

**Community Relations Plan
Brownfields Cleanup and
Redevelopment of the
Teslow Grain Elevator**

Livingston, Montana

February 2020



Prepared by:



**Snowy Mountain Development Corporation
613 N.E. Main Street, Lewistown, MT 59457**

**Teslow Grain Elevator
Community Relations Plan
East Park St., Livingston, Montana**

Prepared by: _____
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Snowy Mountain Development Corporation

Date

Approved by: _____
Greg Davis, Brownfields Project Manager
U.S. Environmental Protection Agency, Region VIII

Date

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MAPS

MAP 1 Site Location Map

LIST OF ABBREVIATIONS AND ACRONYMS

ABCA	Analysis of Brownfields Cleanup Alternatives
ACM	Asbestos Containing Materials
COC	Contaminants of Concern
BGS	Below Ground Surface
CRP	Community Relations Plan
MT-DEQ	Montana Department of Environmental Quality
QEP	Qualified Environmental Professional
Site	Teslow Grain Elevator, East Park Street, Livingston, MT
SMDC	Snowy Mountain Development Corporation
U.S.	United States

OVERVIEW

The purpose of this Community Relations Plan (CRP) is to describe Snowy Mountain Development Corporation's (SMDC) strategy to address the needs and concerns of the residents and visitors who may potentially be affected by the proposed environmental remediation and redevelopment activities conducted at the Teslow Grain Elevator property located at East Park Street in Livingston, Montana (hereafter referred to as the Site). This CRP outlines how SMDC has involved, and will continue to involve the residents and visitors, the Montana Department of Environmental Quality (MT-DEQ), the United States Department of Environmental Protection Agency (US EPA), and local organizations in the process of remediation for activities at the Site.

SPOKESPERSON AND ADMINISTRATIVE RECORD

The spokespersons for the project are Kathie Bailey, SMDC Executive Director, Cathy Barta, SMDC Regional Director and WWC Engineering Project Manager Greg Reid, who is the acting Qualified Environmental Professional (QEP) for SMDC under contract.

Ms. Bailey may be contacted at: bailey@snowymountaindevelopment.com or (406) 535-2591.

Ms. Barta may be contacted at: barta@snowymountaindevelopment.com or (406) 535-2591.

Mr. Reid may be contacted at: greid@wwcengineering.com or (406) 894-2210.

The administrative record files are located at SMDC at 613 N.E. Main Street, Lewistown, Montana and includes the following documents related to environmental assessment and remediation of the project site:

- Community Relations Plan (CRP);
- Phase I Environmental Site Assessment;
- Phase II Environmental Site Assessment;
- Analysis of Brownfield Cleanup Alternatives (ABCA);
- Any public comments received along with SMDC's response to those comments; and
- Any assessment documents, MT-DEQ work plans and cleanup completion documentation outlining the cleanup standards post-cleanup.

This information is available for viewing at SMDC during normal business hours and is also available on their website which is listed below:

<http://www.snowymountaindevelopment.com/>

Public Meetings will be primarily held within the local area of Livingston. These meetings will be coordinated with the Teslow Preservation Group to determine actual dates, times and location address. Additional public meetings may be held periodically at the Site or at another public venue. These meeting times and places will be advertised in the local newspaper as applicable.

SITE DESCRIPTION AND HISTORY

SITE LOCATION

The Site consists of property locally known as the Teslow Grain Elevator located at East Park Street, in Livingston, Montana. The property is a grain elevator structure that sits on land leased from Montana Rail Link, Inc. The legal description for the property is Section 13, Township 02 South, Range 09 East, IMPT on Montana Rail Link Railway Lease #501,129 (Land on #28001) Grain Elevator. Livingston is the county seat of Park County, Montana, United States. The population of Livingston was 7,044 according to the 2010 census.

Livingston Montana lies along the Yellowstone River where the Paradise Valley meets the western end of the Yellowstone Valley. Located on the eastern side of Bozeman Pass where it crosses the Continental Divide, Livingston was platted as a major hub and railyard by the Northern Pacific Railroad (NPR), along its transcontinental route through the northern United States. The NPR built through Montana in the 1880s, reaching Livingston in 1882. This site became a centralized point in the Rockies and the NPR's location for railroad shops to service NPR steam trains before their ascent over the Bozeman Pass, the highest point on the line. Livingston also became the first gateway town to America's first national park, Yellowstone National Park. This is to where the NPR began promoting heavily to visitors from the East.

SITE HISTORY

The Teslow Grain Elevator is a country grain elevator of cribbed wooden construction designed for grain storage and shipment. It is a classic elevator design, representing a building form both early and common to the North American plains. The walls are composed of 2"x6" planks laid flat, and joined at the corners with spikes, a construction method designed to give extra strength to enclose tons of grain, up to the shoulder of the elevator. Above that height, 2"x 4" boards were used to construct the head house atop the structure.

At the ground level, sliding doors once provided access for farm trucks loaded with grain to drive up and dump their load into a cavity called the "boot," which was fitted out with a lift system to hoist the grain up to the head-house. From there, it was gravity fed into storage bins, sorted according to product and grade. The bins provided dry storage until the grains were shipped by rail on freight cars to markets out of state.

The 1906 Billy Miles & Bros. Grain Elevator was an active part of agricultural economy in Livingston throughout the 20th century. Built at the east end of the town's railroad district, the elevator served as a shipment point for agricultural production in the area for over 100 years, linking grain producers from the surrounding farming region with outside markets.

In January 2016, after a severe windstorm blew off a portion of the roof and damaged the high-house, Livingston's iconic Teslow grain elevator was under demolition. Horrified by the thought of losing a building so crucial to their town's history and skyline, a handful of citizen activists quickly organized under the rallying cry, "Save the Teslow!".

With community support, and that of key individuals, the press, and the Montana Preservation Alliance, Team Teslow (as the group called itself), halted demotion, then in a dramatic reversal,

hired the demolition team to become a construction crew to make repairs to the high-house. The group purchased the grand old building 210 years after it was built, then organized as the Teslow Preservation Group, a 501(c)(3).

PREVIOUS ENVIRONMENTAL INVESTIGATIONS AND SUMMARY OF ENVIRONMENTAL CONDITIONS

The following environmental site assessments/investigations and cleanup plans have been completed for the Site:

1. Phase I Environmental Site Assessment for the Teslow Grain Elevator, Livingston, MT; prepared by Weston Solutions, Inc., July 2017 – Document Control No. W0487.1A.01346 (392 pgs.)
2. Phase II Environmental Site Assessment for the Teslow Grain Elevator, Livingston, MT; prepared by Weston Solutions, Inc., September 2017 – Document Control No. W0487.1A.01404 (85 pgs.)
3. Draft Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation, Teslow Grain Elevator, East Park Street, Livingston, MT, Prepared by WWC Engineering, February 10, 2020 (5 pgs.)
4. Sampling and Analysis Plan for Confirmation Samples at The Teslow Grain Elevator Property Livingston, Park County, MT, Prepared by WWC Engineering, February 7, 2020 (131 pgs.)

The results of the Phase II Environmental Site Assessment Report, dated July 1, 2019 confirmed the presence of contaminants including asbestos-containing material (ACM), arsenic, and pigeon guano. These contaminants of concern (COC's) need to be properly addressed prior to the building being reused.

The purpose of this project is to eliminate the potential exposure of the public and contractors to these materials, and to facilitate the renovation of the building by lowering the cost of remediation for the grain elevator. This Brownfields grant will be used to provide project coordination; provide community outreach services; secure an environmental engineering consultant to oversee and monitor the removals; and to pay for the removal and disposal of the materials.

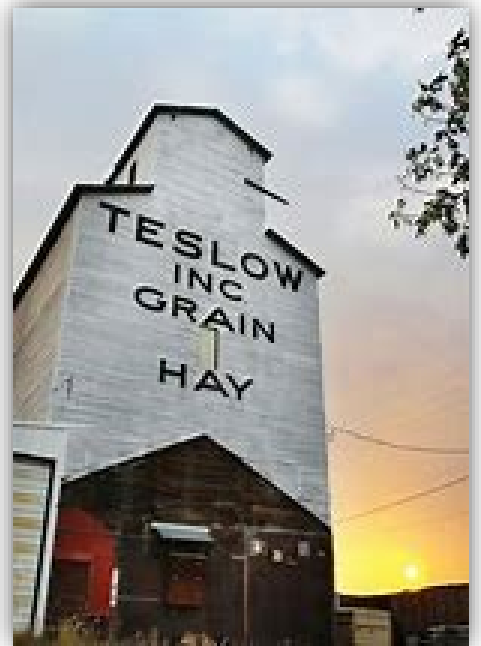


Figure 1: Teslow Grain Elevator located at East Park Street in Livingston

PROPOSED REMEDIATION PLAN

As part of the Snowy Mountain Development Corporation's Brownfields Program, WWC Engineering completed a Draft Analysis of Brownfields Alternatives dated February 10, 2020 to evaluate potential cleanup alternatives for the Site. Three alternatives for remediation were proposed in the draft ABCA:

Alternative #1 (no remediation) was not selected as hazardous building materials would remain in place and would render the unsuitable for reuse.

Alternative #2: Remediation of all Hazardous Materials made by both the Weston Solutions Superfund Technical Assessment and Response Team (START) and WWC Engineering **has been initially selected as the most feasible and cost-effective alternative for the site.** The alternative involves mitigating the potential for human exposure at the Site by removal and abatement of the contaminants in accordance with State and Federal regulations.

Alternative #3 (demolishing the structure) was not selected as it was determined to be costly and because the Teslow Preservation Group bought the building specifically to restore this historic landmark.

COMMUNITY PROFILE

The Teslow Grain Elevator property is located in Livingston, Montana, in Park County. Livingston's 2017 estimated population is 7,294¹ with a median age of 39.7 years² and an estimated median household income of \$38,807.³ The Site is located in the heart of the commercial area of Livingston.

NATURE AND THREAT TO PUBLIC HEALTH AND ENVIRONMENT

The current threat to public health is the exposure to hazardous substances (arsenic and pigeon guano) and asbestos by individuals entering the building. Certain asbestos-containing materials in the building are in poor condition that could cause the release of asbestos fibers to the air and to the building floors and surfaces.

PROPERTY REDEVELOPMENT PLANS

The Teslow Group LLC officially purchased the 73-foot-high, 110-year-old landmark from Livingston developer Chris Salacinski on March 1, 2016 and announced the news at a public meeting at the Shane and Lalani Center for the Arts. The ownership of the property was later transferred to the non-profit organization, Teslow Preservation Group in November of 2019.

The mission of the Teslow Preservation Group is to keep the Teslow standing, preserve its increasingly rare architecture, and reintegrate the building into the community by allowing it to be repurposed. In partnership with the Teslow Preservation Group, the Montana Preservation Alliance completed a Condition Assessment and Feasibility Study for the Teslow in September of 2019.

Once the initial repairs were completed, the Teslow Preservation Group secured the necessary funds to conduct a Condition Assessment and Feasibility Study on the elevator, and nominate it to the National Register of Historic Places. The goal of the study was to evaluate the needs of the structure and its suitability for reuse, to identify potential reuse concepts, and to provide interested parties the information needed to encourage new investment and preservation of this iconic structure so important in the history of the community.

The Teslow Grain Elevator presents space with opportunities for reuse in a variety of ways, both old and new. Discussions with current owners, research into comparable properties and projects, and consultation with the preceding studies suggest a Range of Alternatives, including

- Business Concept, Craft Manufacturing: Beer, Distillery, Cider
- Business Concept, Agricultural: Vertical Gardening, Storage
- Business Concept, Retail/Studios: Art Production, Film or Music Recording Studios, Live-Work Space
- Business Concept, Recreation & Sports Center

The reuse concepts above all hold possibilities for a building like the Teslow Elevator. A mixed use concept combining some of these uses would diversify the business model and potentially, the range of financial incentives available for redevelopment. In a town with limited centralized real estate, which relies heavily on tourism to drive its economy, the elevator is an economic asset in a prime location.

BENEFITS TO THE COMMUNITY

Currently, the grain elevator sits abandoned. This has led to the deterioration in the condition of the building which is progressively becoming an eyesore. The deterioration led to hazardous conditions to the building, of which the structural elements were immediately addressed and repaired when purchased by the Teslow Group. Contaminated conditions still exist within the structure.

The Livingston community will benefit from this project in four primary ways. First, the removal of the hazardous substances and asbestos-containing materials from the building will halt the release and spreading of these substances; second, the removal of the hazardous substances and asbestos-containing materials from the building will reduce threats to human health in that the threat of exposure to individuals entering the building by authorized or illegal means will be eliminated; third, the cleanup will facilitate the redevelopment as it will lower the cost threshold for the renovation planned for the clinic; fourth, the cleanup of the building will advance the conversion of the site from a community eyesore into a community asset.

PUBLIC COMMUNICATION

Overall, the current landowner and general public, through various landowner correspondence and meetings, have stated that they would like to see the Site remediated to permit redevelopment and to safeguard human health.

COMMUNICATION OUTREACH

SMDC updates Site and project status information on its organizational website: www.snowymountaindevelopment.com. In addition, Brownfields projects are summarized in SMDC's Executive Director's Reports, which are discussed at SMDC's Board Meetings, and uploaded to its electronic publishing platform on ISSUU: <https://issuu.com/snowymountaindevelopment>.

SMDC staff also upload photos and project information on its Facebook page: www.facebook.com/snowymountaindevelopment and LinkedIn page: <https://www.linkedin.com/company/snowy-mountain-development-corporation>.

SMDC staff provide Media Releases to local newspapers and radio stations informing them of newsworthy project updates.

CONTACTS

Entity	Name	Title	Address	Phone Number	Email Address
Media Contact	The Livingston Enterprise	Advertising Department	401 S. Main Livingston, MT 59047	(406) 222-2000	ads@livent.net
Media Contact	The Livingston Enterprise	Editors	401 S. Main Livingston, MT 59047	(406) 222-2000	Justin Post: jpost@livent.net Dwight Harriman: dharriman@livent.net Nate Howard: photo@livent.net
Media Contact	The Livingston Enterprise	Reporter	401 S. Main Livingston, MT 59047	(406) 222-2000	Sam Klomhaus: sklomhaus@livent.net
City of Livingston	Michael Kardoes	City Manager	414 E Callender St. Livingston, MT 59047	(406) 823-6000	
City Commission	Dorel Hoglund Term Ends 12/2021	Chair	414 E Callender St. Livingston, MT 59047	(406) 860-2007	
Historic Preservation Commission	Jim Woodhull	Preservation Officer	330 Bennett Street Livingston, MT 59047	(406) 222-4903	
State of Montana Fire Marshal	Sally McKenna	Deputy State Fire Marshal, Area 4	P.O. Box 31094 Billings, MT 59107	(406) 896-4388	smkenna@mt.gov
MT DEQ	Jason Seyler	MT DEQ Brownfields Lead	P.O. Box 200901 Helena, MT 59620- 0901	(406) 444-6447	jseyler@mt.gov
U.S. EPA	Greg Davis	Brownfields Project Manager	US EPA, Region 8 1595 Wynkoop Street Denver, CO 80202	(303) 312-6184	gregory.davis@epa.gov
Teslow Preservation Group	Seonaid Campbell	Teslow Group Vice Chair	PO Box 2101 Livingston, MT 59047-4708	(406) 220-1546	seonaid.campbell@gmail.com
Teslow Preservation Group	Ron Nemitz	Teslow Group Board Member		(406) 599-6213	ronnemetz11@gmail.com
Montana Rail Link Inc			PO Box 16390 101 International Drive Missoula, MT	(406) 523-1500	

REFERENCES

Draft Analysis of Brownfields Cleanup Alternatives Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation, Teslow Grain Elevator, East Park Street, Livingston, MT, Prepared by WWC Engineering, February 10, 2020 (5 pgs.)

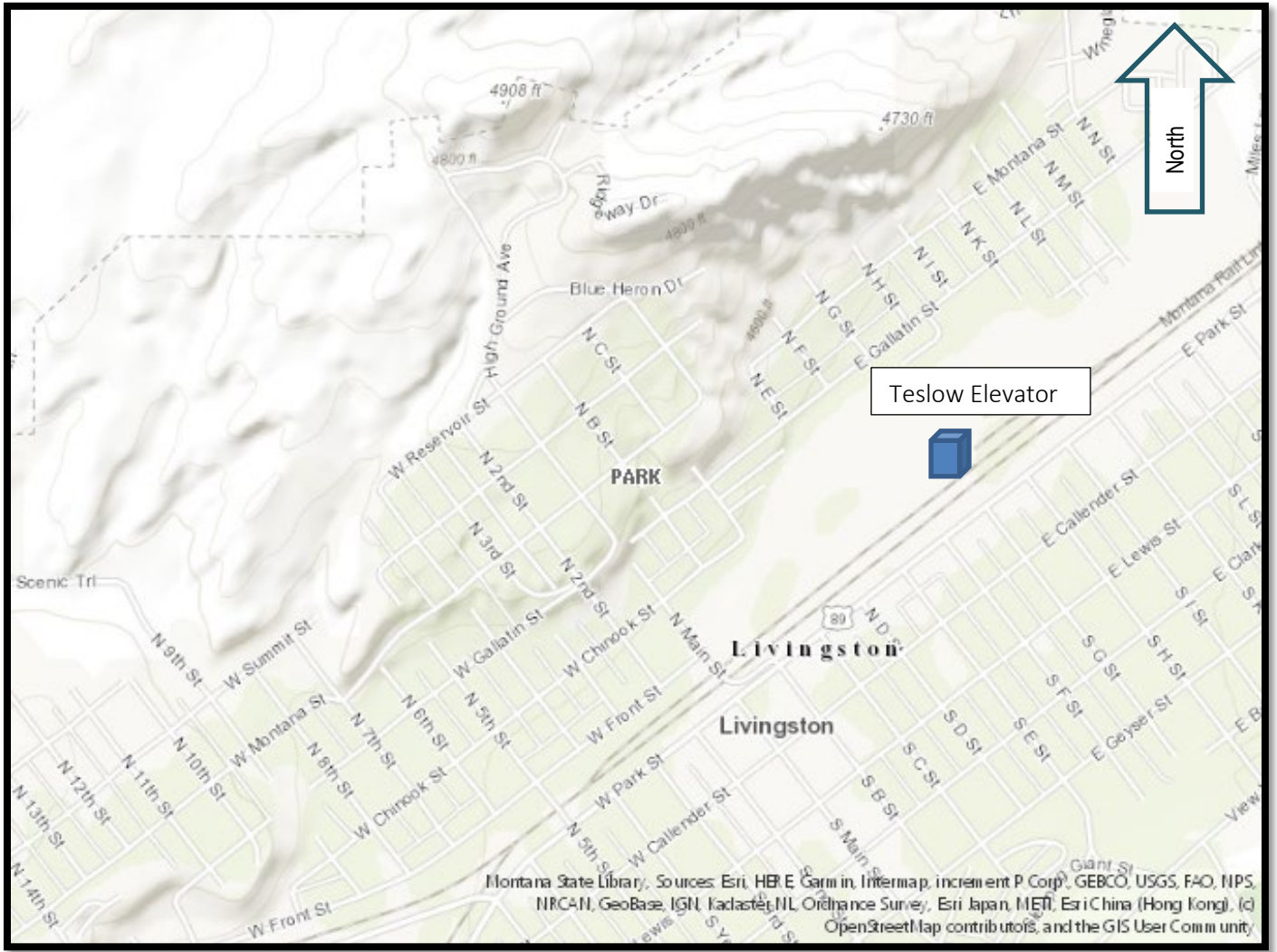
Phase I Environmental Site Assessment for the Teslow Grain Elevator, Lewistown; prepared by Weston Solutions, Inc., July 2017 – Document Control No. W0487.1A.01346 (392 pgs.)

Phase II Environmental Site Assessment for the Teslow Grain Elevator, Lewistown; prepared by Weston Solutions, Inc., September 2017 – Document Control No. W0487.1A.01404 (85 pgs.)

Sampling and Analysis Plan for Confirmation Samples at The Teslow Grain Elevator Property Livingston, Park County, MT, Prepared by WWC Engineering, February 7, 2020 (131 pgs.)

The Teslow Grain Elevator Condition Assessment & Reuse Feasibility Study - 50% Draft | September 2019 – Montana Preservation Alliance. (66 pgs.)

MAP 1: Overview of Site Location Area



Map of the City of Livingston, Park County, Montana