

EPA Brownfield Cleanup Grant - Narrative Information Sheet

1. Applicant Identification

City of Durango
949 E 2nd Avenue
Durango, CO 81301
970-375-5000

2. Website URL

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

3. Funding Requested

Grant Type: Multiple Site Cleanup

Federal Funds Requested:

i) Requested Amount \$500,000

4. Location

- a) City: City of Durango
- b) County: La Plata County
- c) State: Colorado

5. Property Information

Durango City Hall and Police Department Site
201 East 12th St. Durango, CO 81301
215 East 12th St. Durango, CO 81301

6. Contacts

Project Director:

Cody Minnich
970-375-5000
Cody.Minnich@durangoco.gov
215 E. 12th Street
Durango, CO 81301

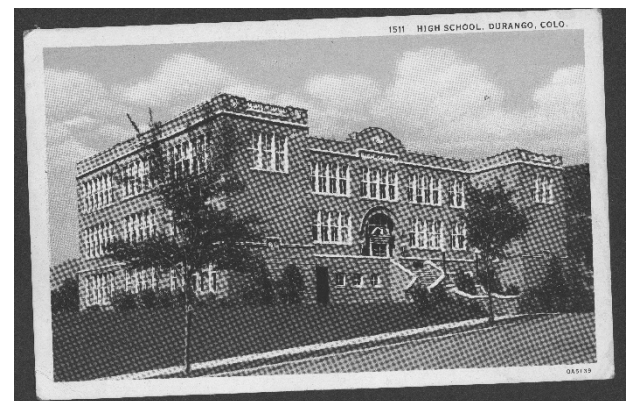


Figure 1: Historic High School Original Construction



Figure 2: Current Condition Historic High School and Alt High School

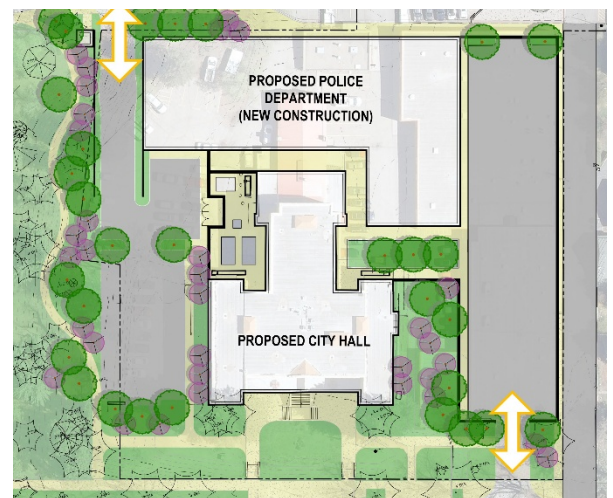


Figure 3: Plan for redevelopment of site

Chief Executive/Highest Ranking Elected Official:

Gilda Yazzie, Mayor
[970-375-5000](tel:970-375-5000)
Gilda.yazzie@durangoco.gov
949 E 2nd Avenue
Durango, CO 81301

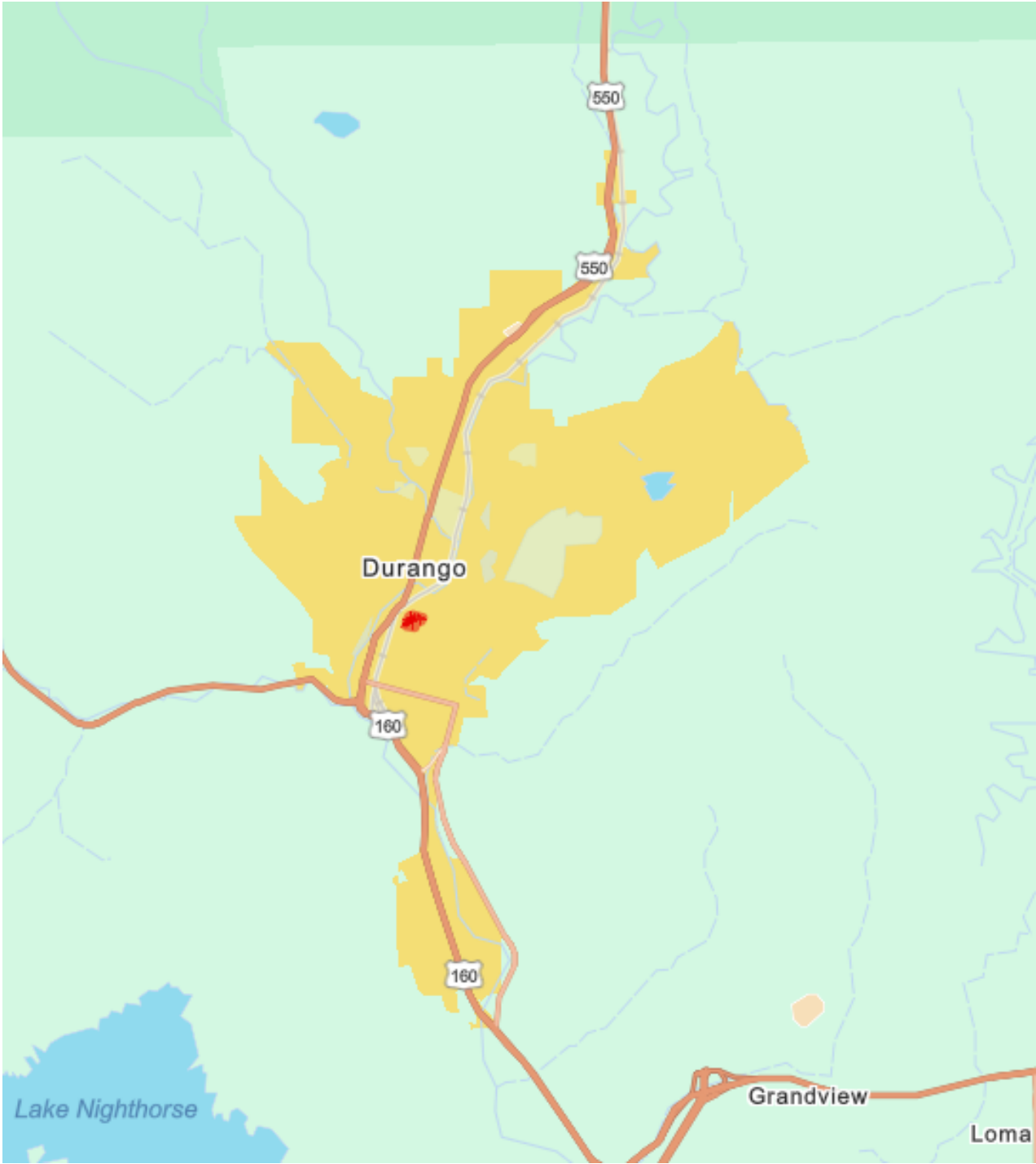
7. Population

Durango Population as of 2024: 19,811

8. Other Factors

Sample Format for Providing Information on the Other Factors	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	
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).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed site(s) will incorporate energy efficiency measures.	Page 5
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Page 5
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

City of Durango City Limits impacted by this project



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(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Overview of Brownfield Challenges and Description of Target Area

The City of Durango faces significant brownfield challenges associated with aging public facilities, particularly historic institutional buildings constructed prior to modern environmental and building standards. The former Durango High School campus—planned for adaptive reuse as the City’s new City Hall—and an adjacent alternative high school building slated for demolition to accommodate a new Police Department facility contain known and suspected hazardous building materials, including asbestos-containing materials (ACM) and lead-based paint (LBP). The presence and potential presence of these hazardous substances meet the definition of a brownfield under CERCLA, as they complicate reuse, redevelopment, and reinvestment.

These municipally owned properties are centrally located within Durango’s historic civic core and highly visible within the downtown corridor. Due to the cost and complexity of environmental abatement, the buildings have remained underutilized and have experienced continued deterioration. Without cleanup, these conditions pose ongoing risks to public health and safety, limit economic reinvestment, constrain the City’s ability to provide essential public services in safe and modern facilities, and undermine historic preservation efforts. Deferred remediation also increases the risk of blight in an otherwise active and walkable area, negatively affecting community perception and downtown vitality.

The City acquired both the historic high school building and the adjacent alternative high school structure through a land swap in August 2023 and subsequently passed a voter-approved sales tax measure in April 2025 to help finance redevelopment of these properties. Despite this local commitment, the cost of properly abating hazardous materials—particularly within a historic structure requiring preservation of character-defining features—remains a significant financial barrier. As a small municipality, Durango must balance competing infrastructure, housing, and public safety needs, and without federal assistance, brownfield cleanup costs divert limited local resources from other critical community priorities.

The EPA Brownfields Cleanup Grant will play a critical role in addressing these challenges by providing dedicated funding to safely and comprehensively abate hazardous materials at two shovel-ready, municipally owned properties. Grant funding will directly reduce risks to construction workers, future occupants, and the surrounding community while enabling timely redevelopment of essential civic facilities.

The target area for this EPA Brownfields Cleanup Grant encompasses the former Durango High School campus and adjacent municipal properties located at the end of 2nd Avenue within Durango’s nationally registered historic district in La Plata County, Colorado. This central civic district includes historic public buildings, municipal services, cultural resources, and surrounding residential and commercial uses. The primary brownfield properties within the target area consist of two mid-20th-century buildings: the former high school planned for adaptive reuse as City Hall and an adjacent structure planned for redevelopment as a new Police Department facility. Both buildings are affected by known and suspected hazardous building materials that have delayed reinvestment and hindered the City’s ability to meet current public service needs.

b. Description of the Proposed Brownfield Site(s)

The properties targeted for cleanup under this application are two municipally owned structures located on the former Durango High School campus in Durango, Colorado. The site includes the original Durango High School building, constructed in 1916 which was listed on the national and Colorado state

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register of historic places in 2001 and recognized as a City of Durango historic landmark in 2025¹. The site includes the historic Durango High School building and an adjacent structure constructed in 1957, both of which are integral components of a planned municipal redevelopment project and are affected by known hazardous building materials that complicate reuse.

The historic high school is a multi-story masonry building representative of early 20th-century institutional construction. Consistent with building practices of the era, it contains asbestos-containing materials (ACM) in multiple applications, including thermal system insulation, flooring, and other building components. The presence of ACM poses health and safety risks during renovation and represents a primary barrier to adaptive reuse. As a result of functional obsolescence and the cost and complexity of environmental abatement in a historic structure, the building has remained largely vacant in recent years.

The adjacent 1957 building reflects mid-century public construction methods and similarly contains known or suspected asbestos-containing materials in building systems and finishes typical of the period, such as pipe insulation, ceiling materials, and resilient flooring. While newer than the historic high school, the presence of ACM restricts renovation and demolition activities without proper cleanup.

Both buildings were historically used for public educational and municipal purposes and have not been associated with industrial manufacturing or commercial hazardous substance use. Current conditions reflect deferred maintenance and limited occupancy due to environmental constraints rather than ongoing contamination sources. The brownfield condition is driven by hazardous substances embedded within building materials, which complicate redevelopment and increase project costs.

Cleanup activities funded through the EPA Brownfields Cleanup Grant will focus on the safe abatement and disposal of asbestos-containing materials in both structures in accordance with all applicable federal, state, and local regulations. Completion of cleanup will eliminate environmental barriers, reduce risks to workers and the public, and enable the City to proceed with planned renovation and redevelopment for long-term civic use.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The City's reuse strategy for the brownfield properties on the former Durango High School campus is centered on adaptive reuse and reinvestment in long-term civic infrastructure. Following cleanup, the historic 1916 Durango High School building will be rehabilitated and repurposed as the City's new City Hall, while the adjacent 1957 building will be demolished to support construction of a modern Police Department facility adjacent to the historic high school. Together, these projects will transform underutilized brownfield properties into productive public assets that directly serve community needs.

This reuse strategy aligns closely with the City of Durango's adopted land use, capital improvement, and revitalization goals, which emphasize downtown reinvestment, preservation of historic resources, efficient use of existing infrastructure, and improved delivery of essential public services. Reusing centrally located, publicly owned buildings reduces pressure for greenfield development, supports walkability, and reinforces the City's historic civic core. The project also reflects community priorities for maintaining Durango's architectural heritage while modernizing facilities to meet current accessibility, safety, and operational standards. Cleanup of asbestos-containing materials is a critical prerequisite to reuse.

The site's location has been carefully considered as part of the reuse planning process. Where applicable, the City has evaluated floodplain conditions and is incorporating resilience, code

¹ <https://www.historycolorado.org/location/durango-high-school>

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compliance, and mitigation strategies into project planning to ensure long-term viability and protection of public investment. Cleanup and redevelopment activities will comply with all applicable federal, state, and local requirements related to floodplain management.

Public and partner involvement has been integral to the development of the reuse strategy. The City has engaged residents, stakeholders, and user groups through public meetings, City Council discussions, and advisory processes focused on civic facility needs, historic preservation, and public safety services. Coordination among City departments, design professionals, and community representatives has helped shape a reuse plan that reflects community values, balances preservation with modernization, and ensures that redevelopment outcomes provide broad public benefit.

d. Outcomes and Benefits of Reuse Strategy

Cleanup and redevelopment of the former Durango High School campus will generate substantial and lasting economic and community benefits for the target area following remediation. By removing asbestos-containing materials and eliminating environmental barriers to reuse, the project will enable a new civic center that incentivizes greater use of 2nd Ave. which is adjacent to main street. By consolidating city services, the project will allow more access to public parking allowing more visitors to the downtown corridor. The City of Durango's economy relies heavily on tourism so this greater accessibility to local businesses will stimulate economic development. This reinvestment is expected to stimulate economic activity by increasing daily employment in the area, supporting nearby businesses, and reinforcing the stability and vitality of the surrounding downtown and neighborhood commercial corridors. The presence of active, well-maintained civic facilities will enhance the area's attractiveness, reduce blight, and encourage complementary private and nonprofit reinvestment in adjacent properties.

The project will also preserve and enhance public and nonprofit use of the site. Adaptive reuse of the historic high school building protects an important community landmark while extending its functional life for public service. Continued public ownership ensures that the benefits of cleanup accrue directly to the community, including improved access to municipal services, enhanced public safety operations, and long-term stewardship of a historic resource. The reuse strategy avoids displacement, supports equitable access to services, and aligns sustainable redevelopment principles by reinvesting in existing infrastructure rather than expanding development into undeveloped land.

During cleanup and redevelopment, the project will create short-term employment opportunities in environmental remediation, construction, and professional services. Over the long term, the reuse will preserve permanent public-sector jobs and support indirect economic benefits associated with civic operations, public visitation, and community engagement.

The new police station will be built to support a Category 4 risk level. This means the facility will be able to operate under extreme weather or seismic events allowing police to service the community in these times of greater need. The existing police station does not support category 4 risk level.

Reuse of the former Durango High School campus incorporates a strong commitment to energy efficiency and sustainable redevelopment as part of the City's broader revitalization strategy. Cleanup and renovation of the historic 1916 building and the adjacent 1957 structure will allow the City to modernize outdated building systems while preserving existing infrastructure, resulting in significant lifecycle energy and environmental benefits compared to new greenfield development.

The reuse strategy prioritizes energy efficiency measures consistent with EPA's Renewable Energy or Energy-Efficient Approaches in Brownfields Redevelopment guidance. Planned improvements include high-efficiency mechanical, electrical, and plumbing systems; upgraded building envelopes; improved insulation; energy-efficient windows compatible with historic preservation

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requirements; and modern building controls to reduce energy consumption and operating costs. These measures will significantly improve performance over existing conditions while extending the useful life of the structures.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The City recognizes that effective remediation depends on having sufficient site characterization to address unforeseen conditions that may be identified during cleanup activities. The city is confident in the steps they have taken to identify all hazardous materials at both buildings, however, if additional assessment or characterization is required to support continued remediation of the former Durango High School campus, the City will fund these assessments.

f. Resources Needed for Site Remediation

The city is able to finance contributing funds to the project through bond funds secured by passing a sales tax measure in 2026. These funds, in addition to the EPA funding requested, will be sufficient to remediate both sites. Through proactive planning and diversification of potential assessment funding sources, the city is positioned to address additional characterization needs efficiently while maintaining compliance with all applicable federal and state environmental requirements. This approach ensures that environmental uncertainties do not impede cleanup progress or the timely redevelopment of these important civic properties in Durango.

The city plans to pursue state funding opportunities through the Colorado Department of Public Health and Environment (CDPHE). As noted in the attached letter of support, the city is actively collaborating with CDPHE staff on these efforts.

g. Resources Needed for Site Reuse

The city will utilize a bond from a sales tax measure for the assessment, matching remediation funds, and to finance renovations for reuse of the building. These funds are limited so renovation costs may not be able to be fully financed without assistance with remediation efforts.

<i>Name of Resource</i>	<i>Is the Resource for (1.e) Assessment, (1.f) Remediation, or (1.g.) Reuse Activities?</i>	<i>Is the Resource Secured or Unsecured?</i>	<i>Additional Details or Information About the Resource</i>
Bond Funds	Assessment, matching funds for remediation, and reuse activities	Secured	The bond funds were secured as of October 2025 after passing a sales tax measure April 2025

h. Use of Existing Infrastructure

To honor the historic elements of the 1916 high school building the city has hired Architectural Resource Group to ensure historically important building elements are preserved. This means the existing footprint of the building will largely be kept intact. Additionally, the roads surrounding the project site and utilities will all be kept intact, allowing for better use of public funds on the project. To perform the necessary renovations to expose historic elements in the 1916 building all ACM materials will be removed per Colorado Department of Public Health and Environment requirements. This approach also allows for the preservation of multiple mature trees around the site.

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The EPA Brownfields Cleanup Grant will facilitate the continued use of existing infrastructure. The site is already served by established public infrastructure, including roads, sidewalks, water, wastewater, storm drainage, power, and communications systems, and cleanup of asbestos-containing materials will allow the City to rehabilitate and modernize the existing 1916 historic high school building existing roadways. This approach leverages existing foundations, structural systems, reduces redevelopment costs and environmental impacts, and minimizes disruption to surrounding neighborhoods.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

The City of Durango has a limited ability to draw on alternative funding sources to carry out environmental remediation due to its relatively small population, constrained tax base, and competing demands for essential services. The cost of abating asbestos-containing materials in the former high school campus represents a significant financial barrier that cannot be readily absorbed through local revenues or offset by private investment, particularly because the properties are intended for long-term public and nonprofit civic use rather than revenue-generating development. Without federal assistance, remediation costs would divert scarce municipal funds away from other critical community priorities or delay reuse. The EPA Brownfields Cleanup Grant directly addresses this funding gap by enabling the City to remediate environmental hazards, protect public health, and unlock the adaptive reuse of centrally located public buildings, allowing a small community with limited financial capacity to advance sustainable redevelopment and deliver broad community benefit that would not otherwise be achievable.

b. Health or Welfare of Sensitive Populations

Similar to many communities the City of Durango has an aging population and a large influx of tourists placing increased demand on city services especially police services. The planned reuse of the site as City Hall and a Police Department facility will further support community welfare by improving access to essential public services, enhancing public safety, and replacing underutilized, contaminated buildings with safe, accessible, and well-maintained civic facilities that contribute to a healthier built environment.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Although the City of Durango does not have a documented, site-specific cluster of disease directly attributable to the proposed cleanup sites, the presence of asbestos-containing materials in centrally located public buildings represents a known environmental risk that can exacerbate conditions such as asthma and other respiratory illnesses, particularly among sensitive populations.

d. Economically Impoverished/Disproportionately Impacted Populations

The EPA Brownfields Cleanup Grant and proposed reuse strategy will help reduce environmental threats faced by economically vulnerable populations and those who may disproportionately experience the impacts of legacy governmental and commercial land uses within the target area of Durango. By funding the identification, abatement, and proper disposal of asbestos-containing materials, this grant will eliminate potential exposure pathways and reduce preventable environmental health risks associated with prolonged building deterioration or renovation activities. The planned reuse of the site as City Hall and a Police Department facility will restore these properties for safe, long-term public use, improve

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equitable access to essential municipal services, and reduce the burden of environmental hazards in a highly visible civic area. Through cleanup and reinvestment in existing infrastructure, the project advances environmental prosperity by addressing legacy contamination in publicly owned facilities and ensuring that the benefits of redevelopment—health protection, improved public services, and revitalization—are shared broadly across the community, including populations that are economically disadvantaged or historically underserved.

Community Engagement

e. Project Involvement

In addition to City staff, the City of Durango has assembled a qualified project team to support the successful implementation of cleanup and redevelopment activities. The City has retained Artaic Group to serve as the Owner’s Representative and provide overall project management services for the abatement and restoration effort, including coordination among consultants, contractors, and City stakeholders. The City will also rely on an environmental consultant to conduct hazardous materials identification, prepare the Asbestos Baseline Compliance Agreement (ABCA), and oversee all remediation activities to ensure compliance with applicable federal, state, and local environmental regulations. These partners bring specialized expertise in environmental remediation, historic building projects, and public-sector construction, and will work closely with City staff to ensure that cleanup activities are performed safely, efficiently, and in alignment with the City’s reuse objectives.

f. Project Roles

City Staff has met with or has scheduled a meeting to meet with the community stakeholders below to discuss the project.

Key Local Organizations, Entities, and Community Groups Supporting Project Engagement

- **Durango City Council & City Commissions** – Elected and appointed representatives directing the project vision and public process and reviewing community input tied to City Hall / Police Department reuse. engage.durangoco.gov
- **Neighborhood Engagement (Boulevard Group, Property Neighbors, Adjacent Businesses)** – City Staff is meeting with neighboring residence and commercial buildings to directly inform them of the project scope and schedule. durangoco.gov
- **Historic Preservation Board** – City staff has presented design concepts twice to the Historic Preservation Board when reviewing the rehabilitation of historic elements at the historic high school. durangoco.gov/474/Historic-Preservation
- **Community Engagement Specialist & Monthly Forums** – City staff conducting forums, outreach events, and targeted feedback sessions to ensure broad resident participation, including translation services and focus groups for inclusive engagement. durangoco.gov
- **Financial Advisory Board** – Oversight committee dedicated to the responsible use of public funds.
- **Local Community Groups (Chamber of Commerce, Rotary Club, Kiwanis)** – Entities that review provide civic investments throughout the City.
- **Engage Durango Community Participation Platform** – City’s online engagement hub used to share information, solicit feedback, and gather public comments on major projects including the Police Department / City Hall reuse strategy. durangoco.gov
- **Brownfield Project Overview** – on January 22nd city staff hosted a public meet to review the remediation efforts on the project.

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g. Incorporating Community Input

The City of Durango will implement a proactive and transparent communication plan to keep the local community informed of project progress and to meaningfully solicit and respond to community input throughout cleanup and redevelopment activities. Residents directly affected by the project, along with involved organizations and stakeholders, will receive regular updates through multiple communication channels designed to ensure broad accessibility. The City has already captured feedback from a Community Forum held on January 22, 2026 regarding ACM Cleanup efforts.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The city will competitively procure the services of an environmental consultant to identify all hazardous materials, oversee removal of these materials and ensure compliance with Colorado Department of Public Health and Environment. The City has used an environmental consultant to develop the Analysis of Brownfield Cleanup Alternatives (ABCA) for this project, recommending removal of all hazardous materials in both the historic high school and alternative high school in order to allow for the full rehabilitation of the Historic High School and demolition of the Alternative High School.

The proposed cleanup plan for the former Durango High School campus focuses on the abatement and proper disposal of asbestos-containing materials (ACM) and lead based paint (LBP) within the two-city owned building. The contaminated media to be addressed at both buildings consist of regulated building materials rather than soil or groundwater and include ACM present in thermal system insulation, flooring materials, ceiling materials, and other building components typical of early- and mid-20th-century construction.

Cleanup activities will be conducted in accordance with all applicable federal, state, and local regulations, including requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Occupational Safety and Health Administration (OSHA) standards, and Colorado Department of Public Health and Environment regulations. Prior to abatement, the City will confirm the location and condition of ACM through existing surveys and, if necessary, limited additional characterization to support safe removal.

To ensure all hazardous materials are properly identified, the city intends to perform destructive testing at both buildings to test all assumed materials. This will ensure the safety of contractors and limit the project's exposure to increased costs of unforeseen conditions. The cleanup method will consist of full removal and abatement of identified asbestos-containing materials by licensed and certified asbestos abatement contractors. The city anticipates encapsulating LBP on historically significant features for the Historic High School and removal of LBP at all other identified locations. Abatement activities will include appropriate containment, negative air pressure systems, wet methods, and air monitoring to prevent the release of asbestos fibers and to protect workers, building occupants, and the surrounding community. Following removal, clearance testing will be performed to verify that abated areas meet regulatory standards prior to renovation.

All removed asbestos-containing materials will be packaged, transported, and disposed of at approved, permitted disposal facilities in compliance with federal and state requirements. Waste handling and disposal documentation will be maintained to ensure full regulatory compliance.

Completion of the cleanup plan will eliminate environmental barriers to reuse, reduce health and safety risks, and allow the City to proceed with the planned renovation and redevelopment of the historic high school building and adjacent structure for long-term civic use.

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b. Project Implementation

The city will implement the proposed cleanup project through a coordinated set of EPA-funded tasks designed to safely remediate hazardous building materials and prepare the sites for reuse. EPA Cleanup Grant funds will be used to support environmental remediation activities at the former Durango High School campus, including confirmation of hazardous material locations, asbestos abatement, air monitoring, clearance testing, and proper transportation and disposal of regulated materials. All cleanup activities will be conducted in compliance with applicable federal, state, and local regulations.

The city is using bond funding only to competitively procure a qualified and licensed abatement contractor. The City has retained SME Environmental, which meets the definition of a Qualified Environmental Professional, to identify hazardous materials, prepare the Asbestos Baseline Compliance Agreement (ABCA). Additionally, the City will procure an assessment team to provide technical oversight, ensure regulatory compliance, and document cleanup activities and outcomes. EPA funds will support abatement by licensed asbestos contractors, implementation of containment and air monitoring measures, clearance sampling, and certification that cleanup activities are complete.

The City does not anticipate issuing subawards under this grant. All EPA-funded work will be performed through procurement of contractors providing direct services to the city. Contractors will operate under city oversight and will not be responsible for programmatic decision-making or grant administration.

Several activities necessary to support and complement the EPA-funded cleanup will be contributed by non-EPA sources. City staff will provide overall grant administration, financial management, reporting, and coordination with regulatory agencies using local resources. The City has retained Artaic Group using non-EPA funds to provide project management services, including coordination between consultants and contractors, schedule and cost oversight, and integration of cleanup activities with subsequent restoration and reuse efforts. Additional non-EPA resources will support design, historic preservation coordination, and long-term facility planning following cleanup.

Through this combination of EPA-funded remediation activities and locally funded project oversight and planning, the City will ensure that cleanup is completed efficiently, in compliance with all requirements, and in direct support of the site's planned reuse as City Hall and a Police Department facility.

c. Anticipated Project Schedule

The city anticipates completing the EPA-funded cleanup activities over a one-year period of performance through a phased, milestone-driven schedule that aligns with regulatory requirements and planned redevelopment timelines. In order to meet the overall project timeline, the City will utilize non-EPA funds to procure a contractor and prepare for abatement activities in the winter of 2026-2027.

Phase 1 (July 2026 – April 2027): Project Initiation and Abatement Activities

During the initial project period, the City will finalize grant agreements, complete procurement of EPA-funded contractors as needed, and initiate project management and reporting systems. In the summer of 2026, the city will finalize confirmation of hazardous material locations, coordination with regulatory agencies, and refinement and approval of the Asbestos Baseline Compliance Agreement (ABCA) and supporting work plans. The City will also support staff participation in eligible brownfields-related training, as appropriate, and continue community outreach efforts. EPA-funded cleanup activities will occur include full asbestos abatement within the historic 1916 building and the adjacent alt high school building. Activities will include contractor mobilization, installation of containment systems, abatement using approved methods, air monitoring, and regulatory inspections. Cleanup work will be sequenced to

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minimize disruption and ensure worker and public safety. Ongoing progress reporting to EPA will occur throughout this phase.

Phase 2 (May 2027 – November 2027): Grant Closeout and Building Rehabilitation

Following completion of abatement, the city will conduct clearance sampling and verification to confirm that cleanup standards have been met. Documentation of completed cleanup activities, waste disposal, and regulatory compliance will be finalized. The City will submit required reports to EPA and coordinate certification of cleanup completion. Transition planning for building renovation will occur in parallel.

Phase 3 (November 2027 - December 2028): Building Rehabilitation and Occupancy

During the final phase, the City will complete any remaining EPA reporting and administrative requirements, finalize grant closeout documentation, and formally transition the sites to post-cleanup redevelopment activities funded through non-EPA sources. Lessons learned and final outcomes will be documented to ensure transparency and accountability. This phased schedule provides flexibility to address unforeseen conditions while ensuring timely completion of EPA-funded cleanup activities and readiness for long-term civic reuse within the four-year period of performance.

d. Task/Activity Lead

The City will serve as the lead entity for all cleanup and abatement activities. Overall project management will be provided by Artaic Group in conjunction with the City team. The City's environmental assessment consultant will provide technical support, including abatement planning, regulatory coordination, and oversight. Licensed abatement and demolition contractors will be procured through a competitive process and will meet all federal, state, and local certification requirements. The City will ensure compliance with EPA, OSHA, and applicable state regulations throughout cleanup implementation.

e. Outputs

Anticipated outputs of the cleanup activities include:

- Hazardous materials abatement within the historic high school building prior to renovation and the Community Development Building prior to demolition
- Preparation of abatement plans, health and safety plans, and regulatory documentation
- Proper disposal of hazardous materials at licensed facilities
- Completion of clearance testing and documentation
- A site and historic building suitable for redevelopment into a City Hall and Police Department campus.

These outputs will remove environmental barriers to reuse.

f. Cost Estimates

Preliminary cost estimates were developed based on completed due diligence, similar municipal cleanup projects, and input from qualified regional abatement contractors. Estimated costs include environmental consulting services, abatement design and oversight, licensed abatement contractor services, air monitoring, clearance testing, community outreach, and regulatory reporting. EPA Cleanup Grant funds will support eligible abatement and cleanup costs at both buildings. The City will provide additional funding for non-eligible costs and overall project delivery. All costs were based on assumed and confirmed quantities in the ABCA.

g. Plan to Measure and Evaluate Environmental Progress and Results

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Environmental progress will be measured using defined cleanup milestones and documentation of completed abatement activities. The City will track quantities of hazardous materials removed, completion of clearance testing, and compliance with approved work plans and regulations. Progress will be reviewed through regular coordination meetings and documented in consultant and contractor reports. Results will be reported to EPA in accordance with grant requirements. Cleanup success will be demonstrated by regulatory clearance and elimination of risks to human health and the environment.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Organizational Structure

In addition to our Project Director, the city has competitively procured an Owner's Representative firm to help oversee the repurposing of the two high school facilities. This firm has experience managing federal grants and will be responsible for ensuring compliance for this project. The Owner's representative will work closely with our environmental consultant to

b. Description of Key Staff

The City has developed a team of key staff to administer the grant in addition to Artaic Group. Overseeing project costs will be the Assistant City Manager and Chief Financial Officer. Overseeing grant requirements will be the head for Housing Program & Operations Administrator along with a Community Engagement specialist who is overseeing outreach efforts. Finally, the city's purchasing manager will ensure procurement practices are aligned with grant requirements.

c. Acquiring Additional Resources

The City of Durango will acquire any additional expertise and resources required to complete the project through established municipal procurement procedures that ensure compliance with federal, state, and local requirements, including applicable EPA Brownfields NOFO clauses. All professional services, construction, and abatement activities will be procured as contracted services, not subrecipient awards, as these entities will provide goods or services to carry out specific project tasks under the City's direction.

The City follows formal procurement policies that include competitive solicitation processes such as Requests for Qualifications (RFQs) or Requests for Proposals (RFPs), evaluation by qualified staff and advisors, and award based on demonstrated experience, technical qualifications, cost reasonableness, and compliance with environmental and safety regulations. These procedures ensure that contractors are properly licensed, insured, and qualified to perform specialized work such as asbestos abatement, environmental monitoring, and hazardous material disposal.

(1) Purpose and Accomplishments

The City of Durango does not currently have, nor has it recently held, an EPA Brownfields Assessment or Cleanup assistance agreement. As such, there are no prior EPA Brownfields-funded projects to report under this section.

However, the City has a demonstrated track record of successfully administering other state and federal assistance agreements for capital improvement, infrastructure, and public facility projects. These efforts have included compliance with grant requirements, effective coordination among consultants and contractors, timely expenditure of funds, and delivery of completed projects that meet community needs. This was demonstrated by the city's AA+ rating when securing bonds to help finance this project.

THRESHOLD CRITERIA RESPONSE
FY2026 US EPA Brownfield Cleanup Grant Application
City of Durango City Hall and Police Department –
Durango, Colorado

1. Applicant Eligibility

The City of Durango, Colorado (the City) is the grant applicant and owner of the future City Hall and Police Department Campus (the Property) made up of the historic high school building and the current community development building. The City meets the definition of a General Purpose Unit of Local Government as defined in 2 CFR 200.64 and is therefore eligible for funding.

2. Previously Awarded Cleanup Grants

The City of Durango property has not received funding from a previously awarded US Environmental Protection Agency (EPA) Brownfield Cleanup Grant.

3. Site Ownership

The City of Durango is the sole owner of the Property. The title is fee simple. The single tax parcel forming the Property was acquired by the City on November 20, 2023.

4. Basic Site Information

- (a) *Name of Site:* City Hall and Police Department Campus
- (b) *Property Addresses:* 201 E. 12th Street, Durango, Colorado 81301 and 215 E. 12th Street, Durango, Colorado 81301
- (c) *Current Owner:* City of Durango, Colorado

5. Status and History of Contamination at the Property

(a) Contaminants of concern at the Property are hazardous substances. Contaminants of concern (COCs) at the Property are asbestos in building materials.

(b) Historical records show that the property was developed with a high school by the 1920s. The over 40,000 square-foot high school building was constructed in 1916. It was used as a high school until the 1970s when it became the high school administrative building.

The adjacent 34,000 square-foot building on the east side of the property was built as a secondary school in 1957. The property and buildings were acquired by the City of Durango in 2023, and the building has been utilized as the City's community development department since then.

(c) The City of Durango completed a building materials survey of the high school building in 2021. Asbestos was identified in building components that will be disturbed or exposed during the phased renovation plan. The condition of these components has degraded due to lack of maintenance and water intrusion following closure of the high school, increasing the chance of their release to the building interior and exposure of future users to these materials. The survey identified approximately 39,156 ft² of asbestos-containing materials throughout the building. These materials must be abated to protect renovation workers, construction teams, future City of Durango staff occupying office spaces, future City Council attendees, and community members frequenting the building.

The City of Durango completed a building materials survey of the adjacent community development building in 2021. Asbestos was identified in building components that will be disturbed or exposed during the planned demolition. These materials were

commonly used during the period when this building was constructed, increasing the chance of their release and exposure during the building’s demolition. The survey identified approximately 44,081 ft² of asbestos- containing materials throughout the building. These materials must be abated to protect demolition workers, construction teams, and surrounding residential areas. Since the City purchased the Property, it has taken steps to ensure that the building is secure and a safe working environment, with no means for release of building materials to the environment.

The locations, quantities, and building components containing asbestos to be abated using the EPA Brownfield Cleanup Grant are summarized in the table below. Abatement is planned for the winter of 2026-2027. The remaining ACMs will be abated using EPA Brownfield Grant funds.

Historic High School Building (201 E 12th St)

Material	Est. Quantity (ft ²)	Building Materials and Locations
Asbestos	39,156	Moisture barriers, sink mastic, chalkboards, mounting mastic, tile, fire rated doors, window putty, window caulk, pipe fittings/ACM pipe insulation, mastic linoleum, baseboard adhesive, window glaze, patio mud fabric, insulation foam, open cell pipe wrap, and pipe dope

Community Development Building (215 E 12th St)

Material	Est. Quantity (ft ²)	Building Materials and Locations
Asbestos	44,081	Tile, grout, carpet glue, mastic, paper pipe insulation, insulation felt, outdoor caulk, window glaze, boiler gaskets and insulation, fire doors, and door caulk

6. Brownfields Site Definition

The Property meets the EPA definition of a brownfield. It is real property where redevelopment and reuse are complicated by the presence of contaminants (asbestos).

- (a) The Property is not currently, nor has it ever been listed or proposed for listing on the National Priorities List.
- (b) The Property is not currently, nor has it ever been subject to unilateral administrative orders, court orders, administrative orders on consent or judicial consent decrees issued to or entered into by parties under CERCLA.
- (c) The Property is not subject to the jurisdiction, custody, or control of the US government.

7. Environmental Assessment Required for Cleanup Grant Proposals

A report entitled *9R Administration Building, 201 East 12th Street, Durango, Colorado, Asbestos Inspection* was completed in January 2021. An additional report entitled *Smiley Arts & Sciences Building, 215 East 12th Street, Durango, Colorado, Asbestos Inspection* was completed in January 2021. These reports assessed the nature, extent, and concentration of asbestos in building materials within the historic high school building and the current community development buildings. A Phase I Environmental Site Assessment equivalent to the ASTM International E1903-11 standard was also conducted on the property site in January 2021.

8. Enforcement or Other Actions

No enforcement actions are known or anticipated for the Property. There have been no

inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the hazardous substances at the Property. There are no environmental liens on the Property.

9. Sites Requiring a Property-Specific Determination

None of the special classes of property that require a property-specific determination in order to be eligible for funding apply to the Property.

10. Threshold Criteria Related to CERCLA Liability

a. Property Ownership Eligibility – Hazardous Substances Sites

i. Exemptions to CERCLA Liability

- (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 Government – NOT APPLICABLE

ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

- (1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002 – NOT APPLICABLE

iii. Landowner Protections from CERCLA Liability

CERCLA has not been triggered related to asbestos in the historic high school and community development building components because: a) the materials are not the result of past industrial operations or improper storage or waste disposal; b) no release of these materials to the environment has occurred. All asbestos in the historic high school and community development buildings are integral to various building components and are contained within the building envelope which has been secured to prevent any releases.

The City acquired title to the historic high school building in November 2023. At the time of the City's acquisition, the buildings were vacant with no active operations. Its most recent use had been as a high school administration building and a secondary school. There have been no active operations at the historic high school building since the City's purchase. The secondary school building is currently in use as the City's community development department.

The City affirms it is not liable in any way for contamination regulated under CERCLA at the Property or affiliated with a responsible party. No disposal of hazardous substances at the Property has been documented, and the City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. There are no past or continuing releases at the Property.

The asbestos contained in building materials of the current community development building currently do not pose a threat to those occupying the building. Upon acquiring the Property, the City ensured that the building envelope was intact to prevent any chance of asbestos impacting the environment and secured the building to prevent unauthorized entry.

The City affirms its commitment to: 1) assist and cooperate with those performing the cleanup and to provide access to the Property; 2) comply with all information requests and administrative subpoenas that have or may be issued in connection with the Property; and 3) provide all legally required notices. There are no land use restrictions or institutional controls imposed on the Property.

11. Cleanup Authority and Oversight Structure

(a) Describe how you will oversee the cleanup at the site

In Colorado, the Colorado Department of Public Health and Environment (CDPHE) oversees all asbestos abatement projects, and the City and its oversight contractor will work closely with CDPHE to ensure the cleanup is protective of human health and the environment. The City has procured an independent third-party oversight contractor and will procure an asbestos abatement contractor to implement Property cleanup in accordance with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326.

(b) Impact of cleanup response activities on neighboring properties

Access to neighboring properties will not be required because remedial actions will be performed wholly within Property boundaries. All friable asbestos abatement activities will be conducted in containment to prevent the release of asbestos.

12. Community Notification

The City provided the community with notice of its intent to apply for an EPA Brownfield Cleanup Grant and allowed the community an opportunity to comment on the draft grant application package, including the draft Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for the Property. Community notification details are provided below.

(a) Draft Analysis of Brownfield Cleanup Alternatives

A draft ABCA summarizing information about 1) the Property and contamination issues, cleanup standards, and applicable laws, 2) the cleanup alternatives considered (for each alternative and the alternative chosen include information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness), and 3) the proposed cleanup was prepared. A copy of the draft ABCA is provided as **Threshold Criteria Response Attachment A**.

(b) Community Notification Ad

A community notification advertisement was published in the City's community newspaper and on their website which serves Durango and the surrounding communities on January 14th, 2026. The ad indicated the following:

- that a draft copy of the EPA Brownfield Cleanup Grant application, including the draft ABCA(s), was available for public review and comment;
- how to comment on the draft proposal;
- where the draft proposal could be accessed; and

- the date and time of the public meeting.

A copy of the ad is provided in Threshold Criteria Attachments.

(c) *Public Meeting*

The City discussed the draft proposal and considered public comments during a public meeting held on January 22, 2026. Required meeting materials are provided in Threshold Criteria Attachments.

(d) *Submission of Community Notification Documents*

Community notification documents are provided as indicated below.

- Draft ABCA – **Threshold Criteria Response Attachment A**
- Community Notification Ad – **Threshold Criteria Response Attachment B**
- Summary of Meeting and Comments and Responses – **Threshold Criteria Response Attachment C**
- Community Meeting Presentation – **Threshold Criteria Response Attachment D**
- Community Notification Meeting Participant List – **Threshold Criteria Response Attachment E**

13. Statutory Cost Share

(a) *Demonstrate how you will meet the required cost share, including the sources of the funding or services, as required for this cleanup grant.*

As the City is seeking \$600,000 in EPA cleanup funding, the City would plan on a \$256,000 cost share (30%), more than is required. This cost share will be met with funds from the City of Durango which passed a bond for the project, and the portion of a Brownfield Cleanup Grant provided by CDPHE will be used for abatement of asbestos.

(b) *If you are requesting a hardship waiver of the cost share, provide an explanation for the basis of your request as part of your proposal*

The City is not requesting a hardship cost share waiver.

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 Durango Former Durango High School Campus- FY26 Cleanup Grant Proposal

Dear Ms. Devincenzi:

The Colorado Department of Public Health and Environment (CDPHE) has worked with the City of Durango as an important municipality in the State. CDPHE has supported and assisted on numerous efforts to address Brownfields sites in Durango. As part of our ongoing and successful partnership, I am writing to acknowledge and express support of the City of Durango's FY 2026 Brownfields Cleanup Grant application for the Former Durango High School Campus located at 201 and 215 E. 12th St, Durango, Colorado. Cleanup of the property will facilitate redevelopment of historic institutional buildings to modern environmental and building standards as a new City Hall and Police Department facility. Known hazardous building materials include asbestos-containing materials, lead-based paint, and others related to historic use of coal as the buildings primary heating system. These conditions meet the definition of brownfields under CERCLA, as the presence or potential presence of hazardous substances complicates reuse and reinvestment.

CDPHE has reviewed the site characterization data associated with this application and determined that the site has been adequately characterized by qualified environmental professionals and the asbestos characterization was completed by a state- and AHERA-certified Qualified Environmental Professional, who followed state and federal regulations in the sampling scope and methodology. While this project is eligible to enroll in the Voluntary Cleanup (VCUP) Program, asbestos abatement projects are cleaned up pursuant to Colorado asbestos abatement regulations overseen by the department's Air Pollution Control Division. Based on the expertise and certifications required for the assessment, CDPHE is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization will be made by the department's Air Pollution Control Division following receipt of the permit application for the project.

Should additional site characterization be required, the department's brownfields program can assist the applicant in collecting the necessary data prior to the June 15, 2026 deadline specified in the grant solicitation guidelines.

Pending a successful proposal by the City of Durango, CDPHE has additional resources to assist completion of the activities outlined in the proposal. These resources range from technical and planning resources to financial resources to assist with the cleanup. CDPHE has informed the City of Durango of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express the department's support for the City of Durango's Brownfields Cleanup Grant application for the former Durango High School Campus. CDPHE looks forward to continuing our partnership with the City of Durango to effect redevelopment and revitalization of brownfield properties in this region of Colorado.

Sincerely,



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

cc: Cody Minnich, City of Durango (cody.minnich@durangoco.gov)
Kathleen Knox, CDPHE Brownfields Coordinator (Kathleen.knox@state.co.us)

