City of Fort Dodge, Iowa Brownfields Cleanup Grant Application
Narrative Information Sheet:

1. **Applicant Identification:**
   - City of Fort Dodge
   - 819 1st Avenue S
   - Fort Dodge, IA 50501

2. **Funding Request:**
   a. **Grant Type:**
   - Single Site Cleanup
   b. **Federal Funds Requested:**
      i. Funding about requested: $250,000
      ii. Cost Share Waiver Request: No
      iii. $500,000 Limit Waiver: No

3. **Location:**
   a. **City:**
   - Fort Dodge
   b. **County:**
   - Webster County
   c. **State:**
   - Iowa

4. **Property Information:**
   - Former Greenleaf Healthcare Facility
   - 1305 North 22nd Street
   - Fort Dodge, IA 50501

5. **Contacts:**
   a. **Project Director:**
      - Vickie Reeck
      - 819 1st Avenue South
      - Fort Dodge, IA 50501
      - Phone: (515) 576-4551
      - Email: vreeck@fortdodgeiowa.org
   b. **Chief Executive/ Highest Ranking Elected Official:**
      - Matt Bemrich, Mayor
      - 819 1st Avenue South
      - Fort Dodge, IA 50501
      - Phone: (515) 573-7144
      - Email: mbemrich@fortdodgeiowa.org

6. **Population:**
   - 23,888 (2020 U.S. Census)

7. **Other Factors Checklist:**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page#</th>
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<tbody>
<tr>
<td>Community Population is 10,000 or less</td>
<td>No</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.</td>
<td>No</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td>No</td>
</tr>
<tr>
<td>The priority site(s) is adjacent to a body of water (i.e. the border of the priority site(s) is contiguous or partially contiguous to the body of water, or</td>
<td>No</td>
</tr>
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</table>


| would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them. |  
| The priority site(s) is in a federally designated floodplain (levee protected) | No |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures. | No |

8. **Letter from the State or Tribal Environmental Authority:** Attached

9. **Releasing Copies of Applications:** Not applicable (n/a) as the application does not have confidential, privilege, or sensitive information.
November 4, 2021

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

RE: City of Fort Dodge, Iowa – FY22 Brownfield Cleanup Grant Application for the former ‘Greenleaf Retirement Community’ Building Property

This letter is submitted by the Iowa Department of Natural Resources (DNR) as a statement of acknowledgement and review, as well as our partnership and support, for the City of Fort Dodge’s brownfield site-specific cleanup grant application, through funding authorized by §104(k) of CERCLA. This application is designed to address the cleanup of regulated asbestos containing materials (RACM) at the former Greenleaf Retirement Community nursing home/retirement residential building complex, at 1305 North 22nd St., Fort Dodge, Iowa.

The neglect and abandonment of this multi-story structure by former owners, as well as the significant environmental regulatory issues associated with addressing RACM abatement that would be required for demolition of this property, has hindered interest by any private entities or developers, leaving the community with no choice but to protect the public’s health and community character by having the City take title to the site through legal, abandonment clauses in Iowa Law.

With ownership of the building, the City has provided physical security for the property, and seeks to demolish the building to not only remediate the environmental hazard that the asbestos materials would cause from further decay, but with the end-goal of a quality redevelopment of the site.

The DNR has worked closely with the City of Fort Dodge on brownfield planning, technical assistance, and coverage of a certified asbestos inspection for this site, through our Brownfield State Response Section 128(a) Program; however, the daunting task of RACM abatement in this multi-story building will require significant investment, beyond the dedicated resources that both the DNR and the City have already put forward on this project.

The DNR appreciates the opportunity to be a supportive partner for brownfield assessment, cleanup, and redevelopment projects in the past in Fort Dodge, and we support the brownfield cleanup strategies presented in this application with the highest degree of endorsement and confidence.

Sincerely,

Mr. Mel Pins  
Executive Officer  
Iowa Brownfield Redevelopment Program
1. Project Area Description and Plans for Revitalization

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: The City of Fort Dodge located in north central Iowa at the crossroads of U.S. Highways 20 and 169. The town of 23,888 (2020 US Census) residents, which is the largest city in a 60-mile radius, serves as its own economic hub and regional center for manufacturing, transportation, and healthcare services. The City of Fort Dodge was originally established as Fort Clark by the U.S. Army in 1850. It was renamed Fort Dodge and later platted by Henn, Williams, & Company. Fort Dodge became a freight and industrial center after two railroads came to the community in 1869. These lines were used to transport coal, clay, and gypsum, which were mined from several local quarries. What was once a prosperous and growing city due to the thriving mining industry, has experienced rampant disinvestment and population decline since the mid-1970s. During the 1980s the City lost its two largest meatpacking plants, causing extensive job loss. Fort Dodge Animal Health, a major producer of pharmaceuticals and vaccines for veterinarian use, moved its headquarters from Fort Dodge in the 1990s causing another economic hardship for the City. A devastated economy caused from the closure of several employers consequently lead to nearly 20% loss in population. This has led to a large number of vacant brownfield properties throughout the City. The City must prioritize these sites as there is a limited amount of funding available for cleanup and redevelopment efforts. Fort Dodge serves as the county seat of Webster County. The Iowa Economic Development Authority has identified Webster County as an economically distressed area which is a county that ranks among the bottom 33 of all Iowa counties, as measured by either the average monthly unemployment level for the most recent twelve-month period or the average annualized unemployment level for the most recent five-year period. The target area for this cleanup grant is Census Tract 1, Webster County, Iowa. The target area makes up approximately 28% of the City’s population, with a population of 6,628.

1.a.ii Description of the Proposed Brownfield Site: The former Greenleaf Healthcare facility is an infill redevelopment project that will occur in an established residential neighborhood. The site (1305 N 22nd Street) has provided little economic value for years, and was built in 1935, as a nursing home, with additions in 1965 and 1974. Most recently the site was the Greenleaf Healthcare facility that served as a 75-bed nursing care facility. With declining population and residents, the Greenleaf Healthcare facility closed in 2012. The site sat vacant and began deteriorating, becoming a health and safety threat to the neighborhood and to children walking to nearby Dodger Stadium and Cooper Elementary (the site lies between the two destinations). When it became evident that the property would not be redeveloped by a private developer, the City acquired the site in 2016 under Iowa Code Chapter 657A (abandoned buildings). Utilizing the Iowa Department of Natural Resources Brownfields Program, the City had an asbestos survey of all the building materials completed. The survey followed appropriate OSHA Regulation 1926.1101 and 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants (NESHAPs). A total of 175 building materials were analyzed for asbestos, of which 45 tested positive. Asbestos containing materials includes thousands of square feet of damaged friable floor tile, mastic, ceiling and wall texture, insulation, adhesive, and numerous other building materials. The building has numerous entrances, broken windows, and a deteriorating roof. Even with the City routinely resecuring the site, the site presents a significant exposure pathway to the public and presents a challenge for city staff to keep children and intruders out.

1.b Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The site presents an opportunity for the City to cleanup and add much needed housing within an established residential neighborhood. The site provides an opportunity for the City to improve the health and safety of the neighborhood through the removal of a health and safety threat and replace with a conforming land use (residential). The project will create a sense of place for residents and more importantly, to fulfill the economic improvement needs of Fort Dodge that aligns well with
local government land use and master plans. The City’s Re-Envision 2030 a Comprehensive Plan for the city of Fort Dodge adopted July 25, 2016, which had a vast community engagement process, identified several goals including promoting optimal health and well-being for the entire community and promoting a well-planned community with balanced land uses. In addition, infill development was identified as a priority for the City. According to the comprehensive plan, only 13 housing sites with infrastructure in place and ready for development are available. Asking prices for available lots in Fort Dodge are reportedly significantly higher than those in adjacent communities or in the county, making the redevelopment of this vacant, blighted, underutilized site prime for residential redevelopment. The development of one to four new housing units on the site will bring an anticipated $175,000 to $700,000 in new construction dollars. The redevelopment is anticipated to bring $4,000 to $16,000 in new property tax to the City per year.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The city of Fort Dodge is making significant progress on brownfields redevelopment throughout the City. The Former Greenleaf Healthcare facility is located directly between the historic Dodger Stadium, which Fort Dodge Senior High, St. Edmond High School, and Iowa Central Community College utilize for athletic events, and Cooper Elementary, which serves approximately 275 first through fifth grade students. It is the site’s proximity to Dodger Stadium and Cooper Elementary School that has made it a priority. As the structure continues to deteriorate, it is causing the asbestos containing materials (ACM) to breakdown into dust filled with asbestos fibers that are being carried with the wind into the environment. Breathing in this deadly dust can cause mesothelioma and other asbestos-related diseases up to 30-years from the initial exposure. Children’s lungs and respiratory systems are still developing, their lungs are smaller, and they have a higher surface area to volume ratio than the lungs of adults. In addition, children breathe at a faster rate causing them to inhale more asbestos fibers with every breath. The positive health impacts of the cleanup of this brownfield site are not quantifiable, but will positively impact the health of residents, athletes, spectators, and students. The positive economic impacts of this brownfield redevelopment within an existing residential neighborhood will provide immense environmental (removing a hazard), economic (new residential development), and social benefits (removal of a blighted building). The project is planned to be redeveloped into one to four new housing units. This project will support over 30 construction jobs while providing up to $1.2 million in wages and providing up to $2.1 million in local economic impact. This project will cleanup a vacant building containing hazardous substances thus protecting surrounding residents, especially children. This new residential development will result in a high-quality development that will incorporate green and sustainable building methods/materials where feasible. Stormwater management principals like rain gardens, rain barrels, and native plantings will allow for the majority of stormwater to stay on the site.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The depressed tax base associated with business closures and a declining population has driven the city of Fort Dodge to become innovative in allocating funding to abandoned properties and in securing outside funding. Prior to the construction of new residential housing, the dilapidated former Greenleaf Healthcare facility must have asbestos abated and come down. Currently, the City does not have the capacity to bond for the full amount of this project as they are approaching their debt service levy policy maximum. This leaves a large gap in the project finances for the environmental remediation and demolition. The City is planning to use general funds for the demolition portion of this project but is relying on grant monies for the environmental remediation portion. The cost for asbestos abatement is estimated at $300,000. City leadership has pledged that if the EPA grant is secured, the 20% cost share portion will come from general funds. Although this is a difficult task, the City realizes the long-term value of this project is significantly higher. With the above financing mechanisms in place, this EPA Cleanup Grant is critical for the future redevelopment and health of this residential neighborhood. With the depressed
tax base, the city of Fort Dodge has become successful in securing outside funding for redevelopment efforts within the target area. Infill housing development is a redevelopment priority for the city, especially in the target area. Substantial financial and programmatic resources have been and will continue to be allocated to this area. Resources secured for the target area to date is as follows:

<table>
<thead>
<tr>
<th>Leveraging Tax Incentives</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>$3,361,000</td>
<td>Cross-town Industrial Park RISE Project</td>
</tr>
<tr>
<td>$1,745,000</td>
<td>East Region Storm Sewer Phase 3A</td>
</tr>
<tr>
<td>$2,699,000</td>
<td>East Region Storm Sewer Phase 3B</td>
</tr>
<tr>
<td>$1,258,000</td>
<td>N. 22nd Street Trail Connection to Nature Trail</td>
</tr>
<tr>
<td>$3,444,000</td>
<td>Community Sewer Initiative Phase 2: Duncombe Area</td>
</tr>
<tr>
<td>$424,000</td>
<td>Rosedale Sanitary Sewer Extension</td>
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1.c.ii. Use of Existing Infrastructure: The site is an infill lot that once the former Greenleaf Healthcare facility has been remediated and demolished, will be attractive to housing developers due to the existing public and private infrastructure (water, sewer, stormwater, electricity, natural gas, streets) already serving the site. The existing utilities will be able to easily handle the demand from the planned housing development (1 to 4 housing units). The new housing development will incorporate green/sustainable building and stormwater management practices into the redevelopment of the site, where feasible.

2. Community Need and Community Engagement:

2.a. Community Need

2.a.i. The Community’s Need for Funding: With a population near 25,000, Fort Dodge has struggled to develop an identity as it is not classified as either rural or urban. Fort Dodge faces the daunting task of handling several urban-type issues (high poverty, declining population, etc.) while grappling with access to very few economic resources. According to the US Census, Fort Dodge lost nearly 20% of its population between 1970 and 2010. In addition, another 2,300 in population was lost from 2010 to 2020 (2020 Census). Resulting in decreased sales and property taxes for the City. Fort Dodge’s poverty level is one of the highest in the State of Iowa at 16%. The poverty rate of Census Tract 1, the target area, is at 9.2%.

These statistics have negatively affected both the City’s operating budget and their bonding capacity. The city of Fort Dodge is near their tax levy limit and simply cannot generate additional funds through taxation. The city of Fort Dodge is facing another budget deficit for fiscal year 2022 at almost $1,000,000. Fort Dodge’s aging infrastructure requires immediate attention and takes precedence to maintain the health and safety of the community. Despite operating within lean government initiatives, such as attrition for position vacancies, the financial condition remains challenging, which is why the City desperately needs funding for asbestos abatement of the former Greenleaf Healthcare facility. In addition, the City is still contending with the multifamily residential tax reform that was passed within Iowa in 2015. This created a loss of tax revenues of nearly 40% on multifamily properties over the following seven years. Lastly, property valuation increases are not keeping pace with the City’s annual increase in expenditures. On average, the City experiences about 2% growth in property tax values, but expenses increase by about 3% every year. All these factors greatly hinder the allocation of City dollars for environmental remediation projects.

2.a.ii. Threats to Sensitive Populations/(1) Health or Welfare of Sensitive Populations: The identified sensitive population (children and seniors) in the target area (Census Tract 1) make up 49% of the total population. Seniors make up 29% while children make up 22% of the population (2019 ACS 5-year). The target area also has 9.2% of population below the poverty level with 7.5% of the households receiving food stamp assistance (2019 ACS 5-year). The U.S. Department of Health and Human Services Office of Minority Health’s The Impact...
of Low-Income Neighborhoods on Health states that for those living in lower income neighborhoods the cost of poverty is high. One of the many problems facing low-income neighborhoods is the unequal exposure to contaminants at a higher rate, which includes asbestos. The threat of asbestos is not simply relegated to home or workplace but can extend throughout neighborhoods as low-income neighborhoods are often locations with a greater chance of industrial, vacant, dilapidated, or hazardous land uses. Residents may face piles of discarded or deteriorating materials that includes asbestos along with other toxic chemicals like hydrogen sulfide, an incredibly dangerous and flammable gas that is created when gypsum drywall gets wet from rain. Thus, putting children, residents, and the public at risk of exposure. Due to the presence of this blighted and dilapidated brownfield site being located between Dodger Stadium and Cooper Elementary, these sensitive populations are at a higher risk for exposure to hazardous substances. This EPA Grant will permanently remove asbestos containing materials from a large building in the middle of a residential neighborhood surrounded by this sensitive population, eliminating the risk of exposure and a safety hazard. The derelict state of this brownfield site poses a safety concern, as the abandoned vacant site is a haven for illicit activities, per input from concerned neighbors. This project will help reduce crime rates and improve neighborhood safety by removing this vacant building and putting the property back into productive use.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Asbestos threats are often difficult to quantify. The concerning facts are that asbestos was used in thousands of building products and EPA has identified no safe quantities for inhalation. According to the Centers for Disease Control (CDC), direct contact and ingestion of asbestos, a known carcinogen, can cause lung cancer and mesothelioma, a form of neoplasm of the lining of the chest and abdominal cavities. Several health studies indicate exposure risk to carcinogens in the area are higher than other areas in Iowa. A University of Iowa report called 2021 Cancer in Iowa listed Webster County (target area county) as one of the top 15 counties for estimated number of new cancers. The National Cancer Institute (NCI) lists Webster County cancer incidence rates (including all races, all ages, and both sexes) from 2014-2018 (www.statecancerprofiles.cancer.gov) as 486.9, which is higher than the U.S. rate of 448.6 per 100,000. According to the State Health Registry of Iowa, the estimated number of new cancers in Webster County in 2021 is 245, while there are an estimated 2,000 residences living with cancer, and 80 estimated deaths are attributed to cancer each year. The County Health Rankings & Roadmap program listed Webster County as 82 out of 99 in terms of health outcomes (1 best to 99 worst). The rankings include health factors such as high school graduation rates, obesity, smoking, unemployment, access to healthy foods, the quality of air and water, income inequality, and teen births. Cleanup funds will allow the City to implement the needed remediation of the former Greenleaf Healthcare facility, and thus removing a site that is contributing to these high cancer statistics.

(3) Promoting Environmental Justice: As evident by the data, the target area has a sensitive population that is more susceptible to the hazardous contaminants of this brownfields site. The EPA EJSCREEN Environmental Justices Indexes show that the sensitive populations living near the former Greenleaf Healthcare facility are disproportionately exposed to contaminants and are experiencing more health impacts than most residents within the EPA Region as the target area was in the 52nd percentile for NATA Air Toxics Cancer Risk. The removal of asbestos contamination at this site, will ensure that future residents of this area will have a lower exposure risk to this cancer-causing agent. Additionally, the EPA’s EJSCREEN Index shows a disproportionally high level of Superfund Proximity in the target area. The percentile is 73rd for the state. The target area is also over the 50th percentile for several other EJ Indexes. The NATA Respiratory Hazard Index is in the 54th percentile for the EPA Region, while the wastewater discharge indicator is in the 63rd percentile for the state. According to the National Center for Biotechnology Information non-occupational exposure to asbestos may contribute to 20% of the mesothelioma cases. The City believes the only way to mitigate and eliminate environmental concerns associated with the former Greenleaf Healthcare facility will be through proactive
redevelopment with the implementation of containment, demolition, and cleanup through the removal of asbestos that is currently impacting the target area population. As a result of this proactive stance to address asbestos within the former Greenleaf Healthcare facility, the environmental benefits are expected to include:

- Remove exposure to cancer causing agents from this property.
- Improved health conditions and reduced risk of asbestos-related diseases.
- Increased safety for neighborhood children with the removal of the vacant structure.

2.b. Community Engagement

2.b.i. Project Involvement: The city of Fort Dodge City Council approved the EPA cleanup grant application process (Resolution Number 21-11-236) at the November 22, 2021, City Council meeting. Draft versions of the brownfields cleanup grant application and associated Analysis to Brownfields Cleanup Alternatives (ABCA) were available for public comment. The resolution affirms that the well-being of the community is an important part of upholding the public interest and trust. Project involvement may be provided by a broad and diverse group of entities including by not limited to community organizations, property owners, developers, and the public.

2.b.ii. Project Roles: Partnerships provide the foundation to overcome a challenge as significant as the Former Greenleaf Healthcare facility site. Effective partnerships leverage the strengths of each partner and apply them strategically to the opportunity at hand. For a community like Fort Dodge, a structure of this size and scope requires an “all in” approach that demands all stakeholders make an important investment in the project. With strong support from the business sector, the goal is to engage the primary sector companies in this community partnership to help bring this exciting and innovative project to fruition. The following partners have pledged their support for this project:

- The City will continue its strong relationship with the Iowa Department of Natural Resources (IDNR), the state agency responsible for conserving and enhancing Iowa’s natural resources. The IDNR carries out state and federal laws that protect air, land and water and administers the state Brownfields Program. The City first began working with the DNR and the State Brownfield Program in 2000 and have worked on dozens of sites throughout the community.
- Webster County Public Health Department (WCPHD) will once again partner with the city of Fort Dodge on this brownfield project. WCPHD’s mission is to promote and maintain health for all, to prevent disease and disability, and to collaborate, coordinate, develop and implement community health programs and provide comprehensive care to the ill and disabled.
- Greater Fort Dodge Growth Alliance (Growth Alliance) has a mission to unify and coordinate accountable economic and community development while enhancing the quality of life in Fort Dodge. The Growth Alliance has pledged to provide direct assistance to the City for redevelopment. The Growth Alliance’s contacts in this arena are long and diversified, meaning they have relationships with residential, commercial, and retail property developers throughout the Fort Dodge region.

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<tr>
<th>Project Partners</th>
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<tr>
<td>Partner Name</td>
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<tr>
<td>Iowa Department of Natural Resources</td>
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### Community Contacts

<table>
<thead>
<tr>
<th>Organization</th>
<th>Contact Person</th>
<th>Contact Information</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Webster County Public Health</td>
<td>Kari Prescott</td>
<td>kprescott@webстерcounty.org</td>
<td>Answer health related questions about contaminants of concern.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>515.571.1656</td>
<td></td>
</tr>
<tr>
<td>Mid-Iowa Development Association (MIDAS)</td>
<td>Shirley Helgevold</td>
<td><a href="mailto:shelgevold@midascog.net">shelgevold@midascog.net</a></td>
<td>Help with community engagement and possible site redevelopment.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>515.576.7183</td>
<td></td>
</tr>
<tr>
<td>Greater Fort Dodge Growth Alliance</td>
<td>Dennis Plautz</td>
<td><a href="mailto:dennis@greaterfortdodge.com">dennis@greaterfortdodge.com</a></td>
<td>Assist with property redevelopment.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>515.955.5500</td>
<td></td>
</tr>
<tr>
<td>Fort Dodge Community School District</td>
<td>Dr. Derrick Joel</td>
<td><a href="mailto:djoel@fdschools.org">djoel@fdschools.org</a></td>
<td>Will assist in getting community input from sensitive population.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>515.576.1161</td>
<td></td>
</tr>
<tr>
<td>General Public – Target Neighborhood</td>
<td></td>
<td></td>
<td>Provide feedback regarding cleanup and redevelopment of the site.</td>
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<td>Around the Site</td>
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2.b.iii. **Incorporating Community Input**: Residents and property owners around the former Greenleaf Healthcare facility have routinely reached out to the City to voice environmental concerns over the property. In response, the City decided to pursue cleanup funding. The City intends to provide periodic progress updates to City Council and the public. This will include information on the project schedule, providing draft and final versions of reports for public review/comment/input and discussing the cleanup and redevelopment plan. Progress will be updated on the City’s brownfield website, [http://www.fortdodgebrownfields.com/](http://www.fortdodgebrownfields.com/) which is linked to the City’s website. The website will have a comments section added to allow citizens to ask questions to City staff about the cleanup and redevelopment initiative. The website will also provide citizens with the positive message of how EPA funding is assisting with this substantial redevelopment initiative. The City will host at least two open house events (in person and/or virtual) at various venues throughout the community, such as churches, schools, or non-profits to keep interested citizens apprised about the progress and to solicit community input. This input will be recorded by City staff at each event. All substantive comments will be considered and will be presented to decision makers (City Council) so they can make informed decisions. Meeting information will be published in the local newspaper, the City’s website (and brownfield website), and posted at public buildings such as City Hall and the public library. The City will also utilize social media outlets such as Facebook and Twitter to keep citizens apprised of this important endeavor. Fort Dodge has a relatively low non-English speaking population (14%); however, the City will provide translation services in Spanish, which is the highest minority (10%). The combination of these community input actions will provide an opportunity to update and engage residents on the progress of the City’s successful brownfields program. The City recognizes the importance of community involvement activities and the role they play in building social strength and stability. This will be especially true for the neighborhood surrounding the Former Greenleaf Healthcare facility, which is why the City has actively been engaging residents throughout the process. Most recently, on November 8, 2021, the City hosted a public meeting to share and solicit feedback on the draft EPA Cleanup Grant application and the draft ABCA. Several neighboring residents showed up to this meeting voicing support for the application and the need to cleanup the site.

### 3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. **Proposed Cleanup Plan**
The City will competitively procure the services of a Qualified Environmental Professional (QEP) in accordance with grant requirements to oversee the response action of this project. The City will require the QEP be experienced with EPA Brownfield Cleanup projects and hold State of Iowa asbestos certifications. Abatement of all asbestos containing materials identified in the ABCA is an integral part of demolition activities and must follow both State and Federal regulations. Therefore, this project will warrant the development of a comprehensive project design. This document will define the expectations of the City, the requirements of the work, the scope of the project, and will ultimately be used as part of the bid process for the abatement work. The specification documents will be prepared by a Project Designer accredited by the Iowa Division of Labor.

Asbestos abatement shall be performed only by a properly trained, licensed, and insured contractor. The abatement contractor must be aware and follow 40 CFR Chapter 61, Subpart M. ACM will only be disposed of at the identified landfill that accepts ACM. When selecting an asbestos abatement contractor, the City will focus on prequalifications. This process will evaluate previous work experience, skills in a similar work environment, length of service history, and business or company stability. Site contract administration for asbestos abatement activities will include someone with credentials. The asbestos removal will be planned and conducted in rigorous detail. The project will require the complete and total removal of all asbestos material and control of all asbestos fibers that may be released because of the abatement work. Asbestos removal is not considered complete until the surfaces from which the material was removed are inspected and cleared by professionals. At that point, the structure can be demolished.

To address the asbestos contamination at this site, the following two alternatives were outlined in the draft ABCA: Alternative #1: No Action and Alternative #2: Full Abatement and Proper Disposal. The “No Action” alternative involves no remedial activities. This alternative does not include a means for mitigating or eliminating potential exposure to asbestos both during and following redevelopment. Therefore, the potential for human exposure continues to exist for future residents, commercial and site workers, and visitors. As such, the “No Action” response is not wholly protective of human health and the environment. Additionally, without action, the toxicity, mobility, and volume of contaminants will not be reduced. Therefore, this alternative is ineffective as a permanent remedial solution. As a result, this alternative cannot be considered as a final alternative for this issue.

The “Full Abatement and Proper Disposal” alternative relies on proper engineering controls and industry proven techniques to effectively abate and dispose of asbestos. Once the remediation is complete, this method would permanently eliminate the potential exposure to asbestos. Based on these considerations, this alternative is highly effective and reliable.

### 3.b Description of Tasks/Activities and Outputs

#### 3.b.i. Project Implementation

- **Task 1: Cooperative Agreement Oversight**
  - Project Implementation: Cooperative Agreement Oversight will be conducted by the city of Fort Dodge and will include, but is not limited to, general grant management, QEP procurement and oversight, ensuring reporting requirements are met, budget and invoice reconciliation, ACRES reporting and overall planning and coordination of cleanup activities.
  
  - Anticipated Project Schedule: Quarters 1-12
  
  - Task/Activity Lead(s): Vickie Reeck (City) with assistance from the QEP
  
  - Output(s): • Workplan
    - Quarterly, Annual and Final Document Closeout Reporting
    - Monthly Funding Draws Prepared/Reconciled and Submitted to EPA
    - Project Scopes of Work

#### 3.b.ii. Task 2: Community Engagement/Outreach
i. Project Implementation: This task includes conducting community engagement activities to inform the public on cleanup plans and implementation while providing opportunities for the community to provide feedback; outreach with the neighborhood; and developing/updating project website and printed materials.

ii. Anticipated Project Schedule: Quarters 1-12

iii. Task/Activity Lead(s): Vickie Reeck (City) and QEP

iv. Output(s):
   - Two Public Meetings
   - Project Website
   - Neighborhood Meeting/Open House Events
   - Print Material

Task 3: Cleanup Planning

i. Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan for confirmation sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup specification documents will be submitted to EPA and/or IDNR for approval prior to obtaining bids from qualified cleanup contractors. Following the acceptance of these documents, the City will initiate a competitive selection process and contract with a qualified cleanup contractor to implement the response activity.

ii. Anticipated Project Schedule: Quarters 2-4

iii. Task/Activity Lead(s): Vickie Reeck (City) and QEP

iv. Output(s):
   - Final ABCA
   - Quality Assurance Project Plan
   - NHPA/Section 106 Compliance
   - Technical Specifications for site cleanup
   - Remediation Contract

Task 4: Site Cleanup

i. This task includes but is not limited to, correspondence with the QEP and cleanup contractor, providing minimal site prep and providing site security during cleanup. Cleanup activities include proper abatement and disposal of ACM.

ii. Anticipated Project Schedule: Quarters 5-8

iii. Task/Activity Lead(s): Vickie Reeck (City) and QEP

iv. Output(s):
   - Site cleaned up
   - Cleanup monitoring of the site
   - Post Removal Action Cleanup Report

3.c. Cost Estimates

3.c.1/ii./iii. Development of Cost Estimates/Application of Cost Estimates/Eligibility of Cost Share Activities: The table below shows the budget for the project followed by a description of how costs for each task were developed. The City will provide a cost share of 20% ($50,000) utilizing Abandoned Building Funds designated for this site. The City will cover any indirect costs. Cost estimates were developed based on the Asbestos Inspection Report.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1 Cooperative Agreement Oversight</th>
<th>Task 2 Community Engagement</th>
<th>Task 3 Cleanup Planning</th>
<th>Task 4 Cleanup</th>
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<td>Direct Personnel 1</td>
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<td>Total Budget</td>
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<td>$8,250</td>
<td>$16,250</td>
<td>$263,000</td>
<td>$300,000</td>
</tr>
</tbody>
</table>

Budget Allocation:  
1 Average salaries Director, & Technician ($51.85 personnel per hour and $12.96 per hour for fringe benefits) *116hrs*64.81=$7,500 (round down)  
2 Travel was based on average costs for five day travel from Fort Dodge to a major metropolitan city for national brownfields conference ((airfare average=$500) (mileage to airport 206 miles*0.56 per mile=$115 (round down)) (airport parking 5 days*$6.75=$34) (round up) (hotel $250*5 nights =$1,250) (meals based on federal per diem rates for a major city (6*$60=$360)) and mileage to meetings outside Fort Dodge (430*$0.56=$241 (round up))  
3 Contractual includes ($194,000 cleanup cost estimate from the asbestos inspection) (QEP oversight, cooperative agreement oversight, community engagement and cleanup planning activities estimated at 638 hours at $150 per hour=$97,500 (rounded up))  
4 Other-conference registration at $250. The City will not charge indirect costs.

3.d. Measuring Environmental Results
The city of Fort Dodge will develop a detailed schedule and workplan for implementing planned outputs under the proposed grant. The workplan will detail key milestones within the grant period for documenting and communicating outputs and outcomes to the public, EPA Region 7, and other partners with all progress detailed in quarterly reports. Prior to the completion of each quarterly report, the project manager will review and evaluate the project progress and take any necessary corrective actions should the schedule fall behind. Corrective actions may include holding weekly meetings/conference calls to ensure tasks are being completed as projected or incorporating a real time tracker to monitor progress by all parties working on the grant as they occur. Lastly, the city will utilize the ACRES Database to report, document, and track information such as job creation, dollars leveraged, properties cleared for redevelopment, and exposure risks reduced/eliminated. These statistics will also be communicated to the IDNR and other projects partners.

4. Programmatic Capability and Past Performance
4.a Programmatic Capability
4.a.i./4.a.ii/4.a.iii. Organizational Structure/Description of Key Staff/Acquiring Additional Resources: The city of Fort Dodge has the requisite skills to satisfy all phases of work under this grant. The City has dedicated highly qualified staff members to implement and administer the grant if awarded. Ms. Vickie Reeck and Ms. Paige Wheeler will have direct responsibilities for this project. Ms. Reeck, who will act as the lead Brownfield Coordinator, has been with the City for over 30 years and currently holds the position of Community and Economic Development Director. Ms. Reeck has assisted with the acquisition of nearly $13 million of property and helped secure and administer nearly $10 million with various state and federal programs. Ms. Reeck currently works to expand relationships with the local and regional development organizations by identifying and marketing in-fill properties in Fort Dodge. Ms. Wheeler, Code Enforcement Officer, has been with the City for six years with three of those years working in the Community Development Division helping with property acquisition, environmental assessments, and demolition projects. Ms. Wheeler will support Ms. Reeck and assist with community outreach, scheduling, and coordination with the environmental consultant, DNR and EPA.

The City will prepare a Request for Proposals/Qualifications to procure a qualified environmental professional (QEP). The City will focus on securing the services of a firm experienced in performing work funded through this program and familiar with the program’s requirements. In addition to securing these services, the City
envisions providing overall management of the consultant’s work, implementing public involvement, and assuming responsibility for the financial management of the program (draw requests, quarterly reports, etc.). In the unlikely event any of these staff members pursue opportunities outside the City, replacement candidates will be required to have federal grant management experience. In addition, the City will issue a Request for Qualifications and hire a qualified environmental firm during the first quarter of the grant cycle to assist with project coordination, community outreach, cleanup planning, and site cleanup. All hiring will follow federal procurement requirements which will also satisfy Iowa Code. The City will require that the environmental firm has adequate experience with EPA Brownfield projects as well as hold appropriate state certifications to work on a project involving hazardous materials.

4.b. Past Performance and Accomplishments
4.b.i./4.b.i.(1)./4.b.i.(2). Currently Has or Previously Received an EPA Brownfields Grant/Accomplishments/Compliance with Grant Requirements: The city of Fort Dodge has been the recipient of three EPA Brownfield Grants; a Pilot Grant in 2000, a Hazardous & Petroleum Assessment Grant in 2013 and a Cleanup Grant in 2019. Both Assessment Grants were successfully closed out upon expenditure of funds. It is important to note that 58 parcels were assessed via Phase I ESAs as well as 30 parcels via Phase II ESAs with the 2013 Grant. This far exceeds the Work Plan objectives of 25-30 Phase I ESAs and 12-16 Phase II ESAs. **While assessed properties varied in size and complexity, 85% of the properties assessed have changed owners or seen some form of progress since 2013.** Fort Dodge has made unprecedented efficient use of EPA grant dollars and will continue to do so if given the opportunity. Accomplishments on the $200,000 Assessment Pilot Grant (Oct 1, 2000 – Sept 30, 2003) included:
- Improved the quality of life for city residents, especially those living along the riverfronts.
- Reclaimed approximately 5.3 acres of brownfield properties for use as greenspace.
- Construction of walking trails to provide an alternative mode of transportation thus reducing emissions and improving the environment and community health.
Accomplishments on the $400,000 Assessment Grant (Oct 1, 2013-Sept 30, 2016): included:
- Attended the 2015 annual Brownfields Conference as well as DNR workshops.
- Assessment of 58 parcels via Phase I ESAs and 30 via Phase II ESAs.
- Continual community outreach, including user-friendly website with information on the program.
- Conducted redevelopment planning on four parcels.
The City collaborated with its environmental consultant to create outreach tools intended to keep residents informed about the project and the brownfield assessment progress. This included an informational brochure, creation of a website to inform and track progress, hosted annual outreach meetings, and maintained a depository of completed reports at City Hall for public viewing. All brownfield objectives were tracked, measured, and accounted for via quarterly reports to EPA and updating the ACRES database.
The 2019 Cleanup Grant (start date of October 1, 2019) is for the asbestos removal of the Wahkonsa Annex Building located in downtown Fort Dodge. What was once one of the largest hotel complexes west of the Mississippi River, the Wahkonsa Annex became one of the largest and most dangerous brownfield sites in all of Iowa. ACM was found in 105 of the 454 samples and included thousands of feet of damaged friable pipe insulation, ceiling texture, drywall joint compound, floor tile, mastics, and numerous other building materials. The project was on schedule to have the cleanup completed within the first year of the grant, but due to the section 106 process taking longer than expected (18 months) the project is now scheduled to be completed by December 31, 2021. The entire project is on track to be closed out by March 30, 2022, ahead of the 3-year cooperative agreement. All programmatic requirements have been met including but not limited to the required quarterly reports, annually reports, and financial reports. Once cleanup has been completed the City will work with developers to redevelop the site into much needed housing.
City of Fort Dodge, Iowa Brownfields Cleanup Grant Application  
Threshold Criteria

1. **Applicant Eligibility:**
   
   The city of Fort Dodge is an incorporated municipality in the State of Iowa and is eligible for funding. (See Attachment 7)

2. **Previously Awarded Cleanup Grants:**
   
   No previously awarded EPA Brownfields Cleanup Grant funding has been utilized at this Site.

3. **Expenditure of Existing Multipurpose Grant Funds:**
   
   The city of Fort Dodge, Iowa affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership:**
   
   The city of Fort Dodge acquired the property, through 657a of the Iowa Code, on April 20, 2015. The City will retain ownership throughout the period of the grant. (See Attachment 7)

5. **Basic Site Information:**
   
   a) **Site Name:** Former Greenleaf Healthcare Facility
   
   b) **Address:** 1305 N 22\textsuperscript{nd} Street  
   
   Fort Dodge, IA 50501

   c) **Current Owner of Site:** City of Fort Dodge (acquired 4/20/2015)

6. **Status of History of Contamination:**
   
   a) **Hazardous Substances or Petroleum:** The site is contaminated by hazardous substances. Asbestos containing materials (ACM) have been identified in building materials across the site.

   b) **Operational History and Current Uses:** The Site was historically utilized as a nursing home from 1935 until 2012 and is in poor and dilapidated condition.

   c) **Environmental Concerns:** The Site has documented ACM within and throughout the building. This ACM requires abatement prior to demolition and redevelopment.
d) **Source, Nature, and Extent of Contamination:** An Asbestos Inspection Report was conducted in April 2016 and updated in November 2021. As part of the updated asbestos inspection 175 samples were collected throughout the building. The report revealed that presence of asbestos above one percent throughout the building in building materials such as floor tile, mastic, insulation, ceiling and wall texture, joint compounds, tar, adhesive, caulk, and tar paper. The widespread of ACM across the site hinders future redevelopment plans.

7. **Brownfields Site Definition:**

The site is (a) not listed or proposed for listing on the National Priorities List; the site is (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 the site is (c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. **Environmental Assessment Required for Cleanup Grant Applications:**

An asbestos containing materials inspection was conducted November 1st and 2nd of 2021 to fill in gaps for the April 2016 asbestos report. Impact7G, Inc. completed the November 12, 2021, report to assist the city of Fort Dodge in facilitating demolition activities of the facility. The ACM inspection was conducted in accordance with OSHA Regulation 1926. The U.S. EPA qualifies asbestos containing materials (ACM) as materials with an asbestos content greater than 1%. According to Iowa OSHA, ACM is any material found to contain asbestos, regardless of its concentration, and shall be regulated as hazardous waste. The following definitions are taken from Section 61.141 of Subpart M, Part 61 of Title 40: Protection of Environment of the Code of Federal Regulations (CFR).

- “Category I nonfriable asbestos-containing material (ACM)” is defined as asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy (PLM).

- “Category II nonfriable ACM” is defined as any material, excluding Category I nonfriable ACM, containing more than 1% asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR part 763, section 1, PLM that when dry, cannot crumbled, pulverized, or reduced to powder by hand pressure.

- “Friable asbestos material” is defined as any material containing more than 1% asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR part 763, section 1, PLM that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10% as determined by a method other than point counting by PLM, verify the asbestos content by point counting using PLM.
9. **Enforcement or Other Actions:**

The City is unaware of any ongoing or anticipated environmental enforcement or other actions related to this site. The City has been in close coordination with IDNR, the agency which would lead and be aware of such enforcement actions.

10. **Sites Requiring a Property-Specific Determination:**

Not applicable

11. **Threshold Criteria Related to CERCLA/Petroleum Liability:**

   a) **Property Ownership Eligibility – Hazardous Substance Sites:**

   i. (1) Not applicable
   (2) Not applicable
   (3) Property Acquired Under Certain Circumstances by Units of State and Local Government:

   (a) The city of Fort Dodge Iowa acquired ownership of the site through Iowa Code 675A Abandoned or Unsafe Buildings. This allows for a city in which a building that has been abandoned for at least six consecutive months to petition the court to enter judgement awarding title to the abandoned property to the City. The City was awarded title on April 20, 2015. The site had been abandoned since 2012.
   (b) April 20, 2015 is the date in which the City acquired the property.
   (c) The city of Fort Dodge affirms that the disposal of hazardous substances at the site occurred before the City acquired the property.
   (d) The city of Fort Dodge affirms that it has not caused or contributed to any release of hazardous substances at the site.
   (e) The city of Fort Dodge affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

   ii. Not applicable
   iii. Not applicable

12. **Cleanup Authority and Oversight Structure:**

   a) **Oversight:** The City does not plan on enrolling the site into the Iowa DNR’s Land Recycling Program, or any other state response program. The City will hire, through a competitive bid procurement process, a qualified environmental professional to oversee the cleanup process. A qualified cleanup contractor will be hired through competitive bid process to remove and dispose of asbestos contaminated materials. The contractors will be responsible for performance of cleanup activities,
complying with all applicable local, State and Federal laws, and will provide full documentation and reporting on all removal activities. The city of Fort Dodge will comply with competitive procurement provisions of 2 CFR 200.317 through 300.326 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b) **Access:** The City has ample access to all areas of the site necessary for cleanup and does not anticipate impacting adjacent properties.

13. **Community Notification:**
   a) **Draft Analysis of Brownfield Cleanup Alternatives:** The City prepared a Draft Analysis of Brownfields Cleanup Alternatives which met the stated criteria and provided it to the public for comment. The ABCA was completed on October 14, 2021, and updated on November 19, 2021.

   b) **Community Notification Ad:** The City published a community notification ad in the local newspaper (*The Daily Nonpareil*) on November 3, 2021 (Attachment 2). The community notification identified: (1) that a copy of this grant application, including the draft ABCA, was available is located; and (2) how to comment on the draft application; (3) where the draft application is located; and (4) the date and time of a public meeting to discuss and accept comment on the draft application.

   c) **Public Meeting:** The City held a public meeting as advertised, on November 8, 2021.

   d) **Submission of Community Notification Documents:**
      - Attachment 1: Draft ABCA
      - Attachment 2: Community Notification Ad
      - Attachment 3: Public Comments
      - Attachment 4: Response to Comments
      - Attachment 5: Public Meeting Notes/Summary
      - Attachment 6: Meeting Sign-in Sheet and Printed Materials

14. **Statutory Cost Share:**

   The city of Fort Dodge will provide the required cost share from the City’s General fund. (See Attachment 7)

15. **Waiver of the $500,000 Limit:**

   Not applicable
16. Named Contractors and Subrecipients:

The City will acquire additional technical expertise and resources through the service of a qualified EPA brownfield experienced QEP, subject to a competitive selection process. The QEP will assist with project management, community engagement, cleanup planning, and Site cleanup activities. The city has implemented this resource acquisition process successfully on previous brownfield grants resulting in achievement of all cooperative agreement objectives. The City has a significant history working closely with the executive officer of the Iowa Brownfield Program to provide technical expertise and advise. All contracts for this program will be completed and consistent with applicable and competitive Procurement Standards in 40 CFR Parts 30 or 31 and will include guidance to attract and utilize minority- and women-owned businesses, as possible.