and recreational amenities while balancing public priorities with environmental conservation.

Based on community recommendations from previous meetings (4100 participants), the project will prioritize 12+ miles of accessible trails, multi-use spaces, and features accommodating residents of all abilities, ensuring equitable access to the area's natural and recreational resources.

To maintain ongoing engagement, we will continue using Speak Up Greeley, workshops, and community events. Students participating in environmental education sessions will share their findings with the public, raising awareness and fostering community stewardship. This continuous, structured engagement ensures that the site evolves in response to community needs and remains welcoming for all residents.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Description of Tasks/Activities and Outputs

3a. Proposed Cleanup Plan: Three remedial alternatives were reviewed as part of the ABCA, including no action, capping in place, and excavation/removal of all ACM/RACS materials. The selected alternative recommends completely removing ACM debris and asbestos-contaminated soil to address environmental hazards and prepare the site for safe public use. This method aligns with the CDPHE compliance advisory. It aligns with CDPHE's "Major Asbestos Spill" requirements, emphasizing the need to remove all ACM per applicable regulations. In evaluating this alternative, considerations included effectiveness, feasibility, cost, and suitability for the site's future role as a park and open space, confirming that it is the most reliable solution for long-term environmental and human health protection.

Alternative 3 involves excavation and disposal of 4,400 Cubic Yards (CY; 34,508 sq ft at 36" depth) of ACM debris and RACS, removal of 2,300 CY (61,955 sq ft at 12" depth) of solid waste, and site restoration. This will be completed through planned activities required by CDPHE and EPA for clean closure, including a C/RAP detailing waste characterization, a Materials Management Plan (MMP) for handling and disposal, record-keeping, and documentation.. The plan also requires a statement from a qualified environmental professional to confirm the cleanup will not interfere with ongoing remedial efforts at the nearby Atlas Missile Complex, corroborated by Bhate Environmental Associates, Inc. Additionally, a Sampling and Analysis Plan (SAP) will verify cleanup levels meet EPA Regional Screening Levels and ensure asbestos is non-detectable. All waste, ACM, and RACS will be performed in accordance with CDPHE Regulation 5.5. Water will be used to ensure airborne asbestos is not released on-site during removal. Following removal, confirmation sampling will be completed before site restoration. Site restoration will involve regrading and hydroseeding, not included in the grant estimates.

Task 1: Programmatic Activities
<p>3b. Project Implementation: Meeting terms and conditions of the Cooperative Agreement, including quarterly reports, financial reporting and accountability, property profile forms, and financial audits. We have experience working in ACRES. Retain a qualified environmental professional (QEP) and remediation contractor to assist in managing the activities funded by the EPA grant procured through a qualifications-based bid process. Request for Reimbursements: Travel & Training (brownfields-related meetings, training sessions, conferences)</p>
<p>3c. Anticipated Project Schedule: QEP/Remedial Contractor Selection and Quarterly reporting beginning in 2027 (Q2 2027), progress updates 2027-2028.</p>
<p>3d. Task/Activity Lead: QEP with oversight by City staff</p>
<p>3e. Outputs: RFP/RFO; documentation, high-quality QEP, EPA quarterly reports, annual federal reports, ACRES updates, summary report and forms submitted to EPA for payment, attend meetings, conferences, and training sessions, and managing the cleanup schedule and budget.</p>
Task 2: Remediation Action Planning
<p>3b. Project Implementation: Kickoff meeting with State CDPHE, EPA, and QEP – Developing Scope of Work Sustainable cleanup options (reduced travel, recycling equipment, etc.) Prepare C/RAP, Materials Management Plan, Sampling Analyses Plan, and Schedule (Q4 2026 – Q1 2027) Prepare site-specific Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) (Q4 2026)</p>
<p>3c. Anticipated Project Schedule: Q1 through Q2 2027.</p>
<p>3d. Task/Activity Lead: QEP with oversight by City staff</p>
<p>3e. Outputs: Plan of Action and schedule identified, approved ABCA, Administrative Record, Response Summary, GSR language in ABCA and RFP, public comment summary letter, approved C/RAP, MMP, SAP, approved budget/schedule, QAPP, HASP, completing the EPA/CDPHE Coordination and Approval Processes.</p>
Task 3: Remediation
<p>3b. Project Implementation: Implementation and oversight of cleanup and abatement activities and soil removal (bid documents, asbestos removal, soil and waste disposal, placement of backfill, site restoration, maintenance of erosion control measures, construction oversight) involves: Project Development and Costing: Establishing a regulatory-compliant scope of work and providing a detailed project cost estimation. Engineering, Technical Specifications, and Bidding: Creating engineering and technical specifications, managing the bidding process, reviewing contractor qualifications, and providing recommendations for contractor selection. Complete Removal of ACM Debris and RACS: Securing CDPHE permits, restricting access to contaminated areas, constructing containment for decontamination, removing ACM debris and RACS, ensuring proper waste disposal, and restoring the site with appropriate reseeding. Certified Asbestos Removal Oversight: Providing certified supervision throughout the removal process, including air and wind monitoring, daily logs, perimeter air sampling, additional sampling as needed, and final reporting to CDPHE. Contract Oversight and Management: Conducting general contract oversight, updating the ACRES system, reviewing payment applications, ensuring regulatory compliance, and verifying the completion of work.</p>
<p>3c. Anticipated Project Schedule: Q2 2027 - project closeout Q4 2027.</p>
<p>3d. Task/Activity Lead: QEP with oversight by City staff</p>
<p>3e. Outputs: Soil excavation and disposal, placement of backfill, site restoration, maintenance of erosion control measures, and closeout of the construction contract. This also includes construction oversight, soil confirmation</p>

sampling, and documenting work is done in accordance with the C/RAP, MMP, SAP, QAPP, and HASP. Periodic inspections and bi-weekly site reports by QEP, and sample analytical results.
Task 4: Regulatory Coordination/Closure
<u>3b. Project Implementation:</u> City and QEP will coordinate with EPA and CDPHE so that regulatory documents and closure letters are submitted in a timely manner.
<u>3c. Anticipated Project Schedule:</u> Will begin in Q4 2026 and have ongoing communication to close out in early 2028.
<u>3d. Task/Activity Lead:</u> QEP with oversight by City staff
<u>3e. Outputs:</u> Coordination with the EPA and CDPHE to confirm cleanup criteria and remedial action objectives, remedial action documentation report, submitting a case closer request and associated documents to the CDPHE, applying for permits, and paying regulatory fees.
Task 5: Community Education
<u>3b. Project Implementation:</u> Work with partners to ensure commitments are implemented (ongoing) Update community relations plan (Q4 2026) Establish information repository (Q1 2027) Public meetings (Q2 2027 prior to remediation) Prepare fact sheets and communicate the status and progress of the site cleanup progress. Project updates will be posted on the City website and status updates will be provided to property owners in the neighborhoods adjoining this property (ongoing)
<u>3c. Anticipated Project Schedule:</u> Detailed schedule above; ongoing throughout grant period.
<u>3d. Task/Activity Lead:</u> City and community input
<u>3e. Outputs:</u> Community Relations Plan, project fact sheet, website updates, public meetings, handouts during public meetings, and meeting minutes.

3.f. Cost Estimates Budget Categories		Project Tasks (\$)					Total
		Task 1 Programmatic Activities	Task 2 Remedial Design	Task 3 Remedial Action	Task 4 Regulatory Coordination	Task 5 Community Involvement	
Direct Costs	Travel	\$3,700					\$3,700
	Contractual	\$8,250	\$40,200	\$208,600	\$26,250	\$16,500	\$299,800
	Other	\$500					\$500
	Construction			\$1,184,931			\$1,184,931
Total Direct Costs		\$12,450	\$40,200	\$1,393,531	\$26,250	\$16,500	\$1,488,931
Total Budget		\$12,450	\$40,200	\$1,393,531	\$26,250	\$16,500	\$1,488,931

Task 1 has less than 1% allocated for grant programmatic management. Costs were confirmed with a QEP and cleanup contractor and verified by the City based on recent projects.

Task 1: Programmatic Activities (\$12,450) Contractual: Assume 50 hours at \$165 per hour for programmatic oversight = \$8,250. Travel: Two staff to attend one EPA National Conference (2 x \$2,100 [flight \$750, hotel 4 nights@\$225/night; meals@\$50/day 4 days] = \$3,700). Other: Conference Fees for 2 staff \$250 each = \$500.

Task 2: Remedial Design (\$40,200) Contractual: Final ABCA, Public Letter, Administrative Order, and Kick off Meeting – 20 Hrs at \$160/Hr, and 20 hours at \$140/HR = \$6,000; C/RAP, MMP, SAP, approved budget/schedule Assume 70 Hrs @ \$160/Hr and 100 Hrs @ \$140/Hr = \$25,200; QAPP, HASP - 20 Hrs at \$160/Hr, and 20 hours at \$140/HR = \$6,000, completing the EPA/CDPHE Coordination and Approval Processes = 10 Hrs @ \$160/Hr and 10 Hrs @ \$140/Hr = \$3,000.

Task 3: Remedial Action (\$1,393,531) Contractual: Project Development and Costing: Assume 60 Hrs @\$140/Hr, 35 Hrs @\$160/Hr = \$14,000; Engineering, Technical Specifications, and Bidding: Assume 40 Hrs @\$140/Hr, 80 Hrs @\$160/Hr = \$18,400; Certified Asbestos Removal Oversight: Assume 200 Hrs @\$140/Hr, 100 Hrs @\$160/Hr, 335 Hrs @\$120/Hr, 400 Hrs @\$105/Hr, plus travel/lodging and equipment expenses of \$17,200 = \$143,400; Contract Oversight and Management: Assume 120 Hrs @\$140/Hr, 100 Hrs @\$160/Hr = \$32,800 (total contractual w/o construction \$208,600). Complete Removal ACM debris and RACS = \$1,030,375 + 15% contingency = \$1,184,931 based on 3 quotes and lowest contractor

Task 4: Regulatory Coordination (\$26,250) Time to assist in meetings with CDPHE and planning/communication 150 hours (\$175/Hr) = \$26,250 consulting staff time. Additional time will be needed for the QEP to complete a final report and submit closure documents to CDPHE.

Task 5: Community Involvement (\$16,500) Includes boards, tours, outreach meetings, and curriculum development. 100

hours of staff consulting time (\$165/hr.) = \$16,500

3g. Plan to Measure and Evaluate Environmental Progress and Results: In cooperation with the EPA Region 8 project officer and our QEP, we will develop a detailed work plan with a timeline for all grant-funded activities, tracking progress through the ACRES system with quarterly and final reports documenting environmental cleanup, site readiness, and implementation of recreational features. The program manager will monitor activities to ensure they remain on schedule, coordinating with staff, contractors, and community partners, and taking corrective action if tasks fall behind. Key metrics for this project include acres remediated for recreational use, miles of trails installed or restored, completed parks, trailheads, and other amenities, community engagement outputs such as volunteer hours and educational participation, and economic and community benefits, including hosted events, leveraged partnerships, and additional funding secured. Progress will be regularly reviewed to evaluate accomplishments and ensure both environmental and recreational goals are met.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability:

4a. Organizational Structure, 4b. Description of Key Staff: Greeley Staff is well qualified and has all the systems, processes, and procedures in place to undertake the responsibilities associated with a Cleanup Grant. Having managed a variety of federal and state grants related to economic and community planning, rehabilitation, and development, including millions of grant dollars from EDA and HUD, our team has time to support and implement the project as a high priority. We will ensure all employees working on this project are appropriately trained, versed in best practices, and up to date on brownfield programs. The City will institute monthly calls with our QEP to track and ensure technical, administrative, and financial requirements are met. Our team will collaborate with the QEP to deliver required quarterly and annual reports, along with reporting through the ACRES system. Leadership roles for this grant will be the project manager, Donald Threewitt (City Planning Manager), and Karen Scopel, Environmental Planner for the Culture, Parks, & Recreation Department. Don has worked in community planning for over 17 years and has overseen dozens of downtown redevelopment efforts. He has managed multiple grants and has a background in brownfield redevelopment. Don attended the EPA Brownfield conference this year for Greeley. Karen has worked for Greeley for 49 years in various natural resource development and management roles. She has focused on this property's redevelopment for the past 3 years. To date, Karen has helped obtain over \$2 million in grants for the effort. She has managed multiple grants and will serve as the Property Representative for this cleanup project. Doug May and Michael Franke will manage the project's day-to-day tasks. Doug May and Michael Franke have been leading the brownfield effort in Greeley for the past 2 years and attending EPA trainings and meetings regionally. Doug May is a community-wide planner with over 9 years of experience and graduated from Kansas State University. Michael Franke has 6 years of experience as a planner and graduated from the University of Wisconsin - Milwaukee. Communication engagement staff will be providing translation and engagement with the Spanish-speaking community. Allena Portis will serve as the grant finance director. She has over 21 years of municipal finance experience and has a master's in urban planning. Other staff are prepared to step into leadership roles should any member depart. The city also has a designated grant management division to help manage funds and ensure that required forms and documents are submitted.

4c. Acquiring Additional Resources: Greeley is comfortable and follows Procurement Standards in 2 CFR 200.317-326 to secure contractors for all services under this grant. We will retain a Qualified Environmental Professional (QEP) per federal procurement guidelines to assist in managing EPA activities with a qualifications-based bid process to attract and utilize minority and women-owned businesses. Our QEP will manage environmental assessments, prepare the QAPP, assist with tracking data in ACRES, and support educational and community outreach activities directly related to cleanup and safe reuse. Greeley, Windsor, and The Trust for Public Land (TPL) have collaborated on this project for over 5 years. Other organizations that have and/or will be involved to help facilitate the project's success include Colorado Parks & Wildlife, Colorado Open Lands, Poudre River Trail Corridor, Inc., Coalition for the Poudre River Watershed, Colorado Natural Heritage Program, Poudre Learning Center, and Poudre Heritage Alliance. TPL has brought in the International Mountain Biking Association (IMBA) as a new partnership where IMBA provides funding and expertise to develop mountain bike trails to engage the local community, to ensure the project meets community needs. Finally, Greeley will continue to coordinate with TPL to continue the deployment of their CORE Strategy using resident experts to ensure their community's voice is heard.

Past Performance and Accomplishments

4d. Currently Has or Previously Received an EPA Brownfield Grant:

- (1) Accomplishments: Greeley received an EPA Brownfield Assessment Grant in May 2024. The \$500,000 is to assess several priority properties in the downtown Railway District. Work began in December of 2024.
- (2) Compliance with Grant Requirements: Greeley is in compliance with EPA requirements on the existing assessment grant. Additionally, Greeley has secured and managed multiple funds, including State and Federal Grant funds, to further economic and community development. In all cases, the independent auditors concluded Greeley complied with all material aspects of the requirements of the state and federal programs, and the City has never received a high-risk classification.

Attachment A

Threshold Criteria Response

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

ATTACHMENT A - THRESHOLD CRITERIA

1. Applicant Eligibility

- a) Eligible Entity: This EPA Cleanup Grant applicant is the City of Greeley, Colorado. The City is a home rule municipality and fulfills the definition of an “eligible entity” and is self-governing under Article 20 of the Constitution of the State of Colorado: Title 31, Article 1, Section 202 of the Colorado Revised Statutes. The City of Greeley is a General-Purpose Unit of Local Government as defined in the eligibility requirements for this grant.
- b) The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

Neither the City of Greeley nor any other eligible entity has received an EPA Brownfield Cleanup Grant for the subject site applied for herein.

3. Expenditure of Existing Multipurpose Grant Funds

The City of Greeley does not have a multipurpose grant.

4. Site Ownership

The property is owned by the City of Greeley pursuant to a Statutory Warranty Deed recorded in Weld County, Colorado, on February 28, 2025 (see Attachment C). Prior to the City’s ownership, the property was owned by the Trust for Public Land (TPL). TPL worked in coordination with the City of Greeley to facilitate the transfer of ownership, preserve the natural area, and secure grant funding to support the City’s acquisition of the property.

5. Basic Site Information

- a) Site name: Arroyos del Sol Natural Area (formerly known as the Shurview Property)
- b) Address: The property consists of two parcels of land (Parcel #095702000004 and 095703000018) measuring approximately 978 acres of prairie and riparian ecosystems located in Sections 34 and 35, Township 6 North, Range 67 West; and Sections 2,3,10, and 11, Township 5 North, Range 67 West of the 6th Principal Meridian in Weld County, Colorado, 80550.

6. Status and History of Contamination at the Site

- a) Type of Contamination: The predominant site contaminant is **hazardous materials** in the presence of (ACM) and Regulated Asbestos Containing Soils (RACs) in addition to solid waste.
- b) Operational history and current use: Historically, the property was used for grazing, agricultural production, and oil and gas activities while largely remaining undeveloped. While production agriculture is no longer practical due to its new role as a public open space, grazing remains compatible with surrounding land uses as neighboring properties continue agricultural operations. Oil and gas wells and tank battery facilities on-site previously had releases but have since been cleaned up and received regulatory closure from the Colorado Oil and Gas Conservation Commission.

The City of Greeley purchased the land with money provided by the Great Outdoors Colorado (GOCO) and the Land and Water Conservation Funds (LWCF) provided by the Colorado Division of Parks and Wildlife (CPW) through the Colorado Department of Natural Resources (DNR) where the future uses of the property are subject to the conditions and limitations set forth in those grants (Attachment B). Additionally, the Colorado Revised Statutes (CRS) provide for the establishment of conservation easements to maintain land “in a natural, scenic, or open condition, or for wildlife habitat, or agricultural...or other use or condition consistent with the protection of open land having wholesome environmental quality or life-sustaining ecological diversity” (CRS § 38-30.5-101). Toward these ends, the City has a conservation easement on 978 +/- acres of the Property in Weld County, Colorado (Property) to the Grantee (Colorado Open Lands). The Grantee is a “qualified organization,” as defined in § 170(h)(1)(B) of the Internal Revenue Code. Colorado Open Lands allows the City of Greeley to utilize the Property as Open Space. In compliance with Title 26 of the

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

Internal Revenue Code (§ 1.170A-14[g][5]), the City of Greeley retained ERO Resources Corporation (ERO) to complete this Baseline Inventory Report for the Property. The land is currently vacant natural area with soft surface trails and roads, trailhead, and parking on the property.

In accordance with the requirements of the GOCO and LWCF grants, the property “must be retained and used for public outdoor recreation in perpetuity to protect its use for public recreation and open space, and prohibits the Property from being wholly or partially converted to uses other than public outdoor recreational uses without notification to CPW and the approval of the National Park Service (NPS) pursuant to the LWCF Act (54 U.S.C. § 200305(f)(3)) and the conversion requirements outlined in 36 C.F.R § 59.3. Construction Plans for the Trail Systems and Outdoor space have been presented to the public for comment and approved/adopted by City Council. The City of Greeley intends to begin construction following cleanup for trail systems, habitat, interpretation walks, and a bike skills course (see Attachment H)

- c) Environmental concerns: include ACM and RACS.
- d) How the site became contaminated, nature, and extent of contamination: Four illegal dump sites were confirmed during a QEP site inspection in 2022. Previous sampling indicated that some of the debris contained asbestos.

In early 2022, Trust for Public Land (TPL) (a non-profit and previous owner working with the City of Greeley) contracted a QEP to inspect the property and identify the illegal dumping locations in coordination with the City of Greeley. DS Consulting developed a plan to sample the solid waste for asbestos. After laboratory results confirmed the presence of asbestos, a Notification of Regulated Asbestos Contaminated Soil Disturbance form was submitted to the Colorado Department of Public Health and Environment (CDPHE) on behalf of the TPL.

In June 2022, CDPHE, TPL, and DS Consulting (in coordination with the City of Greeley) conducted a site inspection to gather firsthand observations and to evaluate the site’s compliance with solid waste facility requirements.

In September 2022, the CDPHE issued a compliance advisory for the Arroyos del Sol Natural Area. This advisory noted the illegal dumping and indicated that operations occurred as a solid waste facility without a Certificate of Designation. The advisory was addressed to the TPL and the City of Greeley. The CDPHE requested a Corrective Action Plan (CAP) to address the debris piles and specified that these piles must be removed; no plans to leave or cap the debris in place would be approved.

The extent is defined to the property and is limited to the four dump sites. The arsenic in the surficial soil is at or near background levels for the region. Targeted soil removal will be conducted, which interferes with regrading, reseeding, and capping efforts. For the RACS removal, the assumption from the contractor was to provide labor, equipment, materials, PPE, disposal and trucking to remove 4,400 cubic yards of RACS and debris – 34,508 SF at 36” depth. For non-RACS removal provide labor, equipment, materials, PPE, disposal and trucking to remove 2,300 CY of non-ACM solid waste debris – 61,955 SF at 12” depth.

7. Brownfields Site Definition

Applicant affirms the site meets the definition of a brownfield under CERCLA § 101(39) as described in Information on Sites Eligible for Brownfields Funding under CERCLA §104(k) EPA Guidance. Specifically, the site is “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence ... of a hazardous substance, pollutant, or contaminant.”:

- a) Not listed or proposed for listing on the National Priorities List.
- b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) Not subject to the jurisdiction, custody, or control of the United States Government.

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

8. Environmental Assessment Required for Cleanup Grant Applications

ERO conducted an Initial Phase I in September 2021, Phase II site inspections were conducted in 2021 and 2022, and an updated Phase I Environmental Site Assessment (ESA) was completed by ERO on July 31, 2024 (Phase I Environmental Site Assessment Update, Shur View Missile Silo Bluffs Property, East and West of State Highway 257, Weld County, Colorado, July 31, 2024). This Phase I ESA was completed under ASTM Standard E1527-21. The property includes historical and recognized environmental conditions (HRECs and RECs). Oil and gas wells and tank battery facilities on-site previously had releases but have since been cleaned up and received regulatory closure from the Colorado Oil and Gas Conservation Commission. Existing environmental concerns only include illegal solid waste disposal observed in multiple ravines, with one ravine containing materials suspected of containing asbestos (ACM). During the ERO site inspection, four illegal dump sites were confirmed. Some of the disposal occurred along a roadside that accesses the area, and additional disposal locations were identified in an arroyo in this location. Environmental professionals indicated the disposal locations in the arroyo were somewhat difficult to access due to the steepness of some of the locations in the arroyo. A Notification of Regulated Asbestos Contaminated Soil (RACS) Disturbance form on March 28, 2022 on behalf of the TPL.

Environmental professionals submitted a Site Assessment & Asbestos Inspection Report summarizing the sampling results from the inspection dates of December 14, 2021, March 23, 2022, and September 30, 2022. The surface survey, inspection, and sampling of subsurface materials detailed in the report did identify ACM(s) on the surface of the soil; therefore, regulated professional remediation activities will be required to remove the asbestos-containing materials as well as the 6" of underlying soil (ACS) per Section 5.5.7 of Colorado's solid waste regulations.

9. Site Characterization

- a) Not Applicable – Applicant is not a State or Tribal Environmental Authority.
- b) State or Tribal Environmental Authority: A letter from CDPHE has been attached (Attachment D).
 - i. **Eligibility:** *CDPHE has reviewed the property and it is partially eligible for Voluntary Cleanup Program (VCUP) entry. The City intends to work with the CDPHE to determine if VCUP entry is appropriate for this site.*
 - ii. **Characterization:** Sufficient site characterization has been completed for remediation work to begin on-site. However, the depth of contamination is unknown. Depth will be assessed by confirmation sampling during remediation.
- c) Ineligibility: Not Applicable

10. Enforcement or Other Actions

There are no ongoing or anticipated environmental enforcement actions or other actions related to the site for hazardous substances contamination. However, the CDPHE issued a Compliance Advisory in September 2022, mandating the complete removal of debris with no capping options allowed.

Since the property encompasses the former Atlas E Missile Site (Warren F.E. AFB Atlas "E" Missile Site #12; EPA ID CO0009139016), recognized environmental conditions remain associated with the adjacent U.S. Army Corps of Engineers (USACE) managed site, including trichloroethene (TCE) groundwater contamination that has migrated onto the property. The surrounding groundwater and soil at the Missile Site have been monitored as part of remediation efforts ongoing for nearly 20 years. USACE has initiated additional remediation activities, including installation of expanded Dual Phase Extraction (DPE) and injection wells to address contamination, with drilling that began in February 2023. Semi-annual groundwater monitoring is in process to evaluate the effectiveness of remediation and determine whether further action is necessary. Groundwater contamination is not included as part of this grant request and is being managed under a separate USACE program on property not within the existing site boundaries owned by the City of Greeley. For the City of Greeley site, no long-term impacts are anticipated, as remediation is being conducted under Department of Defense funding. Any groundwater plumes that have migrated beyond the Missile Site surface boundary will be reviewed with CDPHE should future building development be proposed on the property.

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

11. Sites Requiring a Property-Specific Determination

The site does not fit the description of a “special class of property that is generally an ineligible brownfield site” and, therefore, does not require a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. Exemptions to CERCLA Liability: Not Applicable

- (1) **Indian Tribes:** Not Applicable
- (2) **Alaska Native Village Corporations and Alaska Native Regional Corporations:** Not Applicable
- (3) **Property Acquired Under Certain Circumstances by Units of State and Local:** Not Applicable

ii. Exemptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability. Not Applicable

- (1) **Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002:** Not Applicable

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchase Liability Protection

a. Information on the Property Acquisition:

- (i) The City of Greeley acquired the property (see Attachment C). The property was deeded from Trust for Public Lands who acquired property on 3.31.2022 with funds from the City of Greeley and in coordination with the City of Greeley using the Great Outdoors Colorado Trust Fund and bridge financing provided by the TPL.
- (ii) February 28, 2025 (Attachment C)
- (iii) Statutory Warranty Deed recorded as #5013652 by Weld County, Colorado
- (iv) The Trust for Public Lands (Attachment B). TPL purchased the subject property: Shur View Limited Partnership.
- (v) The City of Greeley was a partner in the purchasing of the property by TPL but has no familial, contractual, corporate, or financial relationship with past owners.

b. Pre-Purchase Inquiry. On behalf of the City of Greeley, a pre-purchase inquiry at the Site was conducted by TPL and performed by a qualified environmental professional meeting the definition set forth in AAI regulations.

- (i) A Phase I and Phase II ESA were completed between October and December 2021 as required to comply with all the conditions and to successfully execute the requirements of the Land and Water Conservation Fund (LWCF) grant and final TPL/City of Greeley agreement. An updated Phase I ESA was completed by ERO on July 31, 2024, and a Phase II ESA Asbestos Inspection was completed by DS Environmental on inspections done 12.14.21, 3.23.22, 9.30.22.

In addition, an environmental baseline study (*Baseline Inventory Report, Shur View Open Space Property, Weld County, Colorado*) was completed on July 24, 2024, and prepared for Mundus Bishop of TPL and Colorado Open Lands as part of the City of Greeley agreement. This report, prepared in accordance with the Colorado Revised Statutes (CRS), outlines the establishment of conservation easements to preserve land in conditions that are "natural, scenic, or open" or designated for wildlife habitat, agriculture, or other uses that uphold the quality of open land and ecological diversity (CRS § 38-30.5-101). In alignment with these goals, the Grantor, The TPL (TPL), proposes to grant a perpetual conservation easement on approximately 978 acres of the Shur View Property in Weld County, Colorado (the Property) to the Grantee, Colorado Open Lands. Colorado Open Lands, a nonprofit organization meeting the

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

- qualifications outlined in § 170(h)(1)(B) of the Internal Revenue Code, intends to permit the City of Greeley to use the Property as Open Space. To comply with Title 26 of the Internal Revenue Code (§ 1.170A-14[g][5]), the City of Greeley commissioned ERO Resources Corporation (ERO) to prepare this Baseline Inventory Report, which documents the current conditions of the Property. The primary objectives of this Baseline Inventory Report are as follows: (1) Provide a summary of the Property's physical and ecological attributes. (2) Record the existing conditions and conservation values associated with the Property.
- (ii) The Phase I ESA was completed by ERO (Consultants in Natural Resources and the Environment) on July 31, 2024, and signed by Courtney Stockwell and Craig Sovka (both environmental professionals with significant experience in Colorado). Additional work was completed by Bill Mangle, natural resource professional meeting the definition of an environmental professional as set forth in AAI regulations.
 - (iii) The Phase I ESA was completed less than 1 year prior to ownership by the TPL, with update performed within 180 days (on July 31, 2024) prior to the City's and TPLs acquisition of the property (see attached). No additional Phase I was determined to be needed prior to finalization of the deed in early 2025 since Greeley was using TPL's ownership to complete due diligence on the property (see Attachment E).
- c. Timing and/or Contribution Toward Hazardous Substances Disposal. All the disposition of hazardous substances at the site occurred before the City of Greeley took ownership of the site. The City has not, at any time, arranged for disposal of hazardous substances at the site or transported hazardous substances to the site.
 - d. Post-Acquisition Uses: The property is currently used for recreational access. The City's future reuse plan centers on enhancing the site's natural ecosystems while offering accessible recreational spaces and educational facilities. Key areas, including 700 acres of shortgrass prairie and 11 acres of riparian floodplain, will be conserved as high-quality habitats for wildlife, creating opportunities for visitors to experience these unique ecosystems firsthand. Designated hubs will reuse previously disturbed areas to minimize impact on natural habitats, providing picnic areas, interpretive trails, and nature play zones that encourage low-impact engagement with the landscape. One of the higher areas, known as the Hilltop Hub, will act as a gateway, equipped with amenities like picnic shelters, seating, and interactive programming that highlights the site's ecological and scenic value. A trail network, integrated with regional connections, will provide accessible pathways across the landscape, offering routes for exploration while preserving unfragmented habitat areas. This reuse approach aims to balance conservation with community access.
 - e. Continuing Obligations: Steps the City of Greeley are taking to stop existing releases, prevent threatened future releases, and prevent exposure to previous releases include the following:
 - (i) (ii) (iii) Stopping any further releases, Preventing any threatened future releases, and preventing or limited exposure to any previously released hazardous substances by complying with land-use restrictions and institutional controls, working with the public to educate future use of the land and limiting property access exclusively to designated, completed trails. In addition, we are collaborating with the Colorado Department of Public Health and Environment (CDPHE) to coordinate and implement cleanup activities.
- We **affirm** that the City of Greeley is:
- (i) Complying with land-use restrictions and institutional controls
 - (ii) Assisting and cooperating with those performing cleanup and provide access to the property
 - (iii) Complying with all information requests and administrative subpoenas that have or

City of Greeley Arroyos del Sol Natural Area Cleanup Grant Threshold Criteria

may be issued in connection with the property

(iv) Providing all legally required notices

iv. Sites with Hazardous Building Material that is not Released into the Environment: Not Applicable

b. Property Ownership Eligibility – Petroleum Sites: Not Applicable

13. **Cleanup Authority and Oversight Structure**

- a) During all stages of design and cleanup, the City and its partners will work together with the CDPHE and the EPA to develop a strategy that meets all state and federal health and safety standards. Shortly after the cleanup grant is awarded, the City will follow the procedures detailed in 2 CFR 200.317-326 for the procurement process to select an environmental consultant project team and will release a competitive, public Request for Qualifications in order to select the team deemed most qualified by a review committee. The environmental consultant will be used to prepare a final cleanup plan, prepare plans and specifications for project bidding, and to provide construction oversight during the cleanup process.
- b) The site is directly accessible by public roadways. Based on results of the environmental assessments, access to neighboring properties will not be necessary for cleanup activities. However, the City of Greeley will maintain communication with adjacent property owners should access become necessary in the future. To access and implement remedial actions, no access is anticipated from neighboring properties.

14. **Community Notification**

- a) **Draft Analysis of Brownfield Cleanup Alternatives (ABCA):** An ABCA was prepared and available for public meeting as noted below and is included in the Attachments to this grant proposal (Attachment E).
- b) **Community Notification Ad:** A public notice was posted on the City of Greeley's website ([Public Notices | City of Greeley](#)) A copy of this Cleanup Grant application and the Draft ABCA were made available for review at the Greeley City Hall (see Attachment G)
- c) **Public Meeting:** Virtual webinar/online meeting hosted by the City was used in lieu of an in-person public meeting and was held on January 7, 2026, from 4 pm to 5 pm virtually as noted in our legal notice.

The meeting was intended to describe the ABCA and grant application and to receive public input and comments. A presentation was prepared for the meeting and presented both in 2024 and 2026. No one from the public attended, but the ABCA and grant application were made available at City Hall. The presentation and documentation of the meeting is in Attachment H. Note, numerous other public meetings have been held for this site since 2021. These public meetings have discussed acquisition, reuse, and environmental concerns with the public. Over 4,100 public have participated in these meetings.

d) **Submission of Community Notification Documents**

The following are included in the attachments to this application:

- Attachment B – Leveraged Funds
- Attachment C – Site Ownership Info
- Attachment D – CDPHE Letter of Support
- Attachment E – ABCA
- Attachment F – Summary of statement of no comments received
- Attachment G – Public Notice
- Attachment H – Meeting Attendance Log, Presentation

15. **Contractors and Named Subrecipients**

The City of Greeley intends to conduct a competitive RFQ for the selection of a qualified environmental professional (QEP) and remediation contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.

January 21, 2026

Melisa Devincenzi
Environmental Protection Agency
Region 8 Brownfields Program
1595 Wynkoop Street (EPR-B)
Denver, Colorado 80202-1129

Via email - Devincenzi.Melisa@epa.gov

RE: City of Greeley Arroyos Del Sol Property - FY26 Cleanup Grant Proposal

Dear Ms. Devincenzi:

I am writing to express the Colorado Department of Public Health and Environment's (CDPHE) support of the City of Greeley's FY 2026 Cleanup Grant proposal for the Arroyos Del Sol Property. Cleanup of this property would facilitate expanded outdoor recreation access to Greeley's diverse and rapidly growing community and support conservation of native wildlife.

A cursory review of the site characterization data provided by the City indicates the proposed cleanup areas have been adequately characterized by Qualified Environmental Professionals. Site data is sufficient to prepare the notification\permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization for asbestos abatement will be determined by CDPHE's Air Pollution Control division following receipt of the permit application. Additionally, for asbestos-containing soil on the site property, the CDPHE Solid Waste and Materials Management Program will be working with the City of Greeley to develop an approved Corrective Action Plan to determine the adequacy of site characterization for asbestos-containing soils prior to remediation.

Should additional site characterization be required, the City of Greeley's current assessment grant can assist in collecting the necessary data prior to the June 15, 2026 deadline specified in the grant solicitation guidelines.

In closing, I again want to express the department's support for the City of Greeley's Arroyos Del Sol Property Cleanup Grant Proposal to facilitate the cleanup and redevelopment of this important community asset.

Sincerely,



Mark Rudolph
Superfund and Brownfields Unit Leader
Hazardous Materials and Waste Management Division

cc: Doug May, City of Greeley (doug.may@greeleygov.com)
Lisa Fugett, Ayers and Associates (fugettl@ayresassociates.com)
Kathleen Knox, CDPHE Brownfields Coordinator (Kathleen.knox@state.co.us)

