**Narrative Information Sheet**

| Applicant Identification: | City of Denison  
111 North Main Street  
Denison, Iowa 51442 |
|---------------------------|--------------------------------------------------|
| Funding Requested:        | a) Assessment Grant Type: Community-wide  
b) Federal Funds Requested:  
i) $400,000  
ii) No site-specific waiver requested |
| Location:                 | Denison, Crawford County, Iowa |
| Target Area and Priority Site/Property Information | • The target area discussed in the Narrative consists of the entirety of municipal limits based on its extremely limited size (6.5 square miles).  
• N/A - the target area is based on municipal limits. The boundaries of the two census tracts covering Denison each extend far into Crawford County jurisdiction.  
• The priority site identified in the Narrative does not have an assigned address. It is located at the southwest corner of the intersection of S. 16th Street and 5th Avenue South (approximately 1505 5th Avenue South). |
| Contacts:                 | b) Chief Executive/Highest Ranking Elected Official:  
Ms. Pam Soseman, Mayor  
Phone: (712) 267-3361  
E-mail: mayor@denisonia.com  
Mailing Address:  
City of Denison  
111 North Main Street  
Denison, Iowa 51442 |
| Population:               | 8,373 (2020 Decennial Census) |
| Other Factors Checklist   | The following items apply to the community’s proposed project:  
• Community population is 10,000 or less (Page 1)  
• 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities (Pages 8 and 9)  
• The reuse of priority site(s) will incorporate energy efficiency measures (Page 3) |
| Letter from the State Environmental Authority | This document is attached to the Narrative Information Sheet. |
| Releasing Copies of Applications | Not applicable |
November 4, 2021

Susan Klein
Superfund Division/STAR
EPA Region VII
1201 Renner Road
Lenexa, KS 66219

RE: City of Denison, Iowa – Brownfield Grant Application for Community-Wide Assessment – Commercial Corridors

Dear Susan:

The Iowa Department of Natural Resources (DNR) is pleased to provide this letter as a statement of acknowledgement, review, and support for the City of Denison’s assessment grant application for $400,000, through funding authorized by §104(k) of CERCLA. This application and brownfield assessment initiative addresses known and potential hazardous substance and petroleum contamination at multiple abandoned and underutilized commercial and industrial parcels within the City.

The City seeks to carry out a comprehensive, community-wide approach for public engagement and participation in the environmental assessment, cleanup, and redevelopment planning efforts for a former power plant site, and a number of properties along major commercial corridors in the City, including along Avenue ‘C’, and near its intersection with Iowa Hwy. 39. Known and suspected environmental contaminants have had a detrimental impact on redevelopment interest and community-quality impact in these areas of the City.

The DNR appreciates the opportunity to be a supportive partner for brownfield assessment, cleanup, and redevelopment projects in the past with the City of Denison, and we support the brownfield assessment strategies presented within the city’s application with the highest degree of endorsement and confidence.

Sincerely,

[Signature]

Mr. Mel Pins
Executive Officer
Iowa Brownfield Redevelopment Program
Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a) Target Area and Brownfields
      i) Background and Description of Target Area- Denison is a rural community of 8,373 located along the Boyer River in western Iowa. The town incorporated in 1875 and serves as the seat of Crawford County. Its history is deeply rooted in farming which formed a steady, but narrow, early economic foundation. Pressures placed on small family-owned farms in decades following the Great Depression required the area to eventually seek diversification in its employment base.

Proximity to cattle and corn production first attracted Iowa Beef Packers (IBP) to Denison in 1961. The company constructed a single-story, fully refrigerated plant that revolutionized the meat packing industry that year. This innovative approach allowed IBP to provide hundreds of stable jobs to the region for many years; however, increased competition slowly eroded wages culminating in a disastrous 1980s strike ending with further pay cuts and a disbanded union. To make matters worse, the event coincided with a severe agricultural recession that dramatically shook the community and forever altered its social fabric. Consequences continue to be felt today.

Many Denison agri-businesses like implement stores and machine shops closed or downsized their workforces during poor market conditions. Supporting commercial retail enterprises also suffered resulting in shuttered storefronts. This decline contributed to a population decrease of 1.1% during the 1980s including a notable outmigration of individuals aged 25-29. A book featured in the New York Times that chronicled the dire situation stated “Young people no longer stay in Denison. Its main street has withered, and the few remaining businesses in town struggle to stay afloat.”

A rebound in the food processing industry helped stabilize the community during the 1990s. Expansions at Farmland Foods swelled its labor force to over 1,000. Smithfield Foods, specializing in fresh and processed pork, acquired the facility in 2003 to become one of the largest hog producers in the country. By August 2005 the company had embarked on an $81 million expansion necessitating the hiring of more people. The operation currently employs over 1,600.

Local meatpacking plants often recruit Hispanic workers to fill positions which has spurred a rapid change in the community’s demographic profile. U.S. Census data indicates the group accounted for only 0.8% of Denison residents in 1990. The figure grew to 17.4% by 2000 while nearly half (48.8%) now identify as Hispanic. Although the first wave of immigration predominately consisted of men, women and children have since followed to establish permanent residence.

The continued influx of people has rejuvenated Denison. City officials estimate the community boasts over 100 Hispanic-owned business such as a bakery, grocery store, used auto dealership, and restaurants. This positive momentum has made the area ripe for more redevelopment opportunities, but a significant number of commercial/industrial properties remain vacant or underutilized from the referenced economic downturn due to perceived contamination concerns. Several of these brownfields are within a predominantly Hispanic neighborhood. Requested funds are necessary to protect this sensitive population from unknown exposure risks and eliminate cleanup liability anxieties that threaten to stall additional progress.

Although proposed assessment activities will focus on sites primarily located in two distinct areas, this application considers all of Denison the target area due to its extremely limited geographical extent (6.5 square miles) and population. In fact, both census tracts combining to cover Denison also encompass portions of unincorporated Crawford County. Brownfields highlighted below are

\footnotesize
\footnotesize
1 The Denison Land Use Plan (2011)
\footnotesize
\footnotesize
3 Denison, 1836-2006, Celebrating 150 Years of History (2006)
\footnotesize
4 2000 and 2020 US Decennial Census
largely sited along a declining industrial corridor between Lincoln Highway and railroad tracks to the north and south, respectively, as well as along a key commercial node stretching Avenue C.

ii) Description of the Priority Brownfield Sites- The City will focus investigation efforts on seven priority sites based on their respective likelihoods for detrimental impact on human health and the environment (see table below). Each displays characteristics common to brownfields including perception of contamination, underutilization, poor physical condition, and lax adherence to best management practices for hazardous material storage. The City has proactively secured a signed access agreement for each property thus ensuring full program participation upon award.

<table>
<thead>
<tr>
<th>Address</th>
<th>Acres</th>
<th>Past Uses</th>
<th>Environmental Issues</th>
<th>Current Use/Cond.</th>
</tr>
</thead>
<tbody>
<tr>
<td>S. 16th St./5th Ave. S</td>
<td>1.1</td>
<td>Electric Power Plant</td>
<td>PAHs, PCBs, heavy metals, TEHs, ACM, LBP</td>
<td>Vacant 2-story bldg.</td>
</tr>
<tr>
<td>232 Avenue C</td>
<td>0.17</td>
<td>Glass repair shop</td>
<td>Heavy metals, ACM, LBP</td>
<td>Vacant 2-story bldg.</td>
</tr>
<tr>
<td>226 Avenue C</td>
<td>0.22</td>
<td>Motorcycle repair</td>
<td>VOCs, TEHs, ACM, LBP</td>
<td>Underutilized bldg.</td>
</tr>
<tr>
<td>222 Avenue C</td>
<td>0.17</td>
<td>Commercial retail</td>
<td>ACM, LBP</td>
<td>Laundromat/storage</td>
</tr>
<tr>
<td>417 S. 9th Street</td>
<td>4.99</td>
<td>Machine shop</td>
<td>Heavy metals, PCBs, VOCs</td>
<td>Minor metal work</td>
</tr>
<tr>
<td>529 IA Highway 39</td>
<td>1.57</td>
<td>Screen printer</td>
<td>Heavy metals, VOCs, ACM</td>
<td>Vacant 1-story bldg.</td>
</tr>
<tr>
<td>705 IA Highway 39</td>
<td>4.3</td>
<td>Farm implement</td>
<td>Heavy metals, VOCs, TEHs</td>
<td>Storage</td>
</tr>
</tbody>
</table>

The former Denison Municipal Utility (DMU) Power Plant is prominently located a block south of Lincoln Highway just east of downtown. The two-story brick building was constructed in 1914 and operated using coal as its energy source until 1965. DMU permanently closed the facility in 1993 after relocating the last of its business operations. Potential cleanup liabilities associated with its former use play a significant factor in its inability to sell the historic property. DMU’s trustees recently targeted the plant for demolition; however, interest from a local developer to rehabilitate the facility into a restaurant/entertainment venue generated community excitement. The utility company publicly pledged $200,000 in economic development assistance towards the effort at its August 2021 meeting. Programmed reuse planning funds under this grant will further assist the project by preparing schematic designs for resident review and input.

Avenue C sites consist of severely blighted, former neighborhood businesses. The area is surrounded by lower income housing primarily inhabited by Hispanic immigrants. These households bear a disproportionate share of negative externalities (e.g., possible health effects and safety concerns) from the brownfields. Further, an assessed value survey of the six single-family homes located on the same physical city block as these priority sites and others just two blocks to the south on Avenue A reinforce the fact. Structures near the former glass and motorcycle repair shops and commercial retail building are worth 10.9% less ($61,708 versus $69,290)³.

The defunct farm implement and screen printer are on IA-39 near Avenue C. Each provides a negative first impression of the community along a gateway road into Denison. Substantial concrete staining combined with exterior storage of used tires, scrap metal, etc. at the former property dissuades investment. A similar situation exists at the latter site because of its deteriorating physical condition. Contamination concerns associated with both of their respective past uses exacerbate the issue.

b) Revitalization of the Target Area
i) Reuse Strategy and Alignment with Revitalization Plans- Repurposing brownfields strengthen the community through new housing and job opportunities and entertainment options; however, the viability of these projects hinge on the City’s ability to remove environmental uncertainties.

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<thead>
<tr>
<th>Priority Site</th>
<th>Projected Reuse</th>
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<tbody>
<tr>
<td>S. 16th Street/5th Ave.</td>
<td>Restaurant and entertainment venue</td>
</tr>
<tr>
<td>222, 226, &amp; 232 Avenue C</td>
<td>Multi-family housing</td>
</tr>
<tr>
<td>417 S. 9th Street</td>
<td>Light manufacturing</td>
</tr>
<tr>
<td>529 IA Highway 39</td>
<td>Commercial retail</td>
</tr>
<tr>
<td>705 IA Highway 39</td>
<td>Commercial sales with showroom</td>
</tr>
</tbody>
</table>

The Denison Land Use Plan, the City’s adopted comprehensive plan, will serve as the guiding framework for all reuse projects cited above. Each proposal is consistent with the document’s future land use map. More importantly, they address two of the most pressing needs facing the community as identified by citizens during the plan’s workshop meetings: 1) Additional housing development, including affordable housing and 2) Business and employment retention and growth.

Officials identified the adjacent Avenue C sites as a good location for new apartments. This will help address a workforce housing shortage cited as the City’s top need in its Housing Market Study from 2018. City Council is receptive to acquiring the properties using tax increment financing (TIF) following completion of environmental due diligence. Staff will then issue a request for proposals to local builders interested in constructing the units. Proposed site reuse assessment and infrastructure evaluation reports will supplement the process with important guiding information like area real estate market conditions, applicable regulations, condition/capacity of utilities, etc.

Clearing the remaining brownfields will achieve a comprehensive plan goal of “providing attractive sites for future commercial and industrial development.” In fact, addressing the environmental component is often the only hurdle remaining for priority sites. A developer recently withdrew a brewery proposal at the power plant for fear of contamination. Similar sentiments exist at the former machine shop which has prevented other light industrial businesses from relocating to the site. Revitalizing these four sites will ultimately allow for job opportunities ranging from skilled labor (manufacturing) to the service sector (retail and entertainment venue).

ii) Outcomes and Benefits of Reuse Strategy: The following table offers detail into potential investment and property tax revenues generated after the former power plant site redevelopment is realized as presented to city officials and DMU by the developer.

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Rest./Ent.</td>
<td>1.1</td>
<td>47,916</td>
<td>8,275</td>
<td>15</td>
<td>$563,301</td>
<td>$3,500,000</td>
<td>$142,044</td>
</tr>
</tbody>
</table>

Projection assumptions for the information provided in the table above assume the following: employment figure is based on one employee per 550 square feet of space; wage impact is based on an average hourly wage of $18.00; and building investment is based on a per square foot value of $423.00. Thus, approximately $3.5 million in building investment equates to over $142,000 in much needed annual property tax revenue (see Community Need section). It also creates 15 full-time jobs resulting in $563,301 in annual wages. This is especially meaningful as the livable pay rate is more than double the State of Iowa’s minimum wage ($7.25/hour).

No reuse project is expected to facilitate new sources of renewable energy; however, the former power plant developer is dedicated to minimizing its carbon footprint. Preliminary renovation plans incorporate energy-efficient windows, doors, lighting, insulation, and HVAC equipment.

Proposed redevelopment projects will directly benefit disadvantaged communities within Denison. Specifically, eliminating Avenue C corridor brownfields will reduce environmental justice concerns for surrounding lower income households that include many Hispanic citizens. Those

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6 Based on a gross property tax levy of 40.58394 per $1,000 of assessed value (Iowa Department of Management- (Accessed 10/25/2021)).
residents immediately adjoining the priority sites are currently subjected to both known (lowered property values) and unknown (exposure risk) impacts.

c) Strategy for Leveraging Resources
i) Resources Needed for Site Reuse- The City is eligible for funding from a variety of resources to supplement its redevelopment efforts. An example includes Community Development Block Grants (CDBG) to assist with infrastructure needs. This project will also stimulate the availability of additional funds necessary for future assessment and/or remediation. Staff will investigate pursuing Iowa Department of Natural Resources (IDNR) 128(a), EPA Targeted Brownfields Assistance, and/or EPA Brownfields Cleanup funds to satisfy site-specific demands, as needed, to ensure the City’s brownfields are returned to a sustainable reuse.

As referenced earlier, DMU has committed $200,000 towards advancing the proposed former power plant project. This significant sum is critical to help close financing gaps for the priority site. Additionally, the developer is in the process of placing the property on the National Register of Historic Places to access historic preservation grants, loans, and tax credits.

ii) Use of Existing Infrastructure- Consistent with The Denison Land Use Plan’s smart growth policy to “make full and efficient use of urban services”, the City will expend grant funds exclusively on brownfields served by existing infrastructure. All priority properties are urbanized – meaning gas, electric, water, sewer, and streets serve the properties. If the infrastructure evaluation study determines upgrades are necessary to redevelop the Avenue C properties, the City will fund improvements through local funding (general obligation bonds, TIF funds, etc.) while also utilizing CDBG or state revolving loan funds, as appropriate.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
a) Community Need
i) The Community’s Need for Funding- Denison does not have the fiscal capacity to undertake a comprehensive approach to addressing brownfields. A limited population and subsequent tax base hinder the City’s ability to complete assessment and/or remediation activities that stimulate reuse projects. The City’s approved FY 2021-2022 General Fund operating budget lists only $4,288,420 in total authorized expenditures. These shortcomings often prevent the City from being able to provide basic services to the community. Elected officials were forced to cancel this year’s streets program meaning no money was available to complete any of the much-needed reconstruction projects. Denison has not had any substantial street improvement projects in the last ten years, except for those funded primarily by the Federal Highway Administration (FHWA).

The City is fully committed to investigating brownfields concerns; however, the current need is on a much larger scale than its budget can absorb. In the absence of this EPA grant, the community cannot allocate funds to inventory, assess, characterize, and conduct cleanup planning on potentially contaminated sites due to competing needs for extremely tight local resources.

ii) Threats to Sensitive Populations
1) Health or Welfare of Sensitive Populations- Denison is one of the most ethnically diverse towns in Iowa. Individuals identifying as Hispanic or Latino account for 48.8% of residents – an astonishing number for a state that is 85.7% white alone, not Hispanic or Latino. The cohort figure is more than seven-and-a-half and two-and-a-half times the percentage living within Iowa (6.0%) and United States (18.0%), respectively. Additionally, Hispanics represent 60.6% of the public school district students, an extreme rarity for the state. EPA’s EJSCREEN Tool lists Denison within the 97th percentile for its people of color population compared to Iowa. This

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7Statistics cited in this section are from the 2019 American Community Survey (ACS) 5-Year Estimate to ensure availability of comparison points.
7https://ejscreen.epa.gov/mapper/ (Accessed 10/21/2021)
disproportionately high number of traditionally disenfranchised people is often relegated to living near brownfields, such as the case around Avenue C, which raises environmental justice issues.

The community is economically depressed when contrasted with the state and country. Median household income data portrays this financial inequality as the figure ($54,190) is 10.1% less compared to Iowa ($60,253) and 17.5% less than the U.S. ($65,712). The free and reduced lunch rate for the local school district reflects these unfortunate circumstances. Over 68% of the total students qualify for the federal aid program, including more than 77% at the elementary level.

Elevated levels of poverty plague Denison due to the limited earnings. Over one-fifth of all people (20.4%) struggle to meet basic food needs. This percentage of individuals in poverty far exceeds rates for Iowa (11.5%) and the U.S. (12.3%). These economic obstacles are hard to overcome when the number of individuals actively seeking jobs go beyond available positions. Joblessness statistics for Denison are not calculated due to its small size. Consequently, this application examines Crawford County. Denison's rate likely mirrors the County's as the town represents 48.9% of its population. The County experienced a slightly elevated unemployment rate (4.3%) when contrasted with Iowa (3.8%) in August 2021 but the annual average percentage of unemployed county residents seeking jobs exceeded the statewide figure every year since 2015.

Public health benefits associated with this proposed project are clear: assessing and characterizing priority brownfields creates healthier neighborhoods by reducing risks to sensitive populations through the gathering of critical information and formulating appropriate responses. Examples include the use of institutional or engineering controls. Investigation data helps officials make better-informed decisions relating to the potential need to safeguard human health through cleanup. This work ultimately culminates in improved local air, land, and water quality that in turn also makes progress towards achieving a higher degree of environmental justice for the community.

2) Greater Than Normal Incidence of Disease and Adverse Health Conditions- Pervasive use of hazardous substances and petroleum at priority brownfields sites creates exposure concerns for Denison residents. Current and past uses make the facilities suspect for the presence and potential release of polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), total extractable hydrocarbons (TEHs), heavy metals/lead based pain (LBP), and asbestos containing materials (ACM). The table below provides perspective on potential health effects associated with these contaminants.

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Potential Health Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>PAHs</td>
<td>Carcinogenic. Possible birth defects and liver/blood problems.</td>
</tr>
<tr>
<td>VOCs</td>
<td>Known carcinogen. Possible cardiovascular, organ growth, liver, immune problems.</td>
</tr>
<tr>
<td>PCBs</td>
<td>Probable carcinogen. Suspected immune, reproductive, nervous, endocrine impacts.</td>
</tr>
<tr>
<td>TEHs</td>
<td>Known carcinogen found in hydrocarbons (benzene, death via ingestion or breathing), bone marrow and immune system effects. Possible low birth weights and bone damage.</td>
</tr>
<tr>
<td>Heavy metals/LBP</td>
<td>Probable carcinogen. Cardiovascular, organ growth, digestive, hematological, musculoskeletal, neurological, ocular, urinary systems or kidneys, reproductive prob.</td>
</tr>
<tr>
<td>ACM</td>
<td>Lung cancer, mesothelioma and lung disorders, other cancers.</td>
</tr>
</tbody>
</table>

County-level health studies suggest the City’s brownfields may already be affecting residents. This situation is especially troubling based on the demographic makeup of Denison. Interaction with contaminants via direct contact, inhalation of airborne particulates, and/or vapor intrusion pathways expose individuals to known carcinogens or other health impairments.
- **County Health Rankings**, a Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute collaboration, analyzes health outcomes (length of life and

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quality of life) and health factors (health behaviors, clinical care, social and economic factors, and the physical environment). Crawford County ranked 78th and 97th of 99 Iowa counties in the referenced categories, respectively. Factors contributing to this poor standing include income inequality as determined by the ratio of household income at the 80th percentile to income at the 20th percentile (4.7) and an elevated percentage of children living in poverty (17%). Air quality, as measured by fine particulate matter in micrograms per cubic meter (μg/m³), is also concerning for residents. The average daily density rate of PM2.5 (7.4) is elevated when contrasted with top U.S. performers (5.2) cited in the study.

- Iowa Department of Public Health’s Public Health Tracking Portal lists Crawford County as having the 2nd highest emergency department (ED) visit rate for people seeking medical treatment related to asthma among the state’s 99 counties. Its crude rate of 39.83 per 10,000 individuals is significantly higher than the overall state ED rate of 21.26. Asthma incidents strongly correlate with environmental conditions as ozone, particulate matter, and other air pollutants can trigger asthma attacks.

This grant allows the City to assess contaminant sources, quantify pollutants, and develop suitable remedies to reduce exposure. The City will facilitate enrolling sites requiring corrective action prior to reuse into IDNR’s Land Recycling Program. The program utilizes Risk Based Corrective Action levels based on EPA’s cumulative increased cancer risk evaluations and requires public notification for all corrective actions.

3) Promoting Environmental Justice- EJSCREEN indicates Denison is within the 86th percentile or above for each environmental justice index it tracks when compared to Iowa. This includes air quality concerns related to particulate matter levels and cancer risks resulting from the inhalation of toxins as well as proximity to facilities requiring risk management plans and National Priority List (NPL) sites. Moreover, the EPA tool also cites the community’s diversity index in the 93rd and 72nd percentile contrasted with the state and U.S. This metric is a combination of percent low-income and percent minority, the two demographic factors explicitly named in Executive Order 12898 on Environmental Justice. Thus, the community has a comparatively higher percentage of traditionally disadvantaged populations that are more likely to suffer negative environmental consequences stemming from its local brownfields.

Securing this grant funding is critical to the City’s ability to serve neighborhoods most impacted by brownfields through positive redevelopment of derelict properties. For example, the three adjoining nuisance properties on Avenue C will continue to lower surrounding property values while also possibly exposing nearby oft-marginalized residents to unknown health risks. Clearing these targeted sites and replacing them with multi-family housing will transition the blight into a community asset that provides safe and sustainable workforce housing.

b) Community Engagement

i and ii) Project Involvement and Project Roles- The City has received commitments from three dedicated local partners to assist with all phases of the brownfields process including resident education and support, site selection, property owner interaction, and marketing properties for reuse. Their invaluable knowledge of the area’s demographics, economy, and market conditions will also help with reuse planning activities. City staff will coordinate with these stakeholders on a bi-annual basis. The following table summarizes their respective roles:

<table>
<thead>
<tr>
<th>Name of Org.</th>
<th>Point of Contact</th>
<th>Specific Involvement in the Project</th>
</tr>
</thead>
</table>
| Crawford Co. Chamber & Dev. Council | Name: Evan Blakley E: eblakley@cdcia.org P: 712-263-5621 | • identify potential brownfields sites
| | | • help market properties for reuse
| | | • meet with owners of targeted properties

15 https://ejscreen.epa.gov/mapper (Accessed 10/21/2021)
iii) Incorporating Community Input- A robust outreach effort will regularly convey project progress to the local community, project partners, and, most importantly, residents living near targeted brownfields sites. The City is using a variety of communication strategies to ensure equal access to information and make certain meeting participant representation mirrors impacted populations (see table below). For instance, annual outreach meetings will occur in public facilities at varying times to accommodate those with non-traditional work schedules. The City will provide interpreting services at the events as the 2019 ACS indicates 55.2% of residents primarily speak Spanish at home. Additionally, outreach materials (e.g., notices, brochures, website, etc.) will be made available in Spanish. As is current City practice, staff will continue working with La Prensa, a local Spanish newspaper, to distribute all project information.

<table>
<thead>
<tr>
<th>Mechanism</th>
<th>Frequency</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outreach Meetings</td>
<td>Annually</td>
<td>Interactive presentation to create dialogue with citizens and gather input. Held at public facilities at varying times for better attendance.</td>
</tr>
<tr>
<td>Project website</td>
<td>Continuous</td>
<td>Provides full project transparency by posting all reports, news, photographs, and success stories. Comment forms offered.</td>
</tr>
<tr>
<td>Brochure</td>
<td>Continuous</td>
<td>Summarizes brownfields program. Available at City Hall and online.</td>
</tr>
<tr>
<td>Press Release</td>
<td>Annually</td>
<td>Provides update to a wide audience (internet, TV, radio, and newspaper).</td>
</tr>
<tr>
<td>Depository</td>
<td>Continuous</td>
<td>Public able to review hard copies of documents. Available at City Hall.</td>
</tr>
<tr>
<td>Proj. Partner Meetings</td>
<td>Bi-annually</td>
<td>Group to identify candidate sites, assist with citizen outreach and education, and discuss marketing possibilities for sites ready for reuse.</td>
</tr>
</tbody>
</table>

The City will also engage the community in the decision-making process. Numerous active (e.g., meetings) and passive (e.g., comment forms) opportunities will be available for citizens to offer meaningful input on sites identified for potential investigation. City staff, with assistance from its contractor and project partners, will review each suggestion based on the following criteria before determining whether it becomes a targeted site: reuse potential; job creation potential; blight elimination; compliance with comprehensive plan; and availability of leveraged funds to facilitate reuse. Feedback will also be sought in the manner outlined above during reuse planning activities. The City will lean on its partner Mr. Castillo, a bilingual local Hispanic business leader, to reach out to the non-English speaking community in an attempt to help empower traditionally disenfranchised people take control of their environment. In all instances of input received, staff will provide a direct response to individuals via e-mail or phone call explaining the resulting action. A document compiling all input/responses will be posted on the project website.

The City will utilize online audio/video conferencing as an alternative to in-person community engagement should any future COVID-19 restrictions remain during the project period. Spanish interpreting services will be available whether meetings are held in-person or virtually.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a) Description of Tasks/Activities and Outputs-

Task/Activity: Program Management (Task 1)

i. Project Implementation: Task 1 involves satisfying programmatic requirements of the grant (e.g., procuring/overseeing a Qualified Environmental Professional, producing necessary reporting documentation, attending meetings with regulatory agencies, and attending educational conferences).

ii. Anticipated Project Schedule: City will dedicate the grant's 1st quarter to issuing a request for qualifications (RFQ) and hiring a qualified contractor via federal procurement guidelines. City to
submit reports as required (quarterly or annually) and meet with regulatory agencies as needed during project period. One city staff person will attend a national brownfields conference, as available.

iii. Task/Activity Lead: City will procure a qualified contractor, assist contractor with preparing required documentation (i.e., quarterly progress reports or QPRs, Final Programmatic Performance Report, federal financial reports, and MBE/WBE forms), attend meetings with EPA/IDNR, and manage project finances (e.g., process drawdowns). A staff member will also attend a brownfields conference. Contractor will produce the referenced required documents and lead EPA/IDNR coordination efforts based on their technical expertise and knowledge of EPA’s reporting expectations.

iv. Outputs: 12 QPRs, 1 Final Programmatic Performance Report, 3 annual federal financial reports, and 3 annual MBE/WBE forms, as well as staff attendance at 1 national conference

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**Task/Activity: Community Involvement (Task 2)**

i. Project Implementation: Task 2 involves informing and engaging the public through the hosting of meetings, creation of outreach tools, and project partner coordination.

ii. Anticipated Project Schedule: City/contractor will host an outreach meeting during 1st quarter of project to inform residents and gather input on potential target sites. An end of Year 2 meeting will summarize ESAs and seek feedback on sites requiring cleanup. A final meeting in Year 3 will cover the reuse planning initiative. The City will develop a project website and brochure during quarter 2 of Year 1 and issue press releases at the end of each year. City to engage project partners bi-annually.

iii. Task/Activity Lead: City staff will lead outreach meetings, prepare annual press releases, and coordinate project partner meetings. Contractor activities include preparation and attendance at outreach and project partner meetings, developing a website, and creating a brochure based on their ability to communicate technical concepts regarding brownfield assessment and reuse to the public.

iv. Outputs: 6 partner and 3 outreach meetings, 3 annual press releases, 1 brochure, and a project website

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**Task/Activity: ESAs (Task 3)**

i. Project Implementation: Task 3 focuses on completing Phase I and II ESAs consistent with EPA’s All Appropriate Inquiry and current ASTM standards. The City will conduct ESAs on each priority site listed above, as well as at additional brownfields identified by the public during outreach activities.

ii. Anticipated Project Schedule: City will submit a Quality Assurance Project Plan (QAPP), obtain access agreements to priority sites, and submit eligibility requests during the 2nd and 3rd quarters of Year 1. City will complete Phase I ESAs during 4th quarter of Year 1 and all of Year 2. City will complete Phase II ESAs and any additional site characterization activities during Year 2 and the 1st, 2nd, and 3rd quarters of Year 3. City will vet potential brownfields identified by the public, using criteria outlined in the Incorporating Community Input section, throughout the project.

iii. Task/Activity Lead: City will secure signatures for access agreements, submit eligibility requests, review report results, and vet potential brownfields sites identified by the public. Contractor will prepare the QAPP, access agreements, eligibility determination documents, Phase I and II ESAs, ACRES Work Packages, and Phase II Sampling Plans and communicate ESA findings to EPA/IDNR as necessary, based on their technical expertise and knowledge of the EPA Brownfields Program.

iv. Outputs: 1 QAPP, ~18 Phase I ESAs, and ~10 Phase II ESAs with an associated access agreement, site eligibility request, ACRES Work Package, and sampling plan for each (as applicable)

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**Task/Activity: Reuse Planning (Task 4)**

i. Project Implementation: Task 4 involves conducting a site reuse assessment and infrastructure evaluation to advance multi-family housing along Avenue C geared towards meatpacking plant employees and a site reuse vision for the former DMU Power Plant.

ii. Anticipated Project Schedule: City to complete reuse planning throughout Year 3.

iii. Task/Activity Lead: Contractor to prepare reuse plans with city/project partner assistance.

iv. Outputs: 1 site reuse assessment, 1 infrastructure evaluation, and 1 site reuse vision

Denison recognizes the unique opportunity these funds represent to transform a rural community. As such, it will not reserve budget for personnel/fringe benefits to maximize its award. All staff
led activities cited in tables above will be donated in-kind at an estimated total value of $25,949. This figure was calculated using the following hours and hourly rates: City Manager/City Engineer- 325 ($56), City Clerk- 102 ($41), and Public Works Director- 123 ($29). The City can thus commit 60% and 30% of Assessment Grant funds to conduct site-specific work (i.e., Phase I and II ESAs) and reuse planning activities, respectively, for priority brownfields.

b) Cost Estimates- Cost estimates are based on staff conversations with environmental contractors experienced in assisting grantees implement Assessment Grants, as well as EPA guidance on eligible planning activities. All costs will be divided equally amongst hazardous substances and petroleum (i.e., $200,000 each) and define the total request outlined in the table below.

Task 1 (Program Management)- Contractor costs: $12,500- complete required programmatic documentation ($7,000) and lead project coordination ($5,500). Travel Costs: $1,700- One city staff member to attend the 2022 National Brownfields Conference in Oklahoma, City, OK ($550/flight, $450/hotel, $300/car rental, and $400/meal).

Task 2 (Community Involvement)- Contractor costs: $25,600- preparation and attendance at three outreach ($3,000/event) and six project partner committee meetings ($1,500/event) and creating both a bilingual brownfields project website ($6,000) and brochure ($1,600). Supplies: $200-printing costs for the brochure and outreach meeting posters/notices for distribution.

Task 3 (ESAs)- Contractor costs: $240,000- develop QAPP ($5,000); assist staff in vetting potential brownfields identified in public outreach activities ($2,000); conduct Phase I ESAs ($86,400 at ~$4,800/report which includes efforts for preparing associated site eligibility requests and ACRES Work Packages) and Phase II ESAs ($146,600 at $14,000/report which includes efforts for preparing Sampling Plans and agency coordination on report findings).

Task 4 (Reuse Planning)- Contractor costs: $120,000- Site reuse assessment ($45,000), infrastructure evaluation ($40,000), and site reuse vision ($35,000).

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c) Measuring Environmental Results- The City will develop a detailed work plan to track, measure, and evaluate progress towards achieving project outputs, overall project results, and eventual project outcomes. This includes associating milestone dates and metrics with specific tasks. The document will serve as a framework for conveying information in quarterly progress reports submitted to EPA Region 7. Staff will schedule monthly phone calls with its EPA Project Officer and contractor to ensure work plan compliance. This approach will allow the City to efficiently achieve its goals and devise an appropriate plan to correct any deficiencies, if identified. Further, the City will maintain its EPA ACRES database to reflect its accomplishments and will also report all future achievements beyond the grant period to support the Brownfields Program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a) Programmatic Capability

i) Organizational Capacity- The City has adequate organizational capacity to carry out the programmatic, administrative, and financial requirements of the project and grant. As cited earlier, the city staff estimates it will spend approximately 550 total hours, or about 183 annually, dedicated to its brownfields efforts. This equates to 3.5 hours per week divided amongst three employees which can be easily supported based on current and historical workload demands.
ii) Organizational Structure- City staff will ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project and grant. Mr. Terry Crawford, City Manager/City Engineer, will serve as the project’s day-to-day contact. His role will include interfacing with the EPA Project Officer, coordinating with property owners and project partners, leading public outreach efforts, and overseeing the contractor. Ms. Lisa Koch, City Clerk, will provide administrative oversight (e.g., financial and programmatic reporting and tracking, public noticing, etc.). Mr. Eric Martens, Director of Public Works, will assist Mr. Crawford in his efforts. This includes attending meetings, reviewing investigation reports, and interacting with residents of affected neighborhoods and project partners.

iii) Description of Key Staff- Mr. Crawford earned a B.S. in Civil Engineering from Iowa State University and has been with the City for nearly 10 years. As City Manager, he advises the City Council and carries out their goals and policies; oversees the delivery of public services; prepares and manages the budget; and serves as the City’s representative. As City Engineer, Mr. Crawford provides general supervision of construction projects. Ms. Koch has been with the City for over 11 years and is certified as a Municipal Finance Officer and a Municipal Clerk. Her primary responsibilities include preparing and managing the City budget; preparing all annual financial reports; and representing the City in negotiations. Mr. Martens has worked for the City for a year and manages the streets system, storm sewers, snow removal, flood control structures, and parks.

iv) Acquiring Additional Resources- The City will acquire additional expertise and resources per grant requirements to successfully complete the project. Subject to a competitive selection process consistent with federal procurement guidelines, the City will hire a contractor with experience in the EPA Brownfields program. The City’s established procedure includes RFQs reviewed by staff and approved by City Council. The proposed project will not involve any subrecipient awards.

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- City staff has the requisite experience in managing state and federal funds necessary to administer the proposed project. Although no past instances are directly comparable in scope or relevance, the City has implemented several similar in size.
   - Airport Improvement Program (Federal Aviation Administration) - The City secured a $4 million grant in 2015. The ongoing phased project has involved land acquisition, grading, drainage, paving and runway edge lighting for new Cross Wind Runway 18/36 at the Denison Municipal Airport. The facility is critical for the safety of future flights.
   - Hazard Mitigation Grant Program (Federal Emergency Management Agency) - FEMA awarded the community $693,000 in 2020 to repair the Boyer River’s east and west banks which had gradually eroded. Accomplishments included restoring sloughs and wash outs on stream banks, installing rip rap in vulnerable areas, and placing grout to stabilize new revetment stone and prevent future washout during high water events. City Council is set to accept the work in December 2021. FEMA will then begin its audit of the project.
   - Surface Transportation Block Grant (Iowa DOT via FHWA) - The $670,000 grant from 2020 allowed the City to fully resurface two of its busiest roadways including Avenue C from 7th Street to 1st Avenue North and 7th Street from U.S. 30 to Avenue C. This represents one of the few significant street improvements in the past 10 years. The project is undergoing final IDOT audit and is expected to be closed out in the upcoming months.

2) Compliance with Grant Requirements- The City has successfully complied with each assistance agreement’s respective work plan, schedule, and terms and conditions and completed all reporting in a timely manner. The City has also achieved all expected results. No awarding agency has ever required the City to undertake a corrective measure.
THRESHOLD CRITERIA RESPONSE
Threshold Criteria

1. Applicant Eligibility
   The City of Denison is eligible for funding as a General-Purpose Unit of Local Government.

2. Community Involvement
   The City of Denison understands the importance of empowering its residents throughout the entire project period. Recognizing its unique demographic composition, the City is committed to providing translated outreach services for Spanish-speaking individuals. The bullet points below summarize the proposed method of informing and actively involving the community and other key stakeholders during the planning, implementation, and other brownfield assessment activities during the three-year grant period:
   - The City will host annual outreach meetings at varying locations within the community (e.g., local school, religious place of worship, etc.) to keep the public informed about project progress and to seek input from interested citizens—likely done via citizen comment forms available in English and Spanish—on various topics (e.g., site selection, redevelopment planning, etc.). The City will hold the events at different times (e.g., afternoon, night, etc.) to ensure all individuals have an opportunity to attend. The City will utilize an online audio/video conferencing platform, such as Zoom, as an alternative to in-person community engagement should any future COVID-19 restrictions remain in place during the project period. Spanish interpreting services will be available whether meetings are held in-person or virtually.
   - The City will meet bi-annually with its project partners. The group will assist with all phases of the brownfields process including initial and ongoing resident education, site selection, property owner interaction, reuse planning, and marketing properties for redevelopment. Each stakeholder brings a unique perspective including a bilingual local Hispanic business leader (Carlos Castillo, Rasmussen Mechanical), economic development (Evan Blakley, Chamber and Development Council of Crawford County), and long-range planning (Gary Reisz, Planning and Zoning Commission).
   - The City will create an interactive project website that explains the EPA Brownfields Program, highlights success stories, summarizes the City’s use of leveraged funds, announces milestone accomplishments, and lists city staff contact information for feedback opportunities such as site selection, general questions, etc. A Geographic Information System (GIS) component will allow the community to geo-reference all project data including sites targeted for investigation and sites with completed assessment activities. Most importantly, the web portal will include all Phase I and II Environmental Site Assessment (ESA) reports making the project fully transparent for the public. As referenced earlier, the website will feature an ability to translate content to Spanish.
   - The City will generate a brochure that explains the EPA Brownfields Program, offers information on the Phase I and Phase II ESA process, highlights benefits of participating for property owners, answers frequently asked questions, and provides contact information for city staff tasked with implementing the grant. Both physical and electronic copies will be available for public consumption. As referenced earlier, the City will also produce the document in Spanish.
   - The City will issue annual project update press releases to area media outlets including the local newspapers (Denison Bulletin Review and La Prenza), news
station (KTIV), and radio station (KDSN). Consistent with past press release practices, Spanish-translated versions will be distributed too.

- The City will maintain and promote the availability of all project files (e.g., quarterly progress reports, annual financial status reports, annual MBE/WBE statements, Final Programmatic Performance Report, QAPP, Phase I and II ESA reports, Phase II Sampling Plans, etc.) for public inspection in a repository located at City Hall. This provides citizens with limited or no internet access an opportunity to review brownfields documents.

3. Named Contractors and Subrecipients
   Contractors: Not applicable
   Subrecipients: Not applicable

4. Expenditure of Assessment Grant Funds
   The City of Denison does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.