



**COLORADO**  
Hazardous Materials  
& Waste Management Division  
Department of Public Health & Environment

# Making Brownfields History: Clearing Hurdles...

*Wade Broadhead- City of Pueblo*  
*Carrie Rackey - Stantec*  
*Sara Kappel – History CO*



# *Translation Services*



duolingo





# P R E S E R V A T I O N :

Reusing America's Energy

Preservation Week May 11-17, 1980



It takes energy to construct a new building.  
It saves energy to preserve an old one.

It takes the energy equivalent of one gallon of gasoline to make, deliver and install eight bricks. Preserving eight old bricks instead of throwing them away and making new ones means that the energy of a gallon of gasoline can be used to meet other needs. Reusing old buildings saves the energy required to demolish and replace them with new buildings. And properly rehabilitated old buildings use no

more energy, on the average, than brand new buildings for operation.

Save energy—save a building! Join the National Trust for Historic Preservation and the U.S. Department of Energy in observing Preservation Week 1980. For details, write to Preservation Week, National Trust, 105 Massachusetts Ave., N.W., Washington, D.C. 20001. Or contact your local preservation organization.

NATIONAL TRUST FOR HISTORIC PRESERVATION

PHOTO © 1980 National Trust for Historic Preservation

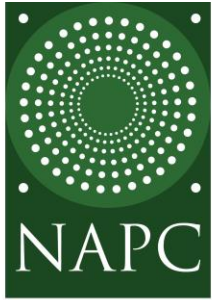


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# *Brownfields? Hold My Beer...*



NAPC

NATIONAL ALLIANCE *of*  
PRESERVATION COMMISSIONS

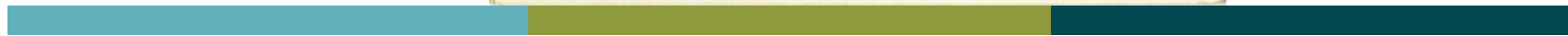
education + advocacy + training



5021 G. F. & I. Co. Steel Plant, Pueblo, Colo.



COLORADO FUEL AND IRON COMPANY'S PLANT AND OFFICES,  
PUEBLO, COLO.



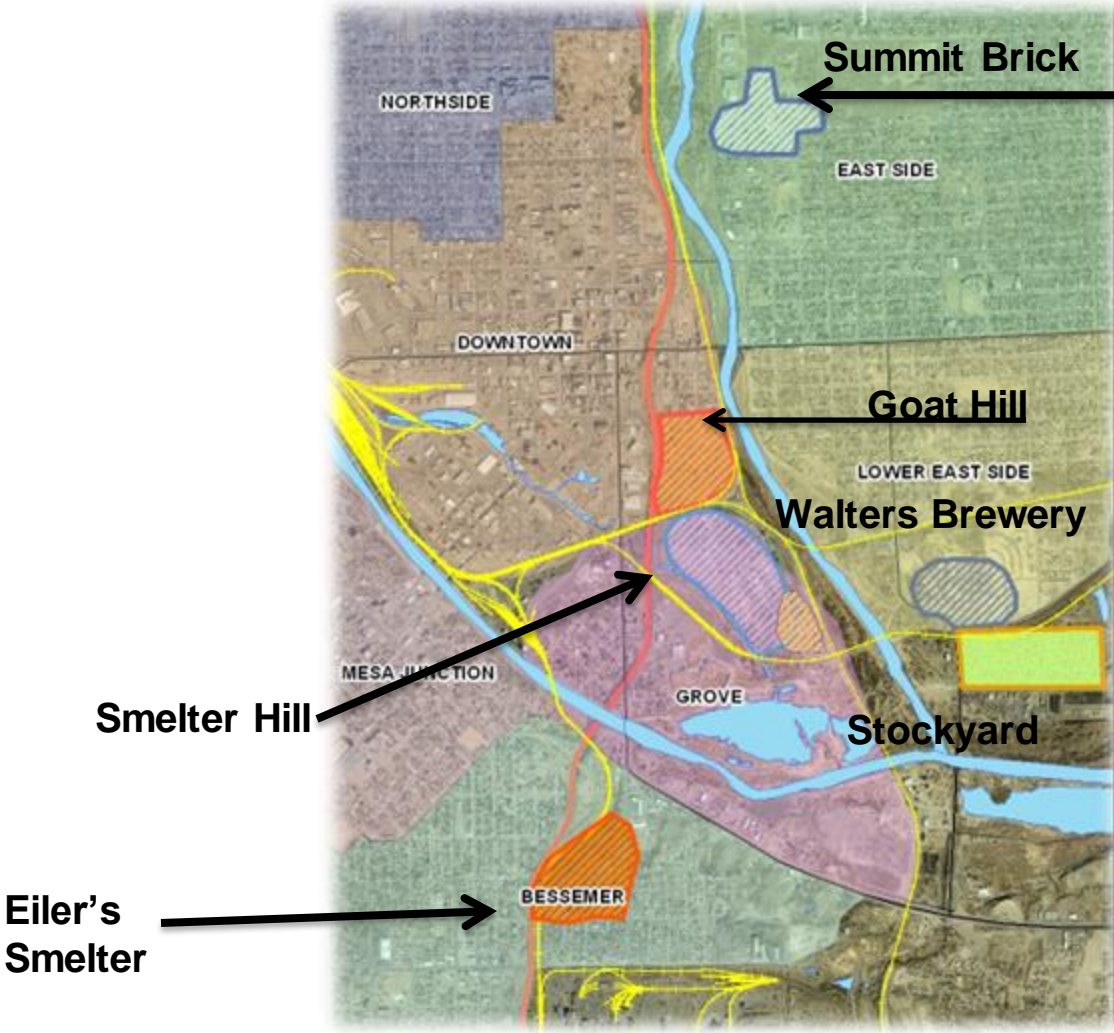




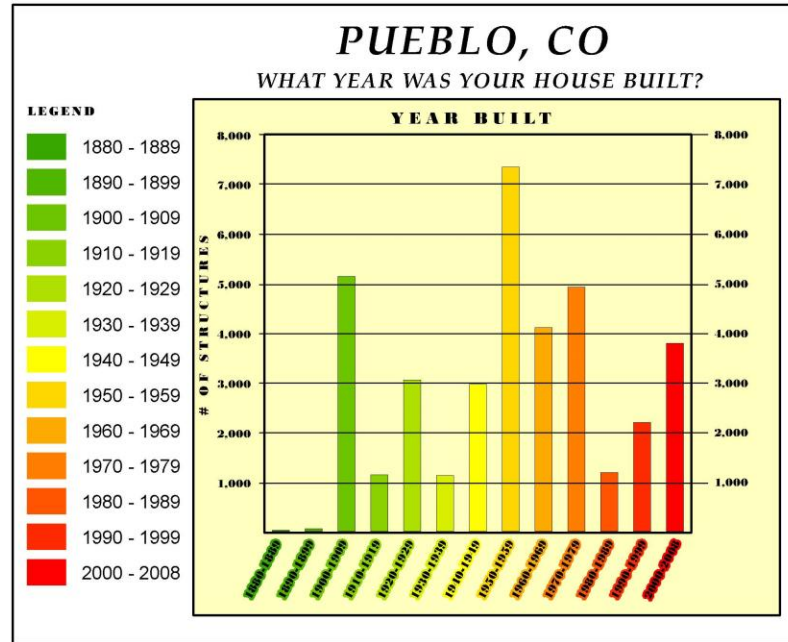


# Pueblo's Industrial Legacy 1905

We have all the flavors of industry!

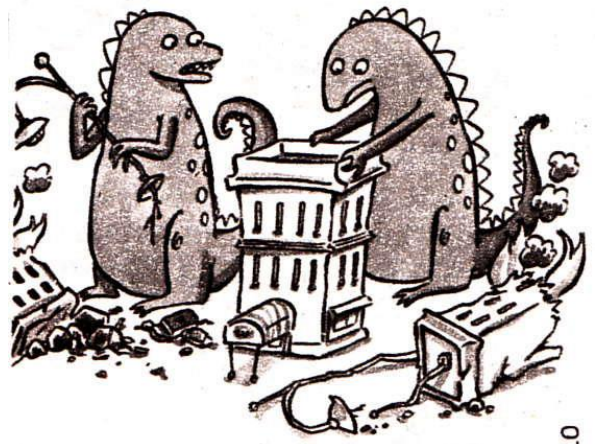


# “Historic” By Default





# Tackling Misconceptions



"Not that one—we'll have the  
Historical Society after us."

RINA PICCOLO

SHPO

SOI  
Standards

Section  
106

NPS

Section  
106

"Is that  
Really  
Historic?"

Not  
contributing

NEPA

TPO

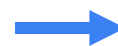




# Levels of Designation



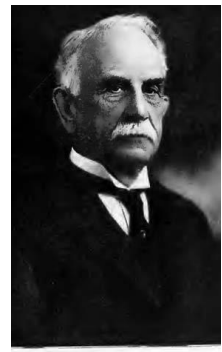
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Protected



# New Significance



MAHLON D. THATCHER



Photo 2: North side. Camera facing south.

# *Federal Projects and Section 106*

Anything eligible for  
the NRHP, 'historicish'

Federal permit or funding



**US Army Corps  
of Engineers®**



Federal Highway  
Administration



# Not So Common Terminology

## “Building Survey” “Site Form” 1403 “Mitigation”

COLORADO CULTURAL RESOURCE SURVEY  
Architectural Inventory Form

Date: \_\_\_\_\_ Initial: \_\_\_\_\_

Determined Eligible - National Register  
 Determined Not Eligible - National Register  
 Determined Eligible - State Register  
 Determined Not Eligible - State Register  
 Need Data  
 Contributing to eligible National Register District  
 Noncontributing to eligible National Register District

Page 1



**I. IDENTIFICATION**

1. Resource number: SPE-5633 Parcel number(s): 52541011

2. Temporary resource number:

3. County: Pueblo

4. City: Pueblo

5. Historic building name: Rettberg-Stanchfield Duplex

6. Current building name: Stewart, Madeline J., Duplex

7. Building address: 485-487 W 13th Street

8. Owner name: Madeline J. Stewart

Owner organization:







Owner address: 487 W 13th St  
Pueblo, CO 81003

44. National Register eligibility field assessment:  Individually eligible  Not eligible  Need data

Local landmark eligibility field assessment:  Individually eligible  Not eligible  Need data

Pueblo East Side Neighborhood Architectural and Historical Selective Inventory Survey Report

**TABLE 4-4: PROPERTIES INDIVIDUALLY ELIGIBLE FOR LANDMARK DESIGNATION**

Photo Reference	Address	Site Number	Historic Property Name	Current Property Name	NR Criteria	SR Criteria	PL Criteria
National Register Eligible (Also Eligible for the State Register and as Pueblo Landmarks)							
	917 East 3rd Street	SPE-7116 (SPE-507-26)	917 East 3rd Street/Ragland House	David Ritterling House	A, C	A, C	1a, 2a
	625-627 East 4th Street	SPE-7118	Fetty Jones Block/Goldsmith Grocery Company et al.	Diamond Jew's Tavern/Bonnie Holdings Building	A, C	A, C	1a, 2a, 3a
	623-625 1/2 East 4th Street	SPE-6289	Baum Duplex	G&E Apartments (East)	A, B, C	A, B, C	1a, 1c, 2a, 2b
	627-629 East 4th Street	SPE-6290	Baum Apartments (East)	Lynda Lee Ewing Apartments	A, C	A, C	1a, 2a, 2b, 2c
	1127 East 4th Street	SPE-7124	East Side Baptist Church/Park Hill Church of Christ et al.	Bethel Pentecostal Holiness Church	A, C	A, C	1a, 2a
	816 East 5th Street	SPE-7128 (SPE-509-5)	816 East Fifth Street House/Lepuska House	Mark Carlos House	A, C	A, C	1a, 2a, 2c

**VI. SIGNIFICANCE**

37. Local landmark designation: Yes  No

Designation authority: \_\_\_\_\_  
Date of designation: \_\_\_\_\_

38. Applicable National Register criteria:

A. Associated with events that have made a significant contribution to the broad pattern of our history.

B. Associated with the lives of persons significant to our past.

C. Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or that possesses high artistic values, or represents a significant and distinguished entity whose components may lack individual distinction.

D. Has yielded, or may be likely to yield, information important in history or prehistory.

Qualifies under Criteria Considerations A through D (see remarks).

Does not meet any of the above National Register criteria.

Pueblo Standards for Designation:

**1a. History**

Have direct association with the historical development of the city, state, or nation; or

1b. History

Be the site of a significant historic event; or

1c. History

Have direct and substantial association with a person or group of persons who had influence on society.

**2a. Architecture**

2a. Architecture

Embody distinguishing characteristics of an architectural style or type; or

2b. Architecture

Be a significant example of the work of a recognized architect or master builder; or

2c. Architecture

2c. Architecture

Contain elements of architectural design, engineering, materials, craftsmanship, or artistic merit which represent a significant or ethereal innovation.

**2d. Architecture**

2d. Architecture

Purify the environment of a group of people or physical development of an area of the city in an area of history characterized by a distinctive architectural style.

**3a. Obsolescence**

3a. Obsolescence

Have a prominent location or be an established, familiar, and enduring visual feature of the contemporary city; or

3b. Obsolescence

3b. Obsolescence

Promote understanding and appreciation of Pueblo's environment by means of distinctive physical characteristics or rarity; or

3c. Obsolescence

3c. Obsolescence

Make a special contribution to Pueblo's distinctive character.

**Not Applicable**

Does not meet any of the above Pueblo landmark criteria.

39. Area(s) of Significance: Architecture

40. Period of Significance: ca. 1890

41. Level of significance: National  State  Local



# Preservation 101 v.s Brownfields



1201 East 7th Street

SPE.7141

Official eligibility determination  
 (OAMP use only)

0AMP1403

Rev. 5/08

COLORADO CULTURAL RESOURCE SURVEY

## Architectural Inventory Form

Page 1

- Date \_\_\_\_\_ Initial \_\_\_\_\_
- \_\_\_\_\_ Determined Eligible- NR
- \_\_\_\_\_ Determined Not Eligible- NR
- \_\_\_\_\_ Determined Eligible- SR
- \_\_\_\_\_ Determined Not Eligible- SR
- \_\_\_\_\_ Need Data
- \_\_\_\_\_ Contributes to eligible NR District
- \_\_\_\_\_ Noncontributing to eligible NR District



### I. IDENTIFICATION

- Resource number: SPE.7141
  - Temporary resource number: Not Applicable
  - County: Pueblo
  - City: Pueblo
  - Historic building name: Bethel Methodist Episcopal Church; Bethel United Methodist Church
  - Current building name: Solid Rock Full Gospel Ministries
  - Building address: 1201 East 7th Street
  - Owner name: Bethel United Methodist Church
  - Owner organization:
  - Owner address: 1201 East 7th Street  
Pueblo, CO 81001
- Parcel number: 430444009

44. National Register eligibility field assessment:  Individually eligible  Not eligible  Needs data  Previously listed
- State Register eligibility field assessment:  Individually eligible  Not eligible  Needs data  Previously listed
- Local landmark eligibility field assessment:  Individually eligible  Not eligible  Needs data  Previously listed

Public Use Sale Survey

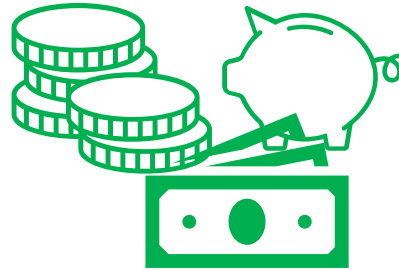
**HISTORITECTURE**

PO Box 415, Estes Park, CO 80517-0415 | (970) 586-1161 | www.historitexture.com

# *Preservation Proforma Payout*



200K Grants  
HSA, ETC  
-State Tax  
Credits



Federal Tax  
Credits



# Call Early and Often



1. *Your SHPO/History Colorado*
2. *Environmental Consultants*
3. *Your Local Planners/Commissions*

Carrie



# Making Brownfields History!

Historic preservation and Brownfield  
Revitalization

**Carrie Rackey**

Brownfield Specialist



# **25+ Years in Brownfields (whew!)**

Environmental scientist

Grant writing & Management

Brownfield Program Development

Sampling & Risk Assessment

Cleanup

Community Engagement

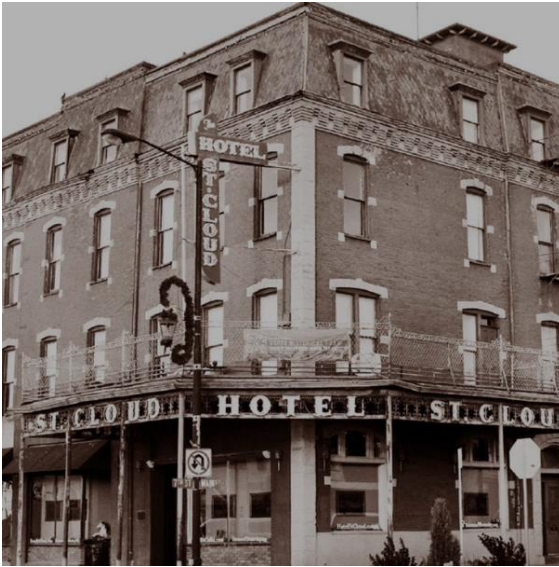
Reuse Planning

Economic Development

**and now . . .**



# Historic Preservation



# Historic Preservation: Economic Game Changer

In Colorado ...

**32 new jobs** are created for every \$1M spent on historic preservation

2002-2015: projects completed using Historic Tax Credits = **3,719 jobs**, **\$280M income**, and **\$58M in tax revenue** to be reinvested

2019: tourism (historic character) = **\$1.5B in state/local tax revenue** and created **180,000 jobs** statewide





# Historic Preservation: Smart Growth

“The greenest building is the one that’s already built.”

-Carl Elefante  
Former President American Institute of Architects



# Historic Preservation: Environmental Challenges

Bird waste

Asbestos

Lead Paint

Universal wastes

Mercury flooring???



# Is that Building a Brownfield?

Sample asbestos, lead paint, maybe flooring

- **Assessment** usually does not trigger SHPO consult



Abate hazardous materials

- **Cleanup** triggers SHPO consult!



## How to pay for it?

CDPHE Targeted Brownfield Assessment

Statewide EPA Brownfield Assessment Grant

Local gov. EPA grant?

EPA Brownfield Assessment Grant

CDPHE Brownfield Cleanup Grant

CDPHE Revolving Loan Fund

EPA Brownfield Cleanup Grant

CDPHE Remediation Tax Credits

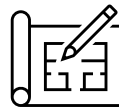
EPA Community Change Grants

# EPA Brownfield Cleanup Grant Section 106 Roles

**EPA:** leads SHPO consult

**Environmental Consultant:**  
technical cleanup scope

**Owner/Developer/Architect:**  
Provide studies, reuse plans



**History Colorado**



# Fox West Theatre - Trinidad



# Fox West Theatre – Trinidad

- FY2017 EPA Brownfield Assessment Grant



Leverage!

- FY2021 Cleanup Grant



Leverage!  
SHPO consult triggered

- CDPHE Cleanup Grant



# Fox West Theatre – SHPO Consult

- EPA started consultation early
- Building use did not significantly change
- Historical studies had been completed











THE TRINIDAD TEA

HAPPY  
Holidays

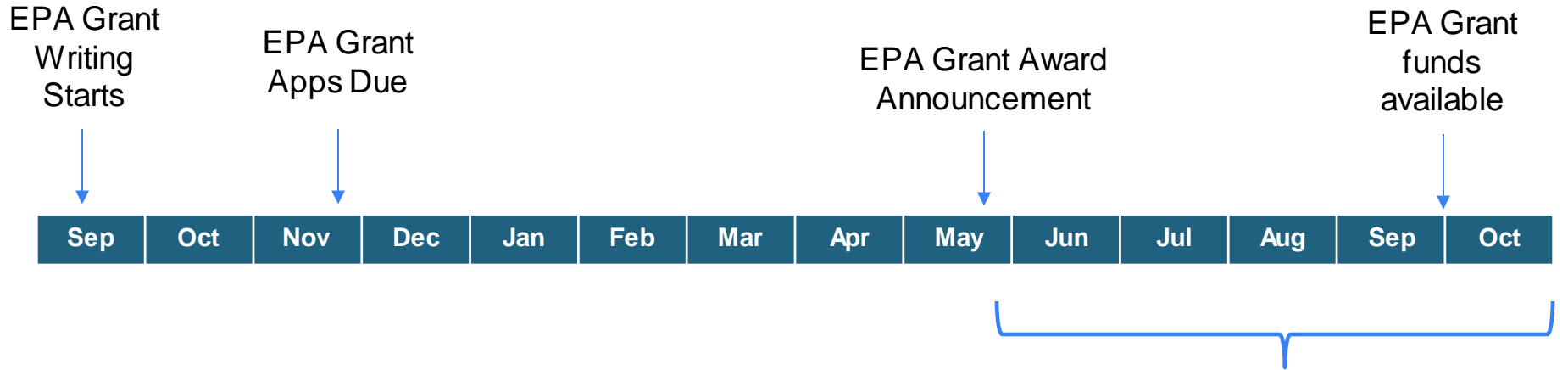
THE LOGO

Sorry we're  
CLOSED

BUSINESS HOURS

TRINIDAD TEA  
BEST  
TASTE  
WINNER

# EPA Brownfield Grant Timeline



Engage w/ SHPO as early as possible

EPA Grant Projects = **EPA** leads  
SHPO consult



# Holy Trinity Convent & School



<https://www.mtcarmelcenter.org/convent-school-cleanup-grant>



# Holy Trinity Convent & School



<https://www.mtcarmelcenter.org/convent-school-cleanup-grant>



# Keating School Pueblo, CO

Assessment with Pueblo's  
EPA Grant

\$1M EPA Brownfield  
Cleanup Grant awarded





Hotel St. Cloud  
Canon City, CO



Columbian Hotel  
Trinidad, CO



Woodman Hall  
Fountain, CO



McGinnis Gym  
Buena Vista, CO





**COLORADO**  
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# RESOURCES

EPA Brownfield Grants:

<https://www.epa.gov/brownfields>

EPA Community Change Grants:

<https://www.epa.gov/inflation-reduction-act/inflation-reduction-act-community-change-grants-program>

CDPHE Brownfields Program:

<https://cdphe.colorado.gov/hm/brownfields>

*Reach out if you want to brainstorm!*

**Carrie.Rackey**@stantec.com

(971) 221-1092

[stantec.com/ideas/spotlight/conference/colorado-brownfields](https://stantec.com/ideas/spotlight/conference/colorado-brownfields)



Sara



# Objectives

1. *Gain knowledge on Brownfield actions and execution of funding*
2. *Understand the collaboration between the Federal agency, property applicant, and State Historic Preservation Office*
3. *Learn how the different types of funding can be leveraged and tips to streamlining that process*



# State Historic Preservation Office (Preservation Tax Credits)

- Federal Rehabilitation Tax Credit (1976)
- Colorado State Historic Preservation Tax Credit
- Secretary of the Interior Standards for Rehabilitation
- Certification of a historic structure
- Qualified Rehabilitation Expenses




2015



1990  
2018

# State Historic Preservation Office (Section 106)

- Section 106
  - Requires federal agencies to take into account the effects of its actions on historic properties by identifying historic properties, assessing adverse effects and resolving those adverse effects.
  - Initiated by the Federal Agency



Getting it done  
≡ VS ≡  
Doing it right

# How Does the Section 106 and Tax Credit programs align?

- Preliminary Eligibility or Designated as a historic structure
- Review work based on the Standards
- Review a project as a whole for impact





# How Does the Section 106 and Tax Credit programs align?

- What is Adverse Effect?
  - When an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places
  - Taking into consideration integrity, significance of the site, location, design, workmanship, feeling, or association
- Essentially, tax credits review for the same items



# Common Examples



# Hazardous Materials and Appropriate Treatments

- Some of the big hazardous materials we run into
  - Window glazing, lead based paint, asbestos in plaster, lead pipes, insulation, asbestos tiles, animal waste
- What can I do if I have these materials?
  - Speak early in the process with the SHPO
  - Alternate materials and appropriate treatments
  - Restoring windows, encapsulating lead based paint, retaining plaster
  - Other alternatives that might trigger an adverse effect: replacement of windows, removing all plaster, floor removal

# Great News??

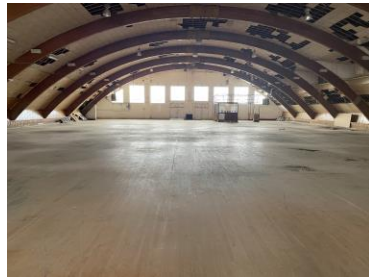
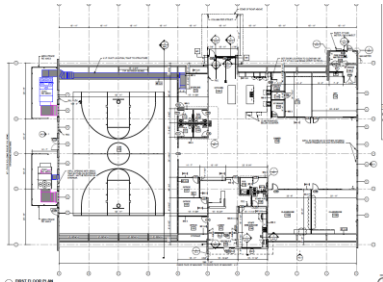
- Expensive...BUT Qualified Rehabilitation Expenses (25-35% State; 20% Federal)
- Section 106 and Tax Credits work together so let us know up front





# What do I need?

- Identify your scope of work that ends in commercial activity (Hint: this might be a larger scope of work than your Brownfield grant)
- Everything you submitted for Section 106 translates to Tax Credits
  - Example: Historic designation, Detailed scope of work, planning documents, photos

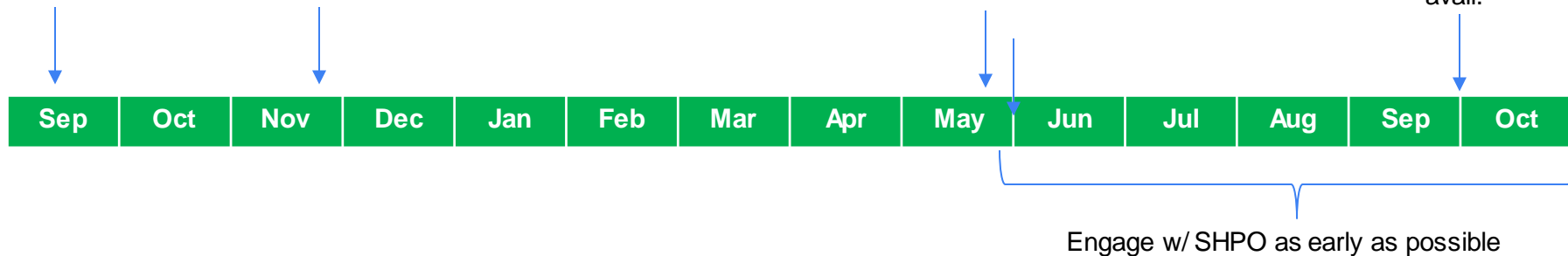


EPA Grant Writing Starts

EPA Grant Apps Due

EPA Grant Award Announcement

EPA Grant funds avail.



Working with Section 106/SHPO

Identifying specific SOW with EPA

Review for Section 106

Begin Work

Connect with Tax Credits (Sara)



# Project Example: McGinnis Gym

- McGinnis Gym; Buena Vista
- Review Process
  - Early discussions with SHPO and SHF
  - Awarded EPA funding
  - Up to date documentation needed for all funding sources
- Estimated Project Cost- \$2.5 million
- Estimated Qualified Expenses- \$2.35 million
- Funding
  - \$805,000 in State HPTC (applied January 23)
  - \$250,000 in State Historical Fund Grant (awarded Spring 23)
  - \$979,222 in EPA funding (awarded Spring 23)
  - \$1 million school district



# Project Example: McGinnis Gym

- Work Items:
  - Steel windows reglazing and operable with storm windows
  - Removal of ceiling tiles
  - Restoring openings
  - Asphalt shingles containing asbestos with a metal standing seam roof



Figure 4: Overall view of the site to the east of the gymnasium.





# Continuing the Conversation

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303-549-6190



