



Community Development
Economic Development
Code Enforcement
Engineering
Planning

R07-24-C-002

**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: \$4,250,000

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

4. Property Information: Warden Plaza
908 1st Avenue South
Fort Dodge, IA 50501

5. Contacts:
 - a. Project Director: Vickie Reeck
819 1st Avenue South
Fort Dodge, IA 50501
Phone: (515) 576-4551, Ext. 1243
Email: vreeck@fortdodgeiowa.org

 - b. Chief Executive/
Highest Ranking Elected Official: Matt Bemrich, Mayor
819 1st Avenue South
Fort Dodge, IA 50501
Phone: (515) 571-3146

mbemrich@fortdodgeiowa.org

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



7. Other Factors Checklist:

Other Factors	Page#
Community Population is 10,000 or less	No
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	No
The priority brownfield site(s) is impacted by mine-scarred land.	No
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 would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	No
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
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing	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.



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields: i. Overview of Brownfield Challenges and Description of Target Area: The City of Fort Dodge with 23,888¹ residents, is located in north central Iowa and serves as the region's economic hub. The railroads helped establish Fort Dodge as the industrial center, transporting coal, clay, and gypsum from local mines and quarries. This once prosperous and growing community has experienced rampant disinvestment and a 20% population decline since the mid-1970s². During the 1980s, the city lost two large meatpacking plants (Hormel Foods and Iowa Beef Processors), causing extensive job loss of nearly 3,000 (over 10% of the population). In 1995 the city saw the loss of Fort Dodge Animal Health headquarters, a major producer of pharmaceuticals for veterinarian use. The great recession of 2007-2009 was particularly difficult for Fort Dodge, which saw the loss of over 1,000 primary jobs city-wide. As recently as 2020, the city experienced the mothballing of the CertainTeed Gypsum facility and the closure of the Misty Harbor Pontoon operations. The devastation caused by the loss of these facilities has contributed to Fort Dodge ranking 13th for the poorest cities in Iowa³ and designation as an economically distressed area ranking among the bottom third of the state for economic health⁴. This decline has left many vacant, abandoned, and unsafe brownfield properties throughout the city (649 brownfields facilities⁵) and especially within the project's target area, Webster County Census Tract 1918700700. The target area encompasses the heart of downtown Fort Dodge. With 1,820 residents and several thousand workers converging into the area daily, redevelopment of the target area is a high priority. The target area is in the geographic center of the town and resides directly east of the Des Moines River. The target area is also home to 186 brownfield facilities⁴ and is a disadvantaged community⁶. Brownfield sites within the target area contribute to the disinvestment the target area has experienced over the last forty years. Several brownfields sites within the target area are assessed at a fraction of what they could be. Instead, are a drain on community resources as these pose a safety risk and are home to vandalism and squatters. The city hopes to maintain momentum through this grant program to clean up the Warden Plaza, building upon the successful remediation of asbestos-containing materials in the adjacent Wahkonsa Annex. The Warden Plaza has been a fixture in the downtown for over a century. In its prime, the Warden offered luxury apartments for area residents and provided hotel accommodations for travelers. Unfortunately, this local icon has fallen victim to the City's economic downturn and as a result has suffered years of deferred maintenance, leaving a building that has been empty and deteriorated.

ii. Description of the Proposed Brownfield Site: The Warden Plaza (908 1st Avenue South, Parcel Number 0720316010) presents an opportunity to cleanup and save a historic treasure within downtown Fort Dodge. What was once part of one of the largest hotel complexes west of the Mississippi River, is now a shell of its former self. The seven-story building was developed by Theodore Warden, an Ohio coal mining investor and housed luxury apartments, hotels, and stores. Hotel operations ceased in 1972, at which time the site served as low-moderate income housing. Since 2005, the Warden Plaza has remained vacant, becoming further deteriorated, serving as an empty nuisance, attracting vandals. As a result, the City spends approximately \$30,000 annually to ensure the building is secure. The city is ready to invest in its future and that simply cannot occur without a massive investment from multiple stakeholders. The site vision includes a \$35 million renovation of the Warden Plaza, redeveloping it into a mixed-use building. Commercial space is planned on the first two floors and around 100 apartments on the upper floors. However, the presence of asbestos and lead based paint and the significant cost of \$3,250,000 for abatement has been a hurdle for developers to redevelop this site. With over 117,000 square feet and over

¹ U.S. Census 2020

² US Census 1970-2020

³ Stacker.com Cities in Iowa with Most Living in Poverty

⁴ Iowa Economic Development Authority

⁵ Peer: Platform for Exploring Environmental Resources

⁶ Climate and Economic Justice Screening Tool



2,200 fixtures, doors, fittings, etc. of asbestos containing materials and 588 positive samples of lead-based paint, removing contamination from the Warden Plaza is a significant undertaking that is required to meet safe housing standards.

b. Revitalization of the Target Area: i. Reuse Strategy and Alignment with Revitalization Plans:

Although this immense brownfield property has presented its fair share of issues for the city, it now presents an opportunity for mixed-use development of commercial and residential. The Warden Plaza redevelopment 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. Several of the goals established within the city's most recent *Comprehensive Plan* (2016) include: promoting optimal health and well-being for the entire community and promoting a well-planned community with balanced land uses. The timing of this grant opportunity is ideal for Fort Dodge. The need and desire for additional affordable housing as well as bolstering the tax base within the target area is evident. This was validated in the *Existing Conditions Report* completed in April of 2015 which revealed a need for a wide variety of housing including: single family, townhomes, multi-family, and adaptive reuse. It was also confirmed during visioning sessions with city staff and civic leaders throughout the community during the *Comprehensive Plan* process. *Existing Conditions Report* recommendations include significant improvements in the number of trail miles and improvement of the aesthetics of the 5th Avenue South corridor. Local business owners had identified the city's overall "quality of life" as a deterrent to employee recruitment. Threats to the city's quality of life include a lack of housing options, as stated previously, as well as the perception of safety against violent crime and the availability of recreational opportunities and entertainment options. As Fort Dodge is essentially its own economic hub, the need for commercial redevelopment with recreational and entertainment options is at an all-time high.

ii. Outcomes and Benefits of Reuse Strategy: As the target area is a disadvantaged community meeting the Justice40 Initiative's definition of neighborhoods experiencing low incomes, persistent poverty, minority populations, and substandard housing, priority has been given for redevelopment of this area⁷. Causing additional concern is that the target area is a disadvantaged community regarding sustainable housing⁶. With the area's extreme poverty rate and need for housing, the redevelopment of the priority site is of the utmost importance as this project will bring good paying jobs and quality housing back into the target area. The **\$35 million** Warden Plaza redevelopment project expects to create **306** construction jobs and **50** permanent jobs⁸. Today the Warden Plaza has an assessed valuation of \$77,430 and annual property taxes of \$2,358. Once this project is complete, the project site is expected to have an assessed value of over \$1 million and an annual property tax increase of at least 20-fold. Redevelopment will benefit this disadvantaged community by bringing in additional property taxes, neighborhood investments, which will remove blight while eliminating harmful effects from the asbestos and lead-based paint contamination that are present at sites like the Warden Plaza. The city will work with the developer to encourage sustainability and energy efficiency measures to be implemented into the redevelopment. This includes assisting with available tax credits and grant opportunities for solar, EV charging stations, lighting, etc.

C. Strategy for Leveraging Resources: i. Resources Needed for Site Characterization: The depressed tax base associated with business closures and declining population has driven the City of Fort Dodge to become innovative in funding solutions to address brownfield sites within the target area. Over the past five years the city has secured **over \$21 million** for the target area. In addition, the city has secured nearly **\$3 million** in private investment for the redevelopment of brownfield sites within the target area. To

⁷ Executive Order 14008

⁸ May 6, 2019, The Messenger Article



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further the development of brownfields sites within the target area the city will continue to work with the Iowa Department of Natural Resources (IDNR), K-State Technical Assistance to Brownfields (TAB), and U.S. EPA Region 7 Technical Brownfields Assistance (TBA) as necessary, to facilitate the assessment, remediation, and redevelopment of brownfields sites within the target area.

ii. Resources Needed for Site Remediation/iii. Resources Needed for Site Reuse:

Resource	Phase	Secured/Unsecured	Details
Tax Increment Financing (TIF)	Reuse	Unsecured	The city will utilize the target area TIF to attract developers. TIF uses future gains in taxes to finance construction and rehabilitation projects to help promote redevelopment of the target area.
Tax Abatement	Reuse	Unsecured	An incentive for developers where 90% for 10 years on multi-family projects or up to 100% for 3 years for existing multi-family and commercial projects.
Main Street Fort Dodge	Reuse	Unsecured	Provides grants, design assistance, building consulting, and market analysis in the target area.
Iowa Business and Tax Advantages	Reuse	Unsecured	Tax Credits job and business creation/expansion in Iowa.
Iowa DNR Brownfield	Remediation	Unsecured	Funding for remediation activities.
Historic Tax Credits	Reuse	Unsecured	Tax credits to assist in rehabilitation and preservation of historic buildings within the target area.
Brownfields/Grayfields Tax Credit	Remediation/Reuse	Unsecured	Tax credits for developers to cleanup and redevelop brownfields/grayfield sites.
EPA Brownfields Assessment	Assessment	Secured*	Funding to conduct assessments within the target area.
Downtown Revitalization	Reuse	Secured*	Assists with downtown exterior improvement projects that eliminate slum and blight conditions.
EPA Brownfields Cleanup	Remediation	Secured*	Provided funded to cleanup adjacent site of the Warden Plaza.
Local Funding	Remediation/Reuse	Secured*	\$1,100,000 secured in matching funds for revitalization and remediation efforts in the target area.

*Documentation of secured funding provided in Attachment 6 – Leveraged Documentation

iv. Use of Existing Infrastructure: The city is looking to redevelop the structure to mixed use. The bottom two floors will contain commercial development, while the upper floors will be redeveloped into residential. Due to the history of the building and unique architectural appeal, the plan is to salvage and reuse as much of the structure as possible. As the site is located within the heart of downtown, it already has access to water, sewer, stormwater, electricity, natural gas, and streets and sidewalks. Therefore, no upgrades to infrastructure are anticipated for the redevelopment of the Warden Plaza. The city is looking at ways to encourage the selected developer to incorporate green and sustainable measures within the rehabilitation.



2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need: i. The Community's Need for Funding: As a micropolitan community, Fort Dodge struggles with challenges facing both urban and rural communities. Fort Dodge faces urban issues of extreme poverty (1.5 times higher than the State of Iowa⁹), high crime (28% above the national average¹⁰), and environmental contamination (over the 70th percentile for ozone and hazardous waste¹¹), while facing rural issues of declining population, health issues, and infrastructure needs. According to the U.S. Census, Fort Dodge lost over 20% of its population from 1970 to 2020. The decline has resulted in decreased sales and property taxes throughout the city, especially within the target area. The city ranks 20th for the highest property tax rates out of 941 cities in Iowa. Property valuation increases have not kept pace with the city's annual expenditure increases. On average, the city experiences a 2% growth in property tax values, but expenses increase around 3% annually. Fort Dodge has one of the highest poverty levels in the state at 18.3% versus Iowa's 11.1%, while the target area has a staggering 32.4%⁷. The impact has negatively affected the city's operating budget and bond capacity, as Fort Dodge is near their levy limit and cannot generate additional revenue through taxation. The city's aging infrastructure requires immediate attention and takes priority as it is a health and safety issue for the community. In addition, the city is still contending with the 2015 Tax Reform, which created a loss of tax revenues of nearly 40% on multi-family properties. This leaves a significant gap in project finances for environmental assessment, remediation, and redevelopment. While operating within the lean budget, the city strives to build a better future by addressing these brownfield sites and revitalizing the target area into the attractive city it once was. Redeveloping and cleaning up the Warden Plaza can only be accomplished with the help from U.S. EPA funding.

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: The sensitive populations of the target area are Hispanics (24.29%), minorities (22.53%), children (19.29%), and seniors (11.43%)¹². Cumulative impacts and decades of persistent poverty and disinvestment, unemployment, and disasters (4 FEMA disaster declarations in the last five years) have created a severe need for funding to alleviate the extreme burdens on sensitive populations. The target area's poverty rate of 32.4% is more than double the U.S. rate of 12.8%, the state rate of 11.1%¹³. The sensitive populations are disproportionately impacted by exposure to contaminants like asbestos and lead-based paint. Abandoned buildings like the Warden Plaza are potentially putting the general public at risk of exposure. Those living in lower-income areas may be at a higher risk of accidental exposure due to older building stock and limited financial means. According to the CDC minority persons and children under the age of six are at a higher risk of lead exposure. In 2013, the CDC released a report: Blood Lead Levels in Children Aged 1-5 Years, which found that low housing quality, dangerous environmental conditions, poor nutrition, and other factors were cited as reasoning for increased lead poisoning risk among low-income and minority persons. While adults and children can have negative effects from lead exposure, children are more susceptible to long term effects including impaired brain and nervous system development, learning difficulties, and even death. Warden Plaza was selected and prioritized for the cleanup of environmental contamination to reduce risk to public health that will provide safe housing in an area that needs it the most.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to County Health Rankings and Roadmaps, Webster County (smallest geographic area available) ranks 81 out of 99

⁹ U.S. Census 2021 ACS 5-year estimates

¹⁰ Property Club Most Dangerous Cities in Iowa – August 23, 2023

¹¹ EPA EJ Screen

¹² U.S. Census 2020 ACS 5-year estimates

¹³ U.S. Census 2021 ACS 5-year estimates



(99 being the worst) counties in Iowa and is amongst the least healthy. The ranking factors considered are high school graduation rates, obesity, smoking, unemployment, access to healthy foods, quality of air and water, income inequality, and teen birth rates. Asbestos and lead-based paint exposure from the Warden Plaza could be a contributing factor to county's health ranking and high lung cancer rate (17th out of 99, one being the worst) of 71.8 compared to Iowa's 62.4 and the U.S.'s 56.3¹⁴. The target area is in the 88th percentile for NATA Cancer Risk and the 87th percentile for low life expectancy¹⁵. The county also experiences a crude rate (33.95) over ten points higher than the state's (22.34) for asthma-related emergency department visits¹⁶. These health findings make it critical for the city to protect the health of all residents, especially the sensitive populations. Identifying and remediating contaminants present at brownfield sites like the Warden Plaza would reduce exposure to known health hazards. As brownfield sites contribute to poor housing quality, lower physical health, and a higher risk of disease, revitalization of the Warden Plaza will provide quality housing, walkable neighborhoods, an expanded tax base, and good paying jobs.

(3) Environmental Justice: (a) Identification of Environmental Justice (EJ) Issues: The U.S. Centers for Disease Control and Prevention (CDC) show that where we live has a direct connection to the quality of our health and influences our experience with disease and well-being. The target area is a disadvantaged area¹⁷ and as a result experiences high climate and disaster risk burdens, environmental burdens, healthy vulnerability, and social vulnerability. These burdens and vulnerabilities result in wide health disparities and inequities for residents of the target area. The first EJ issue facing the target is the persistent poverty experienced¹⁸. According to the National Library of Medicine, people living in poverty, especially children, are disproportionately at risk from and affected by environmental hazards¹⁹. Exposure to contaminants such as asbestos and lead cause health disparities, such as asthma, cancer, lead poisoning, obesity, and hyperactivity. The second EJ issue the target area experiences is housing. The area has a large percentage of older housing stock, with 40% built before 1940 and 69% built prior to 1980²⁰. In addition, nearly 44% of households in the target area have a housing cost burden²¹. The target area is in the 88th percentile for share of households that make less than 80% of the median income but spend more than 30% of the household income on housing¹⁵. The target area is also in the high- risk category for childhood lead exposure²², in part due to the age of housing stock. The final EJ issue being experienced by the target area is exposure to pollution and climate change. The area is in the 95th percentile for expected population loss from natural hazards each year¹⁵ and has a high ranking for potentially hazardous and toxic sites²³.

(b) Advancing Environmental Justice: The vacant, dilapidated Warden Plaza is a contributing factor to environmental justice issues within the target area. Prior to the Warden Plaza becoming vacant in 2005 the site was used as low-moderate income housing. This closure has added to the lack of quality affordable housing within the target area. With the building sitting vacant and deteriorating further, it has contributed to the disinvestment the area has experienced over the last four decades. Finally, the Warden Plaza is full of asbestos containing materials (ACM) and lead-based paint. Redevelopment of the vacant Warden Plaza will not only clean up an exposure risk to the community but will create a \$35 million investment that will

¹⁴ State Cancer Profiles

¹⁵ EPA EJ Screen

¹⁶ Iowa Department of Public Health.

¹⁷ Climate and Economic Justice Screening Tool

¹⁸ U.S. DOT Grant Project Location Verification

¹⁹ National Library of Medicine

²⁰ U.S. Census 2021 ACS 5-year estimates

²¹ U.S. DOT Equitable Transportation Community ETC Explorer

²² Iowa Department of Public Health Lead Exposure Risk Model

²³ CDC ATSDR Environmental Justice Index Explorer



add new affordable housing to the community. Redevelopment of the Warden is projected to create 306 construction jobs and 50 permanent jobs²⁴. Once completed the current \$77,430 assessed value is expected to be over \$1 million with an annual property tax increase of at least 20-fold.

b. Community Engagement: i. Project Involvement/ii. Project Roles: The city understands the importance of partnerships, as they provide the foundation to redevelop brownfield sites successfully. Effective partnerships leverage the strengths of each partner and apply them strategically to accomplish the common goal.

Organization	Contact	Role
Iowa Department of Natural Resources	Mel Pins Mel.pins@dnr.iowa.gov	IDNR will provide input on cleanup and additional grant funding if necessary.
Webster County Public Health	Jennifer Sumpter jsumpter@webstercounty.org	Assist in answering health related questions about contamination.
Greater Fort Dodge Growth Alliance	Astra Ferris astra@greaterfortdodge.com	Assist with site redevelopment.
Fort Dodge Community School District	Josh Porter jporter@fdschools.org	Assist in community engagement activities targeting sensitive populations.
Main Street Fort Dodge	Sharon Stroh director@mainstreetfd.org	Grants, Design Assistance, Business Consulting, and Market Analysis
Fort Dodge Human Rights Commission	Amanda Holmes Aholmes@fortdodgeiowa.org	Assist in engagement activities targeting sensitive populations.
Webster County Cultural Diversity Team	Jamie Anderson janderson@fortdodgeiowa.org	Work with diverse populations to gain input.
General Public		Provide input and feedback on brownfield sites and priorities.

iii. Incorporating Community Input: It is vital to the city and the success of the brownfields program to have meaningful community engagement. Community engagement will begin by providing periodic progress updates to the City Council and the community regarding information on the project schedule, completed reports, and future plans will be made available for public input at: <http://www.fortdodgebrownfields.com>. This website will cover all information regarding brownfield projects and has a comment section to allow questions or input that can be shared directly with program staff. The city will host a series of public meetings and open house events (at least two the first year and at least one annually the following years) at various venues (churches, schools, or non-profits) throughout the target area (in-person and virtual options will be offered) to keep interested citizens apprised on the progress and to solicit input and feedback. Input will be recorded by city staff, and substantive comments will be considered and presented to the city council to make informed decisions. Meeting information will be published in the local newspaper, the city’s website, the city’s brownfields website, and posted in public buildings such as city hall and the library. The city will utilize social media such as Facebook and Twitter to inform citizens on this important endeavor. The target area has a large Hispanic population of 24.29%²⁵ and is in the 60th percentile for persons who speak the English language “less than well.”²⁶ Therefore, the city will provide translation services in Spanish. Feedback from the community members

²⁴ May 6, 2019, The Messenger Article
²⁵ U.S. Census 2020 ACS 5-year estimates
²⁶ CDC ATSDR Environmental Justice Index Explore



and project partners will be incorporated into program decisions documents like the final ABCA, cleanup plans, and the project cleanup specifications.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: Fort Dodge will competitively procure the services of a Qualified Environmental Professional (QEP) and a remediation contract(s) in accordance with 2 CFR §§ 200.317 through 200.327 and 40 CFR Part 261. The QEP will assist city staff in overseeing the response action of this project. The city will require the QEP to have the necessary qualifications and certifications (asbestos inspector, asbestos contractor/supervisor, and lead inspector/risk assessor) to handle a cleanup of this magnitude. Abatement of all asbestos containing materials and lead-based paint contamination are identified in the ABCA, which is an integral part of cleanup activities and must follow State and Federal regulations. Therefore, this project will warrant the development of a comprehensive project design. The project design document will define the expectations of the city, the requirements of the work, scope of the project, and will ultimately be used as part of the bid process for cleanup work. Abatement of asbestos and lead-based paint shall be performed only by a properly trained, licensed, and insured contractor. The cleanup contractor must be aware and follow 40 CFR Part 61, Subpart M and 40 CFR Part 261 Asbestos containing materials (ACM) will only be disposed of at the identified landfill that accepts ACM. When selecting a cleanup contractor, the city will focus on qualifications and cost. This process will evaluate previous work experience, skills in a similar work environment, length of service history, and business or company stability, along with cost. The Site contractor for cleanup activities will be someone with all required credentials. This cleanup will be planned in rigorous detail. The project will require the removal of all asbestos and lead-based paint materials.

b. Description of Task/Activities and Outputs

Task 1: Cooperative Agreement Oversight
i. Project Implementation: Cooperative Agreement Oversight will be conducted by the City of Fort Dodge and will include, general grant administration, procurement and oversight of contracts and contractors, reporting, budget and invoice reconciliation, ACRES reporting, and project coordination.
ii. Anticipated Project Schedule: This task will commence at the beginning of the cooperative agreement and will be ongoing throughout the entire four-year project period.
iii. Task Lead: Community & Economic Development Director (CEDD) & Community Development Manager (CDM)
iv. Outputs: a. Workplan; b. Quarterly, Annual, and Final Reporting; c. Monthly Funding Draws Prepared/Reconciled and Submitted to EPA;
Task 2: Community Engagement
i. Project Implementation: This tasks involves conducting community engagement activities to inform the public on cleanup plans, implementation, and redevelopment of the Warden Plaza while providing opportunities for the public to provide feedback. Emphasis will be on the project neighborhood outreach, updating the city’s brownfields website, and creating printed materials.
ii. Anticipated Project Schedule: This task will commence at the beginning of the cooperative agreement and will be ongoing throughout the entire four-year project period.
iii. Task Lead: CEDD, CDM, & Qualified Environmental Professional (QEP)
iv. Outputs: a. Public meetings; b. Project Website; c. Neighborhood Meeting/Open House; d. Printed Materials in English and Spanish
Task 3: Cleanup Planning
i. Project Implementation: Prior to site remediation work, the QEP will prepare a Site-Specific Quality Assurance Project Plan including the Health & Safety Plan, NHPA/Section 106 Compliance, finalize the ABCA, develop Cleanup Plans and Bid Specs, and conducting the bidding process.



ii. Anticipated Project Schedule: This task will begin after a QEP has been selected and is anticipated to be completed by the end of quarter 4.
iii. Task Lead: CEDD, CDM, & QEP
iv. Outputs: a. Final ABCA; b. Site-Specific Quality Assurance Project Plan; c. NHPA/Section 106 Compliance; d. Cleanup Plan; e. Technical Specifications for Site Cleanup; f. Cleanup Plans and Bid Specifications; g. Remediation Contract; h. Health & Safety Plan; i. Permits; j. Bid Results/Tabulation
Task 4: Cleanup Activities
i. Project Implementation: This task includes the cleanup work and monitoring of asbestos containing materials and lead-based paint remediation, post remediation confirmation sampling, and regulatory compliance
ii. Anticipated Project Schedule: Quarters 5 – 10
iii. Task Lead: CEDD, CDM, & QEP
iv. Outputs: a. Pre-construction Meeting; b. Davis Bacon Records; c. Remediation of Contamination; d. Monitoring/Lab Reports; e. Post Removal Action Cleanup Report

c. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel ¹	\$135,000	\$21,500	\$10,750	\$10,750	\$178,000
	Fringe Benefits ²	\$22,000	\$3,500	\$1,750	\$1,750	\$29,000
	Travel ³	5,000	-	-	-	\$5,000
	Equipment ⁴	-	-	-	-	-
	Supplies ⁵	-	-	-	-	-
	Contractual ⁶	\$50,000	\$50,000	\$100,000	\$587,500	\$787,500
	Construction ⁷	-	-	-	\$3,250,000	\$3,250,000
	Other ⁸	\$500	-	-	-	\$500.00
Total Direct Costs		\$212,500	\$75,000	\$112,500	\$3,850,000	\$4,250,000
Indirect Costs		-	-	-	-	-
Total Budget		\$212,500	\$75,000	\$112,500	\$3,850,000	\$4,250,000

Budget Explanations

¹Personnel: Community & Economic Director has an hourly wage of \$51.51 and is estimated to spend 1,527 hours for a total of \$78,655.77; Community Development Manager has an hourly wage of \$37.37 and is estimated to spend 2,658 for a total of \$99,329.46 (Total: \$178,000.00 round up)

²Fringe Benefits: Community & Economic Director has an hourly fringe benefit wage of \$8.62 x 1,527 hours = \$13,162.74; Community Development Manager has an hourly fringe benefit wage of \$5.87 x 2,658 hours = \$15,602.46 (Total: \$29,000 round up)

³Travel: Airfare - \$1,500 (2 people x 750 each); Mileage to airport - \$130.00 (198 miles x 0.655 per mile (round up)); Airport Parking - \$150 (5 days x \$30); Hotel - \$2,500 (2 rooms x \$250 per night for 5 nights); Meals - \$720 (based on the federal per diem rate of \$60 per day x 6 days for two people) (Total: \$5,000 round up)

⁴Equipment: None budgeted for this project.

⁵Supplies: None budgeted for this project.

⁶Contractual (QEP costs): Reporting/Cooperative Agreement Requirements: \$50,000; Community Engagement: \$75,000; Cleanup Planning (final ABCA, NEPA/Section 106, project specifications, health and safety plan; and cleanup bidding): \$100,000; Cleanup (on-site cleanup monitoring, air monitoring, final inspection, Davis Bacon, post Removal Action Cleanup Report, and lab analysis for sampling (costs determined by an average hourly rate of \$160 from QEPs in the state).



⁷Construction (Cleanup): The estimate was provided by an asbestos and lead-based paint abatement contractor as was based on the following assumptions: Six months with 20-24 workers, working Monday through Saturday. Each floor (7 floors plus basement) is estimated to take between 2.5 to 3 weeks for \$3,250,000.

⁸Other: Registration for National Brownfields Conference \$250 x 2 = \$500

d. Plans to Measure and Evaluate Environmental Progress and Results: Fort Dodge will track the project’s progress and will incorporate correct actions, when necessary, through bi-weekly status meetings with the QEP, remediation contractor, EPA Project Officer, and IDNR. Quarterly reports will be submitted to EPA and will include information on project expenditures, activities, schedule, goals, and corrective actions (where applicable). Environmental results will be measured by the achievement of project milestones and performance metrics detailed in the project Work Plan. Key outcomes will include the amount of acres/square footage ready for reuse, degree of community participation, and redevelopment dollars leveraged by the project. Site-specific information will be regularly entered and tracked in the online ACRES database.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability: i. Organizational Structure/ii. Description of Key Staff: The City of Fort Dodge has the requisite skills to satisfy all phases of work under this grant. The city has dedicated and qualified staff to implement and administer the brownfields cleanup. Ms. Vickie Reeck and Ms. Paige Wheeler will be responsible for managing this project. Ms. Reeck will act as the program lead and has been with the city for over 30 years and currently holds the Community and Economic Development Director position. Ms. Reeck has assisted with acquiring 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 local and regional development organizations by identifying and marketing in-fill properties in Fort Dodge. Ms. Wheeler, Community Development Manager, has been with the city for eight years, with three of those years working in the Development Services Division, helping with property acquisitions, environmental assessments, and demolitions. Ms. Wheeler will support Ms. Reeck and assist with community outreach, scheduling, and coordination with the QEP, DNR, and EPA. Jeff Nemmers, Finance Director for the City of Fort Dodge, will provide financial oversight of the grant, review all invoices, and process draw requests. Mr. Nemmers has been in this role for nearly 13 years. In the unlikely event of staff departure, the city will retain project leadership from city staff (City Manager, City Engineering Department) and the QEP.

iii. Acquiring Additional Resources: 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 environmental cleanups and familiar with program requirements. The city envisions providing overall management of the QEP’s work, implementing public involvement, and assuming responsibility for the fiscal management of the program (draw requests, quarterly reports). In addition, the city will issue a Request for Proposals and hire a qualified environmental cleanup firm to assist with the cleanup of the Warden Plaza. All hiring for this program will follow federal, state, and local procurement policies. The city will also require that all firms have adequate experience and hold the appropriate state certifications/licenses to work on projects involving hazardous materials. The City of Fort Dodge will utilize Iowa’s Targeted Small Business (TSB) Program to promote project work to women, individuals with minority status, service-disabled veterans, and individuals with disabilities. Secondly, the city will encourage selected QEP and contractor to hire local residents, especially from the target area to fulfill project staffing needs.

b. Past Performance and Accomplishments: i. Currently Has EPA Brownfield Grant: (1)
Accomplishments: The City of Fort Dodge has been the recipient of five EPA Brownfield Grants; a Pilot



FY24 U.S. EPA Community-Wide Brownfields Cleanup Grant Application

Grant in 2000, an Assessment Grant in 2013, a Cleanup Grant in 2019 and in 2021, and a Community-Wide Assessment Grant in 2022. Both the 2000 and 2013 Assessment Grants and the 2019 Cleanup Grant have been successfully closed out upon expenditure of funds. The 2022 Cleanup Grant is on track to be completed by the end of 2023. It is important to mention that with the 2013 assessment grant, 58 parcels were assessed via Phase I ESAs, and 30 parcels via Phase II ESAs. 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.

(2) Compliance with Grant Requirements

The \$200,000 Assessment Pilot Grant (Oct 1, 2000 – Sept 30, 2003):

- 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.
 - This space will be home to the newly constructed Webster County Nature Center, which will be completed later this year and open to the public in July of 2024.
 - This space is also selected for the Central River District Plan, which the City will begin constructing in the Spring of 2024.

The \$400,000 Assessment Grant (Oct 1, 2013-Sept 30, 2016):

- Attended the 2015 annual Brownfields Conference as well as DNR workshops.
- Assessed 58 parcels via Phase I ESAs and 30 via Phase II ESAs.
- Continual community outreach, including a 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 to keep residents informed about the project and the brownfield assessment progress. This included an informational brochure, the creation of a website to inform and track progress, hosting annual outreach meetings, and maintaining a depository of completed reports at City Hall for public viewing. In addition, all brownfield objectives were tracked, measured, and accounted for via quarterly reports to EPA and updating the ACRES database.

The \$500,000 Cleanup Grant (start date of October 1, 2019) was for the asbestos removal from the Wahkonsa Annex Building 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 scheduled 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 was closed out by the September 30, 2022, grant cooperative agreement date. All programmatic requirements were met, including but not limited to, the required quarterly reports, annual reports, and financial reports. The city is actively looking for developers to redevelop the site in conjunction with the adjacent Warden Plaza.



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 1)

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:

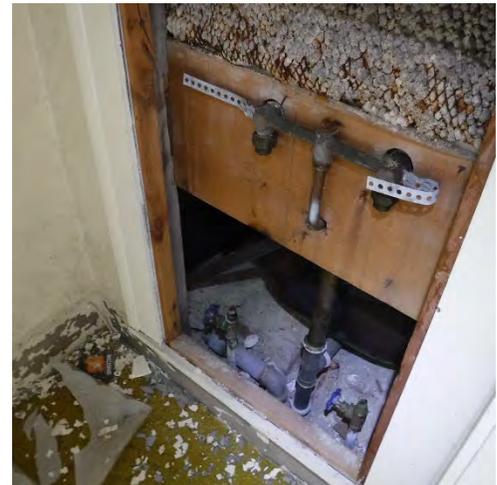
The City of Fort Dodge acquired the property, through 657a of the Iowa Code, on August 15, 2023. The City will retain ownership throughout the period of the grant. (See Attachment 2)

5. Basic Site Information (See Attachment 3):

- a) Site Name: Warden Plaza
b) Address: 908 1st Avenue South
Fort Dodge, IA 50501

6. Status and History of Contamination at the Site:

- a) Hazardous Substances or Petroleum: The Site is contaminated by hazardous substances. Asbestos containing materials (ACM) and lead-based paint have been identified in building materials throughout the Site. (Attachment 5a Draft ABCA)





- b) Operational History and Current Uses: The Site was historically utilized as a hotel and apartments from 1926 until 2005 and is in poor and dilapidated condition.
- c) Environmental Concerns: The Site has documented ACM and lead-based paint within and throughout the building. This ACM and lead-based paint requires abatement prior to redevelopment.
- d) Source, Nature, and Extent of Contamination: Asbestos inspection reports



completed in January 2017 and in March 2017 found that building materials used at the time the Warden Plaza was constructed are the source of Site contamination. As part of the updated asbestos inspection 356 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 texture, roof flashing, transite panels and soffit, pipe insulation, mudded fittings, ceiling tiles, tar, caulk, and HVAC seam tape. The widespread use of ACM across the Site hinders future redevelopment plans. A lead-based paint inspection was completed in December 2016. Lead-based paint was identified in

588 of the 1,956 samples analyzed from the Site. Lead-based paint was identified in building materials such as door components, moldings, walls, window components, stairs, cabinet components, wall tile, shelf components support columns, ceilings, corner board, and fire escape.

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 Survey report was completed by ATC Group Services, LLC (ATC) in January 2017. Impact7G completed a supplemental ACM Inspection report in March 2017. The



purpose of the ACM Inspections was to identify and sample all suspected building materials located on the Site.

Asbestos was detected in 70 of the 356 analyzed samples from the January and March 2017 reports submitted to the City by ATC and Impact7G. ACMs include:

- Caulking
- Exterior Window Glazing
- Window Tar
- Roof Parapet Wall Flashing
- Transite Panels & Debris
- Mudded Fittings
- 9" x 9" Floor Tiles Mastic
- 12"x12" Ceiling Tile Glue
- 12" x 12" Floor Tiles
- Sink Undercoating
- Heat Shield
- Electrical Wire Insulation
- Sheet Flooring
- Elevator Fire Door
- 2' x 4' Ceiling Tile & Debris
- Texture Ceiling & Debris
- Transite Soffit
- Wall Waterproofing
- HVAC Seam Tape & Debris
- Backsplash Wall Mastic
- Pipe Insulation
- Ceiling Mastic Puck
- Wall Mastics
- Duct Mastic



All building materials similar in appearance, color, and/or texture to those determined to contain asbestos are assumed to contain asbestos throughout this building.

ACMs must be removed by a certified asbestos abatement contractor within a full containment and disposed of asbestos waste.

The asbestos containing materials inspection containing the documented locations and estimated amounts is included in Appendix B of the inspection report (Draft ABCA is in Attachment 5a).

A Lead-Based Paint Inspection report was completed by Impact7G in December 2016. The LBP Inspection report collected samples from both the Site (Warden Plaza) and the adjacent Wahkonsa Annex. The Site is identified as the West Building in the XRF results and the Wahkonsa Annex is identified as the East Building. The purpose of the LBP Inspection was to identify and sample all LBP located on the Site.

LBP was identified in 588 of the 1,956 samples analyzed from the Site. LBP includes:

- Door Components
- Walls
- Stair Components
- Support Columns
- Ceilings
- Crown Molding
- Window Components
- Chair Rails
- Railing Base
- Cabinet Components
- Shelf Components
- Baseboards
- Wall Tile
- Corner Board
- Fire Escape



LBP identified on components are assumed to be positive on any similar components, within the same room equivalent, and/or on similar components that have a similar painting history throughout the Site.

For the areas within the building that will be residential after project completion, the contractor performing the LBP abatement must be an Iowa lead firm. The contractor must designate an Iowa licensed lead abatement contractor to oversee the project and workers must be Iowa licensed lead abatement workers.



9. Site Characterization

- a) Not applicable
- b) Not applicable
- c) While the Iowa Department of Natural Resources (IDNR) does not enroll asbestos containing building materials, or lead-based paint, within structures into the Land Recycling Program (Iowa's Voluntary Response Program), the program oversight will be through compliance with the Federal National Emission Standards for Hazard Air Pollutants (NESHAP) and supporting regulations for oversight of asbestos abatement through NESHAP. The disposal of lead-based paint contaminants will comply with RCRA, and the Iowa Department of Natural Resources does not provide oversight of Federal RCRA.
 - i. Iowa Department of Natural Resources Letter (Attachment 4)
 - ii. It is the opinion of Jon Reis, an Environmental Professional (as defined in 40 CFR § 312.10), that based on review of the previously completed asbestos and lead-based paint inspections, there is sufficient level of Site characterization to date for the remediation work to begin on the Site.





10. 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.



11. Sites Requiring a Property-Specific Determination:

Not applicable

12. 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 August 15, 2023. The Site had been abandoned since 2005.
 - (b) August 15, 2023 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

- b) Not applicable

13. 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 a competitive bid process to remove and dispose of asbestos containing materials and lead-based paint. 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.



14. Community Notification (Attachment 5):

- 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 Draft ABCA was completed on October 11, 2023 and updated on October 18, 2023.
- b) Community Notification Ad: The City published a community notification ad in the local newspaper (*Fort Dodge Messenger*) on October 12, 2023 (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 October 23, 2023.

d) Submission of Community Notification Documents (Attachment 5):

- Attachment 5a: Draft ABCA
- Attachment 5b: Community Notification Ad
- Attachment 5c: Public Meeting Summary
- Attachment 5d: Public Comments
- Attachment 5e: Meeting Sign-in Sheet

15. Contractors and Named 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 the achievement of all cooperative agreement objectives. The City has a significant history working closely with the executive officer of the Iowa Department of Natural Resources Brownfield Redevelopment Program (Mel Pins) to provide technical expertise and advice. 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.





October 27, 2023

Susan Klein
Regional Brownfield Program
EPA Region VII
1201 Renner Road
Lenexa, KS 66219

RE: FY24 Brownfield Cleanup Grant Application – City of Fort Dodge
for the former Warden Plaza Hotel, 908 1st Ave S., Fort Dodge, Iowa

Dear Susan:

This letter is submitted as a statement of acknowledgement and review, as well as our partnership and support, for the City of Fort Dodge's brownfield cleanup grant application, designed to address the cleanup of hazardous materials, primarily regulated, asbestos containing material (ACM) and lead-based paint (LBP) within a large, abandoned hotel in downtown Fort Dodge, formerly known as Warden Plaza.

Built in downtown Fort Dodge in 1924, the 8-story Warden Plaza Hotel was the center of civic and commercial activities in this largest city in northwest Iowa. However, by the 1970s changes in highway alignments and travel lodging preferences resulted in a gradual decline in the commercial use of the building, and for more than 15 years the building has sat vacant, with multiple sales between private parties, and no resulting economic redevelopment. The building has further declined, with a leaking roof and broken windows, resulting in the potential release of hazardous buildings materials, including ACM and LBP into the environment. These conditions left the community with no choice but to seek to acquire title to the site through abandonment proceedings within District Court (a non-voluntary taking within CERCLA provisions), in order to secure the building to protect the public's health and safety.

With ownership of the building, the City has provided physical security for the property, and seeks to remediate the environmental hazard that the ACM and LBP presents, in order to prepare the building for renovation and restoration to again be a positive landmark and center of social and economic activity in downtown Fort Dodge.

The Iowa Department of Natural Resources (DNR) has worked closely with the City of Fort Dodge on brownfield technical and assessment assistance related to this site and neighboring properties through our Brownfield State Response Section 128(a) Program; however, the daunting task of ACM and LBP remediation within an 8-story, 100 year old building will require significant investment, beyond the dedicated resources that both the DNR and the City have already put forward on this and related downtown brownfield projects.

A sufficient level of assessment has been completed to characterize the site for the contaminants of concern (assessment has been completed by June 15, 2024), and the City and its brownfield planning partners have had multiple discussions and meetings with DNR to facilitate the abatement of the ACM with DNR oversight through the federally delegated National Emissions Standards for Hazardous Air Pollutants (NESHAP) authority. LBP removal will be coordinated through EPA's LBP Abatement and Evaluation Program, with coordination with DNR and the Iowa Department of Public Health (IDPH) as appropriate.

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,

A handwritten signature in black ink, appearing to read "Mel Pins", written in a cursive style.

Mr. Mel Pins
Executive Officer
Iowa Brownfield Redevelopment Program

cc: Vickie Reeck, Community and Economic Development Director, City of Fort Dodge