



# SouthEastern Arizona Governments Organization

*Serving our member governments and their constituents since 1972*

## Application Information Sheet

FY2026 Brownfield Assessment Coalition Grant Application  
 Southeastern Arizona Governments Organization (SEAGO)  
 RFA NO.: EPA-OLEM-OBLR-25-05

### SEAGO Member Entities

- Cochise County*  
 Benson  
 Bisbee  
 Douglas  
 Huachuca City  
 Sierra Vista  
 Tombstone  
 Willcox
- Graham County*  
 Pima  
 Safford  
 San Carlos  
 Apache Tribe  
 Thatcher
- Greenlee County*  
 Clifton  
 Duncan
- Santa Cruz County*  
 Nogales  
 Patagonia

**SEAGO Office  
 Administration  
 CDBG  
 Economic Dev.  
 Housing  
 Transportation**

1403 W. Highway 92  
 Bisbee, AZ 85603  
 520-432-5301  
 520-432-5858 Fax  
 Housing Fax  
 520-432-2646

**Area Agency on  
 Aging Office**

1403 B Highway 92  
 Bisbee, AZ 85603  
 520-432-5301  
 520-432-9168 Fax

[www.seago.org](http://www.seago.org)

### 1. Applicant Identification

**Name:** Southeastern Arizona Governments Organization (SEAGO)  
**Address:** 1403 W. Highway 92  
 Bisbee, AZ 85603

### 2. Website URL

**SEAGO:** <https://www.seago.org/>  
**Cochise County:** <https://www.cochise.az.gov/>  
**Graham County:** <https://www.graham.az.gov/>  
**Santa Cruz County:** <https://santacruzcountyz.gov/>

### 3. Funding Requested

**a. Assessment Grant Type:** Assessment Coalition  
**b. Federal Funds Requested:** \$1,500,000

### 4. Location – Geographic boundaries to be covered under the application

	County	Cities	State
Lead Coalition Member – SEAGO	Greenlee	All	Arizona
Non-Lead Coalition Member	Cochise		
	Graham		
	Santa Cruz		

### 5. Coalition Members' Target Areas and Priority Site Information

Coalition Member	Target Area	Priority Site Address
SEAGO	Duncan	<ul style="list-style-type: none"> <li>Duncan Theater, 105 Railroad Avenue</li> </ul>
Cochise County	Bisbee	<ul style="list-style-type: none"> <li>Cole Building, 317 Arizona Street</li> <li>Bisbee Fire Station, 404 Bisbee Road</li> </ul>
	Douglas	<ul style="list-style-type: none"> <li>Rivera Building, 357 E 10<sup>th</sup> Street</li> <li>20th Street Properties (1104, 1112, 1120, and 1138 E 20th St)</li> </ul>
Graham County	Safford	<ul style="list-style-type: none"> <li>625 W Main Street</li> <li>627 W Main Street</li> </ul>
Santa Cruz County	Nogales	<ul style="list-style-type: none"> <li>Old Probation Dept, 2251 N Grand Avenue</li> </ul>



# SouthEastern Arizona Governments Organization

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## 6. Contacts

### a. Project Director

**Name:** William Osborne  
**Phone:** 520-559-8546  
**Email:** wosborne@seago.org  
**Mailing Address:** 1403 W. Highway 92  
 Bisbee, AZ 85603

### b. Chief Executive

**Name:** Chris Vertrees  
**Phone:** 520-236-4071  
**Email:** cdvertrees@seago.org  
**Mailing Address:** 1403 W. Highway 92  
 Bisbee, AZ 85603

## 7. Population

Coalition Member	Target Area City	Population <sup>1</sup>
SEAGO	Duncan	1,063
Cochise County	Bisbee	4,963
	Douglas	16,118
Graham County	Safford	10,217
Santa Cruz County	Nogales	19,753

## 8. Other Factors

Other Factors Information	Page #
Community population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	--
The priority site(s) is impacted by mine-scarred land.	2
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	3
The priority site(s) is in a federally designated flood plain.	--
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4, 5
The reuse of the priority site(s) will incorporate energy efficiency measures.	3-5, 11
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4, 8
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <a href="#">Section 3.A.(2)</a> , for priority sites within the target areas.	11
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	--

<sup>1</sup> 2023 American Community Survey



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### **9. Letter from the State or Tribal Environmental Authority**

A letter of support from the Arizona Department of Environmental Quality dated January 5, 2026, is attached.

### **10. Releasing Copies of Applications**

Not applicable; this application does not contain any confidential, privileged, or sensitive information.

# **ADEQ SUPPORT LETTER**



Katie Hobbs  
Governor

ARIZONA DEPARTMENT  
OF  
ENVIRONMENTAL QUALITY



Karen Peters  
Deputy Director

January 5, 2026

Christopher Vertrees  
SEAGO – Executive Director  
1403 W. Highway 92  
Bisbee, AZ 85603

Re: Southeastern Arizona Governments Organization (SEAGO) Community Wide Assessment  
Grant FY26

Dear Mr. Vertrees,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for the SEAGO Community Wide Assessment Grant (FY26) application to the Environmental Protection Agency (EPA) for the assessment of hazardous substances in the communities of Cochise, Santa Cruz, Greenlee, and Graham Counties.

ADEQ believes that the FY26 Brownfields Community Wide Assessment will be a good use of funding to support the many revitalization plans throughout the counties. Specifically, the towns of Clifton, Nogales and Safford. The reuse of the existing blighted structures will have a widespread positive impact on local community safety, quality of life, and job creation.

ADEQ fully supports SEAGO and its' stakeholders with the important Brownfields projects and we look forward to providing the communities and stakeholders with additional services and funding opportunities.

Sincerely,

*Travis Barnum*

Travis Barnum, Brownfields Coordinator  
Waste Program Division

**Phoenix Office**

1110 W. Washington St. | Phoenix, AZ 85007  
602-771-2300

**Southern Regional Office**

400 W. Congress St. | Suite 433 | Tucson, AZ 85701  
520-628-6733

azdeq.gov

# **NARRATIVE**

**PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION: Coalition Members, Target Area, and Brownfields:** **1.a Coalition Members:** The Southeastern Arizona Governments Organization (SEAGO) is a council of governments located less than 5 miles from the US-Mexico border serving Cochise, Graham, Greenlee, and Santa Cruz counties. The 4-county SEAGO service area spans approximately 13,911 square miles with a population of 221,979<sup>1</sup> and a low population density of 15.9 people per square mile. The area is predominantly rural with over 100 communities with populations under 10K and includes the federally recognized San Carlos Apache tribal community. Established in 1972 as a 501(c)(3) nonprofit, SEAGO supports local governments through regional collaboration on housing, economic development, transportation, and environmental initiatives. **SEAGO is the lead applicant** for this EPA Brownfields Coalition Assessment Grant, partnering with **Cochise County, Graham County, and Santa Cruz County** as the **Non-Lead Coalition Members**.

Due to the small populations and low incomes in these counties (see Section 2), each non-lead coalition member faces significant organizational and financial limitations that prevent them from applying for and managing a brownfield grant on their own. Poverty rates in the coalition partner counties are high, and incomes are low, leading to low-income tax revenues for use in brownfield revitalization. Sparse population and low median home values also restrict property tax revenues that are consumed by core county functions. Rising budget obligations in Cochise County limit resources, including a \$3.4M state-mandated increase to the Arizona Long Term Care System<sup>2</sup>. Unfunded pension liabilities, i.e. long-term retirement obligations that counties must pay but do not yet have dedicated funding for, remain a burden for each coalition member (Cochise Co. ~\$36M, Santa Cruz Co. ~\$2.3M, Graham Co. ~\$923K) and reduce budget flexibility and the ability to hire staff for brownfield work. None of the coalition members have environmental staff and each has tight staffing ratios (approx. 6.2 to 8.8 employees per 1,000 residents). Adding brownfield responsibilities would strain these limited resources. These factors mean that each county will benefit from coalition partnership. SEAGO provides the brownfield grant experience and administrative capacity to ensure this region's communities can address brownfield challenges.

**1.b. Overview of Brownfield Challenges and Description of Target Areas:** The geographic boundary for the Coalition's proposed grant activities encompasses the entire SEAGO 4-county service area. For over a century, these communities have been affected by the boom-and-bust volatility of the mining industry. Following major closures, such as the 1975 Phelps Dodge mine shutdown in Cochise County, the region experienced steep population decline, business closures, and widespread property abandonment. At the same time, and prior to the start of US environmental safeguards in the 1970s, industrial and mining activities operated with little oversight, resulting in legacy contamination that continues to burden these communities. Additional economic vulnerability exists in portions of Cochise and Santa Cruz counties, where reliance on cross-border commerce makes local economies highly sensitive to policy shifts and travel fluctuations. Compounding these conditions, widespread deterioration of older buildings and homes and a lack of new construction further reduces the region's already limited supply of adequate, affordable housing. This shortage reflects low reinvestment capacity and decades of economic instability tied to the mining industry that have constrained new development and rehabilitation of existing units.

These contaminated and vacant properties cannot be returned to productive use without environmental assessments, cleanup planning, and reuse feasibility analysis. Economic challenges further compound these environmental barriers; per capita incomes<sup>1</sup> across the Coalition area range from approx. \$18K to \$32K, well below the AZ (~\$41K) and US averages (\$43K), limiting local capacity for reinvestment. As a result, these brownfields constrain job creation and business growth, reinforcing persistent economic hardship across the region.

The Coalition has identified Target Areas based on their concentration of brownfields, proximity to legacy contamination, and potential to catalyze economic revitalization. The **Target Areas (TAs) for non-lead members** include the cities of **Bisbee** (Cochise Co.; pop. 4,963) and **Douglas** (Cochise Co.; pop. 16,118), mining towns founded in 1887 and 1901, respectively, 20 miles apart and partially on the US/Mexico border, each with a long history of boom-and-bust economies tied to the price of silver and copper; **Safford** (Graham Co.; pop. 10,217), founded in 1874 as an agricultural and mining community; and **Nogales** (Santa Cruz Co.; pop. 19,753) founded in 1880 as a railroad and customs station on the US/Mexico border. The **TA for SEAGO** is the town of **Duncan** (Greenlee Co.; pop. 1,063), established in the 1870s as an agricultural hub and a stop along early trade routes between Arizona and New Mexico. These TAs are located in separate municipalities and do not overlap.

This grant will fund the assessments and redevelopment planning needed to identify contamination, remove investment barriers, and guide safe reuse strategies. These efforts will create the conditions that will attract investment, expand job and economic opportunities, support affordable housing development, and improve community health outcomes.

<sup>1</sup> 2023 American Community Survey 5-yr data (obtained from data.census.gov)

<sup>2</sup> Cochise County FY 2025-26 Final Budget – <https://www.cochise.az.gov/369/Annual-County-Budget>

**1.c. Description of the Priority Brownfield Sites:** Across the TAs, there are an estimated **1,232 potential brownfield sites** (Table 1). These include 79 hazardous waste generators, 280 leaking underground storage tank sites, and over 44,000 closed mining claims, each averaging 20 acres. If even 10% of these sites are vacant or underutilized, that represents over 100 brownfields in need of assessment and redevelopment across the TAs, illustrating the scale of environmental and economic challenges in these communities.

TAs	EPA		State of AZ (ADEQ)		Underutilized/ Vacant w/ Env Records	# of Closed Mining Claims– Mine-Scarred Land <sup>1</sup>	Total Potential Brownfields
	Haz. Waste Generator	Sites w/ Env Records	UST/LUST	Sites w/ Env Records			
Bisbee/Douglas	22	175	193	31	41	9,279	175
Duncan	2	38	8	3	5	9,200	50
Nogales	49	120	48	48	40	10,701	542
Safford	6	48	31	45	20	15,386	465
<b>Total</b>	<b>79</b>	<b>381</b>	<b>280</b>	<b>127</b>	<b>106</b>	<b>44,566</b>	<b>1,232</b>

Source: GIS estimates & previous inventories; <sup>1</sup>number of closed mining claims potentially resulting in mine-scarred land. Average claim size is approx. 20.66 acres (www.thediggings.com and BLM data); ADEQ = Arizona Dept of Environmental Quality; UST/LUST = Leaking and Underground Storage Tanks

The Coalition has identified priority sites in each member’s TA (Table 2). Additional priority sites will be identified after grant award. At least two sites will be assessed within each Coalition member’s geographic boundary. These sites were prioritized due to proximity to residential neighborhoods and increased risk of exposure, redevelopment interest and potential, suitability for redevelopment to meet community needs, and alignment with each community’s revitalization goals.

TA	Name and Address	History/Prior Use	Existing Conditions	Funding Needs	Prioritization Reason and Reuse Plan
Bisbee	Bisbee Fire Station, 404 Bisbee Rd, Bisbee	This was the first fire station built for the Warren neighborhood in Bisbee. The building was constructed in 1915.	This is a city-owned building currently used for storage. It likely has asbestos and lead-based paint due to the age.	Phase I/II ESA, RBM Survey	Located in Bisbee’s newly designated Warren Historic District, the building requires regulated-materials assessment before restoration and reuse can proceed. Reuse options include a community meeting space and offices for the Community Development Department.
	Cole Building, 317 Arizona St, Bisbee	Also called the Warren Hotel, this 2-story, 20,300-square-foot 1906 building has served as a drugstore, barbershop, post office, and apartments.	This privately-owned building has been vacant for several years with boarded and broken windows and peeling paint.	Phase I/II ESA, RBM Survey	The Cole Building is considered a prime location for mixed-use such as a grocery store, drug store/pharmacy or offices with residential units on the 2nd floor. This adaptive reuse plan will stimulate economic activity and provide much needed housing while preserving its historic character.
Douglas	Rivera Building, 357 E 10 <sup>th</sup> St, Douglas	This is a 2-story, 15,645-sq-ft, historic building in downtown Douglas, constructed in 1917.	Historic, city-owned Rivera Building adjacent to the Douglas Commercial Historic District; severely blighted and used for storage.	Phase I/II ESA, RBM Survey, SRP	The Rivera Building has historic and cultural significance and can serve as a catalyst for revitalizing Douglas’ main commercial corridor. Assessments and reuse planning will help the city attract new businesses and affordable housing while preserving the structure.
	20 <sup>th</sup> Street Properties, 1104, 1112, 1120, and 1138 E 20 <sup>th</sup> St, Douglas	This site is ~1.75 acres with three one-story residences that have been abandoned for over 10 years.	The privately-owned properties contain vandalized abandoned houses in disrepair, and the site has been an illegal dumping site for many years.	Phase I/II ESA, RBM Survey, SRP	The 20th Street site has become a persistent source of blight and public health concern for the surrounding neighborhood due to the abandoned structures and illegal dumping. Once assessment and cleanup are complete, this will be an excellent location for construction of affordable housing.
Duncan	Duncan Theater, 105 Railroad Ave, Duncan	Historic movie theater constructed in 1921 in downtown Duncan. Believed to have closed after the 100-year flood in 1983.	This privately-owned building is suspected of containing asbestos, lead-based paint, and potentially other contaminants from flood damage.	Phase I/II ESA, RBM Survey, SRP, AWP	Long-vacant historic building on Duncan’s main street; assessments and reuse planning could enable business or community use and spur investment and tourism. Area-Wide Plan inclusion supports coordinated, lasting redevelopment.

**Table 2: Priority Brownfield Sites**

TA	Name and Address	History/Prior Use	Existing Conditions	Funding Needs	Prioritization Reason and Reuse Plan
Nogales	Old Probation Dept, 2251 N Grand Ave, Nogales	Two, one-story buildings formerly used by the county Probation Department.	County-owned buildings used for storage within the larger Santa Cruz County Complex. Given their age, they likely contain asbestos and lead-based paint.	Phase I/II ESA, RBM Survey, Reuse Planning	Located on the major thoroughfare in Nogales, assessment of this underutilized property would allow for many development options including public health services, educational resource center, or workforce development and training center.
	625 W Main St, Safford	One-story building constructed in 1977. Historical use at the property was an automotive repair shop in the 1940s.	It is a vacant, privately-owned commercial building with peeling paint in historic downtown. Given age of the building it likely has asbestos and lead-based paint.	Phase I/II ESA, RBM Survey	This property is included in the draft AWP for Safford’s Entertainment District. Ensuring this site is contaminant-free would promote redevelopment and attract more businesses and visitors to downtown Safford.
Safford	627 W Main St, Safford	Two-story building constructed in 1949. Historical use was as an automotive repair shop in the 1940s.	County-owned vacant building with exterior deterioration; potential asbestos and lead based- paint.	Phase I/II ESA, RBM Survey	This property is included in the draft AWP for Safford’s Entertainment District. This site and its neighbor at 625 W Main St would act as catalysts for bringing new jobs and commercial businesses to revitalize downtown Safford.

ESA = Environmental Site Assessment; RBM = Regulated Building Material; SRP = Site Reuse Plan; AWP = Area-Wide Plan

**1.d. Identifying Additional Sites:** Additional sites will be identified through community input, Coalition members, and updated brownfield inventories. The Coalition will accept site nominations throughout the geographic boundary of the Coalition and will be evaluated based on 1) Location within a community historically affected by economic disinvestment, health disparities, and/or environmental contamination; 2) Redevelopment plans that address core community needs; and/or 3) Alignment with locally adopted vision or strategy documents. Community nuisance indicators, including police reports of illegal camping and dumping, repeated calls for service, fire risks associated with unsecured vacant structures, and chronic code-enforcement issues, will also be incorporated into site-selection criteria to prioritize properties that pose the greatest threats to public safety, community health, and neighborhood stability.

If funding remains after addressing high priority sites within the TAs, the Coalition will prioritize sites outside these areas but within the coalition partner footprint for assessment and reuse planning. This process ensures that redevelopment decisions are transparent, inclusive, and focused on reducing disparities while creating long-term community benefits.

**Revitalization of the Target Areas:**

**1.e. Reuse Strategy and Alignment with Revitalization Plans:** As outlined in Sections 1.b/1.c, the Coalition’s TAs face significant challenges from legacy contamination, economic disinvestment, and housing shortages. The proposed reuse strategies for priority sites directly address these challenges by converting underutilized, contaminated, and deteriorating properties into productive community assets through mixed-use infill, adaptive reuse of historic and commercial structures, and development or rehabilitation of affordable and workforce housing. These strategies align with locally adopted comprehensive and land use plans across all four counties that share common goals focused on infill development, adaptive reuse of historic structures, affordable housing, and economic revitalization, reflecting a unified regional vision.

The draft **Cochise County Comprehensive Plan 2045** prioritizes sustainable growth strategies that include infill development, adaptive reuse of historic buildings, and brownfield redevelopment. Its Housing Element emphasizes the urgent need for affordable housing, stating the current supply of multi-unit structures is only 12.7%, well below the AZ (21.1%) and US (26.9%) averages, and that 46% of renters are cost burdened, spending more than 30% of income on housing. Reuse strategies such as adaptive reuse of the historic Bisbee fire station into community meeting space and redeveloping the Rivera Building for mixed use commercial and affordable housing directly advance these goals. The **Graham County Comprehensive Plan** encourages efficient reuse of underutilized sites while preserving local culture and values, which aligns closely with reuse strategies in Safford. The draft **Safford Entertainment District AWP** prioritizes revitalization of vacant properties to stimulate local business and community activity, strengthening the downtown economy while preserving Safford’s historic identity. The Safford high priority sites are specifically identified in the AWP, demonstrating strong alignment with city and county revitalization priorities. The **Santa Cruz County Comprehensive Plan** promotes infill development, efficient growth to reduce sprawl, and economic development and employment opportunities while fostering local historical and cultural education. Repurposing the old Probation Building in Nogales as a workforce

development and community education center directly supports these goals by reusing existing structures and creating opportunities for skill-building and employment. The **Greenlee County Land Use and Resource Policy Plan** emphasizes adaptive reuse of historic structures and redevelopment of underutilized sites to attract businesses and diversify the economy. Assessment and reuse of the prioritized Duncan Theater will preserve a historic landmark while serving as a catalyst for economic revitalization, attracting investment and tourism to the community.

Beyond alignment with local plans, the reuse strategies are also supported at the regional level. **SEAGO’s Comprehensive Economic Development Strategy (CEDS)** aligns closely with the Coalition’s reuse strategies, guiding regional investment, promoting economic opportunity, and coordinating regional planning efforts across the four counties. The CEDS prioritizes revitalization, adaptive reuse, and redevelopment of underutilized properties. SEAGO’s 2026–2031 updates further reinforce these goals through regional outreach that highlights downtown revitalization, workforce development, and historic property reuse, all of which are directly supported by the Coalition’s priority site plans.

**1.f. Outcomes and Benefits of Reuse Strategy:** The proposed brownfield reuse and redevelopment plans will transform long-vacant, blighted properties into productive assets that stimulate economic development and address critical community needs across the TAs. These outcomes correlate directly with each site’s planned reuse, demonstrating the clear connection between the reuse strategy and resulting community benefits. Post-cleanup and redevelopment, these sites will serve as catalysts for revitalization by attracting new businesses, creating jobs, supporting tourism in historic downtowns, and providing safe, affordable housing options. Table 3 illustrates the scale of these impacts: redevelopment of priority sites alone will deliver approximately **111,500 square feet of new commercial and residential space**, create **39 new jobs**, and add **78 housing units**, including affordable and workforce housing. Restoring the Bisbee fire station as a community meeting space and offices will strengthen local governance and increase capacity for community engagement. Redevelopment of the Rivera Building in Douglas will anchor commercial corridor improvements and encourage private investment, while also providing creative solutions for affordable housing. Converting the 20<sup>th</sup> Street properties into affordable and workforce housing will address critical housing needs, and the Duncan Theater’s reuse as a cultural venue will draw visitors and enhance the town’s identity as a heritage destination. Several priority sites also offer opportunities to incorporate green space and nonprofit uses. For example, the Nogales Probation property could be repurposed for public health services or workforce training to strengthen local job readiness and attract employers, and redevelopment plans for the Main St sites in Safford’s Entertainment District include pedestrian-friendly improvements that enhance connectivity, create outdoor gathering areas, boost tourism, increase foot traffic, and support small businesses.

**Table 3: Beneficial Reuse**

TA	Priority Property	Proposed Reuse Type	Estimated Size <sup>1</sup>	Est. New Jobs <sup>2,3</sup>	Residential Units
Bisbee	Cole Building 317 Arizona St	2-story mixed-use	1st floor retail 9,000 SF 2nd floor residential 9,000 SF	7	9
	404 Bisbee Rd	2-story commercial/office	5,500 SF total; 2,750 SF per floor	11	NA
Douglas	Rivera Building 357 E 10th St	2 -story mixed-use	1st floor retail 6,000 SF 2nd floor residential 6,000 SF	5	6
	20th Street properties	2-story multi-family apartment bldgs	48,000 SF total; 12,000 SF per floor	1	48
Safford	625 W Main St	2- story mixed use	1st floor comm./retail (5,000 SF) 2nd floor residential (5,000 SF)	4	3
	627 W Main St	2-story mixed use	2nd floor comm./retail (4,000 SF) 2nd floor residential (4,000 SF)	3	2
Nogales	Old Probation Dept 2251 N Grand Ave	commercial/office and 2-story aff. housing	Bldg 1-comm., 2,500 SF Bldg 2- res., 5,000 SF per floor	6	10
Duncan	Duncan Theater 105 Railroad Ave	retail/entertainment	3,000 SF	2	NA
<b>Estimated Totals:</b>			<b>34,500 SF retail/commercial + 77,000 SF residential</b>	<b>39</b>	<b>78</b>

<sup>1</sup>Building size from Co. assessor websites or estimated from GoogleEarth; <sup>2</sup>SF per worker used to estimate job creation from US Energy Information Administration, Commercial Buildings Energy Consumption Survey Table B15; <sup>3</sup>National Apartment Assoc. Best Practices Staffing Considerations, June 2020; SF = square feet

Beyond economic revitalization, these outcomes also correlate directly with the reuse strategies by integrating climate resilience, energy performance, and community health benefits into site-specific redevelopment plans. Activities supported by this grant will improve local resilience to extreme weather events like extreme heat and monsoon flooding. Energy efficiency measures, including interior insulation, energy-efficient windows that preserve historic facades, and HVAC retrofits, will be incorporated into redevelopment plans as required by locally adopted and enforced international codes, such as the 2018

International Energy Conservation Code in Bisbee. The draft Cochise County Comprehensive Plan 2045 is actively developing goals and policies that promote energy-efficient construction and expanded renewable-energy access, including support for small-scale rooftop solar and battery storage. These strategies can be applied directly to adaptive reuse of the Bisbee fire station, which could integrate solar panels and battery backup to operate as a community cooling center during outages, and redevelopment of the 20th Street properties into heat-safe affordable housing. Area-wide planning in Bisbee, Duncan, and Nogales can incorporate streetscape and drainage improvements to mitigate monsoon flooding. Integrating these renewable energy and energy efficiency measures into brownfield reuse will lower long-term operating costs, attract investment, and create safer, healthier communities.

**Strategy for Leveraging Resources: 1.g. Resources Needed for Site Reuse:** SEAGO and its Coalition partners are eligible for and expect to leverage additional funds from federal, state, and other funding sources to support additional assessment, cleanup, and reuse of the priority sites. This EPA brownfield grant will provide environmental assessments as the critical first step to unlocking eligibility for complementary funding programs, many of which require environmental clearance before investment. SEAGO and its partners have a proven track record of managing federal and state grants, ensuring that EPA funds will leverage millions of dollars in additional resources to achieve cleanup and fully implement reuse strategies (see Sections 1.c and 3).

• **Community Development Block Grant (CDBG):** CDBG funds are available for projects in low-income areas within TA communities through Regional Account, State Special Projects, and Colonias grants. The Regional Account funds are noncompetitive and awarded on a rotational schedule, while State Special Projects and Colonias grants are competitive funds. Eligibility requires that at least 51% of beneficiaries are low- to moderate-income, the project addresses slum/blight prevention, and resolves urgent health hazards, all criteria met by brownfield projects. Recent allocations demonstrate strong likelihood of award: Cochise County received nearly \$500K in 2023, Santa Cruz County received \$440K in 2025, and Graham County received \$291K from SEAGO regional CDBG funds. These funds will complement EPA assessments by covering remediation costs for regulated building materials in historic structures like the Bisbee fire station, Rivera Building, and Duncan Theater.

• **Economic Development Administration (EDA) Economic Adjustment Assistance (EAA):** EDA grants fund planning and infrastructure investments that strengthen regional competitiveness and resilience, and projects aligned with SEAGO's CEDS goals score more competitively. Nearly all census tracts in the TAs qualify as Opportunity Zones, a priority for EDA funding. Grants range from \$10,000 to \$3 million and can support infrastructure upgrades needed for adaptive reuse of priority sites such as the Rivera Building, Safford Main Street properties, and the Cole Building. EPA-funded assessments will position these sites for EDA investment by providing the environmental clearance required for redevelopment.

• **ADEQ Brownfield Assistance Program (BAP):** The BAP offers site-specific grants of \$50,000 to \$200,000, funded through EPA State Response Grants to counties, cities, tribes, and nonprofits statewide. Applications are accepted year-round, and ADEQ's Brownfields Coordinator, Travis Barnum, actively collaborates with EPA grantees to expedite funding. These funds can help complete environmental site assessments, cleanup planning, and abatement of asbestos and lead-based paint at all priority sites, building on EPA-funded initial work.

• **ADEQ UST State Lead Program:** For sites with auto repair history, such as the Safford Main Street properties, ADEQ provides up to \$25,000 per tank for UST removal and \$15,000 per site for petroleum contamination cleanup. EPA assessments will identify these conditions, enabling property owners to access UST program funds for remediation.

• **US Dept of Housing and Urban Development (HUD) Lead Hazard Reduction (LHR) Grant Program:** With an annual budget of \$520M, HUD's LHR program funds lead hazard control in rental and owner-occupied housing. Priority sites planned for affordable housing reuse, such as the 20th Street properties and Rivera Building, will benefit from this program to ensure safe housing for families. EPA-funded assessments will confirm lead hazards and support eligibility for HUD funding.

• **US Dept of Agriculture (USDA) Rural Development Grants:** USDA grants typically cover 35-75% of project costs for housing, community facilities, and economic development projects in rural areas. Most TA communities qualify due to their small population and low-income status. These grants can fill gaps after EPA assessments, supporting projects like the Cole Building's mixed-use redevelopment and adaptive reuse of the Bisbee fire station into city offices and a community meeting center.

**1.h. Use of Existing Infrastructure:** All TAs have exiting infrastructure including water, sewer, telecommunications, electrical, and gas utilities that will be leveraged to support redevelopment of priority brownfield sites. Most priority sites are located in historic downtowns or along major corridors where roads, sidewalks, and utility lines are already in place, reducing overall redevelopment costs and accelerating project timelines. Because specific end uses for the priority sites have not yet been finalized, additional or upgraded on-site infrastructure upgrades may be required to support future redevelopment needs, meet building code requirements, and incorporate energy-efficiency improvements such as

modern electrical capacity, enhanced water and sewer service, or renewable-energy-ready connections. EPA grant-funded reuse planning will help identify infrastructure needs (if any) and position sites for complementary funding sources to implement upgrades. TA communities have access to have access to multiple funding sources, including CDBG Regional Account and State Special Projects funds, as well as general revenue and capital improvement funds to address these needs. In addition, many of the TAs are eligible for USDA Rural Community Facilities Guaranteed Direct Loan and Grant program for community facilities and infrastructure.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT: Community Need: 2.a. The Community’s Need for Funding:** The communities served by this grant are among the smallest and most economically challenged in AZ. Each of the TA communities is under 20,000 in population, and three of the five TAs meet the EPA definition of “small” (<15,000) or “micro” (<10,000) communities.<sup>3</sup> As shown in Table 4, every TA faces acute economic distress characterized by high poverty and unemployment rates, low incomes, and depressed property values. Douglas and Nogales rank as the two poorest communities in the state<sup>4</sup> with some of the lowest median household incomes and highest rates of unemployment. Beyond demographic distress, the TA communities operate with very limited fiscal capacity. Small populations create narrow tax bases, and most local revenues are already committed to essential services such as public safety, water and wastewater operations, and basic infrastructure maintenance. These TAs have minimal discretionary funds, limited capital budgets, and no environmental staff dedicated to brownfields. Collectively, these limitations severely restrict each TA’s ability to pursue brownfield revitalization and broader economic development initiatives without assistance.

Indicator	Bisbee	Douglas	Duncan	Nogales	Safford	AZ	US
Population	4,963	16,118	1,063	19,753	10,217	7.26M	332M
5-Year Unemployment Rate	4.0%	4.6%	1.8%	8.1%	3.5%	3.1%	3.3%
Per Capita Income	\$31,970	\$18,276	\$20,874	\$21,340	\$27,982	\$40,736	\$43,289
Median Household Income	\$46,689	\$39,350	\$38,750	\$40,745	\$65,727	\$76,872	\$78,538
Poverty Rate	21.2%	30.2%	29.8%	26.1%	13.3%	12.8%	12.4%
Median Home Value	\$209,600	\$138,200	\$159,200	\$172,800	\$191,600	\$358,900	\$303,400

Source: 2023 American Community Survey 5-yr data (obtained from data.census.gov); **Bold** indicates distress factors above or below (depending on factor) national avg. **Shaded** indicates distress factors above or below (depending on factor) AZ State avg.

This grant will meet the needs of these small, low-income communities by unlocking redevelopment potential at former smelter sites, downtown historic buildings, and industrial corridors that have been vacant and blighted for decades due to uncertainty about cleanup costs, liability risks, and the financial feasibility of reuse. This grant will provide critical environmental information needed to guide strategic investment, reduce risks to future site users, eliminate blight, expand job and business growth, attract affordable housing developers, and bring new resources and amenities to this economically stagnant area. The Coalition does not have access to significant brownfield grant resources beyond an EPA Brownfield Grant. While ADEQ can provide a limited number of assessments through their BAP, these isolated evaluations are not a substitute for a comprehensive brownfield strategy. ADEQ’s BAP capacity is limited, typically cannot assist private property owners, and does not cover critical elements such as community engagement, site prioritization, or reuse planning, and therefore does not extend to the level of coordinated, regional support needed by the Coalition. As a result, this EPA brownfield grant represents the Coalition’s primary opportunity to implement a comprehensive, community-driven strategy to address brownfield challenges across the region.

**2.b. Health or Welfare of Sensitive Populations:** Coalition member counties and the TA communities are home to several disproportionately large sensitive populations compared to AZ and the US, including children, people (including children and the elderly) living in poverty, and people living in older, deteriorating housing (Table 5). Three of the four TAs have child poverty rates greatly exceeding the state and US averages. In Bisbee and Douglas, the rates are nearly three times higher. Three of the four TAs also have significantly higher rates of seniors (age 65+) living in poverty, with Douglas, Nogales, and Safford reporting levels two to three times the state and US averages. All TA communities have a greater percentage of homes built before 1980 compared to AZ and the US, including nearly 90% of homes in Bisbee, increasing exposure to lead-based paint, asbestos, polychlorinated biphenyls (PCBs), and other hazardous building materials.

Indicator	Bisbee	Douglas	Duncan	Nogales	Safford	AZ	US
Disabled Persons Population	21.8%	13.6%	20.1%	12.4%	14.5%	13.6%	13.0%
Bachelor’s Deg. or Higher (age 25+ yrs)	32.6%	6.9%	14.3%	11.9%	13.7%	20.0%	21.3%

<sup>3</sup> EPA Fiscal Year 2026 FAQ for Brownfield MARC Grants

<sup>4</sup> Kolmar, Chris. The Poorest Cities in Arizona for 2025. October 1. www.roadsnacks.net

Children/Youth Poverty Rate (age <18 yrs)	<b>46.2%</b>	<b>45.4%</b>	<b>36.9%</b>	<b>34.3%</b>	10.4%	16.7%	16.0%
Senior Poverty Rate (age 65+ years)	<b>15.2%</b>	<b>24.3%</b>	6.2%	<b>29.0%</b>	<b>20.0%</b>	9.9%	10.4%
Housing Units Built Prior to 1980	<b>89.8%</b>	<b>70.7%</b>	<b>58.0%</b>	<b>57.1%</b>	<b>52.8%</b>	30.0%	50.5%
Child/Youth Population (age <18 yrs)	10.9%	<b>23.0%</b>	<b>34.8%</b>	<b>25.5%</b>	<b>26.9%</b>	21.9%	22.2%

Source: 2023 American Community Survey 5-yr data (obtained from data.census.gov); **Bold** indicates distress factors above or below (depending on factor) national avg. **Shaded** indicates distress factors above or below (depending on factor) AZ State avg.

Because households facing poverty or disability often also live in aging, deteriorating homes, their combined vulnerabilities heighten the dangers of extreme heat. As a result, TA residents face disproportionately high health and welfare risks during extreme heat events, especially those living in older or deteriorating homes that may be poorly sealed, under-insulated, or lacking modern cooling systems. These housing conditions can cause indoor temperatures to rise dangerously, increasing residents’ exposure to extreme heat and poor air quality both indoors and outdoors. In 2023, AZ experienced 73 days with temperatures greater than 100° Fahrenheit (F) and broke a record for 31 days in a row with temperatures above 110° F.<sup>5</sup> These conditions create a severe threat to sensitive populations like children, older adults, and individuals with chronic health conditions. This grant will enable remediation and reuse strategies that reduce potential exposure to contaminants by renovating aging structures and creating safer, more heat-resistant living conditions for sensitive populations, e.g. through improvements to insulation, ventilation, and roofing to help maintain safe indoor temperatures. Beyond these health benefits, the grant will also support other sensitive groups by stimulating local jobs and economic activity. As blighted properties are restored, surrounding home values typically rise, helping families build equity and increase municipal tax revenues that can be reinvested in schools, emergency services, youth programs, and senior supports. Together, these outcomes strengthen environmental health, economic stability, and overall quality of life for TA residents.

**2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions:** TA residents face high rates of disease and adverse health conditions. All five cities have **higher rates of asthma, heart disease, and stroke** than national rates, and most have higher rates of cancer (Table 6). According to the National

Indicator	Bisbee	Douglas	Duncan	Nogales	Safford	US
Asthma % (adults)	<b>11.3</b>	<b>10.2</b>	<b>11.0</b>	<b>10.0</b>	<b>11.0</b>	9.8
Cancer % (non-skin)	<b>11.0</b>	5.8	<b>9.6</b>	6.6	<b>8.3</b>	7.9
Heart Disease %	<b>11.4</b>	<b>10.1</b>	<b>7.6</b>	<b>10.5</b>	<b>7.2</b>	6.4
Stroke %	<b>6.0</b>	<b>5.6</b>	<b>4.0</b>	<b>5.9</b>	<b>4.0</b>	3.4

Source: CDC Places, accessed 1/2026; Census tracts 11 (Bisbee), 9.02 (Douglas); 9603 (Duncan); 9663.02 (Nogales); 9613 (Safford)

**highest childhood (<20 years) cancer rates** of all AZ counties; Cochise and Graham counties have **higher rates of lung cancer** than AZ; and Greenlee County has the **highest kidney/renal cancer rate** of all AZ counties.<sup>6</sup> These elevated conditions are consistent with exposure to typical brownfield contaminants, including lead (childhood neurotoxicity), arsenic (lung cancers), benzene and petroleum compounds (blood/kidney cancers), asbestos (respiratory disease), and mine dust particulates (asthma/cardiovascular impacts). These health conditions are compounded by multiple welfare challenges (Section 2.b) and environmental risk factors.

Local brownfield contaminants are known or suspected to include carcinogens and other toxic substances including asbestos, PCBs, petroleum constituents, wood treating chemicals, solvents, and heavy metals. TA residents may be exposed through multiple pathways including ingestion or dermal contact with soil, lead/asbestos from deteriorating buildings, mine ruins, and scattered mine tailings, as well as inhalation of airborne contaminants from wind erosion of tailings or dust. Subsurface contamination in soil and groundwater may generate hazardous vapors that migrate into buildings creating indoor air quality hazards. All five TA communities fall within AZ Dept of Health Services-designated high-risk ZIP codes for childhood lead exposure<sup>7</sup>, reflecting the elevated risk posed by aging housing and historic mining and industrial activity. Statewide surveillance shows that Arizona identifies approximately 800 children each year with elevated blood lead levels, and Arizona’s child asthma prevalence (8.1%)<sup>8</sup> exceeds the national rate, emphasizing the heightened vulnerability of children in the TA communities.

Grant-funded environmental assessments will identify previously undocumented sources of hazardous exposure, enabling targeted remediation and other risk mitigation measures. Cleanup and redevelopment will reduce residents’ risk of cancer, asthma, and other diseases by removing contaminants and transforming blighted properties into safe, healthy spaces for the community.

**2.d. Economically Impoverished/Disproportionately Impacted Populations:** Across the TAs, residents live near historic mining and smelting sites as wells as older building stock. These conditions are associated

<sup>5</sup> Arizona Dept of Health Services, Extreme Weather Heat Safety, <https://www.azdhs.gov>

<sup>6</sup> <https://statecancerprofiles.cancer.gov/incidencerates/>

<sup>7</sup> <https://dcs.az.gov/sites/default/files/media/Lead-Testing-Guide.pdf>

<sup>8</sup> <https://www.lung.org/research/trends-in-lung-disease/asthma-trends-brief/data-tables/asthma-current-state>

with potential exposure to hazardous building materials such as asbestos and lead in structures, and to soil and/or groundwater contamination. Data presented in Section 2.c show elevated disease burdens and poor health outcomes relative to national averages. These environmental risks and exposure pathways occur alongside economic conditions that may limit TA residents’ ability to mitigate hazards or take protective actions.

**Bisbee and Douglas:** Once major mining hubs, these communities remain impacted by abandoned mines, tailings, and smelter residues. Bisbee neighborhoods near tailings face inhalation risks from heavy-metal dust and groundwater contamination. In Douglas, elevated lead, cadmium, and copper have been detected in soil up to six miles from the former Phelps-Dodge smelter.

**Duncan:** This small agricultural community depends on groundwater for drinking and irrigation. ADEQ designates its public water system “high risk,” with threats from past pesticide use and other contamination tied to aging infrastructure.

**Nogales:** As a key port of entry, Nogales experiences runoff from cross-border industry, polluting the Santa Cruz River. Metals from treated effluent from the Nogales International Wastewater Treatment Plant have been linked to bird deformities and bioaccumulation of cadmium and lead<sup>9</sup>.

**Safford:** Mining and industrial operations strain groundwater resources and increase contamination risks. The Safford Mine uses ~5,000 acre-feet of groundwater annually, with a projected 74,000 acre-feet over its life, raising concerns about water table depletion. Acid mine drainage from the mine operations may exacerbate metals contamination, mobilizing contaminants and heightening exposure risks.

Each of the TAs faces risks of flooding, drought, and extreme weather events like monsoons (Table 7). Flooding disproportionately burdens low-income residents who have limited capacity to repair property damage, manage displacement, or address health impacts such as mold and contaminated water. Drought conditions also heavily affect these communities, with each TA experiencing drought more frequently than 80-92% of the US, further straining groundwater supplies already threatened by brownfield contaminants. In Cochise County, for example, groundwater levels have dropped more than 100 feet in the past decade, illustrating the severity of regional water depletion.<sup>10</sup>

Indicator	Bisbee	Douglas	Duncan	Nogales	Safford
Drought Frequency	0.84	0.92	0.91	0.80	0.85
Extreme Weather Events	0.62	0.66	0.40	0.67	0.51
Riverine Flooding Frequency	0.96	0.96	0.20	0.68	0.43
Group Quarters	0.73	0.37	0.44	0.91	0.80
Mobile Homes	0.78	0.65	0.97	0.00	0.64

<sup>1</sup>US percentiles; Source: ATSDR Place and Health Geospatial Research, Analysis, and Services Program, accessed January 2026; CTs 11 (Bisbee), 6 (Douglas); 9603 (Duncan); 9663.02 (Nogales); 9613 (Safford)

The TAs also have a greater proportion of people living in mobile homes and group quarters (nursing homes, correctional facilities, shelters, etc.) than the rest of the US. These individuals often have limited mobility and resources, making them especially vulnerable to environmental hazards and are less able to relocate or mitigate exposure. Extreme heat (Section 2.b) further intensifies these vulnerabilities, increasing the risk of heat-related illnesses.

Brownfield reuse planning will prioritize **safe indoor environments, HVAC/filtration upgrades, and flood-resilient site plans** to increase local resilience. By funding environmental assessments, this grant will identify contamination and public health threats, resulting in reuse strategies that eliminate exposure pathways and alleviate the disproportionate environmental and economic challenges in the region.

**Community Engagement: 2.e. Project Involvement; 2.f. Project Roles:** SEAGO will lead an open, inclusive community outreach and engagement program to inform and actively involve residents, small businesses, and local partners in every target area. The program will: (1) gather input from diverse voices across TA communities; (2) provide clear, accessible facts and resources about brownfields; and (3) establish a Brownfields Advisory Committee (BAC) of business and property owners, neighborhood leaders, bankers, realtors, developers, and longtime residents from each TA community. The BAC will guide site selection by helping to prioritize properties for assessment, ensuring that community ideas and concerns from all backgrounds are incorporated into decision-making. Table 8 below identifies community partners who will support project implementation and help shape final decisions; their participation is essential to a successful brownfield program, particularly in outreach.

**Table 8: Community Engagement**

<b>Municipal Partners:</b> City of Bisbee, Melissa Hartman, City Planner/ Housing, mhartman@bisbeeaz.gov, 520-335-5693   Town of Duncan, Terry Hinton, Town Manager and Clerk, 928-359-2791.
<b>Purpose:</b> Cities will support the grant by participating in public meetings, conducting community outreach and publicity, and assisting with the selection of priority brownfield sites.

<sup>9</sup> <https://www.georgewright.org/1520vanriper.pdf>

<sup>10</sup> <https://www.thecooldown.com/green-business/cochise-county-arizona-drought-farming-water-scarcity/>

gales Community Development (NCD), Patricia Rodriguez, Board of Directors, [REDACTED], 520-285-7094 | Chicanos Por La Causa (CPLC), Nogales, Corina Fragozo, Rural na.fragozo@cplc.org, 520-281-9570

**Purpose:** NCD will participate in public meetings and support community outreach and publicity efforts. CPLC will assist with these activities as well and will help identify priority sites and serve on the Brownfield Advisory Committee.

**Economic, Business, & Citizen Partners:** Downtown Nogales Business Owner, Saleh Jada [REDACTED] | Greenlee Chamber of Commerce, Dorsha Frey, President (928) 965-7943 | Safford Chamber of Commerce, Vance Bryce, Director, admin@grahamchamber.org, 928-428-2511 | Safford Downtown Association, Danny Smith, President, [REDACTED].gov, 928-651-6508 | Realtor and Longtime Safford Resident, Jacque Attaway, [REDACTED], 928-432-1290

**Purpose:** These partners will contribute to public-meeting participation, community outreach and publicity, and priority-site selection, and may also support meeting logistics and serve on the BAC.

In addition to the above-identified participants, the Coalition is committed to partnering with ADEQ and the EPA to maximize use of the grant funds toward safe and beneficial reuse of brownfields throughout the Coalition footprint. Local county Health Departments will also contribute information related to health impacts of the brownfields.

Non-lead members are essential partners in project implementation and will participate in all site-selection decisions, determining scopes of work, and recommendations on allocation of grant funds for each site. SEAGO and its Qualified Environmental Professional (QEP) will work closely with coalition partners through regular meetings, project updates, and transparent communication to ensure sustained engagement. SEAGO will retain final decision-making authority as the lead coalition member and grant recipient, while non-lead members will hold shared decision-making authority for site selection and scope development. The BAC, municipal partners, nonprofits, and business and citizen groups will serve in advisory roles, informing decisions through documented recommendations. ADEQ and EPA will provide regulatory and program guidance, while the QEP will provide technical and quality-assurance support.

**2.g. Incorporating Community Input:** SEAGO will tailor outreach strategies for each TA community to ensure access to project information. Outreach will use multiple channels, including website and social media updates, public notice boards, direct mailings, fact sheets, newspaper articles, and public meetings with radio or TV coverage. Printed materials will be distributed to residents without internet access. Widely read newspapers in each TA will be used for announcements and updates. SEAGO will host at least two BAC meetings annually and anticipates up to five outreach events in Year 1, followed by two events per year thereafter. A dedicated project webpage will be launched within three months of project initiation to provide fact sheets, schedules, meeting notices, minutes, and other resources. SEAGO will provide Spanish language materials for the Hispanic community and materials in the appropriate Native American language before and during public meetings. Translation services will be used as needed to ensure equal access for non-English speaking groups. All meetings will be ADA compliant, and all literature will state that alternative formats are available upon request.

SEAGO is committed to empowering residents and local groups by encouraging community leadership and meaningful participation in brownfield revitalization efforts. To ensure input is effectively solicited, considered, and incorporated, SEAGO will request feedback through comment cards, online forms, email submissions, and virtual forums; document and review all input during BAC meetings to inform site selection and prioritization; and respond by posting summaries and responses on the project webpage, and sharing updates through newsletters, social media, and in person when appropriate.

**3.TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS: Description of Tasks/Activities and Outputs: 3.a. Project Implementation; 3.b. Anticipated Project Schedule; 3.c. Task/Activity Lead; 3.d. Outputs:**

The project is organized into four tasks. There will be no subawards or Participant Support Costs.

<p><b>Task 1: Project Management, Reporting and Other Eligible Programmatic Activities</b></p> <p><b>3.a. Implementation:</b> SEAGO will manage all aspects of the project, including coordination w/ the EPA, 3 non-lead Coalition members, TA communities, procurement (pursuant to 2 CFR 200) of a QEP, and other key stakeholders. Reporting will include: 1) Quarterly Reports (QRs); 2) Assessment, Cleanup and Redevelopment Exchange System (ACRES) updates; 3) Annual Federal Financial Reports (FFRs); and 4) a Project Closeout Report to document accomplishments, expenditures, outputs, outcomes, and success stories. The budget includes funding for up to 8 attendees, 2 from SEAGO and 6 from the Coalition members and/or representatives from TAs to attend up to 2 brownfield conferences. Participant support costs were not included for community liaisons because all TA communities have project partners willing to volunteer their time to support the grant (see Section 2.e/f).</p> <p><b>3.b. Schedule:</b> Management/Reporting will be ongoing throughout the 4-yr grant implementation period. Attendance at a State or Regional Workshop and/or the National Brownfield Conference is anticipated in 2027 and 2029.</p>
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<p><b>3.c. Leads:</b> SEAGO w/ assistance from TA communities and QEP.</p> <p><b>3.d. Outputs:</b> Agendas/minutes from meetings w/ TA communities; 16 QRs; 4 FFR Reports; ACRES updates (ongoing); 1 Final Report; 2 brownfield conferences attended by SEAGO and Coalition members and/or representatives from TAs.</p>
<p><b>Task 2: Community Outreach</b></p> <p><b>3.a. Implementation:</b> This task includes: (1) Conducting at least 11 stakeholder meetings (including formation of a BAC); (2) Preparing and publishing public notices, fact sheets, and meeting materials; (2) Developing/updating a brownfields grant webpage on SEAGO’s website and the website of every TA community; and (3) Infusing meaningful public input and conducting outreach and engagement to inform TA communities about the grant during implementation (see Section 2.b).</p> <p><b>3.b. Schedule:</b> Fact sheets and project webpages will be developed during the first quarter (1Q 2027) of the project. A BAC kickoff meeting will be held during the second quarter (2Q 2027) and convened semi-annually thereafter; other meetings will occur as needed. One to two community open house or informational meetings, events or presentations will also be held each year of the grant.</p> <p><b>3.c. Leads:</b> SEAGO and QEP.</p> <p><b>3.d. Outputs:</b> Fact sheets; press releases/articles; webpage content (updated regularly); ~10 public and BAC meetings including preparation of presentations, agendas, minutes, etc.</p>
<p><b>Task 3: Site Selection, Phase I/II ESAs and RBM Surveys</b></p> <p><b>3.a. Implementation:</b> This task will include completion of site ED requests for priority sites to verify eligibility for using petroleum (ADEQ) and/or hazardous substance funding (EPA). This task also includes engaging 3 TA communities and preparing a brownfield inventory for each. The inventories will be updated throughout the project, and data made available in Geographic Information System (GIS) format such as a web map. Inventory data will be integrated w/existing databases to serve as a long-term planning tool to support revitalization efforts beyond the grant period. Three existing inventories completed under the FY2023 assessment grant will also be updated. The anticipated scope for the inventory updates is detailed below in the cost estimate table. This task will also include environmental assessment of priority brownfield sites. At least 2 priority brownfield sites will be assessed in each Coalition member’s geographic area w/ an emphasis on the TA communities they contain.</p> <p><b>3.b. Schedule:</b> The new and updated inventories will be completed during the first 3 to 6 months (2Q 2027) of the grant and presented to the BAC for prioritization during 3Q 2027. Inventory updates and site selection will continue over the 4-yr period. The assessments will start during the first 6 to 9 months (3Q 2027) of the project and will be performed throughout the grant.</p> <p><b>3.c. Leads:</b> QEP with oversight by SEAGO.</p> <p><b>3.d. Outputs:</b> Prioritization and Site Selection Tech Memos from BAC meetings and Brownfields Site ED Requests for submittal to EPA. Brownfield Inventory Data Package, GIS files, tables, and figures. Quality Assurance Project Plan (QAPP), access agreements (AAs), Sampling and Analysis Plans (SAPs)/Health and Safety Plans (HASPs), and Phase I/II ESA/RBM Survey Reports. Completion of Phase I ESAs at 30 priority brownfield sites in accordance w/ the All Appropriate Inquiries Final Rule and the standards in the ASTM E1527-21 Phase I ESA Process, and completion of Phase II ESAs at 12 high priority brownfield sites and RBM Surveys at 14 high priority brownfield sites.</p>
<p><b>Task 4: Site-Specific Cleanup/Reuse Planning and AWP</b></p> <p><b>3.a. Implementation:</b> This task includes cleanup planning activities to help property owners and TA communities prepare brownfield sites for reuse and redevelopment. It covers preparing Analysis of Brownfield Cleanup Alternatives (ABCAs) and/or SRPs that outline site-specific cleanup options and potential costs. The AWP will identify potential future uses and strategies to leverage existing infrastructure or determine needed infrastructure investments for alternative uses.</p> <p><b>3.b. Schedule:</b> Yr 1: 1 ABCA/SRP   Yr 2: 2 ABCAs/SRP + 1 AWP   Yr 3: 3 ABCAs/SRPs + 2 AWP   Yr 4: 2 ABCAs/SRP + 1 AWP</p> <p><b>3.c. Leads:</b> QEP in collaboration w/ TA Communities and SEAGO.</p> <p><b>3.d. Outputs:</b> The QEP will prepare up to 8 ABCAs and/or SRPs. These will include conceptual site models; remedial action objectives; state and federal cleanup regulatory requirements; and/or evaluation of institutional and engineering controls. The QEP will also develop 4 AWP for brownfield impacted areas when these studies have been requested by TA communities.</p>

**3.e. Cost Estimates:** The table below outlines estimated costs by task and budget category. QEP work is costed at \$180/hour based on industry norms and past procurements. SEAGO staff time is \$50/hour, including \$31.25 personnel and \$18.75 fringe.

<p><b>Task 1 – CA Management, Reporting and Eligible Programmatic Activities: Total Budget = \$75,680</b></p> <p><b>Personnel + Fringe of \$20,000</b> (400 hrs @ \$50/hr) for SEAGO for management and reporting. <b>Travel Costs of \$12,780</b> for 3 attendees from SEAGO and/or the Coalition members and/or representatives from TAs to attend 2 national or state/regional brownfield conferences. The budget assumes 3-day attendance and includes airfare (\$780/person/conference = \$4,680 total) and hotel, meal, and incidental costs (\$450/person/day/conference = \$8,100 total) plus an <b>Other cost of \$1,500</b> for conference registration fees. <b>Contractual of \$41,400</b> (230 hrs @</p>
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<p>\$180/hr) for QEP to assist w/ reporting and eligible project management activities. <b>Outputs:</b> Project Schedule w/ Milestones; ACRES Updates; QRs; annual FFR, and one Project Closeout Report.</p>
<p><b>Task 2 – Community Outreach: Total Budget = \$67,540</b></p> <p><b>Personnel + Fringe of \$15,000</b> (300 hrs @ \$50/hr) for SEAGO. The budget includes <b>\$2,140 in supplies</b> (food for public meetings, foam core boards for display of maps and site-specific information, copies of handouts, rental of a projector and screen, etc.). <b>Contractual of \$50,400</b> (280 hrs @ \$180/hr) for QEP to assist w/ community outreach meetings, informational materials, and other community outreach/public involvement activities. <b>Outputs:</b> Updated webpages, Fact Sheets, other meeting materials and Site ED requests. <b>Brownfield Inventory Data; GIS files; tables; and figures.</b></p>
<p><b>Task 3 – Site Selection, Phase I/II ESAs, and RBM Surveys: Total Budget = \$910,380</b></p> <p><b>Contractual of \$910,380</b> for QEP to (1) prepare Site ED requests for submittal to EPA/ADEQ, <b>\$14,400</b> (40 @ \$360/each); (2) <b>\$32,400</b> for a QEP to develop brownfield inventories for 3 TA communities (60 hrs/inventory @ \$180/hr). This work includes review of public records; compilation of data from EPA, ADEQ, and county assessors; desktop review; windshield surveys; and production of tables and maps. <b>\$13,500</b> to update the 3 inventories completed under the FY 2023 grant (25 hrs/update @ \$180/hr). The inventory updates will follow the same general scope as the original inventories but at a lighter level, relying on desktop review only and excluding windshield surveys; (3) Phase I ESAs (including AAs and HASPs) for up to 30 high priority brownfield sites at an average cost of \$5,500/site, <b>\$165,000</b> total; (4) prepare a QAPP at a cost of <b>\$6,000</b>; (5) complete Phase II ESAs at up to 12 high priority brownfield sites including HASPs and SAPs at an average cost of \$40,070/site, <b>\$480,840</b> total (includes 134 hrs @ \$180/hr, \$6,450 for lab services, and \$9,500 for drilling, utility locate, and investigation derived waste disposal; and (6) RBM Surveys for asbestos and lead based paint for up to 14 high priority sites at an average cost of \$14,160/site, <b>\$198,240</b> total (including 72 hrs/site @ \$180/hr, \$1,200 for lab services. <b>Outputs:</b> Site ED requests; Brownfield Inventory Data, GIS files, tables, and figures; QAPP; AAs, SAPs/HASPs, and Phase I/II ESA/RBM Survey Reports.</p>
<p><b>Task 4 – Cleanup/SRPs and AWP: Total Budget = \$446,400</b></p> <p><b>Contractual of \$446,400</b> for QEP to complete up to 8 ABCAs/SRPs at an average cost of \$12,600/site, <b>\$100,800</b> total (70 hrs/site @ \$180/hr) and completion of AWP for 4 priority focus areas at an average cost of \$86,400 each, <b>\$345,600</b> total (480 hrs/plan @ \$180/hr). <b>Outputs:</b> ABCAs and/or Site Reuse Plans and AWP for brownfield impacted areas.</p>

A summary of the proposed budget for grant-funded activities is provided in the following table. Grant funds are not requested for administrative costs, equipment, and construction, therefore these categories are not included. Approximately 60% (\$910,380) of the total funds are allocated to site assessments and 30% (\$446,400) are allocated for cleanup planning.

Budget Categories		1: PM and Other Eligible Activities	2: Community Outreach	3: Site Selection/ Phase I and II ESAs/ RBM Surveys	4: Cleanup/ SRPs and AWP	Total
Direct Costs	Personnel	\$12,500	\$9,375	\$0	\$0	\$21,875
	Fringe	\$7,500	\$5,625	\$0	\$0	\$13,125
	Travel	\$12,780	\$0	\$0	\$0	\$12,780
	Supplies	\$0	\$2,140	\$0	\$0	\$2,140
	Contractual	\$41,400	\$50,400	\$910,380	\$446,400	\$1,448,580
	Other <sup>(a)</sup>	\$1,500	\$0	\$0	\$0	\$1,500
<b>Total Budget</b>		<b>\$75,680</b>	<b>\$67,540</b>	<b>\$910,380</b>	<b>\$446,400</b>	<b>\$1,500,000</b>

PM = Project Management; <sup>(a)</sup>6 brownfield conference registrations x \$250/registration = \$1,500

**3.f. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure completion of all activities within the grant period, a schedule with milestones will be developed as part of the CA Work Plan. The status and estimated completion dates for outputs identified in Section 3.d, along with anticipated short- and long-term outcomes, will be tracked on the schedule and reported to EPA via QRs, ACRES, and the Project Close-Out Report. QRs will list goals accomplished and activities planned for the next quarter. Any significant deviations from the schedule will be discussed with the EPA Project Officer to develop corrective actions. **Outputs:** Between meetings and QRs, outputs will be tracked on an Excel spreadsheet. These include the number of potential brownfield sites identified and prioritized, the number of Phase I and Phase II ESAs, the number of RBM Surveys, the number of Site Reuse Plans, and the number of community meetings and success stories. Sites assessed with grant funds will be mapped to corresponding parcel data, ensuring accurate attribution of funded activities and enabling efficient tracking and analysis of project outcomes through each county’s GIS platform. This process will also allow accurate tracking of the number of parcels and acreage associated with each assessment. **Outcomes:** Short- and long-term outcomes will also be monitored. These include the number of sites cleaned up, the

number of property title transfers facilitated, the number of sites and acres of land redeveloped, the number of acres of parks or greenspace created, the amount of private investment and other leveraged funding, the number of jobs created or retained, and increases in property value and tax revenue. Individual TAs will be asked to set goals for outputs and outcomes applicable to their communities and to measure and report them to SEAGO quarterly to assess progress.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE: Programmatic Capability:**

**4.a. Organizational Capacity; 4.b. Organizational Structure; 4.c. Description of Key Staff:** SEAGO has a long history of successfully managing federal and state grants for infrastructure and community development. Over the past 15 years, SEAGO has administered more than **60 million dollars** in grants with no substantive compliance findings, demonstrating a strong organizational structure and the capacity to meet programmatic, administrative, and financial requirements. As Coalition lead, SEAGO will prepare all required financial and performance reports, monitor grant and contract activities, and manage evaluation, audit, and closeout tasks. With support from a Qualified Environmental Professional, SEAGO has the capability and capacity to complete all grant activities within the four-year performance period in full compliance with the EPA Cooperative Agreement (CA).

Following award, the Coalition will enter into a **Memorandum of Agreement (MOA)** with Cochise, Graham, and Santa Cruz counties to define roles and establish priorities for site assessments. SEAGO's governance framework includes monthly check-ins with all Coalition members to maintain engagement, set objectives, and guide effective use of grant funds. The Brownfield Advisory Committee, composed of Coalition members and project partners, will assist in site prioritization and stakeholder outreach. This structure, consistent with 2 CFR 200.317 through 200.326, allows project activities to begin promptly once the MOA and CA are executed.

A 3-person SEAGO management team will direct all project activities to meet key milestones. **Christopher Vertrees, Executive Director, will oversee grant administration** and brings more than 30 years of public sector management experience, including administration of infrastructure, planning, and an FY 2023 EPA brownfield grant. **William D Osborne, AICP, Community Development Program Manager, will serve as Project Manager** and is a certified planner with nearly 20 years of experience in public engagement, long range planning, development permitting, historic preservation, zoning reform, and downtown revitalization. **Dina Curtiss, Finance Manager, will provide accounting and financial management services** and has 25 years of experience as a staff accountant specializing in funding and governmental accounting and experience executing drawdowns in ASAP.gov. SEAGO maintains a proactive succession plan to prevent delays, ensure compliance, and support reassignment of qualified staff if needed.

**4.d. Acquiring Additional Resources:** SEAGO will conduct an open, fair, and competitive procurement in full conformance with **2 CFR 200.317–326**, using a publicly advertised Request for Qualifications (RFQ) to select a QEP to assist in grant implementation. Early procurement of a QEP will allow project activities promptly upon execution of the CA with EPA, ensuring timely progress toward project goals. In addition to SEAGO's in-house capacity, which includes community outreach, economic development, planning, GIS, and support staff, the project will also benefit from staff resources provided by Coalition member organizations. This collaborative approach ensures access to a broad range of expertise and additional support as needed.

**Past Performance and Accomplishments: 4.e. Currently Has or Previously Received an EPA Brownfields Grant:**

**4.e.(1) Accomplishments:** In 2023, EPA awarded SEAGO a \$500,000 Community-Wide Assessment grant covering Graham, Greenlee, and Santa Cruz counties and targeting Clifton, Nogales, Patagonia, and Safford. Grant funds supported environmental assessments, reuse planning, and community engagement to address brownfields that hinder economic and community health. SEAGO completed 10 Phase I ESAs, 2 Phase II ESAs, and 8 RBM surveys across multiple sites, including Phase I/II ESAs and an RBM survey at the Safford Airport to inform cleanup planning for the former terminal, and a Phase I ESA and RBM survey at the historic Clifton railroad depot, enabling safe remediation and continued community use. SEAGO also prepared a reuse plan for the historic Arizona Copper Company Headquarters in Clifton, proposing adaptive reuse as Town Hall, and launched an Area-Wide Plan for Safford's Entertainment District to support downtown revitalization. Three inventories were completed, including one in Nogales identifying 41 priority redevelopment sites in the commercial downtown area.

**4.e.(2) Compliance with Grant Requirements:** SEAGO has complied with the workplan, schedule, and terms and conditions of its FY23 EPA Brownfields CWA grant. Quarterly and annual reports, updates, and ACRES entries have been submitted on time and consistently document project progress. SEAGO maintains regular communication with the R9 EPA Project Officer through frequent check-ins and milestone updates to ensure alignment with the workplan and EPA expectations. As of October 1, 2025, SEAGO has expended 76% of grant funds, demonstrating strong progress toward expected outputs and outcomes. The remaining \$106,954.66 is allocated to completing the Safford Entertainment District AWP and at least two Phase I ESAs and one RBM Survey in Nogales by Q3 2026. Project closeout is anticipated by Q1 2027.

# **THRESHOLD CRITERIA RESPONSES**



**(1) Eligibility of Lead and Non-Lead Coalition Members**

**a. Lead Coalition Member – The Southeastern Arizona Governments Organization (SEAGO)**

SEAGO is a regional planning agency which performs and coordinates a variety of functions. Established in 1972, SEAGO is a 501(c)(3), nonprofit organization serving the four counties of Cochise, Graham, Greenlee, and Santa Cruz. SEAGO’s Articles of Incorporation, Bylaws, Executive Orders and Designation Letters are provided in **Attachment A**.

**Three Non-Lead Coalition Members** – Cochise County, Graham County, and Santa Cruz County, Arizona are each eligible as **General Purpose Units of Local Government**.

**b.** Neither SEAGO nor any of its three coalition members are exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

**(2) Target Areas** – The target areas of SEAGO and each of its coalition members are identified in the application narrative and the Application Information Sheet. The Target Areas do not overlap.

**(3) Non-Lead Members that Never Received an EPA MARC Grant** – Two of the three non-lead coalition members, Graham County and Santa Cruz County, have never received an EPA MARC grant.

**(4) Legal Authority to Expend Grant Funds on Behalf of Non-Lead Coalition Members**

- a.** SEAGO attests that it has legal authority to expend grant funds on behalf of the non-lead members to conduct the proposed grant activities.
- b.** SEAGO’s geographic boundary encompasses the geographic boundaries of all non-lead coalition members.

**(5) Coalition Agreement**

Signed letters to SEAGO in which each non-lead coalition member agrees to be part of the project coalition are provided in **Attachment B**.

**(6) Community Involvement**

SEAGO will implement an effective and equitable program of community outreach that will both inform and involve the community and other stakeholders in the planning and implementation of brownfield assessment activities. Project progress and outreach strategies will be tailored for each Target Area community to ensure access to project information:

- Outreach will use multiple channels, including website and social media updates, public notice boards, direct mailings, fact sheets, newspaper articles, and public meetings with radio or TV coverage. Printed materials will be distributed to residents without internet access. Widely read newspapers in each TA will be used for announcements and updates.

- SEAGO will establish a Brownfields Advisory Committee (BAC) to assist in prioritizing properties for assessment. The BAC will include representatives from each Target Area community and will meet at least twice annually. SEAGO anticipates up to five outreach events in Year 1, followed by two events per year thereafter.
- A dedicated project webpage will be launched within three months of project initiation to provide fact sheets, schedules, meeting notices, minutes, and other resources that keep community members and stakeholders informed throughout the project's duration.
- SEAGO will provide Spanish language materials for the Hispanic community and materials in the appropriate Native American language before and during public meetings. Translation services will be used as needed to ensure equal access for non-English speaking groups. All meetings will be ADA compliant, and all literature will state that alternative formats are available upon request.

To ensure input is effectively solicited, considered, and incorporated, SEAGO will request feedback through comment cards, online forms, email submissions, and virtual forums; document and review all input during BAC meetings to inform site selection and prioritization; and respond by posting summaries and responses on the project webpage, and sharing updates through newsletters, social media, and in person when appropriate.

**(7) Expenditure of Existing Grant Funds**

Lead coalition member SEAGO has an open FY23 Coalition Assessment grant that was drawn down by 76.4% as of September 11, 2025 (\$381,927.33 of \$500,000 had been disbursed). The Automated Standard Application for Payments (ASAP) draw down record through October 22, 2025, is provided in **Appendix C**.

Non-lead coalition member Cochise County has two open assessment grants:

- 4B98T43601 (FY22) was drawn down by 96.7% as of October 1, 2025 (\$483,390.73 of \$500,000 disbursed).
- BF99T91301 (FY19) was drawn down by 99.5% as of October 1, 2025 (\$597,208.77 of \$600,000 disbursed).

The ASAP account balances through October 1, 2025, are provided in **Appendix D**.

**(8) Contractors and Named Subrecipients**

Contractors. This criterion is not applicable. SEAGO has not selected a contractor who will be compensated with EPA funds made available with this grant.

Subrecipients. This criterion is not applicable. SEAGO has not identified and does not anticipate using a subrecipient for a subaward who will be compensated with EPA funds made available with this grant.