

---

## Application Information Sheet

---

**1. Applicant Identification:**

Pueblo County Government  
215 W 10<sup>th</sup> Street  
Pueblo, CO 81003

**2. Website URL:** <https://county.pueblo.org/>

**3. Funding Requested:**

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$3,947,961

**4. Location:**

- a. **City:** Pueblo
- b. **County:** Pueblo
- c. **State:** Colorado

**5. Property Information**

Government Service Center (formerly Wells Fargo)  
201 W. 8<sup>th</sup> St.  
Pueblo, CO 81003

**6. Contacts:**

- a. Project Director-  
Weston Burrer, AIA, MPA, CFM, LEED AP O+M, WELL AP  
Staff Architect  
215 W 10<sup>th</sup> Street  
Pueblo, CO 81003  
719.583.6006 | Office  
719.671.6405 | Mobile  
[burrerw@pueblocounty.us](mailto:burrerw@pueblocounty.us)
- b. Chief Executive/ Highest Ranking Elected Official-  
Zach Swearingen  
County Commissioner  
215 W 10<sup>th</sup> Street  
Pueblo, CO 81003  
719.583.6536 | Office  
[swearingenz@pueblocounty.us](mailto:swearingenz@pueblocounty.us)

**7. Population:**

Pueblo County 2020 Census: 168,162

**8. Other Factors:**

Provided Information on Other Factors	
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed site(s) is impacted by mine-scarred land.	N/A
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	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 3
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Page 3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	Page 2

**9. Releasing Copies of Applications:**

Not Applicable

---

## 1. Project Area Description and Plans for Revitalization

---

### Target Area and Brownfields

#### **a. Overview of Brownfield Challenges and Description of Target Area**

Imagine a place where the grit of an industrial legacy meets the promise of resilient renewal. Now travel two hours south of Denver and nestled along the banks of the Arkansas River, between the mountains of the San Juans and famous green Chile farms, sits Pueblo, Colorado, a proud community of approximately 168,000 residents<sup>1</sup>. Pueblo County was established in 1861, the same year Colorado became a U.S. territory, placing it among the earliest foundations of organized government in the region. Long before formal boundaries were drawn, the area served as a vital crossroads for Indigenous peoples, traders, and settlers due to its strategic location along the Arkansas River. With the arrival of Hispanic settlers from New Mexico in the mid-1800s and the subsequent influx of miners, merchants, and railroad workers, Pueblo quickly emerged as a hub of agriculture, railroads, coal, and later steel production in southern Colorado. Since the peak of the industrial boom within the town, Pueblo has since navigated economic resilience and strategic opportunities to sustain a flourishing multi-use community. Nonetheless, due to socioeconomic, environmental, and other related factors, a majority of Pueblo County has been designated as historically disadvantaged as well as an area for navigating persistent poverty. Specifically, the proposed Brownfield cleanup project site, the Government Services Center, bought and owned in 2020 by Pueblo County Government, is located Downtown within the target area, Census Tract 35.

Sitting as a notable structure in the skyline of Downtown Pueblo. This nine-floor multi-use building on 2.715 acres is expected to catalyze local economic vitality and foster community networking. Purchased by Pueblo County in 2020, the property's intent is to be transformed into a centralized economic vitality hub for public services, including County Elections and Voter Registration, Community Planning and Development, state agencies, business incubators, and local non-profits. An EPA cleanup grant will remove a significant barrier and springboard the redevelopment of this brownfield property. Which is not only necessary to protect public health but also critical to advancing community revitalization goals, restoring confidence in public spaces, and catalyzing long-term economic and social benefits within Pueblo County.

#### **b. Description of the Proposed Brownfield Site**

The Government Services Center, formerly a multi-commercial office and Wells Fargo Bank, comprises Parcel #525443004. According to the Pueblo County Assessor webpage, the land associated with this parcel is approximately 2.715 acres with one (1) structure present labeled as "Central Business District". The structure was built in 1974 and is ~122,704 square feet with (9) stories and a concrete slab on grade foundation<sup>2</sup>. The building structure is comprised mainly of masonry brick and prefab rock panel exterior with plaster, drywall, brick, and CMU interior finishes. Flooring consists of carpet, ceramic and quarry tile, and vinyl tile, as well as other tenant finishes. Ceiling throughout consists of both textured drywall and dropped ceilings. The structure is currently at 60% occupancy by various professionals and governmental agencies. The 9th floor is occupied by the HVAC and equipment rooms. The property also has an asphalt parking lot to the north and west. The parking lot includes concrete sidewalks and landscaping.

An [All Phase Environmental Assessment](#) conducted in 2020 identified asbestos-containing materials throughout the building, confirming the presence of environmental conditions that must be addressed to safely return the site to full capacity. Specifically, each floor consists of two restrooms adjacent to the elevators. Said restrooms have tile flooring and walls with a drywall ceiling, which have been identified as asbestos-containing material. Finally, floors and office spaces that have been identified as containing asbestos-containing material that needs priority cleanup are located on the second and seventh floors.

### c. Reuse Strategy and Alignment with Revitalization Plans

To foster an environment of economic excellence, Pueblo’s Elected Leaders, County Staff, and community members have created strategic economic vitality investments through local, state, and federal coalitions and assessments, such as, Pueblo’s Urban Renewal Authority PURA, whose mission is to “enhance Pueblo neighborhoods through redevelopment projects that create jobs, eliminate blight, improve public infrastructure, and preserve history.”<sup>3</sup> Additionally, collaborations and partnerships with Pueblo County’s Technical Advisory Committee have created strong community impact networks that are engaged throughout all phases of economic development, including land use, building development, and property site reuse strategies. Priority needs assessments identified that the Government Services Center, which was formerly commercial office space and a Wells Fargo bank, is a strategic priority that has potential for high economic impact and improved quality of life for those who utilize the building as well as the surrounding residential and commercial neighbors.

This site is a prime candidate for brownfield cleanup consideration as it is not located on a federally designated flood plain. As stated in the All Phase Environmental, “The FEMA Flood Insurance Rate Map (FIRM) listing for the Subject Property, indicates the Subject Property is located in Zone X: 0.2% Annual Chance of Flood Hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas or less than one square mile<sup>4</sup>”.

An EPA Brownfield Cleanup is not only necessary to protect public health but is essential to restoring confidence in public spaces and enabling long-term investment in Downtown Pueblo. The building’s centralized downtown location is critical to its impact. Situated within walking distance of government offices, transit routes, and community gathering spaces, the site offers unparalleled access for residents seeking public services, nonprofit support, and business resources. By transforming this underutilized brownfield into a centralized hub for public services, nonprofit organizations, small business incubation, green space, and emergency preparedness, Pueblo County will restore confidence in public spaces and deliver lasting economic, social, and environmental benefits to the community.

### d. Outcomes and Benefits of Reuse Strategy

#### Economic Development, Community Revitalization, and Nonprofit Reuse

Prominently situated in the skyline of Downtown Pueblo, the proposed cleanup site is a nine-floor, multi-use building and parking lot located on 2.715 acres that is uniquely positioned to catalyze economic vitality and strengthen community connectivity. Purchased by Pueblo County in 2020, the property was intentionally acquired to be redeveloped into a centralized economic vitality hub that consolidates essential public services, nonprofit organizations, and economic development resources within a single, accessible downtown location.

Following environmental cleanup, Pueblo County anticipates increasing building occupancy from its current 60% to 90–100% within four years, resulting in the productive reuse of approximately 25,000 square feet and accessible bathrooms of currently underutilized space. This increase in occupancy will directly support an additional:

- 3-6 nonprofit organizations providing workforce development, social services, and community programming
- 1-5 economic development or business support organizations operating as business incubators and small business startups
- An estimated 20-50 permanent jobs retained or created, including public sector, nonprofit, and private-sector positions

The building will continue to house critical County services such as Elections and Voter Registration, and Community Planning and Development, alongside additional state agencies and non-profits. An EPA Brownfields Cleanup Grant will remove a significant redevelopment barrier by addressing environmental contamination that currently limits full occupancy.

Additionally, the Comanche Station 3 in Pueblo County is the state’s largest coal-fired power plant operated by Xcel Energy. It is scheduled to cease operations by January 1, 2031 as part of Xcel’s Clean Energy Plan to retire its remaining coal units and transition to cleaner energy sources. Comanche 3 has historically been a major contributor to local employment and county revenue, supporting approximately 77 direct jobs and significant indirect

employment, while generating tens of millions of dollars annually in property taxes that help fund schools, public services, and the local budget<sup>5</sup>. While retiring coal facilities like Comanche 3 yields important environmental and public health benefits through dramatic reductions in greenhouse gas and toxic emissions, it also presents economic and workforce challenges for coal-dependent communities.

The redevelopment of the Downtown Pueblo brownfield property into a centralized economic vitality hub aligns directly with Just Transition goals by providing space for workforce development services, business incubation, and job placement programs that can assist displaced workers and stimulate new job creation. By housing nonprofit job training organizations, economic development entities, and business incubators, this project will help facilitate retraining, entrepreneurship, and workforce diversification. In this way, the cleanup and adaptive reuse of the site not only protects public health and the environment but also serves as a strategic component of local economic transition planning, helping to cushion the impact of coal plant retirement while fostering diversified, sustainable job opportunities for Pueblo County's residents.

### **Integration with Parks, Greenways, and Civic Space Planning**

In December 2025, Pueblo County received \$160,000 to develop a comprehensive master plan for the County's Parks, Recreation, and Natural Resources Department. As part of this two-year planning process, the proposed Cleanup Site will be evaluated for opportunities to revitalize adjacent greenway space and/or create a civic center pocket park. Preliminary concepts include revitalizing a portion of the existing parking lot into 0.25–0.5 acres of public green space, which could support 5,000-7,000 annual users. Revitalizing this area would enhance downtown walkability, provide a gathering space for community members and visitors, and strengthen the civic identity of the area. This location is directly across from the County's Historic Courthouse, where Board of County Commissioners meetings are held weekly, and where the Clerk and Recorder offices are located. The area also hosts well-attended community events, including the annual Holiday Courthouse Lighting, making it a highly visible and meaningful site for public use. The integration of green infrastructure or civic open space into the redevelopment of this brownfield property supports EPA priorities by increasing access to nonprofit and public-use spaces while contributing to environmental and social resilience in the downtown core.

### **Resilience to Extreme Weather and Emergency Preparedness**

Cleanup and reuse of this multi-use building will also improve local resilience to extreme weather events and natural disasters. Once fully remediated, the building may be utilized as an additional hub for emergency notification and coordination through the Pueblo County Sheriff's Office. Its centralized location, size, and existing infrastructure make it well-suited to support emergency communications, coordination of services, and dissemination of information during emergencies.

By removing environmental hazards and restoring the building to full, safe operation, the County enhances its capacity to maintain continuity of government and public services during disruptive events, thereby strengthening community preparedness and resilience.

### **Energy Efficiency and Renewable Energy Potential**

The reuse strategy for this site includes consideration of future energy efficiency measures and renewable energy integration. The building has strong potential for the facilitation of renewable energy through solar energy efficiency measures. Existing site conditions allow for the future placement of solar panels on the roof, which could reduce operational costs, lower greenhouse gas emissions, and support long-term sustainability goals.

Incorporating renewable energy planning into the reuse of this brownfield property aligns with EPA objectives to promote sustainable redevelopment and maximize environmental benefits beyond cleanup alone.

## **Strategy for Leveraging Resources**

### **e. Resources Needed for Site Characterization**

The Government Service Center building and property site have been fully assessed. Pueblo County has conducted: a Phase 1 All Environmental Site Assessment, a Soil and Groundwater Screening Assessment, a Subsequent Asbestos Inspection and Sampling Report, and a Limited Phase 2 Investigation.

**f. Resources Needed or Site Remediation**

The EPA Brownfields grant will fully fund all necessary remediation. In the event there is a cost overrun, the County will seek cleanup funding through CDPHE's Colorado Brownfields Tax Credit Program, CDPHE Brownfields Cleanup Grant, and/or the Brownfields Revolving Loan Fund.

**g. Resources Needed for Site Reuse:**

Additional resources include:

Name of Resource	Assessment, Remediation, Reuse	Secured or Unsecured	Additional Details or Information
Pueblo County	Assessment	Unsecured	In the event additional assessment is needed, the County will evaluate covering the costs.
Trusted Medical, Aerial Clinical, TRE, People Care, Non-Golden Home Health	Reuse	Secured	Current Building Non-Profit Tenants

**h. Use of Existing Infrastructure**

The property site is fully served by sewer, storm, drinking water, electrical, telecommunications, natural gas, and transportation infrastructure. The Government Service Center reuse strategy will require no infrastructure improvements beyond the boundaries of the property. The area surrounding the building has ample on and off-street parking. The property also sits on the corner of an arterial downtown corridor, with multimodal options for access.

---

**2. Community Need and Community Engagement**

---

Community Need

**a. Community Need for Funding**

This EPA Brownfields Cleanup Grant addresses a critical need in Pueblo, Colorado, a community with limited capacity to independently finance environmental remediation due to persistent economic hardship, limited tax revenue, and a high proportion of low-income residents. Pueblo is a majority Latino/Hispanic community, with 47% of residents identifying as Latino/Hispanic, 44% as White/Caucasian, and 2.4% as African American/Black. Additionally, 13.1% of residents speak a language other than English at home, highlighting the importance of accessible public facilities and centralized community services. The 2020 median household income of \$46,766 falls well below state and national levels, while the poverty rate of 24.4% is more than 116% higher than the Colorado average and 64% higher than the national average, significantly constraining local financial capacity<sup>6</sup>.

These economic conditions limit Pueblo County’s ability to draw on local or private funding sources to address costly environmental remediation, particularly for large, complex brownfield sites. Local revenues are largely committed to essential public services, and private investment has been deterred by the presence of environmental contamination and associated liability risks. Without EPA support, the cleanup of this site would likely be delayed, prolonging public health risks and hindering economic revitalization. EPA Brownfields funding is therefore essential to remove environmental barriers, unlock safe reuse for public and nonprofit purposes, and deliver equitable economic and health benefits to a community that lacks the resources to achieve these outcomes without federal assistance.

**b. Health or Welfare of Sensitive Populations**

The Government Service Center is located in Census Tract 35, which has been formally identified as a historically disadvantaged community and an area of persistent poverty, with socioeconomic and environmental indicators placing it in the 91st–100th percentile for low income. The tract also experiences overlapping stressors that disproportionately affect sensitive populations, including children, older adults, pregnant women, low-income households, and individuals with elevated disease burdens such as asthma, cancer, chronic respiratory disease, and low birth weight. Additional burdens include high unemployment, housing cost pressures, energy cost burdens, wastewater discharge impacts (71st–90th percentile), and housing-related risks such as lead-based paint exposure (51st–70th percentile)<sup>6</sup>, compounded by climate-related stressors including expected population and agricultural loss rates. The presence of hazardous materials, including asbestos-containing materials within the building, represents a disproportionate health risk for these populations, particularly given the site’s role as a centralized location for public services. This EPA Brownfields Cleanup Grant will reduce these threats by eliminating exposure pathways through remediation and abatement, improving indoor environmental quality, and returning the site to safe, productive use. The reuse strategy further supports the health and welfare of sensitive populations by consolidating public services, workforce development, and nonprofit support in a regulated, accessible facility, reducing cumulative environmental burdens while expanding access to economic opportunity and essential community resources.

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

Cleanup and reuse of the proposed brownfield site will directly address documented environmental health disparities affecting populations in Census Tract 35, which experiences a greater-than-normal incidence of adverse health outcomes compared to state and national benchmarks. Census Tract 35 ranks in the 90th–95th percentile nationally for low life expectancy, with an average life expectancy of 74.8 years. Multiple factors contribute to these outcomes, including historical industrial activity and potential exposure to hazardous building materials such as asbestos. Pueblo County also experiences a statistically elevated rate of asthma-related emergency department visits at 75.7 per 100,000 residents, compared to the statewide rate of 28.64 per 100,000, indicating heightened respiratory vulnerability among local populations<sup>6</sup>. In addition, Pueblo County reports a higher overall cancer rate of 33.3 per 100,000 residents, ranks in the 98th percentile nationally for low birth weight, and has one of the highest breast cancer rates in Colorado<sup>6</sup>. These indicators reflect cumulative health burdens that disproportionately affect low-income households and communities with limited access to preventative healthcare. The presence of asbestos-containing materials at the site represents a potential exposure pathway that can exacerbate respiratory disease and cancer risk, particularly for populations already experiencing shortened life expectancy.

**d. Economically Impoverished/Disproportionately Impacted Populations**

Cleanup and reuse of the proposed brownfield site will directly address disproportionate environmental and economic burdens experienced by residents in the target area, many of whom are economically impoverished and have historically borne the negative consequences of industrial, governmental, and commercial activity. The surrounding community ranks in the 93.4th percentile for low income, with a median household income of \$46,766, significantly below state and national averages. These conditions reflect a limited capacity for residents and local institutions to avoid, mitigate, or remediate environmental hazards. This vulnerability is further captured by the Colorado EnviroScreen score of 92.84, which combines population characteristics and cumulative environmental exposures on a scale from 0 to 100, with higher scores indicating substantially greater environmental burden. The target area also has a high concentration of sensitive populations, with a Sensitive Populations percentile score of 98.41<sup>6</sup>, representing elevated vulnerability among children, older adults, individuals with preexisting health conditions, and households with limited access to healthcare and economic resources. In communities facing these overlapping stressors, environmental contamination poses heightened risks because residents are more likely to live, work, and access services near impacted sites and have fewer alternatives to avoid exposure. The presence of hazardous materials at the proposed site, therefore, represents a disproportionate burden on populations already experiencing cumulative environmental and economic stress.

**Community Engagement**

**e./f. Project Involvement and Project Roles**

The organizations/groups listed below represent a broad and diverse group of entities with meaningful involvement and insight in the success of the project.

Name of Organization/Entity/ Group	Entity’s Mission	Point of Contact	Specific involvement in the project of assistance provided
Pueblo County Technical Advisory Committee TAC	The Pueblo County Planning and Development TAC is a cornerstone of community growth and regulation in Pueblo County. This Department manages a wide range of responsibilities that extend beyond traditional zoning and land-use planning.	Carmen Howard <a href="mailto:howardca@pueblocounty.us">howardca@pueblocounty.us</a>	Community liaison to promote redevelopment to business regionally to locate the new development
The Pueblo Area Council of Governments (PACOG) - Pueblo City and County Metropolitan Planning Organization MPO	PACOG is the MPO for the Pueblo area as required by Title 23 of federal statutes for both long-term and short-term urban transportation and environmental planning.	Eva Cosyleon <a href="mailto:Ecosyleon@pueblo.us">Ecosyleon@pueblo.us</a>	Provide long-range redevelopment planning
Pueblo Urban Renewal Authority PURA	PURA’s mission is to stabilize, enhance, and support economic vitality through community-driven development projects.	Cherish Deeg <a href="mailto:cdeeg@puebloura.org">cdeeg@puebloura.org</a>	Community liaison to promote redevelopment to business regionally to locate the new development
Pueblo Economic Development District PEDCO	Whether you’re relocating, expanding or looking to start a business from the ground up, PEDCO serves as a single point of contact for companies and site selectors considering the Pueblo, Colorado area.	Jeffery Shaw <a href="mailto:jshaw@pedco.org">jshaw@pedco.org</a>	Community liaison promotes redevelopment to business region to locate the new development

**g. Incorporating Community Input**

To communicate project progress, the County will: 1) host at least 2 public meetings at project milestones, such as at grant award and timeline of active cleanup work, and when active cleanup work ends. Meetings will be posted on the County’s Facebook page and on the County Website; 2) present project information and provide opportunities for input at ongoing local meetings such as the Technical Advisory Committee and Area Council of Government meetings; 3) work with the local multimedia college students to provide translations and outreach support to communities with limited English language, elderly residents, and those with limited mobility. The County will hold public meetings virtually or in person. The County will prepare signage for display during the abatement work explaining the activity and noting that it was funded by an EPA Brownfield Grant. The County will solicit community input using tools such as electronic polling/surveys and question-and-answer sessions during public meetings (in-person or virtual). The County will publicize the cleanup plan and project contact information to invite community input. The input will be considered by County staff and project contractors, and plan adjustments and/or

responses will be made as appropriate. Community input and project team responses will be summarized in the quarterly project progress reports.

### 3. Task Descriptions, Cost Estimates, and Measuring Progress

#### a. Proposed Cleanup Plan

Pueblo County will issue a competitive Request for Proposals to engage a qualified environmental professional (QEP) to finalize and oversee the ABCA and cleanup plan and dispose of media in accordance with state and federal law. Contaminated media includes ACBM in concentrations greater than 1%. These materials will be abated by a General Abatement Contractor (GAC), in accordance with CDPHE Regulation 8. A qualified Project Manager will oversee the GAC to ensure regulations are followed and to conduct full visual inspections of asbestos abatement work areas. Following visual inspection, clearance testing will be conducted so that the work area can be deemed clean. Third-party oversight will be provided during the abatement activities to conduct air sampling and clearance sampling by a State of Colorado Project Manager, per qualifications in Regulation 8, Part B. All ABCM will be properly disposed of at a licensed landfill facility approved to accept such waste. Clearance samples will be analyzed per the National Institute for Occupational Safety and Health (NIOSH) #7400 requirements and must show less than 0.01 fiber per cubic centimeter (fivers.cc) of asbestos in work area air.

#### b.-e. Implementation, Project schedule, Lead, Outputs

Task descriptions, including implementation methods, schedule, leads, and outputs are provided in the table below.

Task 1: Grant Administration	
i.	Project Implementation: 1) Cooperative Agreement compliance oversight; 2) quarterly progress reporting; 3) 2 CFR 200 compliance reporting; 4) entries in the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; 5) Grant Closeout Report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned and resources leveraged; and 6) County participation in brownfield conferences/workshops.
ii.	Anticipated Project Schedule: Quarterly and annual reporting; ACRES entries when cleanup is complete; Closeout reporting at completion of cleanup; Conferences and workshops will be attended during the grant term.
iii.	Task/ Activity Lead: Pueblo County Staff with support from the Qualified Environmental Professional
iv.	Outputs: Attend 1 conference and 1 workshop; Quarterly progress reports with budget and schedule status; annual reports; ACRES reporting; and Grant Closeout Report.
Task 2: Community Engagement	
i.	Project Implementation: 1) (1) Pre and (1) Post community meeting (virtual or in-person, during the grant term; 2) outreach materials including fact sheets, press releases, and County website/Facebook page updates; and 3) solicitation and responses to community input.
ii.	Anticipated Project Schedule: Pre/Post public meetings will be held after grant award and after cleanup is complete; English and Spanish outreach materials will be made available before cleanup; input will be gathered at community events and when provided directly to the County via email, Facebook post, or other method.
iii.	Task/ Activity Lead: Pueblo County Staff with support from the Qualified Environmental Professional
iv.	Outputs: At least 2 community meetings held and notes/presentation materials developed; 2-3 project fact sheets and signs; project updates on the County’s website and Facebook
Task 3: Cleanup	
i.	Project Implementation: 1) Finalize Analysis of Brownfield Cleanup Alternatives (ABCA); 2) prepare and obtain EPA approval of an integrated sampling and analysis plan (SAP)/quality assurance project plan (QAPP) that details all project cleanup-related sampling protocols and quality assurance/quality controls; 3) implement the cleanup plan described in Section 3.a including all permitting and prework

	submittals, health and safety plan, site setup, remove and dispose of ACM, and restore the second floor, seventh floor, and 14 bathroom groups located on second-eighth floor; and 4) preparation by the cleanup contractor (reviewed and approved by QEP) of a Closure Report documenting all aspects of the cleanup project.
ii.	Anticipated Project Schedule: Final ABCA and SAP/QAPP completed by end of year 1, estimated December 2026; Site setup and abatement of second floor Year 2-January 2027-December 2027; Bathrooms Year 2/3, Seventh Floor Year 3/4-January 2028-December 2029; Cleanup report final submitted by 6/30/30.
iii.	Task/ Activity Lead: Pueblo County Staff with support from the Qualified Environmental Professional
iv.	Outputs: Final ABCA; SAP/QAPP; HASP; Final cleanup/clearance data; Cleanup/Closure Report.

**f. Cost Estimates**

Pueblo County’s Workplace Policy and Compliance suggests that personnel costs are based on a rate of \$75/hour (\$50 salary and \$25 fringe). QEP costs are based on a competitive Colorado rate of \$175/hour. Cleanup costs are based on an estimate provided by County engineers and environmental subject matter experts.

**Task 1: Grant Administration: \$162,915-**

- **Personnel/Fringe: \$151,500:** [Quarterly and Annual reporting, 60 hrs (~20 reports total/ 3 hours per @ \$75) = \$4500, Budget/Schedule Mgmt., 1920hrs (40hrs/month for 48 months), =\$144,000; Closeout Reporting, 40 hrs=\$3,000]
- **County Travel: \$2,365:** [National conference 1 person = \$1,752: flight \$650 + conference fees \$300 + lodging \$299/night/2 nights \$598 + per diem \$68/day/3 days \$204; Denver workshop 1 person \$613: Mileage 500 miles at \$0.69/mile \$345 + lodging one night/2 people: \$200 + per diem \$68 one day];
- **Contractual QEP: =\$8,750** [Quarterly/Annual reporting, 20 hrs=\$3,500; Budget/Schedule Tracking, 10 hrs=\$1,750; Final Reporting, 20 hrs= \$3,500]

**Task 2: Community Outreach: \$2800-**

- **Personnel/Fringe:\$1,350:** [Plan and host 2 public meetings, 8 hrs=\$600; Develop outreach materials, 10 hrs=\$750]
- **Contractual (QEP): \$1,450:** [2 public meetings, 4 hrs=\$700; assist in developing outreach materials, 10hrs=\$750]

**Task 3: Cleanup: \$3,782,246**

- **Contractual (QEP): \$22,750:** Finalize ABCA, 24 hrs=\$4,200; SAP/QAPP, 30 hrs=\$5,250; Cleanup oversight/report review, 36 hrs=\$6,300; Coordinate with the County, abatement contractor, EPA, CDPHE, 40 hrs=\$7,000];
- **Second Floor Construction \$1,151,104:** [permit for ACM abatement 2<sup>nd</sup> floor, \$3,200; Setup (safety, access, utilities), \$3,554; ACM abatement, 12,500 ft2 at \$50/ft2=\$625,000; site restoration, 12,500 ft2 at \$25/ft2=\$312,500; Clearance/ wipe sampling, \$75,000; Waste disposal, 200 tons at \$250/ton=\$105,000; Expenses (\$26,850): 6 staff, 20 days: lodging \$150 =\$18,000, per diem \$68/day=\$8,160, round trip mileage Denver to Pueblo ~500 miles, 2 vehicles at \$0.69/mile = \$690]
- **Seventh Floor Construction \$1,151,104:** [permit for ACM abatement 7<sup>th</sup> floor, \$3,200; Setup (safety, access, utilities), \$3,554; ACM abatement, 12,500 ft2 at \$50/ft2=\$625,000; site restoration, 12,500 ft2 at \$25/ft2=\$312,500; Clearance/ wipe sampling, \$75,000; Waste disposal, 200 tons at \$250/ton=\$105,000;

Expenses (\$26,850): 6 staff, 20 days: lodging \$150 = \$18,000, per diem \$68/day = \$8,160, round trip mileage Denver to Pueblo ~500 miles, 2 vehicles at \$0.69/mile = \$690]

- **Second-Eighth Floor Restrooms** (14 total/2 groups per floor) = **\$1,457,288**: [permit for ACM abatement 2<sup>nd</sup>-8<sup>th</sup> Floor Restrooms, \$22,400; Setup (safety, access, utilities), \$24,878; ACM abatement, 14 groups at \$75,000 = \$1,050,000; site restoration=\$140,000; Clearance/ wipe sampling, \$75,000; Waste disposal, 250 tons at \$350/ton=\$87,500; Expenses (\$57510): 6 staff, 45 days: lodging \$150 = \$40,500, per diem \$68/day=\$16,320, round trip mileage Denver to Pueblo ~500 miles, 2 vehicles at \$0.69/mile = \$690]

Budget Categories	Project Tasks			Total
	Task 1 Grant Administration	Task 2 Community Engagement	Task 3 Cleanup	
Personnel	\$98,475	\$877		\$99,352
Fringe Benefits	\$53,025	\$473		\$53,498
Travel	\$2,365			\$2,365
Equipment	\$0			\$0
Supplies	\$0			\$0
Contractual	\$8,750	\$1,450	\$22,750	\$32,950
Construction	\$0		\$3,759,496	\$3,759,496
Other	\$300			\$300
Total Direct Costs	\$11,415	\$1,450	\$3,782,246	\$3,795,111
Indirect Costs	\$151,500	\$1,350	\$0	\$152,850
Total Budget	\$162,915	\$2,800	\$3,782,246	\$3,947,961

**g. Plan to Measure and Evaluate Environmental Progress and Results**

When preparing the project work plan, the County will develop a detailed schedule of key project milestones such as SAP/QAPP completion, scheduling and holding outreach events, and beginning abatement work. At least monthly, the County will track and evaluate progress in achieving outputs and milestones against the work plan schedule, in addition to communicating with the QEP and project contractor. The County will increase monitoring and communication during the active cleanup phase to act quickly to address any unanticipated changes during this critical period. The County will monitor the project budget concurrently with tracking the schedule, on at least a monthly basis. The County will document project outputs, outcomes, and results in the quarterly progress reports to EPA and in EPA’s ACRES database, as well as to Pueblo County’s Board of County Commissioners. Outcomes beyond the end of the grant term will also be tracked in the ACRES database. Anticipated outputs are described in Section 3A. Anticipated outcomes and results that the County will track include: square feet of building prepared for reuse, number of jobs created, and reduction in volume of hazardous materials

**4 Programmatic Capability and Past Performance**

Programmatic Capability

**a./b. Structure and Key Staff**

Pueblo County operates under a Board of three elected County Commissioners with a County Manager The County Manager oversees departmental functions of the County, including the County’s Public Works Department, which will oversee and manage all activities under the EPA Brownfields Cleanup grant. This organizational structure

allows for checks and balances. This grant will be managed by Greg George, Director of Public Works, Weston Burrer, Staff Architect and Project Manager; and Elizabeth Fritsch, Property Manager. This team works together often and has a seamless process to ensure all funding requirements are met for a variety of funding mechanisms. Finally,

**c. Acquiring Additional Resources**

In Colorado, the Colorado Department of Public Health and Environment (CDPHE) oversees all asbestos and lead paint abatement projects, and the County and its oversight contractor will work closely with CDPHE to ensure the cleanup is protective of human health and the environment.

**Past Performance Accomplishments:**

**d. Currently has or Previously Received an EPA Brownfield Grant – Not Applicable**

**e. Has not received an EPA Brownfields Grant but has received other Federal of Non-federal Financial Assistance Agreements**

Pueblo County has exhibited exemplary performance in managing and completing various grants, ensuring compliance with all stipulations and delivering measurable outcomes. The county has consistently demonstrated an ability to administer funds effectively, maintain transparency, and report progress accurately and on time. Pueblo County has established robust reporting measures that ensure the timely submission of progress reports. The county's grant management team conducts regular reviews and updates, ensuring that all reports are submitted within the designated timeframes. This efficiency has strengthened the county's ability to track project outcomes and financial expenditure, leading to enhanced accountability.

Pueblo County has demonstrated a solid foundation and capability in managing federal grant awards, particularly as a direct recipient. The recent allocation of \$9 million in federal funding through the Bipartisan Infrastructure Law (BIL) IIJA, facilitated by a RAISE grant award, has highlighted several crucial aspects of the county's capacity for effective grant management. Pueblo County has established a fiscal management team knowledgeable in federal grant compliance and reporting requirements. This team has experience overseeing substantial federal funding, which is essential for managing the complexity associated with grants such as the BIL IIJA funding. The team's expertise ensures that funds are allocated appropriately and that financial records are meticulously maintained, allowing for accountability and transparency.

With the increase in federal funding comes heightened scrutiny in terms of compliance with various federal regulations. Pueblo County has implemented robust compliance protocols to navigate the complexities of federal awards. These include regular audits and monitoring to align with federal guidelines. The county's dedication to maintaining compliance mitigates risks associated with funding mismanagement or eligibility issues, reassuring stakeholders of their commitment to the responsible use of federal funds.

1 U.S. Census Bureau. (2020). *Population, Census, April 1, 2020* (for Pueblo city, CO).

<https://www.census.gov/quickfacts/fact/table/pueblacitycolorado/TAW120222>.

2 "Assessor | Pueblo County." *Pueblo County Assessor*, county.pueblo.org/assessor/assessor-home.

3 "Pueblo Urban Renewal Authority " Enhancing Your Community." *Pueblo Urban Renewal Authority*, 5 Jan. 2026, puebloura.org/.

4 *Flood Zones* | *Fema.Gov*, www.fema.gov/about/glossary/flood-zones. Accessed 28 Jan. 2026.

5 Jaffe, Mark. "Colorado Regulators Lift Generating Cap on Xcel's Comanche 2 Coal Plant in Pueblo." *The Colorado Sun*, 26 Jan. 2026, coloradosun.com/2026/01/26/comanche-power-plant-unit-2-lift-constraints/.

6 "Colorado Enviroscreen 2.0." *Colorado Department of Public Health and Environment*, cdphe.colorado.gov/enviroscreen. Accessed 28 Jan. 2026.

---

## Threshold Criteria

---

### 1. Applicant Eligibility:

Pueblo County, Colorado (the County) is the grant applicant and owner of the Government Services Center. The County meets the definition of a General Purpose Unit of Local Government as defined in 2 CFR 200, is therefore eligible for funding.

2. **Previously Awarded Cleanup Grants:** The site has not received funding from a previously awarded EPA brownfield cleanup grant.

3. **Expenditure of Existing Multipurpose Grant Funds:** Pueblo County does not have an open EPA brownfields multipurpose grant.

4. **Site Ownership:** Pueblo County Government is the sole owner of the site as of 2020

### 5. Basic Site Information

Government Service Center (formerly Wells Fargo)  
201 W. 8<sup>th</sup> St.  
Pueblo, CO 81003

### 6. Status and History of Contamination at the Site

a. Hazardous Substance or Petroleum Contamination: **Hazardous Substances**

b. **Operation History and Current Use:** The subject property, now referred to as the Government Service Center, is a nine-story, multi-use commercial building located in Downtown Pueblo. The building was constructed in 1974 and was historically used as a financial institution and commercial office space. Operating for many years as a Wells Fargo bank under United Bank ownership. During this period, the building supported banking operations, administrative offices, and customer-facing services. In 2020, Pueblo County acquired the property for \$5.5 million through a straw buyer with the intent of preserving and adaptively reusing the structure as a centralized hub for public services and community-serving organizations. The building is currently approximately 60% occupied, with the remaining space targeted for future use by nonprofit organizations, state agencies, and economic development partners following environmental remediation.

c. **Environmental Concerns:** Asbestos-containing materials are located in the walls, tiles, and ceiling panels of the property site

d. **How the Site Became Contaminated:** The environmental conditions at the site are consistent with those commonly found in older, large-scale commercial and institutional buildings constructed prior to the establishment of modern environmental and building material regulations. Building materials historically used for fireproofing, insulation, and mechanical systems frequently contained asbestos-containing materials (ACM), which were legally and widely utilized at the time of construction and renovation. Subsequent environmental

assessments identified the presence of ACM throughout portions of the building, representing a potential exposure risk to occupants, maintenance staff, and visitors if disturbed. The contamination present at the site is not the result of improper operations, but rather reflects legacy materials installed before current health and environmental standards were in place. As such, the site meets the definition of a brownfield property under CERCLA, where the presence of hazardous substances complicates reuse and redevelopment. Cleanup of the site through safe abatement and remediation is necessary to eliminate exposure pathways, protect public health, and allow Pueblo County to fully implement its intended reuse of the building for public, nonprofit, and economic development purposes. EPA Brownfields Cleanup funding is essential to address these conditions and ensure the property can be safely returned to productive, community-serving use.

7. **Brownfield Site Definition-** Pueblo County's Government Service Center site is: 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 U.S.
8. **Environmental Assessment:** The site has been fully characterized. Below is a list of all assessment activities conducted at the site.
  - [Phase I Environmental Site Assessment](#) (December 22, 2020, All- Phase Environmental Consultants, Inc.)
  - [Limited Phase II Environmental Assessment Report](#) (June 3, 2021, All- Phase Environmental Consultants, Inc.)
  - [Asbestos Inspection Report](#) (September 13, 2021, All- Phase Environmental Consultants, Inc.)
  - Limited Site Investigation Report (October, 2021, All- Phase Environmental Consultants, Inc.)
9. **Site Characterization:** b. Letter from CDPHE is attached Attachment A
10. **Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to the site. There are no environmental liens on the Property.
11. **Sites Requiring a Property Specific Determination:** This site does not require property-specific determination.
12. **Threshold Criteria Related to CERCLA/Petroleum Liability:** The site is contaminated with hazardous substances.
  - a. Property Ownership:
    - i. CERCLA has not been triggered related to asbestos and lead paint in the Government Service Center 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 Government Service Center are integral to various building components and are contained within the building envelope, which has been secured to prevent any releases.
      - a) Property Acquisition: The property was sold to the County from United Bank, on December 10, 2020

- b) The County 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
  - c) Substances at the Property has been documented, and the County affirms that it has not, at any time, transported hazardous substances to the site. There are no past or continuing releases at the Property.
  - d) The County has not caused or contributed to any release of hazardous substances at the site.
  - e) The County has taken steps to address asbestos contained in building materials. In 2020, the County completed asbestos sampling in the Government Service Center building to begin planning for its safe abatement. Upon acquiring the Property, the County ensured that the building envelope was intact to prevent any chance of asbestos impacting the environment.
- ii. The County 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.

### **13. 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 and lead paint abatement projects, and the County and its oversight contractor will work closely with CDPHE to ensure the cleanup is protective of human health and the environment.
- 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.

### **14. Community Notification Ad**

- a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): The draft ABCA is attached as Attachment B
- b. Community Notification Ad: A copy of the community notification ad as published on the County's Facebook page is attached as Attachment C, as well as the meeting notification from the County's website.
- c. Public Meeting: A public meeting was held on January 20, 2026 at 10am in person and virtually at the County Chambers to discuss the draft application and consider public comments. The following items are attached in Attachment D and Attachment E
  - i. In-person Attendance -3; Virtual Attendance: 31, utilized quantifiable data to track attendance
  - ii. Meeting notes
  - iii. Summary of comments received with the County's response to those comments.
  - iv. Submission of Community Notification Documents: All community notification documents are attached as described above.

### **15. Contractors and Named Subrecipients: Not Applicable**

---

---

**Threshold Criteria Response - Attachment A**

---

---

**State Agency Letter**

January 26, 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](mailto:Devincenzi.Melisa@epa.gov)

RE: Pueblo County Government Services Center - FY26 Cleanup Grant Application

Dear Ms. Devincenzi:

I am writing to acknowledge and express the Colorado Department of Public Health and Environment's (CDPHE) support of Pueblo County's FY 2026 Brownfields Cleanup Grant application for the Government Services Center Site in Pueblo, Colorado. For many years, CDPHE has worked with stakeholders in Pueblo County to address sources of environmental contamination and support reuse of contaminated properties. Cleanup of the Government Services Center Site will protect public health and allow the Site to be revitalized as a hub for public services, business incubators, and local non-profits.

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 Pueblo County, 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. CPDHE has informed Pueblo County 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 Pueblo County's Brownfields Cleanup Grant application for the Government Services Center Site. CDPHE looks forward to continuing our partnership with stakeholders in Pueblo County to effect redevelopment and revitalization of brownfields properties.

Sincerely,



Kathleen Knox  
Brownfields Coordinator  
Hazardous Materials and Waste Management Division

cc: Elizabeth Fritch, Pueblo County  
Sarah Skinner, Pueblo County

