



1. Applicant Identification

City of Salt Lake  
451 South State Street  
Salt Lake City, Utah 84111

*R08-26-C-025*

2. Website URL

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

3. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$3,786,335

4. Location

Salt Lake City, Salt Lake County, Utah

5. Property Information

Former Salt Lake City Public Safety Center, “Northwest Pipeline Building”  
315 East 200 South, Salt Lake City, Salt Lake County, Utah 84111

6. Contacts

- a. Project Director  
Name: Catherine Wyffels, Air Quality & Environmental Program Manager  
Phone number: 801-535-6470  
Email: catherine.wyffels@slc.gov  
Mailing address: 451 South State Street, Salt Lake City, Utah 84111
- b. Chief Executive/Highest Ranking Elected Official  
Name: Erin Mendenhall, Mayor of Salt Lake City  
Phone number: 801-535-7704  
Email: erin.mendenhall@slc.gov  
Mailing address: 451 South State Street, Salt Lake City, Utah 84111

7. Population

Salt Lake City, UT: 217,783 (Population estimate www.census.gov dated July 1, 2024)

8. Other Factors

<b>Other Factors</b>	<b>Narrative Page #</b>
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 brownfield 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.	Pg. 3-4
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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of proposed site(s) will incorporate energy efficiency measures.	Pg. 3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Pg. 3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

9. Releasing Copies of Applications

Not applicable; this application does not contain any confidential business information (CBI) or trade secrets.

#### **4.C. Narrative Criteria**

### **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

#### **Target Area and Brownfields**

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

Salt Lake City, Utah (the City) is increasingly capturing national and international attention as it prepares to host the Winter Olympics in 2034. Building on the legacy of the 2002 Games, which helped transform the area into a vibrant tech hub known as “Silicon Slopes,” the city has seen strong job growth in technology and related industries. The Salt Lake City metro area continues to grow rapidly with the region’s population increasing by 11.9% between 2010 and 2020 as people are drawn to the region’s strong economy and quality of life. At the same time, Salt Lake City itself has experienced a 5.2% net loss in population in 2022-2023, driven largely by residents relocating to surrounding counties. Rising housing costs within the city are pushing many households to seek more affordable options elsewhere in the region, with U.S. Census data showing that more than half of local workers now commute in from another county due to displacement, even as the broader metro area continues to expand. The 2022 Housing SLC study underscored a growing mismatch between the community’s actual housing needs and the luxury units dominating the market, as high land values and construction costs push for-profit developers toward high-end development which, in turn, drives displacement. Most of the City’s developable land is already built out, while other areas are altogether undevelopable due to ecology or proximity to the Salt Lake City International Airport. This land scarcity, particularly near Downtown, has limited for-profit developers’ interest in affordable housing and has increased land values in areas where high density is allowed. Rehabilitating existing Brownfield Site buildings with environmental concerns has become an attractive option for providing new affordable housing opportunities, offering a remedy to the land scarcity issue that the City currently faces.

Brownfield sites have been an ongoing challenge for the City. Multiple sites have been assessed in previous years, and the area has some of the highest concentration of Brownfield sites in the state. Heavy industry of the past has led to this high volume of sites. Years of mining, smelting, and manufacturing created contaminated land that has continued to sit idle. This in-turn has led to vacant commercial properties that could be used to mitigate the displacement in the area.

This project will help address housing scarcity in the area by redeveloping a vacant, asbestos-impacted former commercial building into affordable housing for low- and moderate-income households; retaining opportunities to live and work in the Central City neighborhood Target Area

The Target Area for this application is the Central City neighborhood (census tract 49035102100). As referenced by KSL.com, Central City is the unofficial bridge between downtown Salt Lake and many residential neighborhoods with vastly ranging incomes. It sits just outside of Temple Square, the headquarters of the Jesus Christ of Latter-day Saint’s Church, and pushes up near the University of Utah campus. Originally laid out as an agrarian community in 1847, Central City followed the contemporaneous development style of ten-acre blocks divided by wide streets. By the 1880s, with the proximity of railway corridor access, as well as the introduction of one of the United States’ first trolley lines to the City, subdivisions serving as manufacturing worker housing had begun to appear and were permanently changing the layout of the neighborhood. As the City’s economy flourished and its population grew rapidly through the early 1900s, the Central City neighborhood became more industrial, its ten-acre blocks interspersed with high-density living spaces.

In the post-Depression era, foreclosures hit all of Utah hard, and by the 1940s the Central City neighborhood found itself heavily redlined with very little new investment flowing to the neighborhood. The Homeowners Loan Corporation of the Federal Government assessed Central City as having “virtually no new development,” describing its residents as lower-class working families. Central City’s location in the “smoke belt” of the railway and manufacturing was also detrimental to the outlook for the area; both in perception and environmentally. Disinvestment in the area continued into the 1950s, and redlining left lasting effects on access to education and economic opportunity. The neighborhood of Central City was left in decline and poverty into the 1990s.

Contrary to what happened in the 1990s, today the Target Area is now seeing intense pressure for displacement as home prices have risen above what the community can afford. The Target Area is now home to a high percentage of renters, 56% of all the City's residents are renters, with nearly half of those households considered rent-burdened; meaning they spend 30% or more of their income on housing (per 2022 "Housing SLC" study by the City). In fact, the rent burden in the Target Area ranks in the worst 25% of the United States. A key takeaway of the City's 2023 "Thriving in Place" plan is that the City no longer has any affordable neighborhoods.

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

The Northwest Pipeline Building (Site) is part of a 2.4-acre complex being redeveloped as 'The Grove,' a mixed-use development offering 196 residential units, a central courtyard, and commercial space. The Northwest Pipeline Building Site is a 95,000 square foot, 8½-story office building and former home to the City's Public Safety Department, located just east of the heart of downtown at 315 East 200 South, in the Central City neighborhood. The Site is an approximately 0.4-acre separate parcel associated with an adjoining 2-acre parking lot and annex building which formed the entire campus for the original 1957 building. Construction of the original property began in 1957, with the Site opening in 1958 as petroleum supplier Pacific Northwest Pipeline Corporation's main offices.

Pacific Northwest's headquarters moved in the late 1970s, and the City purchased the site in 1988, for use as offices and labs for the Public Safety Department. In 2011, the building was added to the National Register of Historic Places, as an example of American architect Slack Winburn's work in the modernist International Style. In 2013, citing an inefficient layout, the City moved their Public Safety Department to a new site, and the Northwest Pipeline Building has been boarded up and unoccupied since.

As with many buildings of its era, asbestos containing building materials (ACM) were widely used in the construction of the Site, including spray-on fireproofing (83,400 square feet [sq ft]), lath and plaster (138,600 sq ft), wall systems (71,816 sq ft), thermal pipe insulation and other materials. Because of the building's outdated layout, a complete renovation of the interior is necessary, which will disturb the ACM. The removal of ACM is necessary to safely accommodate redevelopment of the building that has sat vacant for over 12 years.

#### **Revitalization of the Target Area**

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

Once ACM cleanup is complete, the City intends to sell the building to the Housing Authority of Salt Lake City (HASLC), who will convert the historical building into a mixed-use site with 63 affordable housing rental units and first floor retail businesses. Cleanup of the ACM and redevelopment of the property into affordable housing aligns with the City's three main housing goals: closing a known 5,500-unit gap, increasing housing stability in the City, and increasing affordable homeownership opportunities. Reuse of the Northwest Pipeline building as housing units aligns with the community's priorities defined from the 2022 Housing SLC study as mitigating displacement and offering much-needed family-sized housing. Further, it enables the repurposing of an existing building and infrastructure for affordable housing in a neighborhood where the Utah Non-profit Housing Corporation has already made significant investments in nearby properties. Salt Lake City Mayor Erin Mendenhall, describes the Northwest Pipeline Building project as "transforming the property back into a community asset." A key point in the City's Thriving in Place plan is the leveraging of sites like this one to ensure they provide for long-term affordability, helping stabilize neighborhoods at high-risk of displacement. Renovating the Northwest Pipeline Building for housing has the added benefit of preserving a registered historic building's architectural legacy while once again giving it a functional purpose, capitalizing on existing infrastructure and building housing density.

The City's intent has long been to combat rising housing and rent prices, while still welcoming families into the City. Creation of the Thriving in Place plan was a community-driven process around mitigating the impacts of new development. Feedback from over 2,500 residents was taken into account while formulating this plan. As stated by the Community Planning Collaborative, the community was engaged in two phases, with a "robust project website, community survey, six community liaisons, and

the intrepid work of dozens of students in two University of Utah courses” which led to Thriving in Place passing unanimously by the City’s council. According to Mayor Mendenhall, Thriving in Place considered “thousands of residents [giving] their time, perspectives, and ideas,” and confirmed that available housing is lacking at every level, with a significant lack of affordable units for low-income families.

Independent research by the Utah Foundation shows the City’s housing prices have increased by 50% since 2020 and doubled since 2016, putting tremendous pressure on households at risk of displacement. By 2017, the City's latest housing plan “Growing Utah” saw a city on the verge of a systemic housing crisis. At that time, the City estimated being short 7,500 affordable housing units while expecting to see an additional 30,000 new residents by 2029. Currently, more than half of all families with children live in neighborhoods experiencing displacement risk.

Beginning with the designation of the Site as a historic building and followed by years of planning, community engagement, and design, HASLC has been spearheading the redevelopment of the site and is now positioned to take over the building once the cleanup is conducted. The effort to achieve historic status involved extensive public engagement and Federal Government review/concurrence.

#### 1.d. Outcomes and Benefits of Reuse Strategy

This project would further the rich legacy of the Northwest Pipeline Building by creating economic growth once again in the 21<sup>st</sup> century. The redevelopment of the building by the non-profit HASLC will stimulate economic development and non-profit purposes in the City core. 63 affordable housing units will be created. Floors two through eight of the Site will be a mix of one, two, and three-bedroom residential units, with the rooftop/ninth floor becoming a community room with outdoor space. The affordable housing element will draw in residents who may have otherwise been forced to leave the area due to being priced out. The ground floor will also be commercial/retail space designated for local businesses which will provide new jobs with several community-desired amenities. It is expected that up to thirty jobs will be created by these businesses. In addition, the redevelopment activities will generate hundreds of construction trade jobs.

Providing affordable housing options to vulnerable populations will improve local resilience by offering residential units that have cooling and air filtering to protect community members from extreme heat events affecting the region. The site will be supplied with a backup generator that will ensure power during outages due to extreme weather or natural disasters, and the building will be retrofitted for improved seismic resilience.

The building will meet the Enterprise Green Community certification and will be Energy Star certified, which means that energy efficient measures including such things as insulation, appliances and heating and cooling systems will be incorporated in the final design. Due to asbestos contamination, windows will be upgraded, meeting new energy efficiency standards.

#### **Strategy for Leveraging Resources**

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

As recently as 2025, prior studies have been completed at the Site that fully characterize the site conditions for remediation. No additional site characterization is necessary.

##### 1.f. Resources Needed for Site Remediation

EPA Grant funding requested in this application will be sufficient to complete the cleanup of the ACM at the Northwest Pipeline Building. The cleanup cost estimate is fully reflected in the grant budget and request.

##### 1.g. Resources Needed for Site Reuse

According to HASLC’s winning response to the City’s Historic Northwest Pipeline Building & Site Request for Proposals, HASLC intends to redevelop the Site as part of a mixed-use development to include residential units with a range of affordability. HASLC has an expected budget of \$39,621,881 and has identified their intended sources of secured and unsecured funding for reuse (shown in table below). HASLC has been highly successful at securing similar loan commitments on other housing projects throughout its history. Firm commitments for the loans cannot be obtained at this time, because of the competitive bidding process that HASLC must conduct when the project is initiated and secured

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sources are established. Also, according to the City's Public Benefits Analysis for the renovation and construction of the historic Northwest Pipeline Building (attached), the City intends to sell the building and surrounding property for substantially less than the fair market value of \$18,050,000. They are contemplating a sales price of \$1 million dollars, potentially creating an over \$17 million dollar leveraged benefit (\$5,000,000 of which applies to the Site).

<b>Name of Resource</b>	<b>Secured or Unsecured</b>	<b>Additional Details</b>
Seller Note	Unsecured	\$500,000
Deferred Developer Fee	Unsecured	\$1,749,668
CRA Loan	Secured	\$3,702,851
OWH Loan	Unsecured	\$1,000,000
Permanent Loan	Unsecured	\$9,743,367
Historic Tax Credit Equity	Unsecured	\$10,377,511
LIHTC Equity	Unsecured	\$12,548,484

### 1.h. Use of Existing Infrastructure

Reuse of the Northwest Pipeline Building is a key component to utilizing existing infrastructure. Having previously accommodated hundreds of employees, the Site has water, sewer, electric, telecom, and internet already in place, and the City has determined that this existing infrastructure will meet the planned redevelopment's demands. The Site is ideal for housing, as it is centrally located in Salt Lake City's urban core, within walking distance to hundreds of local and regional businesses, and is along existing major public transit routes, with a transit stop located directly outside of the building.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **Community Need**

#### 2.a. The Community's Need for Funding

This grant will serve the needs of the community by developing essential affordable housing in a state that, in 2024, was ranked the third least affordable in the US to buy a home. Analysis by the 2022 Urban Displacement Project showed that by 2019, the City's rental housing market was only affordable to high-income households, with affordable housing scarce and very competitive for the city's low-income renters. In the Target Area, 44% of children are living below the poverty line and 40% of the population is considered low income. Extremely low-income (ELI) households in the City are the most likely to be rent-burdened or displaced altogether due to the deficit of housing. In 2022, The Urban Displacement Project found there is only one affordable rental unit for every three ELI households in the City. In June of 2023, Housing Connect and the HASLC opened their joint waiting list for the Section 8 Housing Choice Voucher program and closed with 7,000 outstanding applicants on September 22, 2023.

Unfortunately, with the City's land prices increasing, building affordable housing hasn't been financially prudent for developers in many areas. Evidence of this is that the Target Area previously fell into a low-income community qualified census tract, which was withdrawn in 2025. This recent change in qualification status demonstrates how displacement is occurring and loss of Low-Income Housing Tax Credit (LIHTC) funding left HASLC and the project with a major (\$4,000,000+) funding gap, as lower grant levels were available in 2026 for the same project.

Cities in Utah are barred from enacting rent control ordinances or mandatory inclusionary zoning ordinances per Utah State Codes 57-20-1 and 10-9a-535, respectively. However, the City is working to help meet community needs by selling the site at a steeply discounted price to a non-profit that could not otherwise afford the site. With disproportionate asbestos cleanup costs and the limitations of the Utah State Codes, outside funding is needed to meet the City's long-term goals of affordable housing in the Target Area which will in turn seek to improve economic conditions leading to higher income levels.

#### 2.b. Health or Welfare of Sensitive Populations

Sensitive populations in the Target Area include children, the elderly, and pregnant women who are susceptible to air quality issues. In the Target Area, 44% of children are living below the poverty line and 40% of the population is considered low income. The City's five-year housing goals prioritize the

households at the greatest risk of facing housing insecurity, displacement, and homelessness. Low-income neighborhoods in Salt Lake City are already vulnerable to air pollution, with all the low-income census tracts ranking above the 80th percentile for asthma prevalence. The adult asthma rate in the City reached 11.4% in 2022, which was higher than the national value of 9.9% and additionally higher than even the Utah statewide value of 10.9%. Another area of concern is low life expectancy, with almost half of low-income census tracts ranking above the 80th national percentile.

These health issues are primarily caused by year-round air quality challenges, including wintertime inversions (where stagnant cold air leads to the formation of particulate matter), elevated ozone in the summer months, wildfire smoke in the summer and fall, and toxic dust storms from the drying Great Salt Lake. The air pollution in the Target Area was listed in the worst 25% of all US counties in 2020 data from [healthysaltlake.org](http://healthysaltlake.org). Low-income households are exposed to higher levels of air pollution due to proximity to emission sources, such as the Great Salt Lake, highways, the airport, and industry.

The use of this grant will provide sensitive populations relief and healing through air scrubbers in the building, as well as air filtration and central cooling in each residential unit. Windows will be able to remain closed during any extreme incidences which limits exposure to particulates in the air, fostering better indoor air quality and allaying the rising asthma rate.

### 2.c. Greater than Normal Incidence of Disease and Adverse Health Conditions

As noted on [healthysaltlake.org](http://healthysaltlake.org), air pollution due to particulate matter in the Target Area rose to a staggering 10.6 micrograms per cubic meter in 2020 (as compared to the state value of 5.9) and was projected to worsen over time. Further data from 2022 reveals the rates have continued to rise in populations over 65 (which is 3% higher than the national value), and in children (top 4 highest rates in the state). The pediatric ER rate for asthma from 2020-2022 was 14.5% which is 3 percentage points higher than even the state average.

According to the American Lung Association (ALA) and Environmental Protection Agency, Salt Lake County received a 5 (an F grade) based on the average annual number of days that particle pollution levels exceed the US standard during the most recent period, representing the worst percentile of the country. The ALA also ranks the county 9<sup>th</sup> worst for high ozone days out of 228 metropolitan areas, 19<sup>th</sup> worst for 24-hour particle pollution out of 223 metropolitan cities, and 37<sup>th</sup> worst for annual particle pollution out of 204 metropolitan areas. At the time of application development (mid-January 2025), Salt Lake City has the worst air quality in the nation, due to winter inversion. The ALA states that 21,822 Salt Lake County children have pediatric asthma and 98,153 adults have asthma.

Furthermore, a November 2020 study by 23 Utah-based researchers published in *Atmosphere* found that between 2,480 and 8,000 premature deaths in Utah are caused by air pollution each year. This decreased the median life expectancy in Utah by 1.1 to 3.6 years.

The aggressively poor air quality has led to several other health conditions that (as stated in an article discussing the study by Brigham Young University) are not naturally associated with pollution. The study found that this prolonged exposure to particulates increased heart and lung diseases and accounted for 62% of pollution impact on health. These diseases include congestive heart failure, heart attack, pneumonia, and COPD. As stated by the Brigham Young University article, “the remaining 38% of health effects are associated with stroke, cancer, reproductive harm to mothers and children, mental illness, behavioral dysfunction, immune disease, autism, and other conditions—all exacerbated by exposure to dirty air.”

In addition to the significant air quality challenges experienced by Salt Lake City residents, residents also face health risks from extreme heat. The city ranks among the top three U.S. metropolitan areas for urban heat island (UHI) intensity, a phenomenon where urban areas are significantly warmer than surrounding rural regions due to human-made surfaces and infrastructure. According to federal databases, temperatures in Utah have risen more than 2.5 degrees Fahrenheit since the beginning of the 20th century. With increasing temperatures, the state has experienced a dramatic increase in the number of very warm nights and a decrease in the number of very cold nights. There were 18 days in July 2022 with temperatures of 100° F or greater; the most ever recorded in Utah.

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During periods of poor air quality, residents are encouraged to limit time spent outside and take precautions to improve indoor air quality by keeping windows closed and routinely changing HVAC filters. When that is combined with high heat, residents need to run cooling systems constantly, driving up utility costs and environmental impact. This is a significant burden on low-income households with older, inefficient cooling systems.

Environmentally friendly housing retrofitted with central cooling, high-efficiency, HVAC systems, will alleviate air quality issues for interior spaces that will also be free of lead-based paint and asbestos containing materials. LEED certification also means low-VOC materials will be used and indoor air quality will be a focus. This will improve the health of the population disproportionately impacted by wildfire smoke, contaminated Great Salt Lake lakebed dust, and air pollution from temperature inversions.

2.d. Economically Impoverished/Disproportionately Impacted Populations

The US Census Bureau identifies that the City overall has a significantly higher percentage of residents living below the poverty line (14.1%) when compared to other communities in Utah (9.0%). The percentage of residents living below the poverty line is 23% in the Target Area. Additionally, 44% of children are living below the poverty line and 40% of the population is considered low income in the Target Area.

Between 2005 and 2021 median wages increased by 19% in Salt Lake City, and median household income increased by 29%, but rent increased by 38% and home values by 83%, leaving community members unable to afford housing and more than half of the residents severely cost burdened. The housing shortage and lack of affordable housing has created a pattern of displacement for the Target Area as landlords increase rent prices to keep pace with rising costs.

The increased cost of living throughout the City has made it progressively harder for the population to live and work in the Target Area. Instead, they are commuting greater distances or migrating out of the area all together, leading to a muted economic inflow and limiting opportunity for upward mobility.

HASLC will assist in bringing up to 63 units of affordable housing, beginning a generational process of reshaping the economic vitality in the Target Area. Locally owned retail business on the ground level will lead to the creation of new jobs and revenue re-entering a once defunct space. Reinvestment in the Northwest Pipeline Building will create safe, affordable housing in the heart of Downtown Salt Lake City, leading to a positive domino effect of success in growth, commerce and generational economic population longevity in the Target Area.

**Community Engagement**

2.e Project Involvement and 2.f. Project Roles

The following partners will assist in the EPA Brownfield Cleanup project of the Target Site. They will coordinate to achieve community outreach by sharing progress with area residents and updating the project master plans.

<b>Entity name</b>	Housing Authority of Salt Lake City (HASLC)
<b>Entity’s mission</b>	To provide rent subsidies and promote affordable housing for low-income persons residing in Salt Lake City
<b>Point of contact</b>	Daniel Nackerman, <a href="mailto:dnackerman@haslcutah.org">dnackerman@haslcutah.org</a>
<b>Specific involvement</b>	Serving as developer and post-remediation owner for Target Site and accompanying buildings
<b>Entity name</b>	Utah Non-Profit Housing Corporation
<b>Entity’s mission</b>	To improve quality of life through decent, safe, affordable housing; focusing on low- and very-low-income individuals and families
<b>Point of contact</b>	Marion Willey; <a href="mailto:mawilley@utahnnonprofithousing.org">mawilley@utahnnonprofithousing.org</a>
<b>Specific involvement</b>	Owner of numerous parcels adjacent to Target Site and redevelopment project supporter
<b>Entity name</b>	NeighborWorks
<b>Entity’s mission</b>	To revitalize SLC neighborhoods experiencing blight and decline

<b>Point of contact</b>	Maria Garcia; <a href="mailto:maria@nwsaltlake.org">maria@nwsaltlake.org</a>
<b>Specific involvement</b>	Assisting with project homeownership modeling and community development, especially as it relates to disadvantaged communities

2.g. Incorporating Community Input

A Community Involvement Plan (CIP) will be created to define the project’s planned community-engagement activities, schedule, background, and key players. The CIP will be available for resident review online on the City’s website, social media, and/or in hard copy at the Salt Lake City and County Building and the HASLC headquarters. City staff will continue to inform the community about site redevelopment. All community feedback will be presented at the annual public meeting and will be responded to within one month of the meeting taking place.

Public meetings will be held three times throughout the grant period to inform and engage members of the public, and periodic updates will be made during HASLC’s regular board meetings. Additionally, project updates and other grant project-related documents will be provided on social media pages and email distribution lists. Residents and property owners in the Target Area will be encouraged to join an email distribution list and follow the project on social media to remain informed of the latest news of the project’s progress and upcoming events. NeighborWorks and the Utah Non-Profit Housing Corporation will be encouraged to disseminate information to those without internet access and will be asked to help publicize project progress, events, and accomplishments. Non-English translations will be made available through verbal translation at meetings and written translations in meeting notes, fliers, and outreach.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

3.a. Proposed Cleanup Plan

Based on previous assessments, the Target Site is contaminated with asbestos that must be addressed in order to renovate the building safely. Among multiple materials, the most significant were fireproofing (83,400 sf), lath and plaster (138,600 sf), sheetrock wall systems (71,816 sf), and window-glazing (10,200 sf). To address the contamination, a draft ABCA was developed for the site that evaluated three alternatives including a no-action alternative. Based on the renovation plans, certain segments of the asbestos-containing materials can be left in place, and partial abatement will occur for those materials that expect to be disturbed. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup is complete abatement of only those materials that would be disturbed during the renovation. Remaining materials can safely be managed under an operation and maintenance (O&M) plan.

The City will oversee the removal and remediation in accordance with applicable standards. A qualified Project Manager will oversee the Site Contractor to ensure regulations are followed and to conduct visual inspections of asbestos abatement work areas. Following visual inspections, clearance testing will be conducted to confirm the work area can be deemed clean. Third-party oversight will be provided during the abatement activities to conduct air sampling and clearance sampling, per Utah regulations. All ACM will be properly disposed at a 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 of asbestos per cubic centimeter on work area air. At the completion of abatement activities Operations and Maintenance (O&M) Plan will be prepared that addresses the management of ACM remaining in place.

**Description of Tasks/Activities and Outputs**

<b>Task/Activity: Project/Program Mgt.</b>
<u>b. Project Implementation</u> The City (Applicant) will procure an environmental consultant (Consultant) to assist with technical aspects of the grant project in accordance with Federal procurement guidelines. Applicant’s Project Director and Grant Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. Consultant will assist Applicant in completing Reporting, and all additional Programmatic Support for the four-year term of the grant.

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<p>c. <u>Anticipated Project Schedule</u> Reporting begins in the 1<sup>st</sup> quarter, Quarterly Reporting begins in the 2<sup>nd</sup> quarter and continues throughout the grant project. Yearly Reporting and Forms created in the 5<sup>th</sup>, 9<sup>th</sup>, and 13<sup>th</sup> quarters, and during final closeout.</p>
<p>d. <u>Task/Activity Lead</u> Catherine Wyffels, Project Director, will be the lead for the remediation task and will be accountable for grant-related compliance. Amy Dorsey, Grants Manager, Finance Department, will manage the grant finances.</p>
<p>e. <u>Outputs</u> Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, Programmatic Support for the four-year grant period, final comprehensive report.</p>
<p><b>Task/Activity: Community Engagement</b></p>
<p>b. <u>Project Implementation</u> Community Engagement will engage both stakeholders and community members in the Brownfield Grant project. Communication will include disbursement of information through the City's and HASLC's websites. Project Director will develop a Community Involvement Plan (CIP), Brownfield project website, and social media posts with the assistance of the Consultant and HASLC staff. Project Director and HASLC staff will lead community meetings to keep the public informed on project updates.</p>
<p>c. <u>Anticipated Project Schedule</u> CIP created within 3 months of award. Annual Community Meetings will be held during the 2<sup>nd</sup> quarter of each year of the grant project. Stakeholder meetings will be held quarterly. Website and Outreach Materials created in the 1<sup>st</sup> quarter and posted quarterly throughout the grant period.</p>
<p>d. <u>Task/Activity Lead</u> Project Director and HASLC will be assigned as the lead for Community Engagement to provide continuity between the cleanup phase and the redevelopment phase, which will be led by HASLC.</p>
<p>e. <u>Outputs</u> A list of Stakeholder Group members, documentation from 16 quarterly stakeholder meetings and 3 community meetings, project website, brochures/handouts, social media posts, and summary of public meetings, communication plan.</p>
<p><b>Task/Activity: Cleanup Planning</b></p>
<p>b. <u>Project Implementation</u> Project Director will oversee Consultant in the preparation of a Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), Sampling and Analysis Plan (SAP), Final Analysis of Brownfield Cleanup Alternatives (ABCA), specifications for asbestos abatement, preparation of bid documents, review of bids and contractor selection. Once approved, Consultant will prepare specifications for the removal of ACM.</p>
<p>c. <u>Anticipated Project Schedule</u> QAPP, HASP, SAP, and Final ABCA will be prepared within 3 months of QEP selection. Specifications for cleanup and contractor bidding will occur within three months of approval of the Final ABCA by the US EPA.</p>
<p>d. <u>Task/Activity Lead</u> Project Director will oversee Consultant, with support provided by the HASLC Construction Manager, and US EPA.</p>
<p>e. <u>Outputs</u> Final QAPP, HASP, ABCA, Specifications, and bidding documents.</p>
<p><b>Task/Activity: Cleanup</b></p>
<p>b. <u>Project Implementation</u> After US EPA approval of the cleanup plan, and contractor bidding and selection, the project will be scheduled. Project Director will oversee Consultant's management of abatement activities. On-site oversight of the abatement contractor by Qualified Project Designer or Contractor/Supervisor, in accordance with qualifications as stated in Utah Air Quality Rule R307-801 will be provided by Consultant. A completion report will be prepared documenting the removal and proper disposal of all regulated materials, including surrounding air monitoring and personnel monitoring.</p>
<p>c. <u>Anticipated Project Schedule</u> The cleanup will occur after US EPA approval of the underlying plans. Contractor bidding will occur within 90 days of approval of all plans. Project startup is anticipated within 90 days of contractor selection. The project is expected to last 200 shifts, or about 10 months. The final report will be provided within six months of cleanup completion.</p>

- d. Task/Activity Lead Project Director will oversee Project Consultant, with support provided by the Construction Manager and US EPA.
- e. Outputs Air and personnel monitoring, documentation of the amounts of regulated materials removed, and final approval of cleanup.

**3.f. Cost Estimates**

Below are anticipated cost estimates for this project, as based on recent Brownfield cleanup projects and local market standards:

Project Tasks		Task 1 Project/ Program Mgmt	Task 2 Community Engagement	Task 3 Cleanup Planning	Task 4 Cleanup	Total
Budget Costs						
Direct Costs	Personnel					
	Travel	\$5,000				\$5,000
	Construction				\$2,771,335	\$2,771,335
	Contractual	\$50,000	\$65,000	\$60,000	\$835,000	\$1,010,000
<b>Total Budget</b>		\$55,000	\$65,000	\$60,000	\$3,606,335	\$3,786,335

**Task 1. Project/Program Management:** While City staff will be responsible for oversight and management of all grant administration tasks, we will also select a QEP to assist with grant administration tasks at an estimated cost of \$50,000 (\$150/hr x 333 hours). A total of \$5000 is budgeted for travel of 2 city employees to EPA grant training and conferences to account for flights (\$3000), hotels (\$1500) and meals (\$500). **Task 2. Community Engagement:** Applicant will use the QEP to assist with organizing community engagement including quarterly stakeholder meetings (16) and public meetings (4) at an estimated \$2,000 per meeting. Additional activities and personnel associated with website updates, newsletters, CIP, and press releases are estimated at an additional \$25,000 (\$150/hr x 167 hours) over the course of the project. **Task 3. Cleanup Planning:** Consultant will conduct cleanup planning to include a Quality Assurance Project Plan (QAPP) (\$10,000), Sampling and Analysis Plan (SAP) (\$5,000), Site-Specific Health and Safety Plan (HASP) (\$5,000), Final ABCA (\$5,000), specifications for asbestos abatement, preparation of bid documents, review of bids and contractor selection (\$35,000) for a total budgeted cost of \$60,000. **Task 4. Cleanup:** The total estimated cleanup is \$3,606,335; comprised of: on-site cleanup supervision for 200 shifts (200 shifts x \$3,500/shift=\$700,000), project coordination (\$100,000), completion report (\$20,000), O&M plan (\$15,000), contractor costs for Asbestos abatement (\$2,771,335).

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

The Work Plan will include a detailed schedule of project milestones. Applicant will track and evaluate progress in achieving outputs and milestones against the Work Plan schedule, in addition to communicating with the QEP and project contractors. Applicant will document the project in the quarterly progress report to US EPA and in the ACRES database. Among others, the primary outcomes and results to be tracked include: amount of asbestos disposed, number of stakeholder and public meetings conducted, units of housing developed and square footage of commercial space created after project completion, and number of jobs created from the commercial space.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**Programmatic Capability**

4.a. Organizational Structure and 4.b. Description of Key Staff

Salt Lake City Corporation (the City) is a public employer, governed by a full-time Mayor and part-time City Council. The City will manage all aspects of the grant and oversee the cleanup work via internal staff and outside consultants experienced in Brownfield cleanup activities. The City has a proven track record of successfully executing federally funded grant projects on time, within budget, and in full compliance with applicable federal requirements. The City maintains strong financial management systems, established procurement and reporting procedures, and experienced staff dedicated to grant administration, ensuring accountability, regulatory adherence, and consistent project performance.

The Project Director of this grant is Ms. Catherine Wyffels, Salt Lake City Corporation’s Air Quality & Environmental Program Manager. Ms. Wyffels is highly qualified and will oversee and manage this grant, including contractor selection, project schedules, task implementation, and US EPA Brownfield

## FY2026 US EPA Brownfields Cleanup Grant - Salt Lake City Corporation

grant reporting requirements. She will be responsible for day-to-day tasks, including coordination of grant cleanup activities with all involved departments, project partners, and consultants.

Ms. Debbie Lyons, Director of the Sustainability Department, will be responsible for the timely expenditure of funds and for overseeing that grant requirements are being met. Ms. Britnee Dabb, Deputy Director at the Housing Authority of Salt Lake City, will be responsible for coordination with community, project partners, and subcontractors. Ms. Amy Dorsey, Grant Manager from the Salt Lake City Corporation Department of Finance, will be responsible for financial aspects of the grant including drawing down funds through the ASAP system, assistance with budget tracking, invoicing, and arranging payments to the proper entities.

### 4.c. Acquiring Additional Resources

A QEP will be procured to handle the technical portions of this project. Selection will be in compliance with 2 CFR 200.317-326. Should additional resources be needed, the City will follow the competitive Procurement Standards in 2 C.FR 200.317-326 when hiring contractors. The project team is familiar with running large development projects and has established relationships with technical experts in the local community. All remediation contractors will be selected through a public bidding process based on specifications generated in the assessment process, coupled with the City's procurement policy.

### **Past Performance and Accomplishments**

#### 4.d. Currently Has or Previously Received an EPA Brownfields Grant

The City was awarded an EPA Brownfields Cleanup Grant for FY23 for a Site other than the subject of this application. The awarded cleanup site for the prior application is known as the Former Schovaers Site, at 22 South Jeremy Street, Salt Lake City, Utah and was awarded \$495,200. Phase I Environmental Site Assessments (ESAs) and Phase II ESAs were conducted on the site under two prior EPA Brownfields Assessment Grant projects.

##### (1) Accomplishments

To date, the Salt Lake City Community Redevelopment Agency (CRA) has hired an environmental contractor team for this project. CRA staff enrolled this Brownfields cleanup project in the State of Utah's Voluntary Cleanup Program.

##### (2) Compliance with Grant Requirements

This EPA Brownfields Grant was awarded to Salt Lake City Corporation on August 11, 2023, for the period of performance of October 1, 2023 through September 30, 2027. This award is in compliance with the Work Plan and reporting is occurring timely. Currently unspent funds from this grant have all been earmarked and will be fully spent during the project.

## Threshold Criteria

### **1. Applicant Eligibility**

- a) Salt Lake City Corporation (the City) is eligible to apply for the EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR § 200.64.
- b) Salt Lake City Corporation is not a 501(c)(4) organization.

### **2. Previously Awarded Cleanup Grants**

The City affirms that the Former Salt Lake City Public Safety Center (“Northwest Pipeline Building”) site located at 315 East 200 South has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### **3. Expenditure of Existing Multipurpose Grant Funds**

The City affirms that it does not have an open Multipurpose Grant.

### **4. Site Ownership**

In 1988, Pacific Northwest Realty Corp conveyed the property to the Municipal Building Authority of Salt Lake. The Municipal Building Authority was legally a separate entity from the City but was part of the City for practical purposes. This entity was blended as an integral part of the primary government and its funding was included in the City’s annual budget. The sole purpose of the Municipal Building Authority was to serve the City as a financing agency for debt financed projects. Furthermore, Salt Lake City Council served as the Board of Directors of the Municipal Building Authority.

In 2013, the property was transferred to Salt Lake City Corporation after the dissolution of the Municipal Building Authority of Salt Lake. This property transfer was an administrative action between two different City entities and does not constitute an ownership change. The City will retain ownership while the Brownfields Cleanup Grant funds are disbursed for clean-up. Please see the 1988 Warranty Deed and the 2013 Quit Claim Deed attached.

### **5. Basic Site Information**

- a) Site Name: Northwest Pipeline Building
- b) Site Address: 315 East 200 South, Salt Lake City, Utah, 84111

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

- a) This site is contaminated by hazardous substances (i.e., asbestos-only, with no releases outside the building).
- b) The target site Building was originally built between 1957-1958 to be office space for the Pacific Northwest Pipeline Company's headquarters. The 8½-story building's footprint measures approximately 150 feet long by 82 feet wide, with 95,000 square feet of interior space. The Pacific Northwest Pipeline Company left its headquarters in the late 1970s after a prolonged anti-trust court case affected expected growth, and in 1988 the deed was transferred to the City. The City remodeled the interior and converted the building to be their Public Safety Center. In April 2011, the building was added to the National Register of Historic Places as an example of American architect Slack Winburn’s work in the International style. In 2013, the City moved its Public Safety Center to a newly constructed building, citing the now-poor interior condition of 315 East 200 South. The building has remained vacant since this departure.
- c) Through inspections conducted in 1987, 2015, 2016 and 2025, the City has identified various asbestos containing materials (ACM) inside the building. These materials require removal to facilitate the renovation of the building into low-income housing use.
- d) The site contaminants were built into the structure, to the fireproofing, safety, and construction standards of the time. The reports indicated the following ACM present: boiler gaskets, door insulation, duct caulking, exterior caulk gasketing, spray-on fireproofing, floor tile and mastic, flooring adhesive, floor-leveling compound, lab countertop, lath and plaster, roofing material (penetration flashing), wall systems, sink under coatings, thermal system insulation, vapor barrier

(black tar), and window glazing. While the materials are in relatively good condition, the building will be entirely renovated for conversion to low-income housing use, with interior materials being removed down to the structural components or those required to remain in-tact due to historic designation.

#### **7. Brownfield Site Definition**

The Site is a Brownfield because its redevelopment and reuse is complicated by the presence of ACM that must be removed, the cost of which is prohibitive to potential buyers. The site has been vacant since 2013 because of this condition. The City affirms that the site is:

- NOT listed (or proposed for listing) on the National Priorities List (NPL);
- 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;
- NOT subject to the jurisdiction, custody, or control of the US government.

#### **8. Environmental Assessment Required for Cleanup Grant Applications**

The Site will be handled as an asbestos-only cleanup. Comprehensive asbestos inspections have been conducted at the Site by various parties, most recently in July 2025. The following site assessment reports have been completed for the site at 315 East 200 South:

- Asbestos Abatement, Removal and Disposal, June 8, 1987
- Hazardous Materials Inspection and Universal Wastes Summary, July 23, 2015
- Phase I ESA ASTM E1527-13, December 17, 2015
- Asbestos and Universal Waste Re-inspection, June 2, 2016
- Phase I Environmental Site Assessment, September 27, 2024
- Limited Asbestos Survey, July 2025

#### **9. Site Characterization**

**b.** Salt Lake City is proposing a site that is eligible to be enrolled in the Utah Voluntary Cleanup Program (VCP).

- i. A letter from the State of Utah Voluntary Cleanup Program is included in this application that:
  - a. indicates the Applicant will conduct all work under the oversight of the Utah Division of Air Quality
  - b. affirms that the site is eligible to be enrolled in the Utah VCP. Although eligible, the City does not intend to enter the VCP because the site is impacted by asbestos-only, which has not been released outside the building. Therefore, the cleanup will be conducted in accordance with the Utah Division of Air Quality following regulation R307-801; and
  - c. there is a sufficient level of site characterization from the environmental site assessments to determine the cleanup requirements.
- ii. No additional assessment is needed to characterize the site for the remediation work to begin.

#### **10. Enforcement or Other Actions**

The City affirms there are no known ongoing or anticipated environmental enforcement or other actions relating to the property at 315 East 200 South.

#### **11. Sites Requiring a Property-Specific Determination**

The City affirms that the Northwest Pipeline Building at 315 East 200 South does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

#### **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

**a. Property Ownership Eligibility – Hazardous Substance Sites**

##### **iv. Sites with Hazardous Building Material That is Not Released into the Environment**

- (1) The City affirms there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions. The City was aware of asbestos in building at purchase and took appropriate measures during the course of ownership to properly manage ACM during regular maintenance activities. The City

has managed the ACM in the building by conducting general awareness training and utilizing properly licensed contractors when small abatement projects were needed during the time they occupied the building. Since their departure from the building in 2013, the Site has remained vacant and secured, and no releases of ACM have been documented or reported.

### **13. Cleanup Authority and Oversight Structure**

Salt Lake City will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

- a. Cleanup will be done in accordance with the Utah Division of Air Quality following regulation R307-801.
- b. No offsite access will be necessary.

### **14. Community Notification**

#### **a. Draft Analysis of Brownfield Cleanup Alternatives**

A draft EPA application and ABCA, along with the proposed redevelopment and cleanup activities for the Target Site were discussed at the Public Meeting held on January 26, 2026. The community is also provided access to the draft ABCA in hardcopy at the Housing Authority of Salt Lake City's public offices and online at <https://www.slc.gov/sustainability/the-grove-brownfield-grant-application/>. The draft ABCA is attached to this application.

#### **b. Community Notification Ad**

The Public Meeting was held January 26, 2026, and Community Notification ads were published in English and Spanish on January 11, 2026, by The Salt Lake Tribune. The ad was shared via The City of Salt Lake's social media and website, and the Housing Authority of Salt Lake's social media and website. Copies of the Notification were also sent directly to be shared by Salt Lake City Council Staff, the Downtown Community Council, and the Downtown Alliance. A copy of the Community Notification Ad is attached.

#### **c. Public Meeting**

The Public Meeting was held in person at the Housing Authority of Salt Lake City's January 26, 2026 Board Meeting.

#### **d. Submission of Community Notification Documents**

The following community notification documents are included as an attachment to this proposal:

- A copy of the draft ABCA,
- A copy of the ad that demonstrates notification to the public and solicitation for comments on the application, and that notification to the public occurred at least 14 days before the application was submitted to the EPA,
- The comments received (none),
- The City's response to the comments (none),
- The Public Meeting notes summary; and
- Meeting sign-in sheet.

### **15. Contractors and Named Subrecipients**

Not Applicable.



State of Utah

SPENCER J. COX  
Governor

DEIDRE HENDERSON  
Lieutenant Governor

Department of  
Environmental Quality

Tim Davis  
Executive Director

Ashley Sumner  
Deputy Director

Jill Burton  
Deputy Director

ERRC-006-26

January 22, 2026

Catherine Wyffels, Air Quality and Environmental Program Manager  
Department of Sustainability  
Salt Lake City Corporation  
451 South State Street  
Salt Lake City, Utah 84111

**Re: DEQ Support Letter – Northwest Pipeline Building, Salt Lake City, Utah  
FY26 EPA Brownfields Program Cleanup Grant**

Dear Ms. Wyffels:

Thank you for involving the Department of Environmental Quality (DEQ) in Salt Lake City's (City) planning discussions regarding the City's application for a U.S. Environmental Protection Agency (EPA) Brownfields Program Cleanup grant for the former Northwest Pipeline Building located at 315 East 200 South, Salt Lake City, Salt Lake County, Utah. The grant will help the City abate Asbestos Containing Material (ACM) in the building and facilitate redevelopment into future low income, affordable housing. The DEQ believes cleanup is an important and significant step towards the goal of revitalizing properties in Utah communities and is committed to seeing Brownfields-caliber sites assessed, remediated and redeveloped to a higher and better use wherever possible.

The DEQ supports the City in its application for an FY26 EPA Brownfields Program Cleanup grant and believes, based on the current information available, there is a sufficient level of characterization to proceed with the remediation work under the grant. The benefits of cleanup include removing the potential stigma associated with the impacted property, protecting public health, and reclaiming valuable property for economic development and future, sustainable growth. The site will not be entered into the Voluntary Cleanup Program since the DEQ has an Air Toxics Lead and Asbestos Section that manages these contaminants. Asbestos Containing Material will be addressed in accordance with the DEQ/Division of Air Quality rules, regulations and requirements.

195 North 1950 West • Salt Lake City, UT  
Mailing Address: PO Box 144810 • Salt Lake City, UT 84114-4810  
Telephone (801) 536-4300 • Fax (801) 536-0095 • TDD 800 346-3128

[www.deq.utah.gov](http://www.deq.utah.gov)

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We look forward to continuing our partnership with the City to cleanup and return this property to a higher and more productive use. Should you have any questions, please contact Lincoln Grevengoed, the Division of Environmental Response and Remediation project manager, at (801) 536-4100, or Leonard Wright, the Division of Air Quality ATLAS manager, at (801) 536-4000.

Sincerely,



[Tim Davis \(Jan 22, 2026 17:45:43 MST\)](#)

Tim Davis  
Executive Director

TD/LGG/LW/jn

cc: Ron Lund, Environmental Health Director, Salt Lake County Health Department  
Eric Peterson, Environmental Health Deputy, Salt Lake County Health Department  
Leonard Wright, Division of Air Quality