



Community Development
Economic Development
Code Enforcement
Engineering
Planning

City of Fort Dodge, Iowa Brownfields Cleanup Grant Application

B. Application Information Sheet:

(1) Applicant Identification	City of Fort Dodge 819 1 st Avenue S Fort Dodge, IA 50501	
(2) Website URL	https://www.fortdodgeiowa.org/	
(3) Funding Requested	a. Grant Type: Single Site Cleanup	
	b. Federal Funds Requested: \$3,200,000	
(4) Location	a. City: Fort Dodge	
	b. County: Webster County	
	c. State: Iowa	
(5) Property Information	Warden Plaza 908 1 st Avneue South Fort Dodge, IA 50501	
(6) Contacts	a. Project Director	b. Highest Ranking Elected Offiical
	Paige Wheeler (515) 576-4551, ext. 1201 pwheeler@fortdodgeiowa.org 819 1 st Avenue South Fort Dodge, IA 50501	David Flattery, Mayor (515) 570-3048 dflattery@fortdodgeiowa.org 819 1 st Avenue South Fort Dodge, IA 50501
(7) Population	23,888 (2020 U.S. Census)	

8. Other Factors	Page #
Community Population is 15,000 or less	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Terriorty.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of remediation/reuse; secured resource is identified in the Narrative and sustaintiated in the attached documentation.	3 & Attachment 1
The proposed 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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A



The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resiliency to protect residents and community investment.	2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	N/A

9. Releasing Copies of Applications – This application does not contain confidential, privileged, or sensitive information.

January 6, 2026

Tarah Vaughn
Regional Brownfield Program
EPA Region VII
1201 Renner Road
Lenexa, KS 66219

RE: FY26 Brownfield Cleanup Grant Application for the former Warden Plaza Hotel,
908 1st Ave S., Fort Dodge, Iowa

Dear Tarah:

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 allowable CERCLA liability protection 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 risk 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.

Within this letter, the DNR states the following:

- 1) The City is coordinating with the 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. ACM and LBP removal within structures is not eligible for enrollment in the DNR's voluntary cleanup program, as hazardous building materials within structures are not within the oversight of Iowa's VCP.

- 2) A sufficient level of assessment has been completed by an Environmental Professional (as defined in 40 CFR § 312.10) to characterize the site for the contaminants of concern, and the building has had a recent, certified asbestos inspection and related lead-based paint inspections of the structure. The DNR affirms that the site will be ready for remediation efforts, with all necessary assessment having been completed before June 15, 2025.

The DNR appreciates the opportunity to be a supportive partner for many, successful brownfield assessment, cleanup, and redevelopment projects in the past within 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: Paige Wheeler, Development Service Director, City of Fort Dodge



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(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields: a. Overview of Brownfield Challenges and Description of Target Area: The City of Fort Dodge is a regional economic hub located in north central Iowa with a population of 24,788¹. 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 the Hormel Foods and Iowa Beef Processors meatpacking plants, resulting in the loss of nearly 3,000 jobs equal to 10% of the population and 19% of the labor force³. The city was nicknamed “Dirty Dodge” during this time, due to the crime rate that resulted and the meatpacking industry’s disposal of waste directly into the Des Moines River. 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 jobs citywide and as recently as 2020, the city experienced the mothballing of the CertainTeed Gypsum facility and the closure of the Misty Harbor Pontoon operations leaving over 100 people without jobs. The devastation caused by the loss of these facilities has contributed to Fort Dodge ranking 13th for the poorest cities in Iowa⁴ and its designation as an economically distressed area ranking among the bottom third in the state for economic health⁵. This decline has left vacant, abandoned, and unsafe brownfield properties throughout the city (649 brownfield facilities⁶) and especially within the program target area, Webster County Census Tract 7 (186 brownfield facilities⁶). The target area is in the geographic center of the town and is located directly east of the Des Moines River. It also serves as the target area for the city’s current U.S. EPA Assessment grant. “We were a regional center for this part of Iowa. We were an employment center. We were a retail center. We were an industrial center, and so on. And I think Fort Dodge grew by virtue of the dominance of this region as an agricultural area,” said Dennis Plautz, former CEO of the Greater Fort Dodge Growth Alliance. The target area encompasses the heart of downtown Fort Dodge and was once a bustling area lined with storefronts but today many are closed or demolished entirely. The city and target area have changed dramatically from their former status as a thriving mid-Iowa hub and now lack the resources needed to address the many brownfield sites that have contributed to the disinvestment within the target area over the last 40 years. Brownfield sites within the target area are valued at a fraction of what they could be and are a drain on community resources as they pose a safety risk and attract vandalism and squatters. With 1,820 residents and thousands of workers converging into the area daily, redevelopment of the target area is a high priority. The target area has a clear and well-documented demand for additional workforce housing, which the redevelopment of the Warden Plaza will help meet. While, progress has occurred, the city hopes to maintain momentum through this grant program by remediating and redeveloping the Warden Plaza. Building upon the successful redevelopment of the former Wahkonsa Manor into a 76-apartment complex for seniors and disabled and the remediation of asbestos-containing materials, through an U.S. EPA Brownfields Cleanup Grant of the Wahkonsa Annex, the city is now focused on the Warden Plaza. The Wahkonsa-Warden buildings have been a fixture in the downtown for a century. In 1910, Wahkonsa Manor was built by the city’s Commercial Club to provide a first-class hotel for the community, and it was expanded in 1917 with the addition of the Wahkonsa Annex. Finally, in 1922, the Warden Plaza was added, offering luxury apartments for area residents along with additional hotel accommodations. Unfortunately, this local icon (Warden Plaza) has fallen victim to the City’s economic downturn and as a result has suffered years of deferred maintenance, leaving an empty and deteriorated building. U.S. EPA Brownfields Cleanup Funding will provide the catalyst to save the Warden Plaza while meeting the community’s workforce housing needs.

b. Description of the Proposed Brownfield Site: The Warden Plaza (908 1st Avenue South, Parcel Number 0720316010) represents a unique opportunity to clean up and preserve a historic landmark in downtown Fort

¹ U.S. Census ACS 2023 5-Year

² US Census 1970-2020

³ US Census 1980

⁴ Stacker.com Cities in Iowa with Most Living in Poverty

⁵ Iowa Economic Development Authority

⁶ Peer: Platform for Exploring Environmental Resources



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Dodge. Once part of one of the largest hotel complexes west of the Mississippi River, the seven-story (eight including basement), 183,000-square-foot building was developed in 1922 and originally housed luxury apartments, hotels, and retail stores. Hotel operations ceased in 1972, after which the property served as low- to moderate-income housing until it became vacant in 2005. Following years of vacancy and deterioration, the City of Fort Dodge acquired the property in 2016 under Iowa’s 657A Abandoned or Unsafe Buildings code. A developer committed to investing \$30 million in redevelopment; however, the extent and cost of contamination proved insurmountable. The city re-acquired the site in August 2023 and has since borne the burden of maintaining a structure that has become a public nuisance, attracting vandalism and posing safety hazards. Annual security and stabilization costs range from \$10,000 to \$15,000, not including extraordinary expenses such as the \$15,000 cleanup after a lightning strike caused bricks to fall onto the sidewalk. The community is ready to invest in its future, but redevelopment cannot proceed without significant support from multiple stakeholders. The city is currently partnering with Kansas State University’s Technical Assistance to Brownfields (TAB) program to complete a market feasibility study, ensuring that the community’s vision is achievable and attractive to developers. The proposed vision includes a \$35 million plus renovation of the Warden Plaza, redeveloping it into a mixed-use building. However, the presence of asbestos containing materials (ACM) and lead-based paint (LBP) and the significant cost of \$2,800,000 for remediation has been a hurdle for redevelopment of this site. With more than 189,090 square feet and 17,150 linear feet of asbestos-containing materials—including 1,060 windows, 1,700 fittings, 865 fixtures, 105 sinks, 30 gaskets and 2 doors—along with 441,246 square feet of lead-based paint, 40 contaminated doors, 81 windows, and extensive lead dust throughout the building, the Warden Plaza presents a substantial environmental cleanup challenge. Addressing these hazards is essential to advancing the redevelopment plan and ensuring long-term safety. The preferred redevelopment concept, estimated at more than \$35 million, envisions office, commercial, and public space on the first two floors, with affordable workforce housing on the upper levels. Years of community engagement have consistently highlighted the need for additional affordable workforce housing, and the redevelopment of the Warden Plaza—with approximately 100 new units—would make a meaningful contribution toward meeting that need.

Revitalization of the Target Area: c. Reuse Strategy and Alignment with Revitalization Plans: Although this large brownfield property has posed challenges for the City of Fort Dodge for nearly two decades, it now offers a transformative opportunity for mixed-use commercial and residential development. The Warden Plaza redevelopment will create a vibrant sense of place for residents while driving economic growth in alignment with local land-use plans and priorities shaped by extensive community engagement. The proposed project includes the cleanup and renovation of the building into commercial and public space on the first two floors and one hundred units of affordable workforce housing on floors three through seven. Recent community engagement efforts through the city’s Brownfields Assessment Grant program including stakeholder meetings, farmer’s market outreach events, and a public open house have confirmed that this redevelopment initiative aligns with key goals in the City’s Comprehensive Plan (2016). These goals included promoting optimal health and well-being for the entire community and promoting a well-planned community with balanced land uses. Redevelopment of the Warden will address a significant source of contamination that is contributing to negative health outcomes like cancer and asthma within the target area. In addition, it will provide workforce housing near employment opportunities. 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, validated in the *Fort Dodge Growth Alliance Housing Study* completed in 2024 which revealed a need for a wide variety of housing including: single family, townhomes, multi-family, and adaptive reuse, which is still a top need for the target area. Local business owners noted that the city’s overall quality of life is hindering their ability to attract employees, particularly due to the shortage of quality workforce housing near the main employment area. They also pointed to limited housing choices, concerns about safety tied to deteriorated or vacant buildings, and a lack of recreational and entertainment amenities as key challenges. Cleaning up the vacant and deteriorated Warden Plaza removes blight that contributes to safety concerns, nuisance activity, and crime. Once this site is remediated,



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it can be transformed into new housing, commercial spaces, and entertainment amenities—directly addressing the city’s shortage of workforce housing, limited entertainment options, and need for commercial space.

d. Outcomes and Benefits of Reuse Strategy: The target area neighborhood is burdened by low incomes, persistent poverty, minority populations, and substandard housing, making it a priority for redevelopment. With an extreme downtown poverty rate of 30.9 percent (ACS 2023 5-year) and a critical need for housing, the Warden Plaza project is essential to revitalizing this community. This redevelopment will bring good paying jobs, quality housing, and renewed economic vitality to the heart of Fort Dodge. The proposed **\$35 million** Warden Plaza redevelopment project expects to create **306** construction jobs and **50** permanent jobs⁷. Today the Warden Plaza has an exempt valuation of \$83,890 and generates no property tax revenues. Once this project is complete, the site is anticipated to have an assessed value of over **\$2.5 million** and would begin to contribute to the City’s property tax revenues at an estimated amount of **\$101,145 annually**. Redevelopment will benefit this depressed community by bringing in **100** new affordable multi-family housing units and neighborhood investments and will remove blight and eliminate harmful effects from the ACM and LBP contamination while saving an iconic downtown historic structure. According to the U.S. Department of Agriculture’s Northern Research Station, “vacant buildings have a negative impact on neighborhoods and the quality of life for residents. They are consistent predictors of crime in urban areas.” According to FBI data the crime rate in Fort Dodge is higher than the national average. Fort Dodge’s goal is to save the Warden Plaza and redevelop into a community asset, while reducing crime within the target area. It will also decrease community-level vulnerability from severe weather climate events by eliminating blight and structural hazards, upgrading the structure to current building codes and implementing energy efficiency measures, and stormwater management systems, while improving neighborhood stability.

Strategy for Leveraging Resources: e. Resources Needed for Site Characterization/f. Resources Needed for Site Remediation/g. Resources Needed for Site Reuse:

Resource	Phase	Status	Details
Local Funds	Acquisition	Completed	The city utilized local funds (\$48,000) to acquire the building through 657A Abandoned or Unsafe Buildings.
EPA Brownfields Assessment	Assessment	Secured	\$500,000 assessment grant awarded and available if further assessment work is needed.
KSU TAB	Planning	Secured	Market analysis on the Warden Plaza.
Iowa Dept. of Natural Resources (IDNR) Brownfields	Assessment	Completed	Provided \$25,000 (maximum amount) in Section 128(a) funding for assessments.
IDNR Brownfields	Remediation	Unsecured	Up to \$25,000 available for site remediation.
EPA Brownfields Cleanup	Remediation	Applying	\$3.2 million to remove ACM and LBP from the Warden Plaza.
Historic Tax Credits	Reuse	Unsecured	Up to 25% of qualified rehabilitation expenditures.
Iowa Economic Development Authority (IEDA) Brownfields/ Grayfields Tax Credit	Remediation/ Reuse	Secured	The previous owner secured \$800,000 in tax credits to clean up and redevelop the Warden Plaza.
IEDA Downtown Revitalization	Reuse	Unsecured	Up to \$650,000 for exterior improvements of iconic buildings, like the Warden Plaza.
Main Street Iowa Challenge Grant	Reuse	Unsecured	Up to \$100,000 for brick-and-mortar projects within a designated Main Street district.

⁷ May 6, 2019, The Messenger Article



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Workforce Housing Tax Credits	Reuse	Unsecured	\$1 million in tax credits for the rehabilitation and creation of workforce housing units.
Local Funds	Reuse	Secure	\$4.5 million committed in tax abatement

The depressed tax base associated with business closures and declining population has driven the City of Fort Dodge to become innovative in finding solutions to address brownfield sites within the target area. Over the past five years the city has secured **over \$21 million** for the downtown target area redevelopment. In addition, the city has secured **\$3 million** in private investment for the redevelopment of brownfield sites within the target area. To further the development of brownfields sites within the target area the city will continue to work with the Iowa Department of Natural Resources (IDNR), KSU TAB, and U.S. EPA Region 7 Technical Brownfields Assistance (TBA) as necessary, to facilitate the assessment, remediation, and redevelopment. This is especially important to the Warden Plaza site, as area developers have expressed interest in the site, however remediation costs hinder them from moving forward.

h. Use of Existing Infrastructure: The Warden Plaza site is strategically located in the heart of downtown Fort Dodge and already benefits from existing infrastructure, including water, sewer, stormwater systems, electricity, natural gas, and well-maintained streets and sidewalks. As a result, **no major infrastructure upgrades are anticipated**, allowing resources to focus on environmental remediation and redevelopment. Once remediation is complete, the City will issue a formal invitation for developers to submit proposals aligned with the Warden Plaza redevelopment plan. This approach ensures that the site transitions quickly from cleanup to revitalization, leveraging its prime location and existing utilities to maximize economic and community impact.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need: a. 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 (1.3 times higher than the State of Iowa⁸), high crime (28% above the national average⁹), and environmental contamination (over the 70th percentile for ozone, lead paint, risk management plan site (RMP) proximity and hazardous waste¹⁰), 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 37th for the highest property tax rates out of 941 cities in Iowa, which places additional burden on this low-income community. While Fort Dodge experiences about a 3% growth in property values annually, recent legislation has placed additional limits on the amount of taxation the city is able to collect on the growth. The result is property tax increases have not kept pace with the city’s annual expenditure increases. Fort Dodge ranks 13th in the state for poverty¹¹, and 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. In addition, the city is still contending with the 2013, 2019, and 2023 property tax reforms, which created a loss of tax revenues of nearly 40% on multi-family properties. This leaves a significant gap in project finances for environmental remediation. 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.

b. Health or Welfare of Sensitive Populations: The sensitive populations of the target area are Hispanics (28%), minorities (14%), children (19%), and seniors (12%)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

⁸ U.S. Census 2023 ACS 5-year estimates

⁹ Property Club Most Dangerous Cities in Iowa – May 13, 2024

¹⁰ Public Data Partners

¹¹ Stacker.com

¹² U.S. Census 2023 ACS 5-year estimates



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of 30.9% is more than double the U.S. rate of 12.5%, and the state rate of 11.3%¹². The sensitive populations are disproportionately impacted by exposure to contaminants like ACM and LBP. This is shown in the area's above normal rates for low life expectancy (74.8 years vs Iowa's 78.1 years)¹³, heart disease (420.5 heart disease deaths per 100,000 people 35+)¹⁴, and asthma (2.82 crude per 10k for hospitalizations)¹⁵, which the Warden Plaza's contamination is contributing to. Those living in lower-income areas may be at a higher risk of accidental exposure to environmental contaminants due to older building stock and limited financial means. According to the U.S. Centers for Disease Control and Prevention (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. The downtown target area is considered a high lead exposure risk area. The Warden Plaza was selected and prioritized for the cleanup of environmental contamination to reduce risk to public health with a goal of providing safe housing in an area that needs it the most.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to County Health Rankings and Roadmaps, Webster County (smallest geographic area available) ranks 82 out of 99 (99 being the worst) counties in Iowa and is amongst the least healthy. ACM and LBP 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 69.4 compared to Iowa's 60.8 and the U.S.'s 53.1¹⁶. The county also experiences a crude rate (36.07) over ten points higher than the state's (25.86) 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 combat these while also providing quality housing, walkable neighborhoods, an expanded tax base, and good paying jobs.

d. Economically Impoverished/Disproportionately Impacted Populations: The CDC has shown 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 faces significant risk burdens, environmental hazards, and social vulnerabilities, resulting in wide health disparities among residents. Persistent poverty is a defining challenge with 30.9 percent of residents living in the target area living in poverty, compared to 14.4 percent citywide and 11.3 percent statewide (ACS 2023 5-year). According to the National Library of Medicine, individuals living in poverty, especially children, are disproportionately exposed to environmental hazards. Exposure to contaminants such as asbestos and lead cause health disparities, such as asthma, cancer, lead poisoning, obesity, and hyperactivity. The target area also experiences poor housing quality. The area has a large percentage of older housing stock, with 40% built before 1940 and 69% built prior to 1980¹⁷. In addition, nearly 44% of households in the target area have a housing cost burden¹⁹ (over 30% of income spent on housing). The target area is also in the high-risk category for childhood lead exposure¹⁸, in part due to the age of housing stock. The vacant, dilapidated Warden Plaza is a contributing factor to the burdens 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 target area has experienced over the last four decades. The Warden Plaza is full of asbestos containing materials (ACM) and LBP. Redevelopment of the Warden Plaza will eliminate these environmental risks and inject a \$35

¹³ Iowa Health and Human Services System Snapshot

¹⁴ Iowa Heart Foundation

¹⁵ Iowa Department of Health & Human Services

¹⁶ State Cancer Profiles

¹⁷ U.S. Census 2021 ACS 5-year estimates

¹⁸ Iowa Department of Public Health Lead Exposure Risk Model



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million investment into the community. The project will deliver 100 new affordable housing units, create 306 construction jobs and 50 permanent jobs¹⁹, and restore a historic downtown landmark. Economically, the site's current exempt valuation of \$83,890 will increase to over \$1 million, generating significant property tax revenue and strengthening the local tax base. This project is not just a cleanup – it is a catalyst for health equity, economic revitalization, and community resilience.

Community Engagement: e. Project Involvement/f. 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.

Project Partners

Iowa Department of Natural Resources		
Mission	Contact	Role
To conserve and enhance our natural resources in cooperation with individuals and organizations to improve the quality of life in Iowa and ensure a legacy for future generations.	Mel Pins Mel.pins@dnr.iowa.gov	IDNR will provide input on cleanup and additional grant funding if necessary.
Webster County Public Health		
Mission	Contact	Role
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.	Jennifer Sumpter jsumpter@webstercounty.org	Assist in answering health related questions about contamination.
Greater Fort Dodge Growth Alliance		
Mission	Contact	Role
To unify and coordinate accountable economic and community development to enhance the quality of life in Fort Dodge and the region.	Astra Ferris astra@greaterfortdodge.com	Market site to businesses and developers.
Fort Dodge Community School District		
Mission	Contact	Role
Strives for excellence daily by creating a compassionate community built on high expectations, quality instruction, and meaningful relationships so everyone feels they belong and are successful.	Josh Porter jporter@fdschools.org	Assist in community engagement activities targeting sensitive populations.
Main Street Fort Dodge		
Mission	Contact	Role
To work to reclaim the downtown's historical purpose and prosperity by revitalizing the culture and character of its original merchant district.	Mary Green Warnstadt director@mainstreetfd.org	Grants, Design Assistance, Business Consulting, and Market Analysis.

g. Incorporating Community Input: Meaningful community engagement is essential to the success of the City's Brownfields Program and the Warden Plaza redevelopment. The city will ensure transparency by providing regular progress updates to the City Council and the public, including project schedules, completed reports, and upcoming plans. As an alternative to in-person meetings, program information will also 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 (at least one annually) and open house events (at least one annually) at various venues (churches, schools, or non-profits) throughout the target area (in-person and

¹⁹ May 6, 2019, The Messenger Article



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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 Meta and X to inform citizens about this important endeavor. The target area has a large Hispanic population of 24.29%²⁰, therefore, the city will provide translation services in Spanish for community engagement efforts. Feedback from the community members and project partners will be incorporated into program decisions documents like the final ABCA, cleanup plans, and the project cleanup specifications. A summary of community responses/input received will be shared on the program website and at neighborhood and public meetings.

(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 contractor(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. Asbestos was detected in 70 of the 356 samples analyzed from the property. There are over 1,060 windows with ACM exterior window glazing; over 43,000 square feet of ACM floor tile through the building; 865 fixtures containing ACM heat shields; 1,700 mechanical fittings with ACM; 9,000 square feet of ACM pipe insulation; 29,000 square feet of ceiling, wall, and backsplash mastics and backings; and 16,800 square feet of popcorn ceiling texture and ceiling texture debris on the floors. ACM parapet flashing was also identified on the roof. Asbestos content in the ACM ranges from 1% to 50% in pipe insulation and asbestos forms include chrysotile and amosite. Abatement of all asbestos containing materials (189,090 square feet, 17,150 linear feet and over 2,700 fixtures, doors, fittings, etc.) and 441,246 square feet of LBP contamination (588 positive samples and lead dust throughout the entire building) are identified in the ABCA. An integral part of remediation is following State and Federal regulations. The project design document will define the expectations of the city, the requirements of the work, scope of the project, all applicable regulations and will ultimately be used as part of the bid process for cleanup work. Abatement of ACM and LBP shall be performed by a properly trained, licensed, and insured contractor. The cleanup contractor must adhere to 40 CFR Part 61; Subpart M and 40 CFR Part 261 Abatement of the interior ACMs will occur within containment under negative air pressure and containment associated with friable materials will include a three-cell decontamination unit with a shower. Following completion of asbestos abatement, the QEP will complete a visual clearance to ensure asbestos materials have been removed. Once the visual clearance has passed, the QEP will then collect air clearance samples as documentation the containment was thoroughly cleaned and is safe for reentry. LBP abatement will also occur within containment. A visual clearance will be completed following LBP abatement to confirm all LBP has been removed. Dust wipes for lead will be collected by the QEP after the visual clearance has passed to confirm cleaning has occurred and provide documentation the work area is safe for entry. ACM and LBP will only be disposed of at a regulated landfill that accepts hazardous waste. 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 as the project will require the removal of all ACM and LBP materials.

Description of Tasks/Activities and Outputs:

Task 1: Cooperative Agreement Oversight

b. Project Implementation: EPA cooperative agreement (CA) execution, compliance, and oversight.

•Solicitation, selection, and contracting of QEP using EPA acceptable procedures. •Reporting: Quarterly

²⁰ U.S. Census 2020 ACS 5-year estimates



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progress and ASAP account management; ACRES; Annual disadvantaged business enterprise and federal financial report; Final cleanup and closeout reports •Travel and attendance at National Brownfields conference.

c. Anticipated Project Schedule: The solicitation and selection of the QEP will be completed within 3 months following the execution of the CA. Quarterly and annual reports will be submitted within 30 days of the end of the quarter/year. •ACRES updated at the same time as quarterly report submittal. •Final reports submitted when cleanup is complete. •Conference attended during the 4-year grant term.

d. Task/Activity Lead: Development Services Director (DSD) with assistance from Development Services Specialist (DSS) and QEP

e. Outputs: Executed CA •QEP Procurement & Selection •Quarterly, Annual, and Final Reporting; ASAP account management; •ACRES reporting; •Attendance at National Brownfields Conference

Task 2: Community Engagement

b. Project Implementation: This task involves conducting community engagement activities to inform the public about cleanup plans, implementation, and redevelopment of the Warden Plaza while providing opportunities for the public to provide feedback. Emphasis will be on the target area. Activities include outreach events, updating the city’s brownfields website, and creating printed materials.

c. 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. (1) Community Input Plan (Q1), project website (Q1), (1) program flyers (Q1), (4) public meetings (Q2, Q4, Q10, & Q15), (4) neighborhood meeting (Q3, Q7, Q11 & Q16); (1) National Brownfields Conference (FY2027);

d. Task/Activity Lead: DSD, DSS & QEP

e. Outputs: •Public meetings (at least one meeting annually) •Project website •Open house events (at least one annually) •Project printed materials in English and Spanish

Task 3: Cleanup Planning

b. Project Implementation: Prior to site remediation work, the QEP will prepare a Site-Specific Quality Assurance Project Plan including the Health & Safety Plan (HASP), ensure NHPA/Section 106 Compliance, finalize the ABCA, develop Cleanup Plans and Bid Specs, and lead the bidding process.

c. Anticipated Project Schedule: This task (including all outputs) will begin after a QEP has been selected and is anticipated to be completed by the end of quarter 8.

d. Task/Activity Lead: DSD, DSS & QEP

e. Outputs: Final ABCA •Site-specific quality assurance project plan (QAPP) •HASP •NHPA/Section 106 compliance •Cleanup plan •Technical specifications for site cleanup •Bid specifications •On-site pre-bid meeting •Bid results/tabulation •Remediation contract •Permits

Task 4: Cleanup Activities

b. Project Implementation: This task includes the cleanup work and monitoring of ACM and LBP remediation, post-remediation confirmation sampling, and regulatory compliance

c. Anticipated Project Schedule: Quarters 5 – 16

d. Task/Activity Lead: DSD, DSS & QEP

e. Outputs: Pre-construction meeting •Davis Bacon records •Remediation of contamination •Monitoring for regulatory compliance/confirmation sampling •Post removal action cleanup report

f. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel ¹	\$50,100	\$10,750	\$10,575	\$10,575	\$82,000
	Fringe Benefits ²	\$7,490	\$1,590	\$1,560	\$1,560	\$12,200
	Travel ³	5,150	-	-	-	\$5,150
	Equipment ⁴	-	-	-	-	-
	Supplies ⁵	-	-	-	-	-



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	Contractual (QEP) ⁶	\$50,000	\$25,000	\$50,000	\$175,000	\$300,000
	Construction (Remediation) ⁷	-	-	-	\$2,800,000	\$2,800,000
	Other ⁸	\$650	-	-	-	\$650
	Total Direct Costs	\$113,390	\$37,340	\$62,135	\$2,987,135	\$3,200,000
	Indirect Costs	-	-	-	-	-
	Total Budget	\$113,390	\$37,340	\$62,135	\$2,987,135	\$3,200,000
Budget Explanations						
¹ <i>Personnel:</i> DSD has an hourly wage of \$49.03 and is estimated to spend 900 hours for a total of \$44,000 (round down); DSS has an hourly wage of \$35.58 and is estimated to spend 1,065 for a total of \$38,000 (round up) (Total: \$82,000)						
² <i>Fringe Benefits:</i> DSD has an hourly fringe benefit wage of \$6.75 x 900 hours = \$6,100 (round up); DSS has an hourly fringe benefit wage of \$5.75 x 1,065 hours = \$6,100 (round down) (Total: \$12,200)						
³ <i>Travel:</i> Airfare - \$1,650 (2 people x 825 each); Mileage to airport - \$130.00 (179 miles x 0.725 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: \$5,150)						
⁴ <i>Equipment:</i> None budgeted for this project.						
⁵ <i>Supplies:</i> Supply costs will be covered by the city.						
⁶ <i>Contractual (QEP costs):</i> Reporting/Cooperative Agreement Requirements: \$50,000 (125 hours per year x 4 years x \$100 per hour = \$50,000); Community Engagement: \$25,000 (250 hours x \$100 per hour); Cleanup Planning (final ABCA, NEPA/Section 106, project specifications, health and safety plan; and cleanup bidding): \$50,000 (400 hours x \$125 per hour; Cleanup Monitoring (on-site cleanup monitoring, air monitoring, final inspection, Davis Bacon, Post-Removal Action Cleanup Report, and lab analysis for sampling: \$175,000 (1,200 hours x \$125 = \$150,000 + \$25,000 for lab, mileage, supplies, per diem, and hotels) (costs determined by an average hourly rate of \$100-125 from QEPs in the state).						
⁷ <i>Construction (Remediation):</i> The estimate was provided by an ACM and LBP 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 \$2,800,000.						
⁸ <i>Other:</i> Registration for National Brownfields Conference \$325 x 2 = \$650						

g. Plan to Measure and Evaluate Environmental Progress and Results: Fort Dodge will track the project’s progress and will incorporate corrective 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 square footage ready for reuse, degree of community participation, housing units created, jobs created, 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

Programmatic Capability: a. Organizational Structure/b. 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. Paige Wheeler and Ms. Amanda Duran will be responsible for managing this project. Ms. Wheeler will be the program lead and has been with the city for 10 years and currently holds the Development Services Director position. Ms. Wheeler has assisted with property acquisitions, environmental assessments, and demolitions and has successfully managed millions of federal dollars. Ms. Wheeler currently works to expand relationships with local and regional development organizations by identifying and marketing in-fill properties in Fort Dodge. Ms. Duran, Development Services Specialist, has been with the city for four years, and helps with applying for and complying with programmatic requirements. She administers the Heart of Iowa Regional Housing Trust Fund, Community Development Block Grants, Iowa



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Economic Development & Finance Authority Community Catalyst Program funding, Justice Assistance Grant, and the city's current EPA Brownfields Community-Wide Assessment Grant. Ms. Duran will support Ms. Wheeler 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 14 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.

c. 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 assisting with and overseeing environmental cleanups who is also 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 cleanup 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.

Past Performance and Accomplishments: d. Currently Has EPA Brownfield Grant: (1) Accomplishments/ (2) Compliance with Grant Requirements: The City of Fort Dodge has been the recipient of five EPA Brownfield Grants, with the successful closure of four grants and one currently underway. It is important to mention that previous success has accomplished the assessment of 58 parcels via Phase I ESAs, and 30 parcels via Phase II ESAs, far exceeding the Work Plan objectives of 25-30 Phase I ESAs and 12-16 Phase II ESAs. Fort Dodge has made unprecedented efficient use of EPA grant dollars and will continue to do so if given the opportunity as highlighted by the previous three grant awards. ***The \$500,000 Community Wide Assessment (start date October 1, 2023)***, is currently underway. The city is compliant with all reporting requirements. To date, the city has completed 13 Phase I ESAs covering 21 parcels and six Phase II ESAs. An additional 10 supplemental Phase II assessments have included ACM inspections, and five have incorporated LBP inspections. The brownfields team has also conducted one stakeholder meeting and three public open houses. Both a brownfields inventory for the target area and an inventory of vacant parcels have been finalized, along with one completed cleanup plan. The program remains fully compliant with all reporting and administrative requirements, including ACRES. ***The \$250,000 Cleanup Grant (start date of October 1, 2022)*** was for the ACM removal from the former Greenleaf Healthcare Facility in Fort Dodge. The 75-bed former nursing care facility is in a residential neighborhood and had fallen into disrepair with numerous entrances and dozens of broken windows. ACM abatement began approximately nine months from the grant start date, and the abatement took approximately seven weeks to complete. The grant was formally closed out by EPA in October of 2024. All programmatic requirements were met, including but not limited to, the required quarterly reports, annual reports, and financial reports. Redevelopment is underway with the building demolished in 2025; new housing is planned for a large portion of the lot while the irregularly shaped part of the parcel will be disbursed to interested neighbors. ***The \$500,000 Cleanup Grant (start date of October 1, 2019)*** was for the ACM removal from the Wahkonsa Annex Building. 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 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.



B. Threshold Criteria

(1) Applicant Eligibility:

- a. The City of Fort Dodge is an incorporated municipality in the State of Iowa and is eligible for funding. (See Attachment 1)
- b. The City of Fort Dodge is exempt from Federal taxation but is not a 501(c)(4) of the IRC and does not lobby the Federal government.



(2) Previously Awarded Cleanup Grants:

No previously awarded EPA Brownfields Cleanup Grant funding has been utilized at this Site.

The City of Fort Dodge affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

(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:

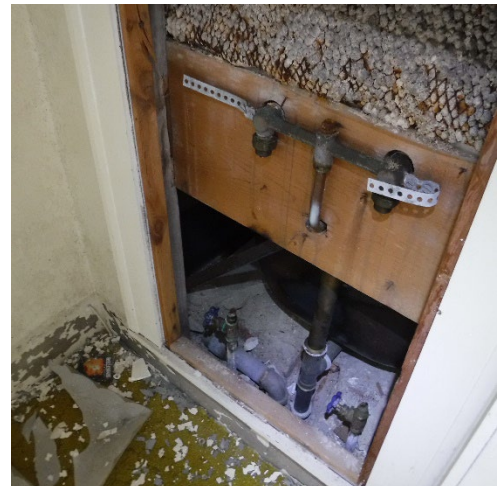
The City of Fort Dodge acquired the property, through 657A of the Iowa Code, on August 15, 2023. The city will retain ownership throughout the period of the grant. (See Attachment 2)

(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. Since 2005 – present the site has remained vacant.
- c) Environmental Concerns: The Site has documented ACM and lead-based paint within and throughout the building. The ACM and lead-based paint requires abatement prior to redevelopment.
- d) How Site Became Contaminated & Source, Nature, and Extent of Contamination: The



site became contaminated through standard building materials (asbestos containing materials and lead-based paint) that were popular during the time the site was constructed. 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 City of Fort Dodge affirms the site is: a) not listed or proposed for listing on the National Priorities List; 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 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 using full containment procedures, with all asbestos waste properly handled and disposed of in accordance with regulatory requirements.

The asbestos containing materials inspection containing the documented locations and estimated amounts are 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:



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- 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.



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- 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.

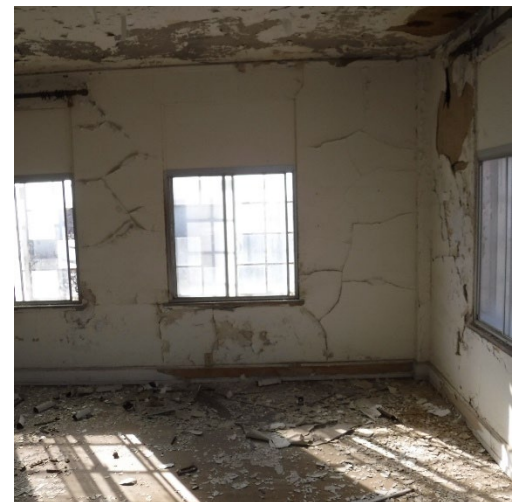
(11) Sites Requiring a Property-Specific Determination:

Not applicable

(12) Threshold Criteria Related to CERCLA/Petroleum Liability:

a) Property Ownership Eligibility – Hazardous Substance Sites:

- i. Exemptions to CERCLA Liability:
 - (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 657A 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.





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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

iv. With the numerous broken windows and damaged friable asbestos containing materials it is believed that the hazardous substances have been released into the outdoor environment.

b) Not applicable

(13) Cleanup Authority and Oversight Structure:

a) Oversight: The city does not plan to enroll 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 4, 2024 and revised December 9, 2025.
- b) Community Notification Ad: The city published a community notification ad in the local newspaper (*Fort Dodge Messenger*) on December 16, 2025 (Attachment 5). The community notification identified: (1) a copy of the draft application and draft ABCA were available for public review and comment; (2) how to comment on the draft application; (3) where the draft application was located for review; and (4) the date, time, and location of the public meeting.
- c) Public Meeting: The city held a public meeting as advertised, on December 22, 2025.
- 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:

- **Contractors**: 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 collaborating 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



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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.

- Named Subrecipients: The City of Fort Dodge does not plan to utilize any subrecipients with these grant funds.

Attachments:

- 1. Applicant Eligibility**
- 2. Site Ownership**
- 3. Site Information**
- 4. State Environmental Authority Letter**
- 5. Community Notification**
 - a. Draft ABCA**
 - b. Community Notification AD**
 - C. Public Meeting Summary**
 - D. Public Meeting Comments**
 - E. Public Meeting Sign-In Sheet**
- 6. Interested Developer Letter**

