Park City Municipal Corporation
FY25 Brownfield Cleanup Grant
Narrative Information Sheet

1. Applicant Identification
   Park City Municipal Corporation
   445 Marsac Avenue
   Park City, UT 84060

2. Website URL
   https://parkcity.org/

3. Funding Requested
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested: $2,000,000

4. Location
   a) Park City b) Summit County c) Utah

5. Property Information
   Bonanza Park 5-acre Site: Nominally located at 1665 Bonanza Drive, the property is comprised of nine parcels with addresses of 1635, 1665, 1685, and 1705 Bonanza Drive; 1401, 1409, and 1415 Kearns Boulevard; and 1420 and1490 Munchkin Road, Park City, Utah.

6. Contacts
   a. Project Director
      Ryan Blair, Property and Environmental Services Manager
      445 Marsac Avenue
      Park City, UT 84060
      385-290-7703
      ryan.blair@parkcity.org

   b. Chief Executive/Highest Ranking Elected Official
      Matthew J. Dias, City Manager
      445 Marsac Avenue
      Park City, UT 84060
      435-615-5000
      matt.dias@parkcity.org

7. Population
   Park City, UT: 8,560 (US Census: 2018–2022 American Community Survey)

8. Other Factors

Other Factors	**Page #**
Community population is 15,000 or less.	1, 4, 5, 5
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.	2
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	6
The target area(s) is impacted by a coal-fired power plant has recently closed (2014 or later) or is closing.	N/A

9. Releasing Copies of Applications

Not Applicable.

Park City Municipal Corporation
FY25 Brownfield Cleanup Grant
Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: Park City Municipal Corporation (PCMC) is applying for an EPA Cleanup grant to remediate the Bonanza Park 5-Acre Site (Bonanza Park or "site") in Park City, Utah. Park City, the geographic boundary for this application, is a small community with a population of approximately 8,500[1] in the Wasatch Back region of northern Utah, 30 miles east of Salt Lake City.

Park City's origin began in the 1860s with the discovery of silver, gold, and lead in the mountains surrounding the town. Mining settlements soon followed as crowds of prospectors set up camps across the surrounding mountains, which were soon followed by large industrial mining operations. Park City's mines fueled a booming economy where more than 300 mines with over 1,000 miles of underground mine tunnels once operated and waves of immigrants from around the world came to work. These former mining operations have left a legacy of environmental contamination that impacts almost every acre of developable land within City limits, including the Bonanza Park site. This legacy contamination adds considerable cost and complexity to redevelopment projects, which leads private developers to prioritize high-margin projects (e.g., exclusive luxury housing and lodging) to the exclusion of affordable workforce housing and community spaces.

Park City's mining economy flourished through the Great Depression, but the post-World War II prosperity enjoyed by much of the United States did not materialize in Park City. Steep drops in lead and zinc prices in the late 1940s led to mass layoffs and the closure of many of Park City's most iconic mines. In 1951, Park City was featured in the book *Ghost Towns of the West*. Mining operations did not officially cease in Park city until 1982, but the industry never recovered. After growing for decades, Park City's population fell from 4,281 in 1930 to 1,366 in 1960. Amidst the prolonged mining bust, in the late 1950s United Park City Mines Company (a consolidation of Park City's many earlier mining companies) sought to monetize its vast holdings of undevelopable mountainous land surrounding the town. They procured a low interest loan from the Federal government to construct a ski resort, and on December 21, 1963, Treasure Mountains (now Park City Mountain Resort) opened. This was the first step in Park City's complete reinvention as an outdoor recreation destination. Today, Park City's legacy mining contamination compounds the challenges it faces from its rapid recreational growth and popularity as a tourist destination. Demand for vacation homes has created a severe shortage of affordable housing that prevents the local workforce from being members of the community they serve; the volume of visitors can overwhelm popular areas, creating a need for new vibrant shared spaces; and almost any project that seeks to alleviate these problems faces substantial environmental remediation costs.

The Target Area for this grant is Park City's Bonanza Park neighborhood, which is approximately 200 acres in size and generally bounded by Park Avenue to the west, Deer Valley Drive to the south, Bonanza Drive and Prospector Avenue to the east, and the Park City Cemetery toward Snow Creek Drive to the north.[2] The Target Area is located within Census Tract 9643.08 and Census Tract 9644.02. This grant will provide PCMC with the financial and personnel resources required to enable the cleanup the Bonanza Park site. Its remediation and redevelopment will address the community's need for affordable workforce housing, locally owned businesses, space for artists and public art installations, and shared community gathering and green spaces.

ii. Description of the Proposed Brownfield Site(s): The proposed cleanup site is the Bonanza Park site, a 5.43-acre site located at 1665 Bonanza Drive and comprised of nine parcels with addresses of 1635, 1665, 1685, and 1705 Bonanza Drive; 1401, 1409, and 1415 Kearns Boulevard; and 1420 and1490 Munchkin Road in Park City. The two main roads that bound the Bonanza Park neighborhood, Park Avenue and Kearns Boulevard, funnel vehicular traffic into and out of the city from nearby State Route 189 and Interstate 80, respectively. As such, many tourists, residents, and commuters who use these corridors move through Bonanza Park when heading toward Old Town and Park City's ski resorts and the target area is an underutilized gateway to Park City. **The Bonanza Park site offers walkable, bikeable, and transit-accessible connections to all of Park**

[1] https://data.census.gov/profile/Park_City_city,_Utah?g=160XX00US4958070
[2] https://parkcity.org/home/showpublisheddocument/76215/638581077052570000

City's major gathering places and attractions via free local bus service and multi-use pathways (MUPs) such as the Poison Creek Trail and Park City Rail Trail, both located less than 100 yards from the site.

Historical mining activities occurred on and in the immediate vicinity of the site starting in the 19th century and continuing into the mid-20th century. Mine waste and mine infrastructure are clearly visible on and adjacent to the site in historical aerial photographs. The Prospector Square Tailings Impoundment site, located just a few hundred feet to the east, was proposed for listing on the National Priorities List[3] which directly led to the creation of Park City's "Soil Cover Ordinance"[4] to protect residents from the heavy metals contamination ubiquitous in the community. Several active mining related CERCLA sites are present in the Park City area, but the Bonanza Park site is outside any Operable Unit boundaries and is not subject to any CERCLA enforcement action. After removal of the mine infrastructure in the 1960s, development of the site commenced circa 1976 with the development of one building (present day 1401 Kearns Boulevard) on the western and southern portions of the site. Three additional buildings were constructed by 1978 (present-day 1420 and 1490 Munchkin Road). Between 1993 and 1997, four additional buildings were constructed on the eastern and northern portions of the site (1635, 1665, 1685, 1705 Bonanza Drive). The site remained in the same general configuration until PCMC's acquisition of the site in 2018. Automobile service businesses operated at the 1490 Munchkin Road parcel from 1982 until approximately 1994. The 1635 Bonanza Drive parcel operated as a gas station from as early as 1985 until 2018. The former gas station USTs were removed by the gas station operator in 2018 under a state-approved closure plan. The 1705 Bonanza Drive parcel operated as a car wash from the mid-1990s to 2014. Other historical uses of the site include a medical clinic, a grocery store, a restaurant, and office space. Except for the former gas station building, all structures at the site have been demolished and the site is currently vacant.

A Phase I Environmental Site Assessment (ESA) was prepared for the site in 2017 as part of PCMC's pre-purchase due diligence, and multiple subsurface soil and groundwater investigations have been conducted, including a Limited Site Investigation (LSI) in 2017 and a Brownfields ASTM E1903-compliant Phase II ESA in 2024 which defined the overall vertical and lateral extents of contamination. These investigations estimated that **over 28,000 cubic yards of contaminated fill is present at the site, with concentrations of arsenic as high as 585 mg/kg, lead as high as 15,700 mg/kg, and mercury as high as 286 mg/kg**, far exceeding EPA Regional Screening Levels (RSLs) of 0.68 mg/kg, 200 mg/kg, and 11 mg/kg, respectively. At one location in the vicinity of the former automobile service businesses, groundwater has been impacted by trichloroethene and chloroform above EPA Residential Vapor Intrusion Screening Levels (VISLs) but below EPA maximum contaminant levels (MCLs). Historical petroleum releases have occurred at the former gas station parcel (1635 Bonanza Drive), but sampling data from the 2024 Phase II ESA indicates that petroleum hydrocarbons are not currently present in soil and groundwater at concentrations that exceed regulatory screening levels.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: PCMC's goal is to revitalize and activate the blighted Bonanza Park site by building on the area's rich history and its meaningful place in the community. As the largest undeveloped property within the target area, cleanup and redevelopment of the Bonanza Park site will be a catalyst and cornerstone for revitalization of the target area. The reuse strategy will be driven by the Bonanza Park Small Area Plan,[2] which is the result of a years-long planning effort and will guide public and private investment in the target area for the next 10 years. The Bonanza Park Small Area Plan's vision statement **reimagines the Bonanza Park neighborhood as a more walkable, connected, livable, and inclusive mixed-use community** for "Parkites" of all ages, incomes, and backgrounds.

The planning process involved extensive public input including three community meetings, two online surveys, 12 stakeholder roundtables, a project website with interactive features,[5] and additional in-

[3]https://www.deseret.com/2006/7/30/19966138/epa-drops-area-of-park-city-from-superfund-cleanup-list/
[4]https://www.parkcity.org/departments/building-department/building-plan-review/soil-ordinance
[5]https://www.bonanzapark.com/

person engagement such as walking tours, coffee and pastries events, and meetings with students. The process was advised by a 14-member Advisory Group of local stakeholders including community leaders, business owners, and residents, that met four times through this process at key milestones to provide feedback to the planning team. To ensure that the community engagement process reached underserved populations, the project team committed to engaging with Parkites from all backgrounds, with a focus on reaching groups traditionally underrepresented in the public planning process.[2] Following each phase of engagement, the planning team reviewed engagement results to identify portions of the community that were not being adequately represented in the process up to that point in time. To engage with Park City's Spanish-speaking population, the planning team hosted a coffee and pastry event at the Park City Library; the project website included a dedicated Spanish-language page and a full translation of the entire site; and all online surveys, meeting flyers, and social media graphics made available in Spanish. To better understand the needs and hopes of Park City's younger residents, the planning team hosted two engagement sessions with students from Park City High School. Park City planning staff also hosted two roundtable discussions with Park City's young families to understand their needs and wants for the future of Bonanza Park.

The Bonanza Park Small Area Plan's vision statement is supported by six specific project goals and 19 recommendations. The project goals aim to create a mixed-use neighborhood with livability in mind; will support locally owned business and entrepreneurship; will be a safe haven for pedestrians, cyclists, and transit riders; will expand the availability of affordable and workforce housing units; will add green community gathering spaces and new sustainable development; and will weave arts and culture into the community fabric. PCMC recently closed a two-month-long solicitation period for redevelopment proposals. The Request for Proposals[6] (RFP) included very specific requirements to ensure that any redevelopment plan for the site aligns with the Bonanza Park Small Area Plan project goals. A new Bonanza Park Mixed Use Zoning District (BPMX) will replace the current outdated commercial and auto-driven zoning to encourage a mix of uses and provide a path toward increasing building heights to 45-feet through the addition of a density bonus.

Housing will incorporate a range of unit prices and affordability levels, **including deeply affordable units, possibly as low as 50% area median income (AMI)**. Market-rate units will be limited to no more than 20% of all units. Retail spaces will include a quality mix of local maker/art spaces and market-rate retail. Local retail spaces will be available at reduced rents in favor of public benefit and chain businesses will be limited. Below-ground public parking is strongly preferred, with minimal ground-level parking allotments for narrowly tailored retail needs. With the Kimball Art Center as an anchor, Bonanza Park will be a hub for Park City's art scene that will encourage new public art and placemaking elements throughout the neighborhood.

Community space is vital to achievement of the project's vision statement, and **a minimum of 35,000 square feet will be provided to support the site's vibrancy**. This space will be distributed between a combination of larger and smaller spaces for different uses, such as multiple small parks and a large central gathering space for locally-focused events and concerts. Public transportation access, pedestrian and bicycle pathways, and accessibility and integration will be prioritized. The site is partially located within a reduced-risk federally designated flood plain (FEMA Zone X), separated from nearby Silver Creek by a former railroad bed and a public thoroughfare. Redevelopment will incorporate green stormwater features including rain gardens, green roofs, pervious areas, and runoff capture to further enhance flood resilience.

Because the Bonanza Park site is vacant, no historic structures will be impacted by the proposed redevelopment, Park City is home to more than 400 historic sites, including two National Register Historic Districts. PCMC has taken great measures to protect and preserve historic resources and the historic character of the Park City community.

ii. Outcomes and Benefits of Reuse Strategy: Park City has capitalized on its natural beauty, abundant snowfall, mild summers, proximity to Salt Lake City, and connection to the Wasatch–Cache National Forest

[6]https://www.parkcity.org/Home/Components/News/News/45885/234

to transform a hardscrabble mining town into a world-class recreation destination. With a population of just 8,500, Park City is visited by 600,000 tourists per year.[7] Unfortunately, a booming tourism economy is not an unconditional good. Today, **70% of homes in Park City are either vacant or second homes**, less than 20% of homes are owner occupied, and second homes and recreational use account for 96% of vacant units.[8] The cost of living in Summit County is nearly 35% higher than the national average and **the median sales price of a single-family home in Park City is over $2 million**.[8] The lack of affordable workforce housing drives the local labor shortage, increases the cost of local services, and reduces air quality due to the lengthy commutes of much of Park City's workforce.[8] As noted in Section 1.b.i, the reuse strategy is to incorporate a range of housing unit prices and affordability levels, **including deeply affordable units as low as 50% AMI**, locally focused commercial spaces available at reduced rents, and **large amounts of community space and natural areas** (minimum of 35,000 square feet). Park City will benefit from greater availability of affordable homes. The new retail spaces, maker/art spaces, and public art installations throughout the neighborhood will support greater economic development, especially for new, locally owned businesses and artists, and improve community wellbeing. This will spur further investment and contribute to the financial health of Park City by generating additional tax revenue as well as increased revenue for local businesses. These affordable centrally located homes near jobs, commercial areas, transit, and MUPs will help reduce commutes and vehicle miles traveled. No residents or businesses will be displaced by this project.

Green development is a core goal of the Bonanza Park Small Area Plan.[2] PCMC's RFP[6] requires developers to consider building energy efficiency and environmentally focused construction standards, which will reduce home ownership costs and help reduce fossil fuel consumption. Park City has a goal to be a net-zero community by 2030, running on 100% renewable energy. **The Bonanza Park site is expected to incorporate green technologies and renewable energy resources like solar, wind and geothermal to reduce greenhouse gas emissions.** Redevelopment will incorporate green stormwater features including rain gardens, green roofs, pervious areas, and runoff capture to enhance flood resilience. Green infrastructure such as green roofs, parks, bike paths, and public transit, all of which are proposed for inclusion in redevelopment of the Bonanza Park site, can reduce air pollution and promote a healthier environment.

Salt Lake City was recently selected to host the 2034 Winter Olympic Games and Park City will host multiple events. A redeveloped Bonanza Park site could provide multiple benefits during these events. Fewer commuting workers will help alleviate transportation pressures; additional retail spaces will reduce congestion in existing commercial areas and drive business to locally owned businesses and artists; and the large amounts of community space could be used for various events and public gatherings.

To facilitate this redevelopment and ensure the economic viability of the project, PCMC has chosen to shoulder the environmental cleanup. PCMC has previously attempted to find alternative ways to reduce the cost of environmental cleanups in Park City, namely through the attempted creation of a dedicated repository for contaminated soil excavated from construction projects within Park City. The proposed repository was promoted as a safer and cheaper way to dispose of contaminated soil and would have saved public and private entities an estimated $17 million over a 10-year period, primarily through reduced transportation costs. However, the project was met with fierce public opposition and the plan was abandoned in 2021.[9] Therefore, this grant is needed fill a critical funding gap to clean up the site and return it to productive use.

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: The previous subsurface investigations conducted at the site sufficiently characterized the extent and degree of contamination to develop a draft Analysis of Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach and the site is ready to proceed directly into the cleanup phase. Seventy soil samples and ten groundwater samples were collected throughout the site at depth of up to 40 feet. PCMC funded the Phase I ESA, LSI, and ABCA.

[7]https://www.visitparkcity.com/meetings/blog/post/the-history-of-park-city/
[8]https://townlift.com/wp-content/uploads/2023/07/Revised-Park-City-Needs-Assessment-2021.pdf
[9]https://www.kpcw.org/local-news/2021-08-20/its-done-park-city-abandons-gordo-soils-project

ii. Resources Needed for Site Remediation: EPA grant funding requested in this application is expected to be sufficient to allow PCMC to complete the remediation. However, as with any contaminated site, unforeseen conditions may increase the cost to the remediation. In the event costs exceed this budget, PCMC will evaluate covering the costs and may consider a Brownfields RLF loan. PCMC will spearhead the cleanup process and hire a qualified environmental professional to manage remediation efforts. EPA funding will allow PCMC to complete remediation and proceed to the reuse phase of development.

iii. Resources Needed for Site Reuse: PCMC invested substantial resources into the purchase of the property and preparation of the nearly 100-page planning document.[2] In order to procure the property, PCMC enacted a 1% Municipal Transient Room Tax (TRT) and issued debt against that sales tax revenue. TRT revenue cannot be used to fund the proposed cleanup. Moving forward, PCMC is seeking a development partner to form a public-private partnership. Tax credits, including LIHTC, and other affordable housing financial tools will be pursued. In addition, PCMC anticipates the development partner will pursue traditional financing.

iv. Use of Existing Infrastructure: The Bonanza Park site has existing infrastructure in place such as water, sewer, power, telecom, and internet. PCMC believes that the existing infrastructure will meet the demands for the planned redevelopment, but in the event infrastructure improvements are needed, the cost of these improvements is expected to be nominal relative to the overall construction cost and will not create a significant impediment to redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: The contamination present at the Bonanza Park site is a significant impediment to redevelopment. The cost of the cleanup will substantially impact the economic feasibility of the proposed redevelopment and **threaten the ability to offer the desired quantity of affordable housing units and retail spaces at below-market rates** that will provide workspaces for local artists and art institutions. PCMC is requesting EPA Brownfields cleanup funds because Park City is a small community of only 8,500 people that services an annual tourist population nearly 100 times larger. Funding revitalization projects requires proportionally large tax hikes on residents. The AMI for a family of four is $134,700, but this number is misleading because workforce wages are much lower. Park City's **average earnings per job are $4,000 lower than the state of Utah's, which itself is $10,000 less than the national average**.[10] Further, **Park City is the only city in Utah where workers (11,000) outnumber the population (8,500)**.[8] Due to the scarcity of affordable workforce housing, **over 8,000 workers commute daily from homes outside of Summit County to jobs in Park City**.[8] Park City has only 650 affordable housing units out of a total housing inventory of 10,440 units, and the occupancy rate for affordable units is 99%.[2] **The current affordable housing inventory accommodates only 6% of Park City's workforce**.[8] Reducing the number of workers that must commute from outside of Park City will significantly impact personal and public safety. Park City averages almost 30 feet of snowfall annually[11] which substantially impacts its commuter workforce. **In 2023, 3,915 crashes occurred on Utah roadways from January 1 to April 3 during adverse snow conditions**.[12] Many of Park City's workers commute on Interstate 80 through Parleys Canyon which experiences some the most severe weather and contains steep grades, tight curves, and high volumes of semi-truck traffic. Shorter commutes directly reduce fossil fuel consumption, improve air quality, and reduce traffic accidents.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: While the Climate and Economic Justice Screening Tool (CEJST) does not identify the target area (including portions of Census Tracts 9643.08 and 9644.02) as disadvantaged, as noted in Section 2.a.i, CEJST statistics do not accurately reflect local housing unaffordability for Park City workers who primarily commute and **make $10,000 less than the national average**.[10] Within the target area boundary **44.3% of the population identifies as having**

[10]https://parkcitycf.org/housingaction/
[11]https://www.abc4.com/news/snowiest-cities-in-utah/
[12]https://www.sltrib.com/news/2023/04/06/snow-related-crashes-utah-doubled/

Hispanic/Latino origin,[2] significantly higher than the surrounding census tracts (3.3% to 27.9%) and the general Park City population (15.3%).[2] EPA's EJScreen ranks census tract 9643.08 in the 83rd percentile nationally and **94th percentile in Utah for population over age 64**. The project's reuse strategy will help meet the need for additional affordable housing especially near social services, businesses, and community amenities. It will provide for public open space and access to MUPs. **Housing units as low as 50% of AMI** will allow workers to spend less of their income on housing, which releases resources to meet other needs, including healthy food, childcare, healthcare and insurance, education, and social activities that foster community ties. Housing located adjacent to a town center brings people closer to jobs, services, and other amenities and reduces transportation expenses and stress for workers. Longer commutes are associated with lower job satisfaction and poorer mental and physical health outcomes.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: EPA's EJScreen ranks census tract 9643.08 in the 71st percentile nationally and **88th percentile in Utah for cancer risk**.[13] The target area ranks in the **86th percentile nationally**[13] for air pollution from ozone. Vehicle emissions are the primary source of ozone pollution in the target area, which is exacerbated by a commuter-driven workforce. **The target area ranks above the 90th percentile for Superfund Proximity**.[13] The site's main contaminants of concern, which are the same as those found at nearby Superfund sites, are arsenic, lead, and mercury which are known or possible carcinogens and lung irritants per the US Agency for Toxic Substances and Disease Registry. Using a Cleanup Grant to remediate the heavy metals at the site will render exposure pathways to these carcinogenic toxins incomplete and will effectively remove the threat of exposure. As noted in Section 2.a.i, **Park City's severe winter weather exposes commuting workers to a far greater risk of traffic accidents** and transportation-related hazards than a typical worker. Allowing more workers to reside within Park City will ease these transportation-related health risks and economic burdens.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: While CEJST does not identify the target area (including portions of Census Tracts 9643.08 and 9644.02) as disadvantaged, CEJST statistics do not accurately reflect local housing unaffordability for Park City workers who primarily commute and **have an average wage $10,000 less than the national average**. The target area meets other climate change burden criteria above the 90th percentile threshold including expected population loss rate (**99th percentile**), projected wildfire risk (**94th percentile**), and wastewater discharge (**98th percentile**). The reuse strategy is expected to prioritize fire wise design and construction practices, including fire-resistant materials, minimal flammable vegetation, and tree spacing. This will reduce fire risk for future site residents and current adjacent residents.

(b) Advancing Environmental Justice: This project advances environmental justice by cleaning up a century-old legacy pollution site; building centrally located, affordable housing and local retail space; providing public open space and community facilities; and weaving arts and culture into the community fabric to enliven public spaces. Affordable housing will reduce the displacement of workers and residents due to secondary homeownership and allow workers to live in the community they serve. Building in town reduces the need for housing developments in surrounding open space that have a higher risk of wildfires. Because the Bonanza Park site is vacant, there is no displacement of residents or businesses.

Community Engagement i. Project Involvement & ii. Project Roles: PCMC formed the **Bonanza Park 5 Acre Site Advisory Group** in 2023 to help guide PCMC's decision making at the site. The group will support and augment the community engagement process, provide feedback to the Small Area Plan project management team, and serve as a partner in the implementation of the completed plan. The group is comprised of local stakeholders including business owners and community advocacy groups. Members include:

Name	Title/Organization	Contact	Specific project involvement
Jennifer Wesselhoff	Director Park City Chamber of Commerce	jennifer@visitparkcity.com 928-300-8229	Business liaison

[13]EPA EJ Screen Report (Version 2.3)

Jessica Norie	President Art Space Utah	jessica@artspaceutah.org 810-897-0538	Artist community liaison
Matthew Nagie	Teacher Park City School District	nagie@protonmail.com 435-640-9564	Student involvement
Kathy Olson	Director of Development Woodbury Corporation	kathylynnolson@yahoo.com 312-213-6463	Assistance with redevelopment strategies
Seth Beal	Board Member Park City Library	gsethbeal@gmail.com 425-988-4144	Community input and outreach
Tony Tyler	Partner Columbus Pacific Development	tony@cdpre.com 435-640-0558	Assistance with redevelopment strategies and private investment
Aldy Milliken	Executive Director Kimball Arts Center	Aldy.milliken@kimballartcenter.org	Artist community liaison
Sheri Green	Chief Product and Technology Officer Sundance Institute	Sheri_green@sundance.org	Nonprofit organization dedicated to the development of independent artists

iii. Incorporating Community Input: PCMC informed the public of their intent to pursue an EPA Brownfields Cleanup Grant in Park City's local newspaper, the Park Record, on October 23, 2024, and October 26, 2024. A Community Involvement Plan (CIP) will be created within three months of the grant award to describe the project's planned community engagement activities, schedule, background, and key players. The CIP will be available for review online on PCMC's website and social media page(s) and in hard copy at City Hall. PCMC will hold public meetings at least once a year within the target area throughout the grant period. These meetings will build on the successful engagement practices developed during the Bonanza Park Small Area Plan process; will explain the cleanup project; and will give project status updates throughout the cleanup process to inform and engage members of the public. Input from the target area workers and residents will be sought and recorded in meeting minutes and will be responded to in writing within two weeks of receipt. PCMC will use multiple forms of media to provide alternatives to in-person community engagement and ensure that the underserved community and project partners are included in outreach efforts. Project updates and other project-related documents will be provided on PCMC's website. Target area workers, residents, and property owners 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. Project partners will be encouraged to disseminate information to those without internet access and will be asked to help with outreach assistance by publicizing project progress, events, and accomplishments. PCMC will provide verbal translation at meetings and written translations in meeting notes, fliers, and outreach for non-English-speaking members of the community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: A draft ABCA was developed for the site that evaluated four alternatives including a no-action alternative. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup alternative consists of partial excavation and removal of metals-contaminated fill soil. The site has been enrolled in the Utah Department of Environmental Quality's (UDEQ) Voluntary Cleanup Program (VCP) for regulatory oversight purposes. Agency oversight costs will be paid from Brownfields Cleanup Grant funds. Contaminated fill removal will be based on screening against EPA RSLs and site-specific background threshold values (BTVs), which in the Park City area are typically higher than RSLs for some metals. The primary remedy is to remove impacted soils that exceed BTVs and manage residual impacts exceeding RSLs in accordance with a Remedial Action Plan (RAP) approved under the VCP. The RAP will be the master document for cleanup and subject to a public comment period prior to implementation.

b. Description of Tasks/Activities and Outputs

Task 1: Outreach	
i.	*Project Implementation:* The PCMC Brownfield Project Director will develop a Community Involvement Plan (CIP), outreach materials, a brownfield project website, and social media posts with the assistance of the qualified environmental professional (QEP). PCMC staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, postage, and software to manage the grant.
ii.	*Anticipated Project Schedule:* The CIP will be created within three months of award. Community Meetings held 1st quarter of each year throughout the grant project. Website and Outreach Materials will be created in the 1st quarter and updated monthly thereafter throughout the grant project. Additional community meetings may be held as-needed.
iii.	*Task/Activity Lead:* PCMC: Ryan Blair, Brownfield Project Director.
iv.	*Outputs:* CIP, Brownfield Website, minimum 4 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Programmatic Support	
i.	*Project Implementation:* PCMC will procure a QEP to assist with project oversight and oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The QEP will assist PCMC in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The PCMC staff travel budget allows for two staff to attend two national/regional/grantee brownfield training conferences/workshops.
ii.	*Anticipated Project Schedule:* QEP procurement and ACRES Reporting begins in the 1st quarter. Quarterly Reporting begins in the 2nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in 5th, 9th, 13th quarters, and during final closeout.
iii.	*Task/Activity Lead:* PCMC: Hans Jasperson, Brownfield Financial Manager
iv.	*Outputs:* ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two PCMC staff to attend two conferences.
Task 3: Cleanup/Reuse Planning	
i.	*Project Implementation:* The PCMC Brownfields Project Director will manage the QEP as they finalize the ABCA, prepare a Remedial Action Plan (RAP), and prepare a QAPP and Health and Safety Plan.
ii.	*Anticipated Project Schedule:* Initiated on award and funding of the grant 10/2025; QAPP and final ABCA preparation 03/2026; QAPP approval 06/2026. RAP preparation 06/2026; RAP approval 09/2026.
iii.	*Task/Activity Lead:* The QEP will handle the technical aspects of the project with management from PCMC: Ryan Blair, Brownfield Project Director.
iv.	*Outputs:* 1 ABCA, 1 RAP, 1 Site Specific-QAPP, 1 Health and Safety Plan (HASP).
Task 4: Cleanup Oversight	
i.	*Project Implementation:* The PCMC Brownfields Project Director will manage the QEP as they prepare the cleanup planning documents, perform site cleanup activities including contractor mobilization, waste characterization, fill removal, and cleanup reporting.
ii.	*Anticipated Project Schedule:* Begin in the 3rd quarter and continue throughout the grant project.
iii.	*Task/Activity Lead:* The QEP will handle the technical and physical aspects of the project with management from PCMC: Ryan Blair, Brownfield Project Director.
iv.	*Outputs:* Weekly status reports during cleanup, budget meetings, quarterly reports, compliance with terms and conditions, 1 cleanup report.

Task 5: Cleanup	
i.	*Project Implementation:* The QEP will perform the proposed site cleanup activities including removal of fill material, confirmation soil sampling, contractor oversight, and cleanup oversight and reporting under the direction of the PCMC Brownfields Project Director.
ii.	*Anticipated Project Schedule:* Field mobilization by 03/2027; soil removal complete by 12/2027; final remedial action report by 6/2028; EPA closeout report by 12/2028
iii.	*Task/Activity Lead:* The QEP will handle the technical and physical aspects of the project with management from PCMC: Ryan Blair, Brownfield Project Director
iv.	*Outputs:* 1 site ready for reuse, 4 remediation jobs created (annualized), 1 cleanup report, 1 site management plan, 1 environmental covenant

c. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks*. The budget for this project includes travel, supplies, construction, and contractual costs only. Personnel and fringe costs will be paid as in-kind services by PCMC. All work will be conducted in adherence to Davis Bacon guidelines. **Task 1 Outreach:** Contractual: Community Involvement Plan $4,200 (28 hrs x $150); Brownfield Website, Outreach Brochure/Cleanup Site Signage, Social Media Posts $3,600 (24 hrs x $150); 4 Community Meetings $6,000 (40 hrs x $150; $1,500/meeting). Supplies: Outreach Supplies (printed brochures) $1,000 (1,000 x $1.00). **Task 2 Programmatic Support:** Travel: Two staff to attend two conferences $9,000 (flights at $750, 3 nights in hotel at $350 each, 3 days' incidentals and per diem at $150/day for 2 attendees x 2 conferences). Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period $30,000 (200 hrs x $150). **Task 3 Planning:** Contractual: Finalize Draft ABCA, Prepare Site Specific QAPP, HASP, RAP, and permitting $22,500 (150 hrs x $150). **Task 4 Cleanup Oversight:** Contractual: Utah VCP Regulatory Oversight $40,000 (320 hrs x $125); QEP cleanup oversight $143,700 (meetings with the regulatory agency; public notification of proposed cleanup; QEP field oversight during remediation, QEP confirmation soil sample collection; cleanup completion report; and Environmental Covenant and Site Management Plan; [958 hrs x $150]); laboratory soil confirmation sample analysis $15,000 (100 at $150/sample). **Task 5 Cleanup:** Contractual: cleanup oversight. Construction: Fill Removal $1,725,000: Contractor mobilization, soil excavation, transport, and disposal of fill soil (23,000 tons at $75/ton);

Category	**Tasks**					**Totals**
	Outreach	***Programmatic Support***	***Planning***	***Cleanup Oversight***	***Cleanup***	
Travel		$9,000				$9,000
Supplies	$1,000					$1,000
Contractual	$13,800	$30,000	$22,500	$198,700		$265,000
Construction					$1,725,000	$1,725,000
Total Budget	**$14,800**	**$39,000**	**$22,500**	**$198,700**	**$1,725,000**	**$2,000,000**

d. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this Brownfields Grant is implemented on schedule, PCMC's Internal Brownfields Team, which will include the QEP, will meet biweekly to track all **outputs identified in 3.b.** using an Excel spreadsheet. PCMC will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP, ABCA, and RAP development; contractor procurement; weekly (during field work); quarterly, annual, and closeout reports; and the number of community meetings. Outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently,

countermeasures are in place to address the problem, which include making monthly calls to the EPA Project Officer and, if needed, creating a Corrective Action Plan to get back on schedule. Outputs and outcomes will be aligned with EPA's 2022-2026 Strategic Plan.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure & ii. Description of Key Staff:

PCMC has a large, qualified workforce of more than 180 individuals, including dedicated Environmental Regulatory Affairs and Environmental Sustainability departments. PCMC can successfully manage and implement all phases of the work required to remediate and revitalize the Bonanza Park site. The **Brownfield Project Director** for this grant will be Ryan Blair, who will be responsible for timely expenditure of funds. Mr. Blair is PCMC's Property and Environmental Services Manager and has led all environmental compliance for PCMC since 2022. Mr. Blair has a Master's Degree in Public Health and has over 8 years of environmental regulatory experience. Michelle Downard will serve as the **Brownfield Development Project Manager** and will be responsible for management of day-to-day activities including coordination of grant cleanup activities with all involved PCMC departments, project partners, subconsultants, and the community. Ms. Downard is managing PCMC's Redevelopment of the Bonanza 5-Acre Site project. Hans Jasperson, PCMC's Budget and Grants Analyst, will act as the **Brownfield Financial Manager and Grant Administrator** and 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.

iii. Acquiring Additional Resources: PCMC will procure a QEP and subcontractors to assist with technical, physical, and reporting aspects of the Brownfield Cleanup. Job opportunities for remediation and redevelopment services will be posted in the community, and preference will be granted to local contractors providing services in the community, employment of residents, and Minority and Women-owned Business Enterprise (MBE/WBE). QEP procurement will comply with PCMC's competitive contracting and procurement process; EPA requirements for "Professional Service" including 2 CFR §§ 200 and 1500; 2 CFR § 200.322; 40 CFR Part 33, and Build America, Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA).

b. Past Performance and Accomplishments ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose and Accomplishments: From 2017 to 2023, PCMC received $23.7 million in federal grant funding from the Department of Transportation (DOT). These grants included Low-No Emissions Vehicles grants for the purchase of electric buses and bus charging infrastructure, Bus & Bus Facilities grants for bus stop improvements, and a 5304 Planning grant for transit planning. These DOT grants have similar administrative requirements to EPA Brownfields grants. These grants allowed PCMC to purchase seven zero-emission battery-electric buses and two battery-electric bus chargers. PCMC was also able to improve more than 72 bus stops, particularly in areas with historically disadvantaged communities. The improved bus stops provide upgraded and fully ADA-compliant pickup sites, feature solar-powered route and scheduling information that provide real time updates to riders, and provide a safer, more appealing interface for transit users.

(2) Compliance with Grant Requirements: For the above listed grants, the grant schedules, terms, and conditions were followed to ensure timely completion of projects. During the project periods, no corrective actions were required. PCMC staff complied with expenditure stipulations and required reporting was completed in a timely manner. PCMC has a demonstrated history of compliance with grant schedules, adherence to terms and agreements, and timely and efficient reporting to all federal, state, and local agencies.

Park City Municipal Corporation
FY25 Brownfield Cleanup Grant
Threshold Criteria
Draft ABCA

Analysis of Brownfield Cleanup Alternatives (ABCA)

Bonanza Park Property
1665 Bonanza Drive
Park City, Utah

August 15, 2024 | Terracon Project No. 61247147

Prepared for:
Park City Municipal Corporation
Park City, Utah

6952 South High Tech Dr. Ste. B
Midvale, Utah 84047
P (801) 545-8500
Terracon.com

August 15, 2024

Park City Municipal Corporation
PO Box 1480
445 Marsac Avenue
Park City, UT 84060

Attn: Mr. Ryan Blair
P: (385) 290-7703
E: ryan.blair@parkcity.org

Re: Analysis of Brownfields Cleanup Alternatives (ABCA)
Bonanza Park Property
1665 Bonanza Drive
Park City, Summit County, Utah
Terracon Project No. 61247147

Dear Mr. Blair:

Terracon Consultants, Inc. (Terracon) presents to Park City Municipal Corporation this Analysis of Brownfield Cleanup Alternatives (ABCA) as part of cleanup design for the above-referenced Site. This cleanup design activity was performed following assessment of the site under a Brownfields Assessment Grant (EPA Cooperative Agreement #95815230).

In the event a Brownfields Cleanup Grant is sought to assist with cleanup of the site, funding guidance requires the applicant to provide the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allow the community an opportunity to comment on the draft proposal. In addition, the EPA Brownfields Cleanup funding proposal must include, as an attachment, a draft ABCA that summarizes information about the Site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup.

The ABCA must include information on the effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered, including the one chosen. The ABCA is intended as a brief preliminary document summarizing the larger and more detailed technical and financial evaluations performed in addressing each of these areas. The ABCA may be modified technically and financially or in more depth relative to each of these areas upon award of funding and in response to community interaction.

Cleanup alternatives were evaluated in accordance with EPA protocols and general guidance required prior to implementation of a cleanup design using EPA Brownfields Grant funding.

More specifically, this ABCA summarizes viable cleanup alternatives based on Site-specific conditions, technical feasibility, and preliminary cost/benefit analyses. Specific cleanup alternatives and associated recommendations are presented in the applicable sections of this report.

Terracon appreciates this opportunity to continue to provide environmental consulting services for Park City Municipal Corporation in support of Brownfields redevelopment. Should you have any questions or require additional information, please do not hesitate to contact our office at (801) 545-8500.

Sincerely,
Terracon Consultants, Inc.

Andy King
Senior Project Manager

Amy Austin
Authorized Project Reviewer

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Appendices

APPENDIX A Exhibits

APPENDIX B Tables

1.0 Introduction and Background

Terracon Consultants, Inc. (Terracon) has prepared this Analysis of Brownfield Cleanup Alternatives (ABCA) on behalf of Park City Municipal Corporation (PCMC) for the Bonanza Park property. The site includes 5.43 acres on nine parcels located at 1665 Bonanza Drive in Park City, Utah (Exhibits 1 and 2, Appendix A). The site is currently vacant. Several environmental investigations were previously conducted on the site, including assessment under an EPA Brownfields Assessment Grant following EPA approval by a Site Eligibility Determination Outline (EPA Region 8, August 17, 2023).

This ABCA has been prepared in the event PCMC would like the option to pursue Brownfields funding to support redevelopment of the Site.

1.1 Previous Investigations

Multiple environmental investigations were previously conducted at the site. These investigations included a Phase I Environmental Site Assessment (ESA) and Limited Site Investigation (LSI) conducted at the site by Terracon in September 2017 (Terracon 2017a and 2017b, respectively), and an underground storage tank (UST) closure (Maverik 2020). Exhibit 2 displays previous investigation sample locations. These investigations identified the presence of metals-impacted fill soils, localized petroleum impacts to groundwater, and the potential for historical releases from a former automotive service and repair facility. Based on the historical review, the site appeared to be vacant until approximately 1967. One building was developed on present-day 1401 Kearns Blvd by 1976. Three additional buildings were developed on present-day 1420 and 1490 Munchkin Road from 1978–1983. Four additional buildings were developed on the eastern and northern portion of the site from 1993–2009. Silver King Coffee was present in the northern parking area by 2011. All buildings on the site except for the former Maverik building were demolished between September 2020 and August 2021.

Under an EPA Brownfields Community-Wide Assessment Grant (awarded to the Utah Department of Environmental Quality/Division of Environmental Response & Remediation, EPA Cooperative Agreement #95815230), Terracon conducted a Phase II ESA in 2024 (Terracon, 2024) to further assess soil and groundwater impacts at the site. With the cumulative data sets from the Phase II ESA and prior investigations, the nature and overall extent of impacts to soil and groundwater were defined.

1.2 Summary of Identified Impacts

Previous investigations identified the presence of fill materials throughout the site, with observed thicknesses ranging from less than 1 foot to approximately 8.5 feet below ground surface (bgs). The site's underlying native soils generally consist of gravelly sands and silts

with localized zones of clays and gravels at depth. The depth to groundwater, where encountered, was observed to range from approximately 33 to 35 feet bgs. Groundwater flow direction was estimated to be toward the northwest (Exhibit 3, Appendix A), based on relative groundwater elevations measured from temporary piezometers that were installed during the Phase II ESA.

1.2.1 Soil Impacts

Metals - Several metals including arsenic, cadmium, lead, and mercury have been identified at concentrations exceeding EPA Industrial and/or Residential Regional Screening Levels (RSLs) in the fill materials. The maximum concentrations of these metals were identified in fill material collected from a depth of 4 feet bgs at one boring (B-9). The mercury exceedances were identified in fill samples from two boring locations (B-1 and B-9, both in the northeastern portion of the site) while the arsenic, cadmium, and lead exceedances were widely distributed across the site.

Analytical results from native soils underlying the fill material indicate that native soils have not been impacted by metals leaching from overlying contaminated fill materials. With limited exceptions, metals concentrations in native soils were below Residential RSLs. Native soils exceeded the Industrial RSL for lead at boring B-1, and slightly exceeded the Residential RSL for cadmium at borings B-1, B-3, B-5, and B-9. It is possible that the native soil samples from these borings were impacted by sluffing of overlying contaminated fill material. All samples from native soils exceeded the Industrial RSL for arsenic, but the concentrations present are indicative of natural background concentrations.

Metals exceedances in soil are presented in Exhibit 4, and the approximate depth of metals-contaminated fill soils throughout the site is presented in Exhibit 5 (Appendix A). Per the data presented in Exhibit 5, the volume of metals-contaminated fill soils is estimated to be approximately 28,178 cubic yards.

Petroleum Hydrocarbons - No petroleum hydrocarbons were detected in soils at concentrations above regulatory screening levels. There were detections of petroleum hydrocarbons in each of the samples that were analyzed for petroleum hydrocarbons, but all were at concentrations below regulatory screening levels.

Volatile Organic Compounds (VOCs) - No VOCs were detected in soils at concentrations above laboratory reporting limits.

1.2.2 Groundwater Impacts

Groundwater impacts with concentrations of petroleum hydrocarbons (diesel range and gasoline range) above screening levels were previously identified at the former gasoline filling station during Terracon's 2017 Limited Site Investigation (Terracon, 2017b), but the 2024 Phase II ESA did not identify similar petroleum impacts above screening levels. At the

former automobile service and repair shop location, two VOCs (chloroform and trichloroethene) were identified in groundwater at concentrations well below drinking water standards but moderately above Residential Vapor Intrusion Screening Levels (VISLs). Soil gas sampling would be required to confirm whether or not vapor intrusion is a potential issue at the site. Previous groundwater sampling for arsenic and lead (sample locations TER-10 and TER-11, Exhibit 2) did not identify elevated concentrations of these metals.

1.3 Project Goal

The site was previously investigated under an EPA community-wide assessment grant to inventory, characterize, assess, and conduct cleanup planning along with public outreach activities for eligible Brownfield sites located within the State of Utah.

This ABCA has been prepared to support redevelopment of the site by prospective developers by providing preliminary cleanup planning information. It is Terracon's understanding that PCMC wishes to remediate the site to allow for redevelopment.

2.0 Applicable Regulations and Cleanup Standards

2.1 Cleanup Oversight Responsibility

If PCMC requires regulatory oversight and documentation by a regulatory agency of completion of a remedial action, the two most appropriate regulatory programs to oversee remediation of the Site are the Utah Department of Environmental Quality (DEQ), Division of Environmental Response and Remediation (DERR), Voluntary Cleanup Program (VCP) or the Utah DEQ, Division of Waste Management and Radiation Control (DWMRC), Environmental Cleanup Program (ECP). A successful VCP cleanup results in the issuance of a Certificate of Completion, which provides a limited release of liability to qualified applicants as specified in the statute. The liability release is transferable to subsequent property owners. A successful DWMRC ECP cleanup results in a No Further Action designation. Either program may be appropriate if regulatory oversight is required, but the VCP will likely be required if Brownfield funds are used.

The goal of both regulatory programs is to promote the investigation and cleanup of contaminated sites under a cooperative, regulatory-friendly framework. The purpose of the programs is to encourage the investigation and cleanup of sites where there has been a suspected or confirmed contaminant release threatening public health and the environment.

This proposal assumes all work plans, including sampling and analysis plans and quality assurance project plans, and reports related to environmental investigations and

remediation activities conducted at the site will be submitted to the VCP as required for the use of Brownfields funds.

2.2 Cleanup Standards

Terracon understands that the property will be redeveloped for residential and/or commercial uses. With these anticipated exposure scenarios, Terracon anticipates the following screening levels will be used as the Cleanup Standards for the Site.

- Soil: EPA's most recent RSLs for residential and commercial soil with a target cancer risk of $1x10^{-6}$ and a hazard quotient of 1. For petroleum products (if encountered), Utah DEQ's Initial Screening Levels (ISLs) in accordance with the DERR - LUST program. These cleanup standards will be used as screening levels and applied in a manner that is consistent with existing controls in the Park City area (e.g., applicable City ordinances requiring physical barriers and cover materials over metals-impacted soils).

- Groundwater: Groundwater remediation is not anticipated, as groundwater beneath the site is not used as a drinking water source and there is no indication of impacts at concentrations at or above drinking water standards.

  VOCs were detected in groundwater at concentrations below drinking water standards but above VISLs at one location (boring B-5). In this area, sampling and analysis of soil gas will be conducted to allow comparison of soil gas concentrations with residential and commercial VISLs. If VISLs are exceeded in soil gas, design of redevelopment features will incorporate appropriate engineering controls to ensure that indoor air quality standards are met for buildings in areas with potential for vapor intrusion.

2.3 Laws & Regulations Applicable to Cleanup Activities

Laws and regulations that are applicable to cleanup activities include:

- Occupational Safety and Health Act, Hazardous Waste Operations and Emergency Response Standard (40CFR1910.120) and applicable Safety and Health Regulations for Construction (29CFR1926).

- National Emissions Standards for Hazardous Air Pollutants (NESHAP) (40CFR61—Subpart M: National Emission Standard for Asbestos).

- Department of Transportation, Hazardous Materials Regulations (49CFR Subtitle B, Chapter 1, Subchapter C).

- Resource Conservation and Recovery Act (42 U.S.C. § 6901, et. seq.).
- National Historic Preservation Act of 1966, Section 106.
- Utah Code Ann. 19-6-401 et. seq. (Underground Storage Tank Act and rules promulgated there under [Utah Admin Code, R311]) and the Corrective Action Cleanup Standards Policy Per UST and CERCLA Acts, Utah Admin. Code, R311-211.
- Utah Code Ann. 19-6-101 et. seq. (Solid and Hazardous Waste Act and rules promulgated there under [Utah Admin Code, R315]).
- Utah Code Ann. 19-5-101 et. seq. (Water Quality Act and rules promulgated there under [Utah Admin Code, R317]).
- Utah Code Ann. 19-2-101 et. seq. (Air Conservation Act and rules promulgated there under [Utah Admin Code, R307]).
- Utah Code Ann. 57-25-101 et. seq. (Uniform Environmental Covenants Act).
- Park City, Summit County, and State of Utah building codes and construction requirements.
- Park City Municipal Code Section 11-15-1 (Park City Landscaping and Maintenance of Soil Cover [“The Soil Ordinance”].
- Utah Code Ann. Title 19, Chapter 6, Part 3 et seq. (Hazardous Substances Mitigation Act).
- Utah Code Ann. Title 19, Chapter 8 et seq. (Voluntary Cleanup Program).
- Federal Small Business Liability Relief and Brownfields Revitalization Act, if Brownfields or other Federal funding is used.
- Federal Davis-Bacon Act if Brownfields or other Federal funding is used.

In addition, all appropriate permits and notifications (e.g., Blue Stakes of Utah Utility Notification Center, soil disposal acceptance notification, soil transport/disposal manifests, etc.) will be obtained as appropriate for the type of cleanup activities implemented.

2.4 Climate Change Considerations

Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, establishes an integrated strategy for sustainability within the Federal Government. Under the Executive Order, each agency is required to evaluate their climate change risks and vulnerabilities to manage the effects of climate change on the agency's

mission and operations in both the short and long-term as part of the formal Strategic Sustainability Performance Planning process.

Effective with Fiscal Year 2013, EPA's Brownfields Program initiated a change to cooperative agreements for Cleanup and Revolving Loan Fund awards. It requires cooperative agreement recipients to evaluate the resilience of remedial options funded by the award in light of reasonably foreseeable changing climate conditions. As directed under EPA's Climate Change Adaptation Plan, the ABCA must include a discussion of observed and forecasted climate change conditions for the area of the project and the associated site-specific risk factors. Specifically, this is to be presented as part of the ABCA. As the possibility exists that Cleanup grant funds or Revolving Loan Fund grand funds may be utilized for cleanup actions at the Site, climate change has been considered in this ABCA.

2.4.1 General Considerations

In considering remedy resiliency Terracon consulted the following resources as authoritative sources:

- Climate Resources on Data.gov
- U.S. Global Change Research Program (USGCRP)
- EPA Climate Change on EPA.gov

2.4.2 Site-Specific Considerations

The Site and Utah are located in EPA's climate designation of Southwest (Reference 2016 in Section 4.0). The Southwest is the hottest and driest region in the nation (Reference 2014a in Section 4.0). Extending from the Pacific Ocean east to the Rocky Mountains and south to the Mexican border, this region is home to about 56 million people, about 90% of whom live in cities, including Albuquerque, Phoenix, Las Vegas, Salt Lake City, Denver, San Diego, Los Angeles, Sacramento, and San Francisco. The population of the Southwest is expected to increase by nearly 70% by mid-century (Reference 2014a in Section 4.0). The Southwest encompasses a wide range in elevations, spanning valleys that are below sea level to mountain ranges that contain some of the highest peaks in the contiguous United States. The region's southern portion includes deserts, like the Mojave. In contrast, northern California, the Rocky Mountains, and the Sierra Nevada mountain range tend to get more precipitation and snow. The Central Valley in California is one of the most productive agricultural regions in the country.

Climate change is affecting the Southwest. Temperatures have increased by almost 2°F in the last century, with the 2001-2010 decade being the warmest since records began 110 years ago (Reference 2014a in Section 4.0). The length of the frost-free season has increased by 19 days in recent decades (Reference 2014b in Section 4.0). Average annual

temperatures are projected to rise an additional 3.5°F to 9.5°F by the end of this century, with the greatest temperature increases expected in the summer and fall (Reference 2014a in Section 4.0). Drought conditions are already common in the Southwest and drought periods are expected to become more frequent, intense, and longer. Drought will affect important water sources, including the Colorado River Basin (Reference 2014a in Section 4.0). Combined with expected population growth, climate change will exacerbate existing stresses.

Higher temperatures lead to greater evaporation and surface water losses, more heat stress, and increased energy demand for cooling. Over the last 50 years, there has been less precipitation falling as snow late in the winter and snow melt has occurred earlier (Reference 2014a in Section 4.0). Maximum streamflow has also occurred earlier in the year and total yearly streamflow has decreased in the last decade. Increasing temperatures will also increase evaporation, causing river-flow reductions and dwindling reservoirs.

These considerations did not identify property-specific risks in considering resiliency of remedy at this property as part of feasibility and implementability.

3.0 Remedial Alternatives Evaluation

A discussion of the cleanup objectives and an evaluation of remedial alternatives for the Site are provided below.

3.1 Cleanup Objectives

- Elevated concentrations of arsenic, cadmium, lead, and mercury have been identified at concentrations exceeding Industrial and/or Residential RSLs in the fill materials. A remedial goal would be to manage, reduce, or eliminate exposure potential to these metals in materials.
- At one portion of the site, two VOCs (chloroform and trichloroethene) have been detected in groundwater at concentrations above residential VISLs. A remedial goal would be to assess whether a potential vapor intrusion condition actually exists and if so, manage, reduce, or eliminate exposure potential to the VOCs in soil gas.

The primary conditions driving a need for cleanup are metals impacts in fill materials.

3.2 Cleanup Alternatives Considered

Each of the following cleanup alternatives is compared with respect to: effectiveness, long-term reliability, implementability, and general cost implications, within Table 1 (Appendix

B). More detailed comparison of potential costs to implement is provided in Table 2 (Appendix B).

3.2.1 Alternative 1: No Action

The No Action alternative is included as a baseline comparison to other remedial alternatives and assumes no action is taken.

3.2.2 Alternative 2: Complete Soil Removal

Alternative 2 includes complete removal and disposal of all contaminated fill materials with metals concentrations above residential RSLs, which would involve the following:

- obtaining appropriate access and work permits to conduct excavation and loading activities
- excavation and removal of all the contaminated fill materials down to the native soil surface
- waste profile and confirmation soil sampling as needed during and at the end of the removal and disposal process to document removal of the impacted soils
- proper disposal of the impacted fill materials as non-hazardous soil

For the purpose of this ABCA, it is assumed that the contaminated fill materials are Bevill-exempt and can be disposed of as a non-hazardous waste. Disposal of soil as a hazardous waste is not included in this evaluation as Terracon cannot estimate a potential quantity of soils that may be characterized as hazardous waste. Hazardous waste profiling was not included in the Phase II ESA. As the site is currently vacant and undeveloped with an unknown future use, backfilling and compaction of the excavated areas is not included. A cleanup completion report will be prepared to document the cleanup activities, the final condition of the site, and that the Project Goal and Cleanup Standards were met.

This alternative would involve removal of an estimated volume of approximately 28,178 cubic yards of metals-contaminated fill soils. This alternative is an effective but costly way to remediate the site. Site redevelopment can proceed immediately after completion of the remedial event.

As part of this alternative, the potential for vapor intrusion would be assessed in the area of the former automobile service and repair shop by sampling and analysis of soil gas and comparison of results to VISLs. If VISLs are exceeded in soil gas, design of redevelopment features will incorporate appropriate engineering controls to ensure that indoor air quality standards are met for buildings in areas with potential for vapor intrusion.

3.2.3 Alternative 3: Partial Excavation and Removal of Impacted Soils

Alternative 3 includes partial removal of the contaminated fill materials based on screening against residential RSLs and against site-specific background threshold values (BTVs), which for some metals are typically higher than RSLs in the Park City area. This approach may require development of site-specific BTVs. Under this approach, contaminated fill materials with metals concentrations above screening levels and also above BTVs would be removed for offsite disposal as Bevill-exempt non-hazardous waste. Contaminated fill materials with metals concentrations above screening levels but below BTVs would remain at the site, with risk managed through engineering and institutional controls (e.g., via the existing Park City Soils Ordinance – Park City Municipal Code Section 11-15 and/or an Environmental Covenant and Site Management Plan as required by the VCP). This approach is currently in use on a nearby remediation project with oversight by the Utah DEQ/DWMRC. For the purposes of this ABCA, it is assumed that comparable site-specific BTVs that were determined for the nearby remediation project would be adopted for the Bonanza Park property remediation. Partial removal of impacted soils and would involve the following:

- evaluation of whether the VCP will accept adoption of BTVs developed for a nearby site or whether site-specific BTVs will be required to established
- obtaining appropriate access and work permits to conduct excavation and loading activities
- excavation and removal of contaminated fill materials down to the native soil surface in the areas surrounding each of 10 sampling locations from the Phase II ESA where metals concentrations in fill materials exceeded RSLs and site-specific BTVs (sampling locations B-1, B-7, B-9, B-10, B-11, B-13, B-14, B-15, B-16, and B-17)
- at the above locations, assume removal of contaminated fill materials from areas ranging from approximately 5,625 square feet (75’ by 75’) to 10,000 square feet (100 feet by 100 feet), with use of field XRF instrumentation to guide the extent of excavation
- waste profile and confirmation soil sampling as needed during and at the end of the removal and disposal process to document removal of the impacted soils
- proper disposal of the impacted fill materials as non-hazardous soil

For the purpose of this ABCA, it is assumed that the contaminated fill materials are Bevill-exempt and can be disposed of as a non-hazardous waste. Disposal of soil as a hazardous waste is not included in this evaluation as Terracon cannot estimate a potential quantity of soils that may be characterized as hazardous waste. Hazardous waste profiling was not included in the Phase II ESA. As the site is currently vacant and undeveloped with an

unknown future use, backfilling and compaction of the excavated areas is not included. A cleanup completion report will be prepared to document the cleanup activities, the final condition of the site, and that the Project Goal and Cleanup Standards were met.

This alternative would involve removal of an estimated volume range of approximately 12,395 to 21,670 cubic yards of metals-contaminated fill soils. Exposure to metals-contaminated fill soils remaining on site (above RSLs but below BTVs) would be controlled by engineering and institutional controls. Under the VCP, an Environmental Covenant would be required to be recorded on the property deed with development of a Site Management Plan to detail proper maintenance and inspection to ensure preventative exposure measures remain in place.

As part of this alternative, the potential for vapor intrusion would be assessed in the area of the former automobile service and repair shop by sampling and analysis of soil gas and comparison of results to VISLs. If VISLs are exceeded in soil gas, design of redevelopment features will incorporate appropriate engineering controls to ensure that indoor air quality standards are met for buildings in areas with potential for vapor intrusion.

3.2.4 Alternative 4: Soil Cover following Park City Soils Ordinance

Alternative 4 assumes sitewide placement of a minimum 6” soil cover and reliance on the existing Park City Soils Ordinance. This approach does not address exposure to impacted soils during development of the site and would not be considered a remedial option under the VCP as it does not address exposure risk. Under this approach, the existing contaminated fill materials would remain at the site, with risk managed through institutional controls via the Park City Soils Ordinance – Park City Municipal Code Section 11-15. This alternative would involve the following:

- obtaining appropriate access and work permits to import approved clean topsoil or other approved materials
- sitewide placement and compaction of clean topsoil or other approved materials

For the purpose of cost comparisons for this ABCA, this alternative assumes that topsoil or other approved clean cover material is placed over the entire 5.43-acre site. This simplistic assumption does not account for the fact that actual site redevelopment will likely include placement of buildings, walkways, roadways, parking areas, and other hardscape that would replace the use of some of the topsoil as cover.

As part of this alternative, the potential for vapor intrusion would be assessed in the area of the former automobile service and repair shop by sampling and analysis of soil gas and comparison of results to VISLs. If VISLs are exceeded in soil gas, design of redevelopment features will incorporate appropriate engineering controls to ensure that indoor air quality standards are met for buildings in areas with potential for vapor intrusion.

3.3 Recommended Cleanup Alternative

The most cost-effective option is Alternative 3: Partial Excavation and Removal of Impacted Soils, which reduces the overall amount of soil removed for disposal by removing only the most highly contaminated soils that are above local background levels. Because of the range of potential quantities of fill soils that would need to be removed based on concentrations, the estimated range of costs is relatively wide. Although contaminated soils within local background levels would remain on site, exposure to these soils would be managed by engineering and institutional controls, consistent with existing controls that are used throughout the area via the Park City Soils Ordinance. This is the preferred method as it provides a balance between remediation costs and a level of protectiveness that is consistent with surrounding areas.

While Alternative 2: Complete Soil Removal eliminates the need for ongoing engineering and institutional controls, it is the most costly option. Alternative 4: Soil Cover following Park City Soils Ordinance provides a low-cost means of controlling exposure to soil contaminants through engineering and institutional controls, requires permanent maintenance, does not reduce the level of contamination at the site, and would not be a viable option under the VCP. The Alternative 1: No Action option is not considered a viable option since it does not meet the redevelopment objectives or protect from future exposure to site contaminants.

4.0 References

Maverik, Inc. (Maverik) 2020. Closure Notice and UST Closure Sample Analysis Results, Former Maverik Store #317, 1635 Bonanza Drive, Park City, Utah 84060, Facility Identification No. 7000065. June 15, 2020.

Terracon, 2024. Phase II Environmental Site Assessment, Bonanza Park, 1665 Bonanza Drive, Park City, Summit County, Utah, EPA Cooperative Agreement #95815230. April 23,2024.

Terracon 2023a. Sampling and Analysis Plan, Bonanza Park, 1665 Bonanza Drive, Park City, Summit County, Utah, EPA Cooperative Agreement #95815230. November 27, 2023.

Terracon 2023b. Community-Wide Quality Assurance Project Plan, Utah Department of Environmental Quality/Division of Environmental Response and Remediation Community Wide Assessment Grant for States and Tribes, EPA Cooperative Agreement No. 95815230, Salt Lake City, Utah. July 21, 2023.

Terracon 2017a. Phase I Environmental Site Assessment, Proposed Arts & Culture Center Property, 1635, 1665, 1685, and 1705 Bonanza Drive, 1401, 1409, and 1415 Kearns

Boulevard, 1420 and 1490 Munchkin Road, Park City, Summit County, Utah. September 22, 2017.

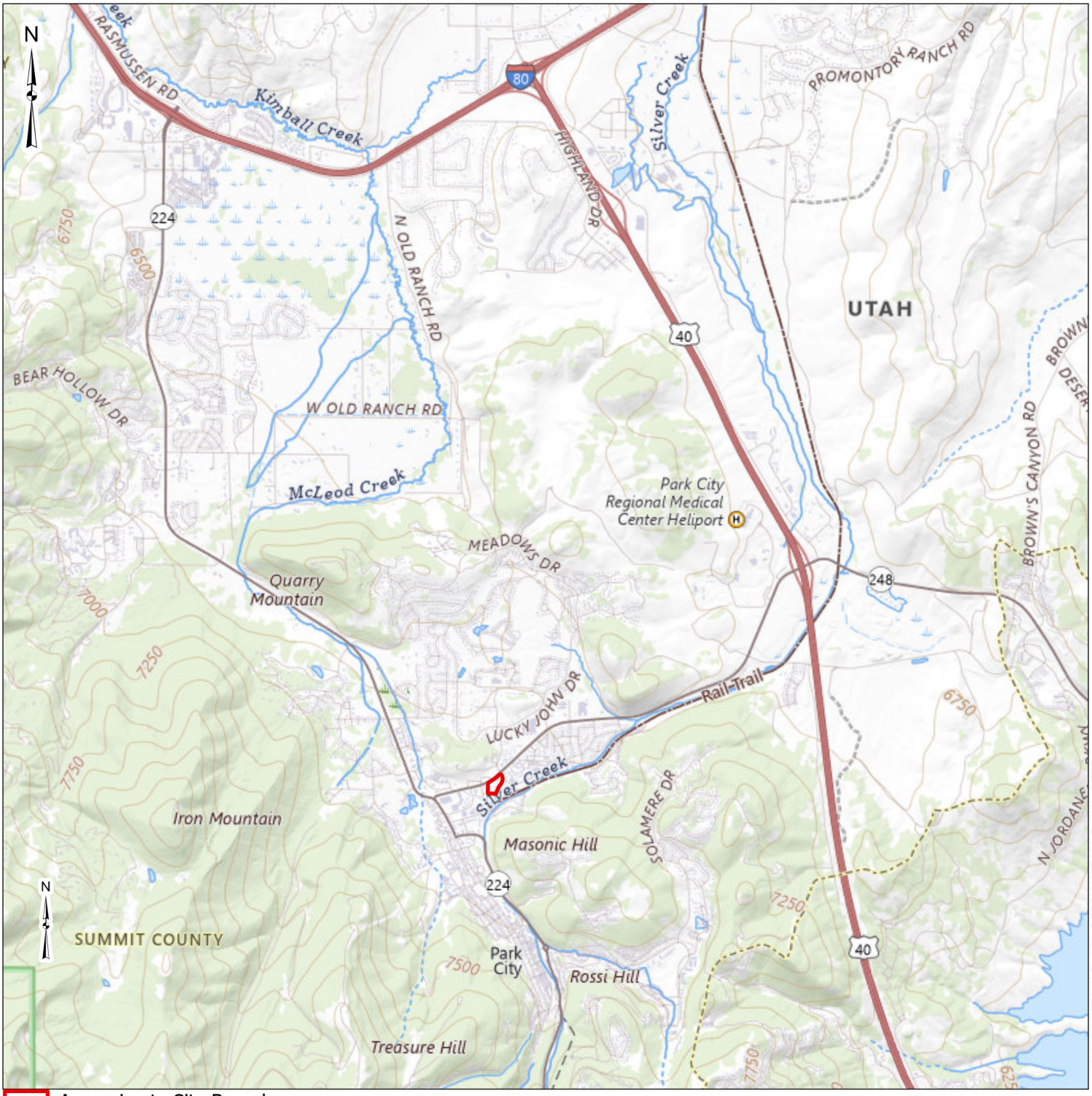
Terracon 2017b. Limited Site Investigation, Proposed Arts & Culture Center Property, 1635, 1665, 1685, and 1705 Bonanza Drive, 1401, 1409, and 1415 Kearns Boulevard, 1420 and 1490 Munchkin Road, Park City, Summit County, Utah. September 21, 2017.

2016 Climate Change Indicators, A Closer Look: Temperature and Drought in the Southwest (Web update: August 2016). https://www.epa.gov/climate-indicators/southwest.

2014a Garfin, G., G. Franco, H. Blanco, A. Comrie, P. Gonzalez, T. Piechota, R. Smyth, and R. Waskom, 2014: Ch. 20: *Southwest. Climate Change Impacts in the United States: The Third National Climate Assessment*, J. M. Melillo, Terese (T.C.) Richmond, and G. W. Yohe, Eds., U.S. Global Change Research Program, 462-486. doi:10.7930/J08G8HMN.

2014b Walsh, J., D. Wuebbles, K. Hayhoe, J. Kossin, K. Kunkel, G. Stephens, P. Thorne, R. Vose, M. Wehner, J. Willis, D. Anderson, S. Doney, R. Feely, P. Hennon, V. Kharin, T. Knutson, F. Landerer, T. Lenton, J. Kennedy, and R. Somerville, 2014: *Ch. 2: Our Changing Climate. Climate Change Impacts in the United States: The Third National Climate Assessment*, J. M. Melillo, Terese (T.C.) Richmond, and G. W. Yohe, Eds., U.S. Global Change Research Program, 19-67. doi:10.7930/J0KW5CXT.

Appendix A
Exhibits



Approximate Site Boundary

Miles

0 0.5 1 2

DATA SOURCES:
ESRI - Basemaps

N:\GIS\61177441_ParkCityDERR\61177441_ParkCityDERR.aprx

Project No.:	61247147
Date:	Jul 2024
Drawn By:	AST
Reviewed By:	ABA

terracon

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Midvale, UT

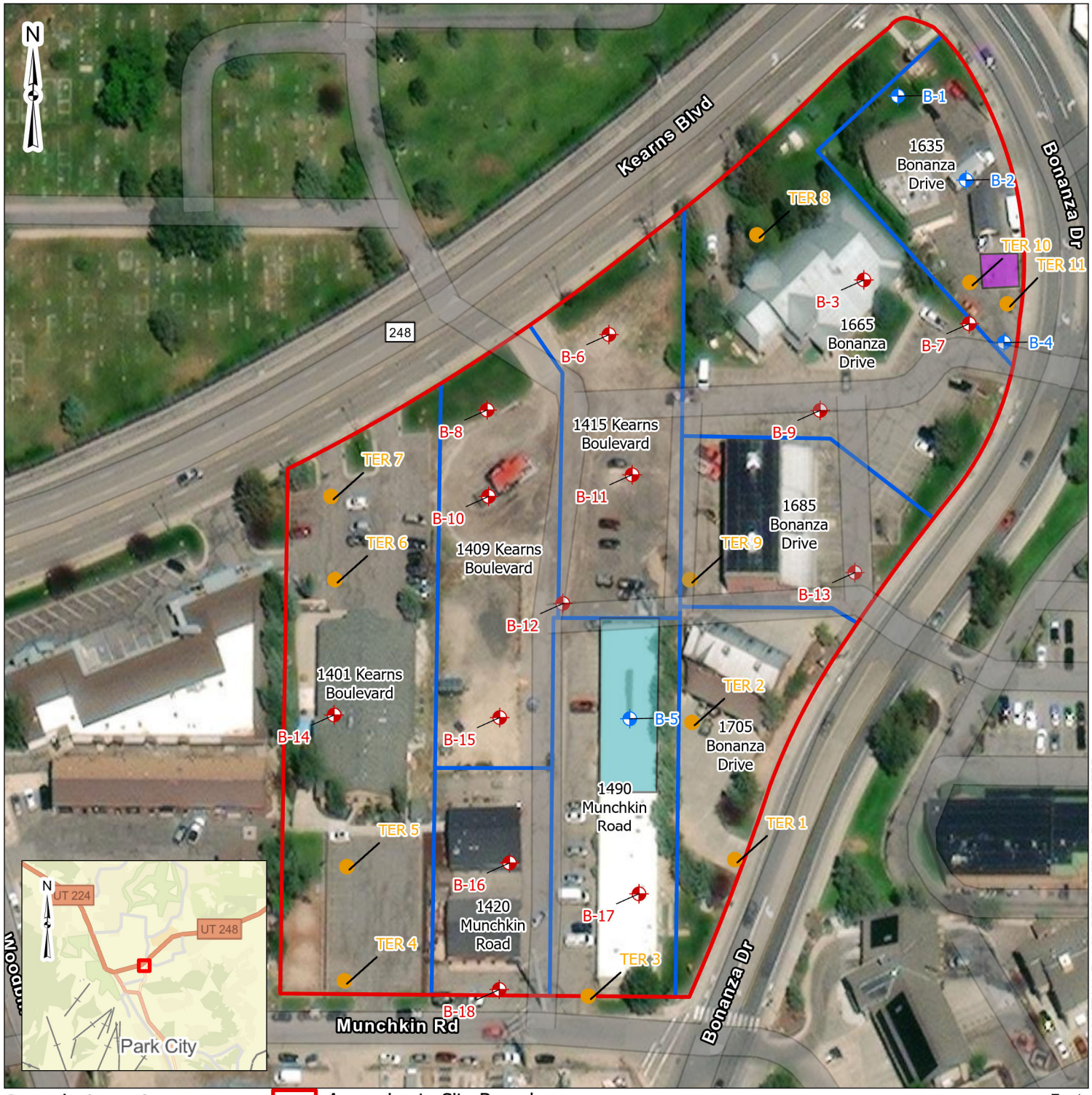
PH. 801-545-8500 terracon.com

Topographic Site Overview

Bonanza Park
1665 Bonanza Drive
Park City, Utah

Exhibit

1



Sample Location

- Soil and Groundwater
- Soil
- Previous

- Approximate Site Boundary
- Parcel Location
- Former USTs
- Former Auto Repair Facility

Feet
0 50 100 200

DATA SOURCES:
ESRI - Basemaps

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Project No.:	61247147
Date:	Jul 2024
Drawn By:	AST
Reviewed By:	ABA

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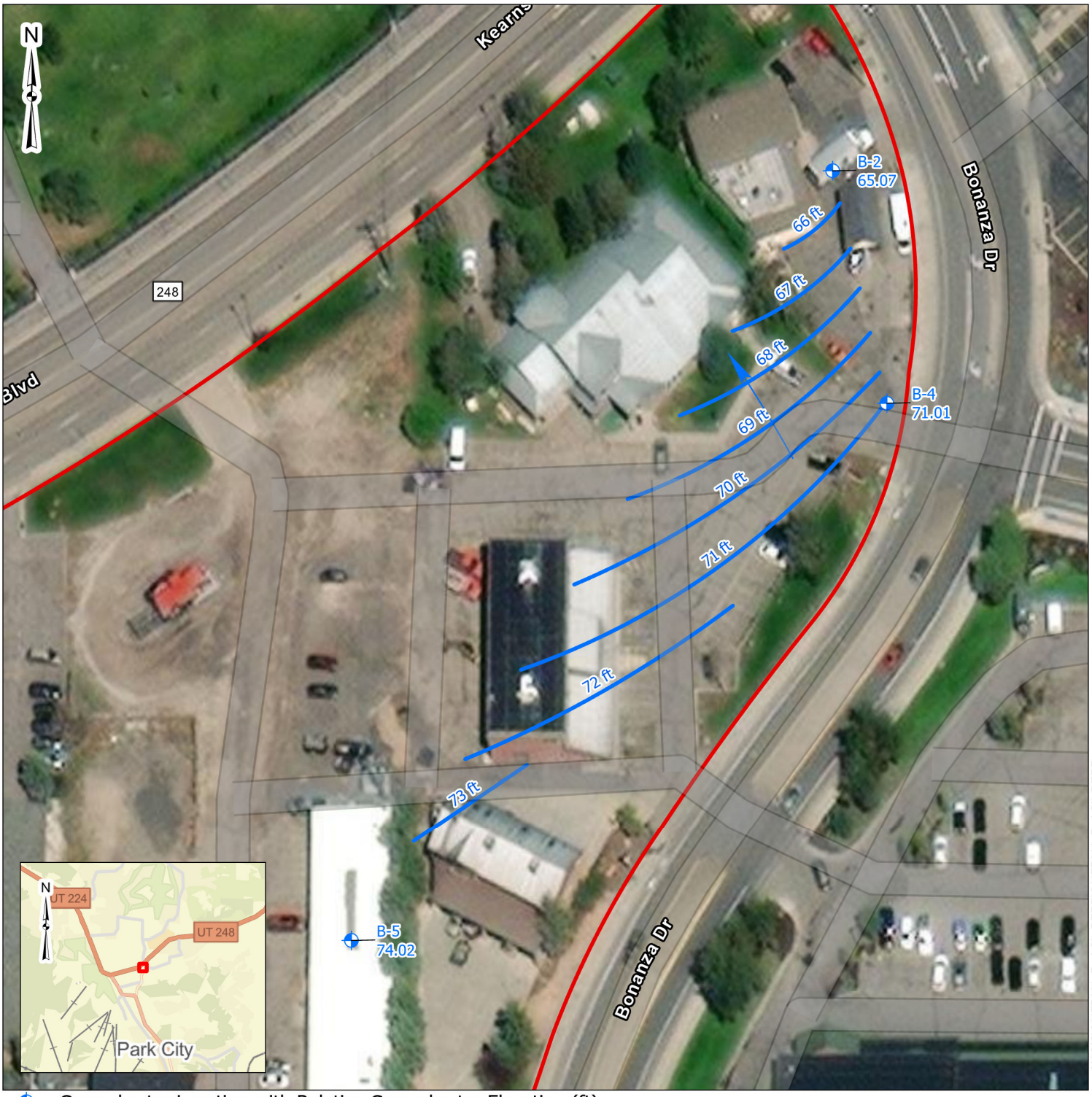
Midvale, UT
PH. 801-545-8500 terracon.com

Previous Investigations Sample Locations

Bonanza Park
1665 Bonanza Drive
Park City, Utah

Exhibit

2



Groundwater Location with Relative Groundwater Elevation (ft)

Groundwater Contour

Groundwater Flow Direction

Approximate Site Boundary

Feet

0 40 80 160

DATA SOURCES:
ESRI - Basemaps

N:\GIS\61177441_ParkCityDERR\61177441_ParkCityDERR.aprx

Project No.:	61247147
Date:	Jul 2024
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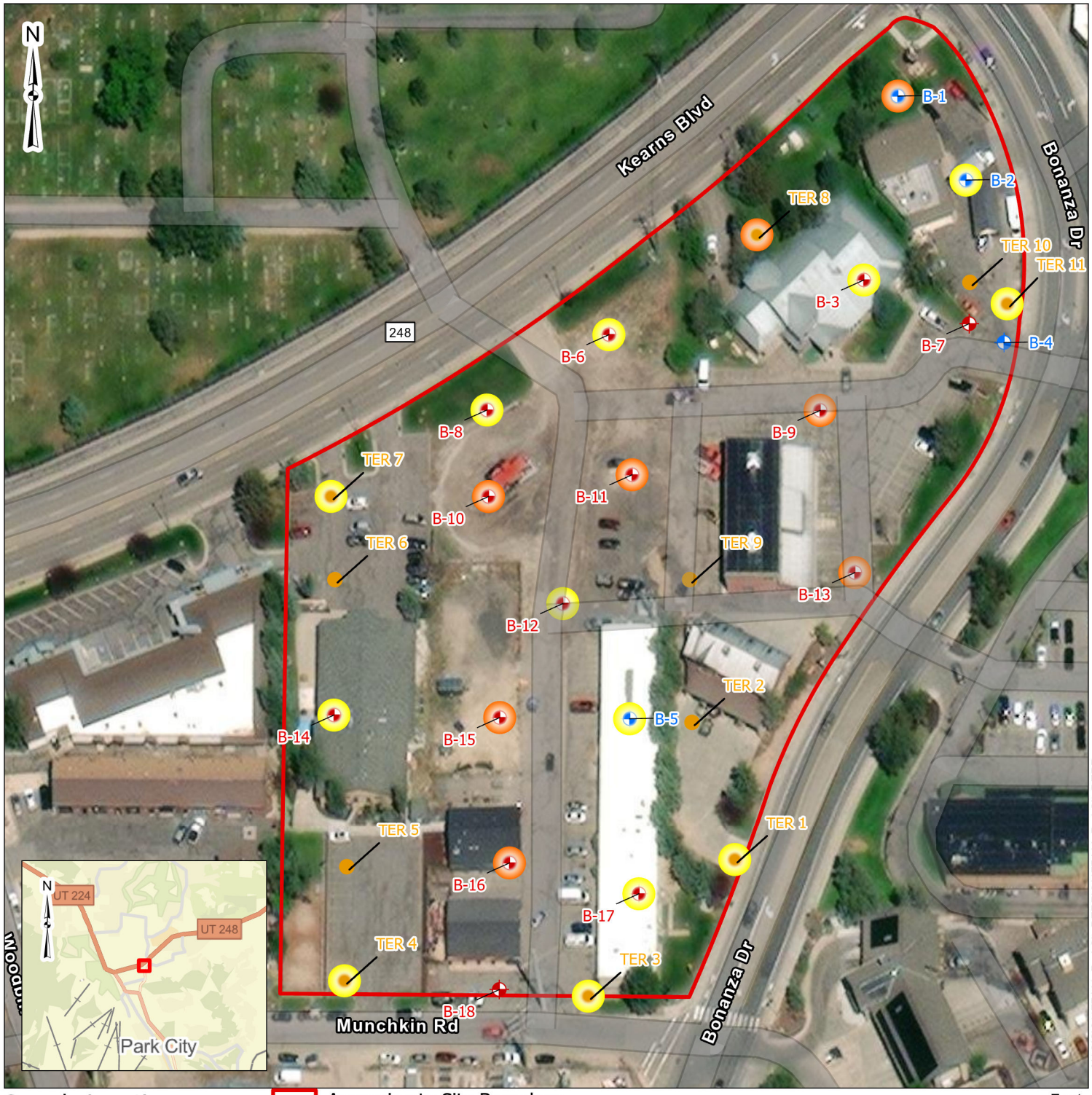
Groundwater Potentiometric Surface Map

Bonanza Park
1665 Bonanza Drive
Park City, Utah

Exhibit

3



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Sample Location

- Soil and Groundwater
- Soil
- Previous

Approximate Site Boundary

Metals Exceedances in Soil

- Exceeds Residential RSL
- Exceeds Industrial RSL

Feet

0 50 100 200

DATA SOURCES:
ESRI - Basemaps

Project No.:	61247147
Date:	Jul 2024
Drawn By:	AST
Reviewed By:	ABA

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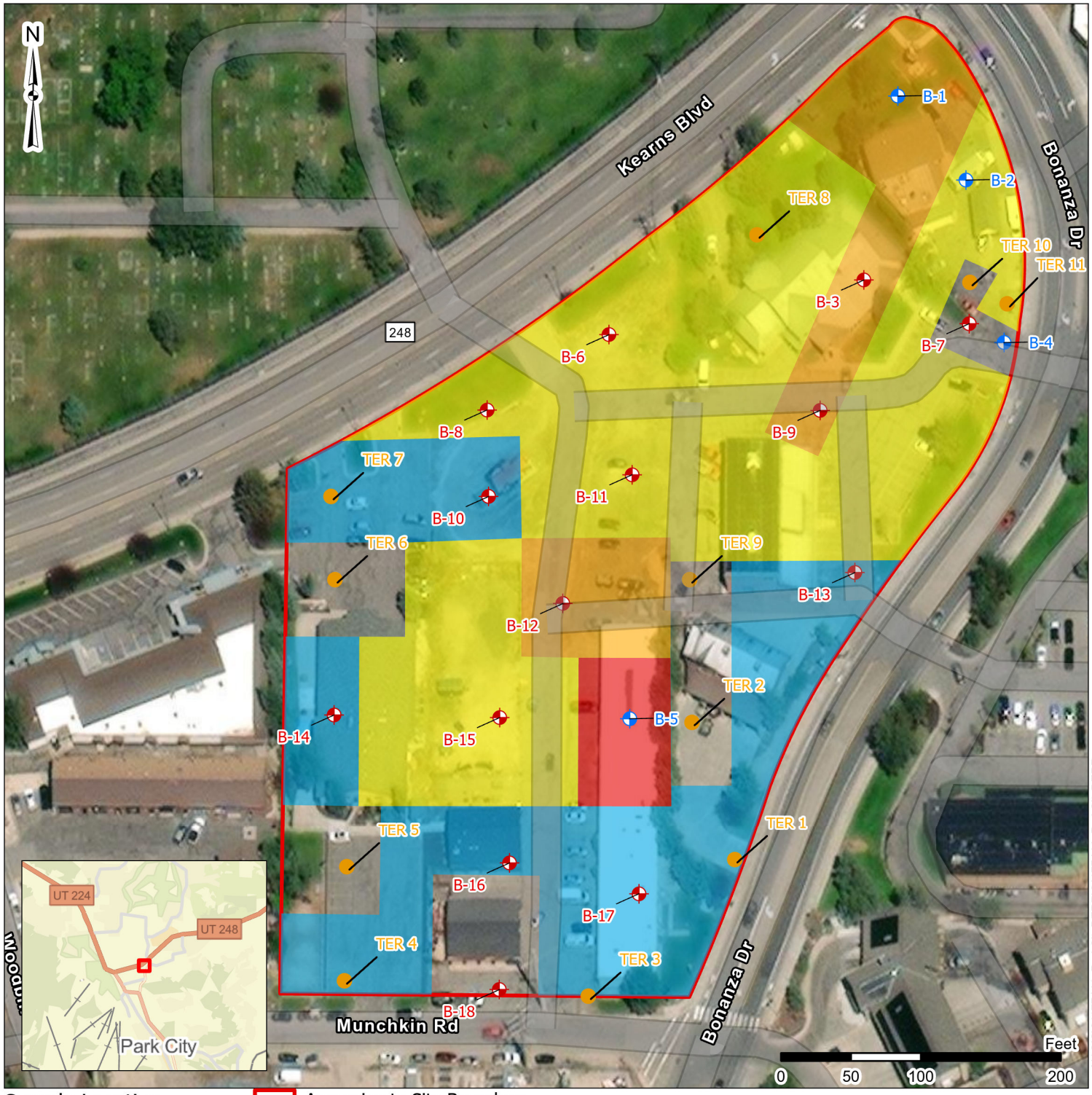
Metals Exceedance in Soil

Bonanza Park
1665 Bonanza Drive
Park City, Utah

Exhibit

4



Sample Location

- Soil and Groundwater
- Soil
- Previous

Approximate Site Boundary

Approximate Depth of Contaminated Fill/Soil

- 0-2 ft
- 2-4 ft
- 4-6 ft
- 6-8 ft

DATA SOURCES:
ESRI - Basemaps

Project No.:	61247147
Date:	Jul 2024
Drawn By:	AST
Reviewed By:	ABA

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Approximate Contaminated Fill Depth

Bonanza Park
1665 Bonanza Drive
Park City, Utah

Exhibit

5

Appendix B
Tables

Table 1 Brownfield Cleanup Alternatives Balancing Factor Evaluation

Remedial Alternative	Effectiveness	Long-term reliability	Implementability	Cost Implications
1. No Action	Does not address potential risks.	Does not address potential risks.	Not applicable for No Action.	No cost to implement. Potential cost implications on property value and future liabilities associated with contaminant exposure.
2. Complete Soil Removal and Disposal	Effectively eliminates future exposure.	Reliable long-term strategy to address on-site exposures. Essentially eliminates the risk associated with future exposure to contaminated soils at the site.	Minor implementation risks associated with excavation and transportation to appropriate disposal facility. Minor risk to community due to transportation. Fast to implement site work.	Relatively higher costs for excavation, transportation, and disposal fees.
3. Partial Removal and Disposal of Soil	Leaves a portion of the contaminated soils in-place, which require	Generally reliable at reducing or eliminating risk of exposure with proper site maintenance. Site inspections required to verify engineering	Minor implementation risks associated with excavation and transportation to appropriate disposal facility. Minor risk to community due to transportation.	Moderate costs for excavation, transportation, and disposal fees. Moderate costs associated with draft of Environmental Covenant, Site Management Plan if required.

	ongoing management.	controls have not been breached. Potential liability with leaving impacted soils on a site.	Fast to implement site work.	High costs for on-going/long-term site inspection requirements. Requires site inspections in perpetuity and Environmental Covenant recorded on the property.
Soil Cover following Park City Soils Ordinance	Leaves the contaminated soils in-place, which require ongoing management. Not a viable option for oversight under a regulatory program.	Not generally reliable at reducing or eliminating risk of exposure. Site inspections required to verify engineering controls have not been breached. Potential liability with leaving impacted soils on a site and exposure to site workers during redevelopment. Not a viable option for oversight under a regulatory program.	Minor implementation risk to community associated with transportation of import materials. Fast to implement site work.	Moderate costs for soil import. High costs for on-going/long-term site inspection requirements. Requires site inspections in perpetuity.

Table 2 Estimated Comparative Costs for Cleanup Alternatives

Cleanup Alternative	Estimated Costs	Notes	
1. No Action	$0	Not a viable option, does not address exposure risk during site redevelopment.	
2. Complete Soil Removal	$3,100,600–$3,500,000	Removal of all contaminated fill soils above RSLs (estimated 28,178 cubic yards)	
		$2,975,600-$3,330,000	Estimated cost to remove, transport and dispose of contaminated fill soils Summit County-3 Mile Canyon Landfill as cover material. Assumes landfill acceptance of all soils for non-hazardous waste disposal.
		Oversight and Reporting	
		$20,000–$30,000	Regulatory oversight by the VCP. Cost varies based upon size of site and extent and nature of impacts.
		$75,000–$100,000	Terracon oversight during remediation. Includes confirmation soil sample collection, soil vapor sampling, and laboratory analyses.
		$30,000–$40,000	Cleanup planning document preparation; meetings with the selected regulatory agency; public notification of proposed cleanup; and cleanup completion report

Cleanup Alternative	Estimated Costs	Notes	
3. Partial Soil Berm Removal in Impacted with Environmental Covenant and Site Management Plan	$1,500,000–$2,500,000	Partial removal (only soils that exceed RSLs and site-specific background levels) (estimated 12,396 to 21,667 cubic yards)	
		$1,309,000-$2,288,000	Estimated cost to remove, transport and dispose of contaminated fill soils Summit County-3 Mile Canyon Landfill as cover material. Assumes landfill acceptance of all soils for non-hazardous waste disposal.
		Oversight and Reporting:	
		$30,000–$40,000	Regulatory oversight by the VCP. Cost varies based upon size of site and extent and nature of impacts
		$100,000-$105,000	Site-specific BTV calculation (if required) and Terracon oversight during remediation. Includes confirmation soil sample collection and laboratory analyses.
		$61,000-$67,000	Cleanup planning document preparation; meetings with the selected regulatory agency; public notification of proposed cleanup; cleanup completion report; and draft of Environmental Covenant and Site Management Plan. Legal counsel should review the Environmental Covenant.

Cleanup Alternative	Estimated Costs	Notes	
		*Site Inspection and Reporting: (Per Inspection Event. Not included in Estimated Costs. Inspection Frequency to be determined).	
		$3,000–$5,000	Annual Site Inspection per Site Management Plan

Cleanup Alternative	Estimated Costs	Notes
4. Soil Cover following Park City Soils Ordinance	$199,000 - $210,000	Sitewide (5.43 acres) cover with 6 inches of topsoil or other approved clean cover

Estimated Cost Range for Cleanup Alternatives: $199,000 to $3,500,000

Park City Municipal Corporation
FY25 Brownfield Cleanup Grant
Threshold Criteria

Threshold Criteria

1. Applicant Eligibility

a. Park City Municipal Corporation (PCMC) is a General Purpose Unit of Local Government. PCMC affirms that it is eligible for EPA Brownfield Cleanup Grant funding.
b. PCMC affirms that it is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

PCMC affirms that the Bonanza Park site located at 1665 Bonanza Drive has not received funding from a previously awarded EPA Brownfield Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

PCMC affirms that it does not have an open Multipurpose Grant.

4. Site Ownership

PCMC acquired the property on **January 8, 2018 and January 9, 2018**.

5. Basic Site Information

a) Site Name: Bonanza Park 5-acre Site (Bonanza Park)
b) Site address: 1665 Bonanza Drive, Park City, UT 84060

6. Status and History of Contamination at the Site

a) The site is contaminated with hazardous substances.
b) The 5.43-acre site located at 1665 Bonanza Drive and is comprised of nine parcels with addresses 1635, 1665, 1685, and 1705 Bonanza Drive; 1401, 1409, and 1415 Kearns Boulevard; and 1420 and1490 Munchkin Road, Park City, Utah. Historical mining activities occurred on and in the immediate vicinity of the site likely starting in the 19th century and continued until the mid-20th century. Mine tailings and mine infrastructure are clearly visible on and in the immediate vicinity of the site in historical aerial photographs. Post-mining development of the site commenced circa 1976 with the development of one building (present day 1401 Kearns Boulevard) on the western and southern portions of the site. By 1978, three additional buildings were present (present-day 1420 and 1490 Munchkin Road). Between 1993 and 1997, four additional buildings were constructed on the eastern and northern portions of the site (1635, 1665, 1685, 1705 Bonanza Drive). The site remained in the same general configuration until PCMC's acquisition of the site in 2018. Automobile service businesses operated at the 1490 Munchkin Road parcel from 1982 until approximately 1994. The 1635 Bonanza Drive parcel operated as a gas station from as early as 1985 until 2018. The former gas station USTs were removed by the gas station operator in 2018 under a state-approved closure plan. The 1705 Bonanza Drive parcel operated as a car wash from the mid-1990s to 2014. Other historical uses of the site include a medical clinic, a grocery store, a restaurant, and office space. Except for the

former gas station building, all structures at the site have been demolished and the site is currently vacant.

c) Metals-impacted fill materials are present throughout the site at depths of up to 8.5 feet below ground surface (bgs). Arsenic, cadmium, lead, and mercury have been identified in the fill materials at concentrations exceeding EPA Industrial and/or Residential Regional Screening Levels (RSLs).[1] The site is located within the Park City "Soil Cover Ordinance" area and is subject to compliance with the "Soil Cover Ordinance" requirements including specific capping material of at least 6 inches in depth, landscaping, and activity restrictions. At one location in the vicinity of the former automobile service businesses, groundwater has been impacted by trichloroethene (TCE) and chloroform above EPA Residential Vapor Intrusion Screening Levels (VISLs) but below maximum contaminant levels (MCLs).[1] Historical petroleum releases have occurred at the former gas station parcel (1635 Bonanza Drive), but recent sampling data indicates that petroleum hydrocarbons are not present in soil and groundwater at concentrations that exceed regulatory screening levels.[1]

d) The overall vertical and lateral extents of contamination have been defined.[1]

7. Brownfields Site Definition

PCMC affirms that the site is:

a) NOT listed (or proposed for listing) on the National Priorities List (NPL);
b) NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
c) NOT subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

The following site assessment reports have been completed for the Bonanza Park site:

- Phase I Environmental Site Assessment, September 22, 2017 (Terracon)
- Limited Site Investigation, September 21, 2017 (Terracon)
- Phase II Environmental Site Assessment, April 23, 2024 (Terracon)

9. Site Characterization

b. The Bonanza Park site at 1665 Bonanza Drive has enrolled in the State of Utah Voluntary Cleanup Program. A letter from the Utah Department of Environmental Quality (UDEQ) is included in this application that:

i. affirms that the site is eligible to be enrolled in UDEQ's Voluntary Cleanup Program (VCP);

ii. indicates that the site can remain enrolled in the VCP for brownfield regulatory oversight purposes; and

iii. indicates that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin.

10. Enforcement or Other Actions

[1]Terracon, 2024. Phase II Environmental Site Assessment, Bonanza Park, 1665 Bonanza Drive, Park City, Summit County, Utah, EPA Cooperative Agreement #95815230, ACRES IDs# 259685, 259686, 259688, 259689, 259690, 259691, 259692, 259693, 259694. April 23.

PCMC affirms there is not any ongoing or anticipated environmental enforcement actions relating to the Bonanza Park site.

11. Sites Requiring a Property-Specific Determination
PCMC affirms that the Bonanza Park site 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
i. EXEMPTIONS TO CERCLA LIABILITY
(1) Indian Tribes
Not Applicable.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations
Not Applicable.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government
Not Applicable.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

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

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection
(a) Information on the Property Acquisition
(i) PCMC acquired the property by negotiated purchase from private owners.
(ii) PCMC acquired the property on **January 8, 2018 and January 9, 2018**.
(iii) PCMC is the sole owner of the property and has fee simple title.
(iv) PCMC purchased the property from the previous owners: MJF Investments, LLC and JP'S NEVADA, LLC.
(v) PCMC does NOT have familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of the site.

(b) Pre-Purchase Inquiry
(i) The following environmental site assessments were performed prior to PCMC's purchase of the property:
- Terracon 2017. Limited Site Investigation, Proposed Arts & Culture Center Property, 1635, 1665, 1685, 1705 Bonanza Drive; 1401, 1409, 1415 Kearns Boulevard; 1420, 1490 Munchkin Road, Park City, Summit County, Utah. September 21, 2017.

- Terracon 2017. Phase I Environmental Site Assessment, Proposed Arts & Culture Center Property, 1635, 1665, 1685, 1705 Bonanza Drive; 1401, 1409, 1415 Kearns Boulevard; 1420, 1490 Munchkin Road, Park City, Summit County, Utah. September 22, 2017.

(ii) Terracon Consultants performed the Phase I Environmental Site Assessment. The Phase I ESA was performed by Craig Eaton. Mr. Eaton stated that he meets the definition of Environmental Professional as defined in Section 312.10 of 40 CFR at the time of the report.

(iii) The most current Phase I ESA (September 22, 2017) was conducted within 180 days of the acquisition of the property. The Phase I ESA was conducted consistent with the procedures included in ASTM E1527-13.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before PCMC acquired the site. PCMC has not caused or contributed to the release of any hazardous substances on the site. PCMC has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazard substances to the site. PCMC is not aware of any ongoing release to the environment at the site. The former gas station building is currently vacant, therefore the potential for vapor intrusion risk does not exist.

(d) Post-Acquisition Uses

Since taking ownership on January 8, 2018, and January 9, 2018, PCMC demolished all structures except the former gas station building, which is currently vacant. PCMC has periodically used the site for temporary construction materials storage. No storage of petroleum products or hazardous substances occurred, and storage utilized paved areas of the site.

(e) Continuing Obligations

(i) There are no known continuing releases at this time. Based on the planned cleanup and reuse of the site and typical Utah VCP requirements, any residual impacts to soil or groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling PCMC's continuing obligations in regard to current releases of known hazardous substances found at the site.

(ii) PCMC will exercise appropriate care with hazardous substances found at the site by maintaining a vacant and capped site until site remediation is complete, protecting site workers during site cleanup by implementing a health and safety plan, and by taking reasonable steps to prevent any future releases. No business operations have taken place at the site since the former businesses vacated their respective properties. No chemicals are currently stored at the property. The former gas station UST have been removed and the gas station building is vacant and locked. Terminating business operations at the site has stopped the potential for any continuing releases and prevents any threatened future releases. The site is compliant with PCMC's "Soil Cover Ordinance" requirements, eliminating any threatened future releases preventing exposure to previously released hazardous substances. The planned cleanup activities will further prevent future releases.

Maintaining the site as vacant until cleanup avoids vapor intrusion risk related to VOCs identified previously in groundwater at the site. PCMC intends to use Cleanup Grant funds to remove impacted soils, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the Utah VCP program, any residual impacts to soil or groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling PCMC's continuing obligations in regard to future releases of known hazardous substances found at the site.

(iii) By maintaining compliance with PCMC's "Soil Cover Ordinance" requirements, PCMC exercised appropriate care and took reasonable steps to prevent or limit exposure to any previously released hazardous substances. The planned cleanup activities will further prevent and limit exposure to previously released hazardous substances. PCMC intends to use Cleanup Grant funds to remove impacted soils, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the Utah VCP program, any residual impacts to soil or groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling PCMC's continuing obligations in regard to preventing and limiting exposure to past releases of known hazardous substances found at the site.

PCMC confirms its commitment to:

(i) comply with any necessary land use restrictions and not impede the effectiveness or integrity of any institutional controls;
(ii) assist and cooperate with those performing the cleanup and provide access to the property;
(iii) comply with information requests and administrative subpoenas that may be issued in connection with the property; and
(iv) provide all legally required notices.

13. <u>Cleanup Authority and Oversight Structure</u>

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

a. PCMC intends to maintain enrollment in the Utah VCP. PCMC will hire a qualified environmental professional with brownfields experience prior to implementing remediation activities. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup. PCMC will comply with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b. The site is bound on its north side by Kearns Boulevard, on its east side by Bonanza Drive, and on its south side by Munchkin Road. These are public thoroughfares and as such, are accessible during cleanup activities. In the event that access becomes necessary to the west adjoining property, PCMC does not anticipate difficulties obtaining access agreements to these properties.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

PCMC announced their intent for cleanup funding for the Bonanza Park site and the proposed redevelopment on **October 23, 2024, and October 26, 2024**. A draft ABCA for the site and this proposal was made available at this time for public review and comment. These documents summarize information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b. Community Notification Ad

A request for public input was published on **October 23, 2024, and October 26, 2024**, in the local newspaper, the Park Record, the oldest continuously published newspaper in Utah. A copy of this grant application, including a draft ABCA was made available for public review and comment.

c. Public Meeting

A brownfield and revitalization presentation was made during a public hearing in person and via video conference on **October 29, 2024, at 5:30 pm Mountain Daylight Time**. This live meeting was recorded for future use and posted for public viewing on PCMC's website. PCMC documented participant attendance at the meeting. Comments were received until **November 8, 2024**.

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.
- a copy of the meeting attendance sheet and meeting agenda.
- Since PCMC did not receive any comments from the public nor did the public attend the public meeting, PCMC is not submitting meeting notes or responses to public comments.

15. Contractors and Named Subrecipients

Not applicable.

Park City Municipal Corporation
FY25 Brownfield Cleanup Grant
Threshold Criteria
Community Notification & Meeting Documentation

PARK CITY 1884

BONANZA PARK EPA BROWNFIELD FUNDING COMMUNITY MEETING

Tuesday, October 29, 2024 | 6:00-7:00 p.m.
Council Chambers at City Hall

Park City Municipal Corporation (PCMC) is seeking public comment on its draft Fiscal Year 2025 application to the Environmental Protection Agency's (EPA) Brownfields Cleanup Grant. PCMC is applying for an EPA Brownfields Cleanup Grant to request funding for remedial activities for the Bonanza Park 5-acre Site located at 1665 Bonanza Drive, Park City, Utah. As part of the application process, PCMC will host a meeting to solicit public input on Tuesday, October 29, 2024, at 6:00 PM in the City Council Chambers on the first floor of City Hall (445 Marsac Ave., Park City). The meeting will also be broadcast via video conference. Please see the video conference link below:

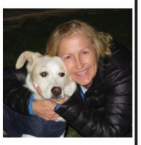
Meeting Link: tinyurl.com/mrmuctxf
Meeting ID: 289 871 147 806
Passcode: mtPLTa

During the meeting, PCMC will discuss the draft application and respond to public comments. A copy of the draft Brownfields Cleanup Grant application and draft Analysis of Brownfields Cleanup Alternatives (ABCA) will be available for review at City Hall, 445 Marsac Ave, Park City, UT 84060 starting on October 28, 2024, and online at parkcity.org. Public comments can also be received via email at ryan.blair@parkcity.org by November 8th, 2024.

Obituaries

Katie Vorsanger

July 27, 1963 - October 8, 2024



On October 8, 2024, Katie Vorsanger passed away at her home in Park City, Utah. She was surrounded by family with both her husband Bob and son, Corey by her side. Katie ended her courageous fourteen-year battle with metastatic breast cancer on her own terms.

Catherine (Katie) was born in Elmhurst, Illinois, on July 27th, 1963, to Bob and Catherine Smith. She was a fun-loving person that enjoyed being with family and close friends, many of whom she considered family. Katie had a passion for giving care for children. This passion was so obvious during her 20+ years at Desert Dawn Pre-School in Phoenix, AZ. Katie attended the University of Arkansas, earning a Bachelor of Science degree in finance. There she met her future husband, Bob, who became her life partner. They married on May 6th, 1989.

Katie loved life and lived it to the fullest. Sunday-Fundays with family and friends were special days to Katie, whether it be by the pool in Phoenix, or skiing, hiking, and mountain biking in the Utah Mountains. She was a true outdoor enthusiast, enjoying the great outdoors with her family and friends. Living in Phoenix, AZ, and Park City, UT, allowed her to embrace the beauty of the southwest with its canyons, mountains, and everything in between. On many occasions, she could be overheard saying "Mother Nature is something" or "Don't mess with Mother Nature".

Over the course of her life, Katie accomplished numerous incredible feats. The top of this list would be raising her pride and joy, their son Corey, who grew into a caring young man who enjoys outdoors activities just as his parents. Katie was also a three time "Rim-to-Rim" hiker of the 23.9-mile one day hike in the Grand Canyon. She took on principle caregiving duties for her mother after she was diagnosed with early onset dementia in the early 2000's. She devoted countless hours to her sweet preschool students. Finally, Katie was an enthusiastic and loving dog mom. She loved her furry family members, and they loved her unconditionally.

Katie exuded sunshine everywhere she went. She was always up for a fun time with friends.

She had a smile or an eye roll for Bob's antics, which were a constant source of entertainment. She enjoyed calling those Razorbacks on football game days. She will be remembered by her calm, and caring demeanor, her zest for life and beautiful smile.

In addition to Bob and Corey, she is survived by her brother, Bob Smith (Martha), her nephews and nieces, Dave, Becky, Michael, Todd, Michael, Maggie, and Charlie as well as countless friends that held a special place in her life.

Thanks are extended to University of Utah Huntsman Cancer Research institute for providing outstanding care to Katie over the past three years. The entire staff took incredible care of Katie, most notably Dr. Stephen Kimani and Nurse Tammy Henry. A special thanks to the many friends who were there for her and her family every day during her courageous battle.

There will be a celebration, truly a celebration, of Katie's life on Sunday Funday December 8th, 2024 at 4:00PM at Park City Brewery. Located at 1764 Unita Way, Park City, UT 84098. Casual or Hiking attire is encouraged. In lieu of flowers, please consider a donation to the Arizona Border Collie Rescue, P.O. Box 10717, Tempe, AZ 85284, or a Cancer Research organization of your choice. Both causes have a special place in Katie's life.

Lear finds passion in work

State school board member hopes for practical solutions

DON ROGERS
The Park Record

COURTESY OF CAROL LEAR
Carol Lear has served on the state school board since 2016.

The real work of the state school board is far more about making sausage than grabbing headlines, notwithstanding the occasional flare-up in the cultural wars.

Carol Lear, one of two Democrats in the 15-member board, was first elected to the body in 2016, before it became a partisan post, and opposed the move in 2020, including as a plaintiff in a lawsuit. She hasn't seen much good come out of the change.

With just two Democrats, the school board's partisan divisions are mostly between the five moderates and the farther-right Republicans.

"There was a real, I was going to say unmitigated but not a secret effort, in this last election to get rid of some moderates on the board so that it would be more closely aligned with the supermajority of the Legislature," Lear said. She noted that the school board has less influence with the state lawmakers today than ever.

The one-time high school teacher, 27-year director of law and policy for the state Office of Education, and then attorney who focuses unsurprisingly on education issues has an adult lifetime of connection to the state school board and the issues it does resolve and to greater and lesser degrees over the years, influence.

The state school board did not impose the book ban, require that every district and charter school hire their own armed guards, decide where transgender people go to the bathroom on campus, pass the voucher law Utah Fits All, or leave Utah at the second-lowest level of state funding for public schools in the nation.

The Legislature did all that, which of course is its job.

The state school board does up its meeting schedule from monthly to weekly during the six-week annual legislative session and review education bills. But mostly, the staff works with legislators and their staffs in hopes of providing guidance. Lear believes the lawmakers would be wiser to heed their suggestions, which would improve the practical quality and efficiency of the education bills they pass — and save money by doing so.

The state school board's main duties are decidedly less sexy. The board sets standards in such stuff as curriculum and programs, licensing, financial compliance, policies governing the full range of what school districts and charter schools do. The board also serves as the local school board for the Utah Schools for the Deaf and Blind. The local districts base their policies on meeting criteria set by the state board.

There's far more scrutiny of things like the driver's ed manual than hot discussion over sex education, the guts of free-meal reporting than deciding whether to overturn the ban of a specific book — which the state school board declined to take on this year. "I've noticed when new members get on the board," Lear said. "And I've been listening to board meetings for 40 years, almost, and so they're very interesting to me. I mean there's moments when they are even snoozers for me too, but I've seen these new board members thinking, 'Oh my gosh, this is so tedious. This is not really what I signed up for.'"

It's not that members don't have opinions, and Lear holds hers strongly: The voucher program is flawed, costly and lacks academic accountability found in other states; this could be improved if the supermajority Legislature maybe listened a little better. She agrees with reducing class size, to a point, but is concerned about the incredible expense in carrying this out, whether there are enough classrooms that would be needed, and sees how this would aggravate Utah's ongoing teacher shortage. The safety bill that mandates paid guards for every district takes dollars directly from educating kids, and she sees better ways to achieve the goal than another blunt mandate.

She tends to see practical solutions for unintended messes created by a lot of what the Legislature has passed concerning education.

Besides, the scope of the school board's constitutional role is more nuanced. And here is where she sees potential to address the state's teacher shortage, for instance.

"The hardest thing about teaching was the inflexibility of it," she said, recalling her own time in the job in her 20s, a part of the work that hasn't not changed much. Measures helping with that could only help with retention and making a great job otherwise more attractive, she believes. A floating professional substitute, say, letting retired teachers come back at better than entry level pay, figuring out creative ways to make the job less stuck in tight scheduling, job sharing in the classroom.

She'd like to see districts experiment with pilot programs in subsidizing quality preschool beyond Head Start, which is limited to lower income families. Research suggests preschool is a powerful boost for achievement in later years. It could also help with the teaching shortage for young moms.

She's also a stickler for teacher licensing, recognizing this is work for professionals, even if they're not always recognized as such.

As for the book ban, rival candidate Diane Livingston's calling card, fair or not, largely results from Livingston challenging books at the Park City School Board in 2022 and being frustrated at how long it would take to ban them.

Lear, with her attorney's hat on, said, yes, it's called due process. It should take time. But she sees better ways to accomplish the same goal without so blunt a tool as a ban affecting all the schools in the state if any three decide they don't like a particular book.

"I think that symbolically, for me, it's super important. You don't ban books in school, and if you want to give parents more choice, you do something else," she said. She suggested books can be evaluated and parents notified so they can make their own decisions about whether they are appropriate for their child. True local control.

She said she would welcome a legal challenge to the book ban, but the school board members, including her, don't see good coming out of attempts to overturn the ban of books, at least for now.

"I really worry, given the makeup of the Legislature, that if we tried to go back to moderate part that part of it, it would just get worse," she said.

Meantime, there's plenty of work left for the state school board far away from what gins up a social media sensation or big headlines. That's where she wants to continue trying to make a difference, and she's still excited about it.