



## City of Fort Dodge U.S. EPA Brownfields Cleanup Grant Application

### (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 with 24,788<sup>1</sup> residents, is 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-1970s<sup>2</sup>. During the 1980s, the city lost two large meatpacking plants (Hormel Foods and Iowa Beef Processors), causing extensive job loss of nearly 3,000 (10% of the population or 19% of the labor force<sup>3</sup>) and leaving the city with the nickname of "Dirty Dodge", due to the crime rate that resulted and the fact the meatpacking industry dumped 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 primary 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 13<sup>th</sup> for the poorest cities in Iowa<sup>4</sup> and its designation as an economically distressed area ranking among the bottom third in the state for economic health<sup>5</sup>. This decline has left many vacant, abandoned, and unsafe brownfield properties throughout the city (649 brownfields facilities<sup>6</sup>) and especially within the program target area, Webster County Census Tract 7 (186 brownfield facilities<sup>6</sup>). 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, which now are shuttered or demolished entirely. The city and target area are a far cry from the vibrant mid-Iowa hub that it once was and is under-resourced at the ability to address all these sites. Brownfield sites within the target area contribute to the disinvestment the target area has experienced over the last forty years. Several 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 several thousand workers converging into the area daily, redevelopment of the target area is a high priority. Some progress has been made, and the city hopes to maintain momentum through this grant program by cleaning up and redeveloping the Warden Plaza. Building upon the successful redevelopment of the former of the 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 posed to clean up the Warden Plaza. The Wahkonsa-Warden buildings have been a fixture in the downtown for a century. In 1910 the Wahkonsa Manor was built by the city's Commercial Club to provide a first-class hotel for the community and was expanded in 1917 with the addition of Wahkonsa Annex. Finally, in 1922 the Warden Plaza was added offering luxury apartments for area residents and 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 a building that is empty and deteriorated.

b. Description of the Proposed Brownfield Site: The Warden Plaza (908 1<sup>st</sup> Avenue South, Parcel Number 0720316010) presents an opportunity to cleanup and save a historic treasure within downtown Fort Dodge. When the site became vacant in 2005, the city was hopeful that a private developer would acquire and redevelop. After acquiring the site through Iowa's 657A Abandoned or Unsafe Buildings code (675A) in 2016, the city found a

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<sup>1</sup> U.S. Census ACS 2023 5-Year

<sup>2</sup> US Census 1970-2020

<sup>3</sup> US Census 1980

<sup>4</sup> Stacker.com Cities in Iowa with Most Living in Poverty

<sup>5</sup> Iowa Economic Development Authority

<sup>6</sup> Peer: Platform for Exploring Environmental Resources

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developer willing to invest \$30 million into the site. Unfortunately, the amount and cost of contamination within the site became a hurdle the developer could not overcome. The city had to re-acquire the site through 675A and has owned since August of 2023. The site, 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, nearly 165,000 square foot building was developed in 1922 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, deteriorating further, serving as an empty nuisance, and attracting vandals. As a result, the city spends between **\$10,000 to \$15,000** annually on building security and stabilization. This does not include additional items like lighting striking the building this fall, resulting in part of the building crashing into the sidewalk and **\$15,000** in brick cleanup. The city is ready to invest in its future and that simply cannot occur without a massive investment from multiple stakeholders. The city is currently working with Kansas State University (KSU) Technical Assistance to Brownfields (TAB) on a market feasibility for the site. This study will ensure that the community's vision for the site is viable and one of the interested developers can fulfill the proposed vision that includes a \$35 million plus renovation of the Warden Plaza, redeveloping it into a mixed-use building. Commercial space would be 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 \$2,800,000 for remediation has been a hurdle for redevelopment of this site. With over **78,550** square feet, **9,100** linear feet, **750** windows, **500** fixtures, **75** sinks, and **2** doors of asbestos containing materials, and **441,246** square feet, **40** doors, and **81** windows of lead-based paint, and **extreme amounts of lead dust** coating all surface areas, removing contamination from the Warden Plaza is a significant undertaking that is required to fulfill the redevelopment plan. The preferred site redevelopment option is estimated to cost **\$35 million** plus and includes office, commercial, and public space on the first two floors, with affordable workforce housing on the remaining up floors. Years of public input has shown the need for affordable workforce housing, which the redevelopment of the Warden Plaza and the additional **100 units** would help meet.

**Revitalization of the Target Area:** c. 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 commercial and residential mixed-use development. The Warden Plaza redevelopment will create a sense of place for residents and more importantly, will fulfill the economic improvement needs of Fort Dodge that aligns well with local government land use and master plans that were developed from extensive community engagement. Most recently, through the city's brownfields assessment program's community engagement efforts, which included a stakeholder meeting, farmer's market engagement event, and open house at the library, validated that this redevelopment meets several of the goals established within the city's most recent *Comprehensive Plan* (2016) and is still relevant to residents. 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 remove a significant source of contamination that is contributing to negative health outcomes like cancer and asbestos 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. 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, which is still a top need for the target area. Local business owners had identified the city's overall "quality of life" as a deterrent to employee recruitment, including lack of quality workforce housing located near the employment center (target area). Threats to the city's quality of life include a lack of housing options, as well as the perception of safety against violent crime (cleaning up of deteriorated and vacant buildings), and the availability of recreational opportunities and entertainment options. As Fort Dodge is essentially its own economic hub, the need for commercial redevelopment, affordable workforce housing close to employment, recreational and entertainment options is at an all-time high.

d. Outcomes and Benefits of Reuse Strategy: As the target area is a neighborhood experiencing low incomes, persistent poverty, minority populations, and substandard housing, priority has been given for redevelopment of this area. With the downtown's extreme poverty rate (30.9% (ACS 2023 5-year) and need for housing, the



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redevelopment of this priority site is of the utmost importance as this project will bring good paying jobs and quality housing back into the target area. The proposed **\$35 million plus** Warden Plaza redevelopment project expects to create **306** construction jobs and **50** permanent jobs<sup>7</sup>. Today the Warden Plaza has an exempt valuation of \$83,890 and generates no property tax revenues. Once this project is complete, the project site is expected 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**. Redevelopment will benefit this depressed community by bringing in **100** new multi-family housing units, additional property taxes, and neighborhood investments, which will remove blight while eliminating harmful effects from the asbestos and lead-based paint contamination while saving an iconic downtown historic structure. According to the U.S. Department of Agriculture’s Northern Research Station found that “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. While Fort Dodge’s goal is to save the Warden Plaza and redevelop it back into a community asset, the same argument can be made that redevelopment of this vacant building will lead to a reduction in crime within the target area.

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

<b>Resource</b>	<b>Phase</b>	<b>Status</b>	<b>Details</b>
Local Funds	Acquisition	Completed	The city utilized local funds ( <b>\$48,000</b> ) to acquire the building through 657A Abandoned or Unsafe Buildings
EPA Brownfields Assessment	Assessment	Secured	<b>\$500,000</b> 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 <b>\$25,000</b> (maximum amount) in Section 128(a) funding for assessments.
IDNR Brownfields	Cleanup	Unsecured	Up to <b>\$25,000</b> available for site remediation.
EPA Brownfields Cleanup	Remediation	Applying	<b>\$3.2 million</b> to remove ACM and LBP from the Warden Plaza.
Historic Tax Credits	Reuse	Unsecured	Up to <b>\$25%</b> of qualified rehabilitation expenditures.
Iowa Economic Development Authority (IEDA) Brownfields/ Grayfields Tax Credit	Remediation/ Reuse	Secured	The previous owner secured <b>\$800,000</b> in tax credits to clean up and redevelop the Warden Plaza.
Downtown Revitalization	Reuse	Unsecured	Up to <b>\$650,000</b> for exterior improvements of iconic buildings, like the Warden Plaza.
Main Street Iowa Challenge Grant	Reuse	Unsecured	Up to <b>\$100,000</b> for brick-and-mortar projects within a designated Main Street district.
Workforce Housing Tax Credits	Reuse	Unsecured	<b>\$1 million</b> in tax credits for the rehabilitation and creation of workforce housing units.
Local Funds	Reuse	Secure	<b>\$4.5 million</b> committed in tax abatement and including \$180,000 to the previous developer for redevelopment of the Warden Plaza.

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

<sup>7</sup> May 6, 2019, The Messenger Article



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five years the city has secured **over \$21 million** for the downtown 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 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 of brownfields sites within the target area, include the Warden Plaza site.

**h. Use of Existing Infrastructure:** 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 the infrastructure are anticipated for the redevelopment of the Warden Plaza. Once the cleanup has been completed the city will seek proposals from developers to implement redevelopment plan of the Warden Plaza.

### **(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 Iowa<sup>8</sup>), high crime (28% above the national average<sup>9</sup>), and environmental contamination (over the 70<sup>th</sup> percentile for ozone, lead paint, RMP proximity and hazardous waste<sup>10</sup>), 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 37<sup>th</sup> for the highest property tax rates out of 941 cities in Iowa. 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 13<sup>th</sup> in the state for poverty<sup>11</sup>, 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, & 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 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.

**b. Health or Welfare of Sensitive Populations:** The sensitive populations of the target area are Hispanics (28%), minorities (14%), children (19%), and seniors (12%)<sup>12</sup>. 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 30.9% is more than double the U.S. rate of 12.5%, and the state rate of 11.3%<sup>12</sup>. The sensitive populations are disproportionately impacted by exposure to contaminants like asbestos and lead-based paint. This is shown in the area's above normal rates for low life expectancy (74.8 years<sup>13</sup>), heart disease (420.5 heart disease deaths per 100,000 people 35+)<sup>14</sup>, and asthma (2.82 crude per 10k for hospitalizations)<sup>15</sup>, 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 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,

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<sup>8</sup> U.S. Census 2023 ACS 5-year estimates

<sup>9</sup> Property Club Most Dangerous Cities in Iowa – May 13, 2024

<sup>10</sup> Public Data Partners

<sup>11</sup> Stacker.com

<sup>12</sup> U.S. Census 2023 ACS 5-year estimates

<sup>13</sup> Iowa Health and Human Services System Snapshot

<sup>14</sup> Iowa Heart Foundation

<sup>15</sup> Iowa Department of Health & Human Services

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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, therefore 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. 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 (17<sup>th</sup> out of 99, one being the worst) of 69.4 compared to Iowa's 60.8 and the U.S.'s 53.1<sup>16</sup>. The county also experiences a crude rate (36.07) over ten points higher than the state's (25.86) for asthma-related emergency department visits<sup>16</sup>. 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 U.S. Centers for Disease Control and Prevention (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 experiences risk burdens, environmental burdens, and health and social vulnerability. These burdens and vulnerabilities result in wide health disparities for residents of the target area. The target area experiences persistent poverty<sup>17</sup>, with 30.9% of the target area experiencing poverty compared to the city's 14.4% and the state's 11.3%<sup>18</sup>. According to the National Library of Medicine, people living in poverty, especially children, are disproportionately at risk from and affected by 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 1980<sup>19</sup>. In addition, nearly 44% of households in the target area have a housing cost burden<sup>19</sup>. The target area is also in the high-risk category for childhood lead exposure<sup>20</sup>, 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 area has experienced over the last four decades. 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 add new affordable housing to the community, addressing some of the need. Redevelopment of the Warden is projected to create 306 construction jobs and 50 permanent jobs<sup>21</sup>. Once completed the current \$83,890 exempt value is expected to be over \$1 million and add significant review to the local tax base.

**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.

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<sup>16</sup> State Cancer Profiles

<sup>17</sup> U.S. DOT Areas of Persistent Poverty for MPDG 2025-2026

<sup>18</sup> U.S. Census ACS 2023 5-year and 1-year estimates

<sup>19</sup> U.S. Census 2021 ACS 5-year estimates

<sup>20</sup> Iowa Department of Public Health Lead Exposure Risk Model

<sup>21</sup> May 6, 2019, The Messenger Article

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**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 <a href="mailto:Mel.pins@dnr.iowa.gov">Mel.pins@dnr.iowa.gov</a>	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 <a href="mailto:jsumpter@webstercounty.org">jsumpter@webstercounty.org</a>	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 <a href="mailto:astra@greaterfortdodge.com">astra@greaterfortdodge.com</a>	Assist with site redevelopment.
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 <a href="mailto:jporter@fdschools.org">jporter@fdschools.org</a>	Assist in community engagement activities targeting sensitive populations.
Main Street Fort Dodge		
Mission	Contact	Role
Is 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 <a href="mailto:director@mainstreetfd.org">director@mainstreetfd.org</a>	Grants, Design Assistance, Business Consulting, and Market Analysis
General Public	Provide input and feedback on brownfield sites and priorities.	

g. 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 plans. 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 and open house events (at least two in 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 about this important endeavor. The target area has a large Hispanic population of 24.29%<sup>22</sup>, therefore, the city will provide translation services in Spanish

<sup>22</sup> U.S. Census 2020 ACS 5-year estimates



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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.

### (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. Asbestos was detected in 70 of the 356 samples analyzed from the property. There are over 750 windows with ACM exterior window glazing; over 43,000 square feet of ACM floor tile through the building; 500 light fixtures containing ACM heat shields; 1,000 electrical fixtures with ACM electrical wire insulation; 9,000 square feet of ACM pipe insulation; 900 ACM pipe mudded fittings; 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 (117,000 square feet and over 2,200 fixtures, doors, fittings, etc.) and lead-based paint contamination (588 positive samples and lead dust throughout the entire building) 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 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. Lead-based paint abatement will also occur within containment. A visual clearance will be completed following lead-based paint abatement to confirm all lead-based paint 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. 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.

#### **Description of Tasks/Activities and Outputs:**

<b>Task 1: Cooperative Agreement Oversight</b>
<b>b. Project Implementation:</b> EPA cooperative agreement (CA) execution, compliance, and oversight. •Solicitation, selection, and contracting of QEP using EPA acceptable procedures. •Reporting: Quarterly 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.
<b>c. Anticipated Project Schedule:</b> 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.
<b>d. Task Lead:</b> Community Development Manager (CDM) & Grant Writer & Administrator (GWA)



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<p>e. <u>Outputs:</u> Executed CA •QEP Procurement &amp; Selection •Quarterly, Annual, and Final Reporting; ASAP account management; Attendance at National Brownfields Conference</p>
<b>Task 2: Community Engagement</b>
<p>b. <u>Project Implementation:</u> 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 downtown target area. Activities include outreach events, updating the city’s brownfields website, and creating printed materials.</p>
<p>c. <u>Anticipated Project Schedule:</u> This task will commence at the beginning of the cooperative agreement and will be ongoing throughout the entire four-year project period.</p>
<p>d. <u>Task Lead:</u> CDM, GWA &amp; QEP</p>
<p>e. <u>Outputs:</u> •Public meetings (at least annually) •Project website •Neighborhood meeting/open house (at least 4 meetings) •Project printed materials in English and Spanish</p>
<b>Task 3: Cleanup Planning</b>
<p>b. <u>Project Implementation:</u> Prior to site remediation work, the QEP will prepare a Site-Specific Quality Assurance Project Plan including the Health &amp; Safety Plan (HASP), ensure NHPA/Section 106 Compliance, finalize the ABCA, develop Cleanup Plans and Bid Specs, and conduct the bidding process.</p>
<p>c. <u>Anticipated Project Schedule:</u> This task will begin after a QEP has been selected and is anticipated to be completed by the end of quarter 4.</p>
<p>d. <u>Task Lead:</u> CDM, GWA &amp; QEP</p>
<p>e. <u>Outputs:</u> •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</p>
<b>Task 4: Cleanup Activities</b>
<p>b. <u>Project Implementation:</u> This task includes the cleanup work and monitoring of asbestos-containing materials and lead-based paint remediation, post-remediation confirmation sampling, and regulatory compliance</p>
<p>c. <u>Anticipated Project Schedule:</u> Quarters 5 – 16</p>
<p>d. <u>Task Lead:</u> CDM, GWA &amp; QEP</p>
<p>e. <u>Outputs:</u> •Pre-construction meeting •Davis Bacon records •Remediation of contamination •Monitoring for regulatory compliance/confirmation sampling •Post removal action cleanup report</p>

### f. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel <sup>1</sup>	\$50,100	\$10,750	\$10,575	\$10,575	<b>\$82,000</b>
	Fringe Benefits <sup>2</sup>	\$7,490	\$1,590	\$1,560	\$1,560	<b>\$12,200</b>
	Travel <sup>3</sup>	5,150	-	-	-	<b>\$5,150</b>
	Equipment <sup>4</sup>	-	-	-	-	-
	Supplies <sup>5</sup>	-	-	-	-	-
	Contractual (QEP) <sup>6</sup>	\$50,000	\$25,000	\$50,000	\$175,000	<b>\$300,000</b>
	Contractual (Remediation) <sup>7</sup>				\$2,800,000	<b>\$2,800,000</b>
	Construction <sup>8</sup>	-	-	-	-	-
	Other <sup>9</sup>	\$650	-	-	-	<b>\$650.00</b>
Total Direct Costs		\$113,390	\$37,340	\$62,135	\$2,987,135	<b>\$3,200,000</b>
Indirect Costs		-	-	-	-	-
Total Budget		<b>\$113,390</b>	<b>\$37,340</b>	<b>\$62,135</b>	<b>\$2,987,135</b>	<b>\$3,200,000</b>
Budget Explanations						



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<sup>1</sup> <i>Personnel:</i> CDM has an hourly wage of \$49.03 and is estimated to spend 900 hours for a total of \$44,000 (round down); GWA 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)
<sup>2</sup> <i>Fringe Benefits:</i> CDM has an hourly fringe benefit wage of \$6.75 x 900 hours = \$6,100 (round up); GWA has an hourly fringe benefit wage of \$5.75 x 1,065 hours = \$6,100 (round down) (Total: \$12,200)
<sup>3</sup> <i>Travel:</i> Airfare - \$1,650 (2 people x 825 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: \$5,150)
<sup>4</sup> <i>Equipment:</i> None budgeted for this project.
<sup>5</sup> <i>Supplies:</i> Supply costs will be covered by the city.
<sup>6</sup> <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).
<sup>7</sup> <i>Contractual (Remediation):</i> 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 \$2,800,000.
<sup>8</sup> <i>Construction:</i> Not applicable
<sup>9</sup> <i>Other:</i> Registration for National Brownfields Conference \$325 x 2 = \$650

**g. Plans 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 acres/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**

**a. 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 act as the program lead and has been with the city for 9 years and currently holds the Community and Economic Development Manager 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 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 nearly 14



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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 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.

**Past Performance and Accomplishments:** d. Currently Has EPA Brownfield Grant: (1) Accomplishments: The City of Fort Dodge has been the recipient of five EPA Brownfield Grants; a Pilot 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 and 2021 Cleanup Grants have been successfully closed out upon expenditure of funds. 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 \$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 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.*

*The \$250,000 Cleanup Grant (start date of October 1, 2022) was for the asbestos 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 was identified in 66 of 265 building materials and included thousands of square feet of damaged friable floor tile, mastic, ceiling and wall texture, insulation, adhesive, and numerous other building materials. Asbestos abatement began approximately nine months from the grant start date and the abatement took approximately seven weeks to complete. The final closeout report was submitted in March of 2024 and EPA notification of grant closeout was in October of 2024. All programmatic requirements were met, including but not limited to, the required quarterly reports, annual reports, and financial reports. The city is currently accepting bids for the demolition of the former Greenleaf Healthcare Facility. Following demolition, a large portion is planned for residential development while some of the irregularly shaped property will be disbursed to interested neighbors.*