

November 8, 2024

NARRATIVE INFORMATION SHEET

1. Applicant Identification:

City of Fountain 116 S Main Street Fountain, Colorado 80817

- 2. Website URL: https://www.fountaincolorado.org/
- 3. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$1,925,000
- 4. <u>Location</u>:
 - a. City: Fountain
 - b. County: El Paso
 - c. State or Reservation: Colorado
- 5. <u>Property Information</u>: The Lorraine Center, 301 East Iowa Avenue, Fountain Colorado 80817
- 6. Contacts:
 - a. Project Director: Kimberly A. Bailey, 719-322-2056,
 <u>kbailey@fountaincolorado.org</u>, 116 S. Main Street, Fountain Colorado 80817
 - b. Chief Executive/Highest Ranking Elected Official: Scott Trainor, City Manager 719-322-2025 strainor@fountaincolorado.org, 116 S. Main Street, Fountain Colorado 80817
- 7. Population: Fountain, Colorado: 29,802 (US Census 2020 5-Year Estimate)

8. Other Factors Checklist:

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States t erritory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate c ompletion of the remediation/reuse; secured resource is identified in the Narrativ e and substantiated in the attached documentation.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority sit e(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 pub lic thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from win d, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measu res.	3, 6
The reuse strategy or project reuse of the proposed site(s) considers climate adapti on and/or mitigation measures.	3
The target area(s) is located within a community in which a coalfired power plant h as recently closed (2014 or later) or is closing.	

9. Releasing copies of applications: Not applicable

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Target Area & Brownfields: 1.a.i. Overview of Brownfield Challenges & Description of Target Area: The City of Fountain (City) is the southern gateway to Colorado's Pikes Peak region. Fountain is in El Paso County, just east of the Rocky Mountains and 16 miles south of Colorado Springs. Incorporated in 1903 with a population of a few hundred, growth accelerated in the mid-20th century with the construction of several large military bases nearby. Today, Fountain's population is approximately 30,000 and the economy has diversified to include manufacturing, transportation/logistics, retail, and industries supporting the military due to the proximity of the Fort Carson Army Installation. Fountain is also part of the booming Front Range corridor, a 215-mile stretch of interconnected cities along the east side of the Rocky Mountains, extending from Pueblo, CO to Cheyenne, WY. Roughly 80% of Colorado's population resides along the Front Range, which is expected to grow by 43% over the next 20 years.¹

The combination of rapid growth and brownfields in Fountain is straining the City's ability to grow sustainably and equitably. Brownfields in the heart of Fountain are a barrier to creating much needed housing, establishing new businesses and jobs, and providing space for services and amenities. To address these issues, the City served as a coalition partner to the City of Colorado Springs on a 2019 EPA Brownfield Coalition Assessment Grant. Fountain used the funding to develop a brownfield inventory of the State Highway 85/87 Urban Renewal Area (URA) centered on the blighted 0.5-square-mile **Fountain Olde Town District (Target Area)** centered on the Highway 85/87 corridor (Santa Fe Avenue) through the heart of town. Fountain established the Fountain Olde Town District and associated redevelopment incentives in 2008 to address brownfields and blight in this area.

The brownfield inventory identified 38 brownfields representing 35 acres of the Target Area where environmental unknowns constrain redevelopment and pose potential community health risks. Fountain's brownfields include several large vacant lots used for vehicle/equipment storage or sites with dilapidated vacant former agricultural buildings. Aging buildings in the heart of Fountain contain asbestos and lead paint, are underutilized, and are in poor condition. These brownfields are hindering the community's efforts to catalyze redevelopment to meet the increasing demand for housing and services. For example, a 2023 analysis found that Fountain needs 1,200 new units of affordable housing, and over half of Fountain residents spend over 30% of their income on housing.² Residents commute outside of Fountain for a range of services including healthcare and entertainment. Brownfield reuse is critical to the city's ability to safely and sustainably meet the growing community's needs for housing, local shops and services, and economic opportunities.

1.a.ii. Description of the Proposed Brownfield Site(s): Responding to the community's need for housing, services, and economic opportunity, the city is stewarding one of the largest brownfields in the Target Area—the former Lorraine Center site—back to productive use. The 7.5-acre Lorraine Center site is located at 301 E. Iowa Avenue in the Target Area in a walkable residential neighborhood two blocks from Main Street, the historic heart of the Target Area. The site is developed with the 56,556-square-foot (sf) Lorraine Center building that was constructed as an elementary school in the 1950s which operated until 2000. From 2000 to the mid 2010s, it housed El Paso County offices, medical offices, a workforce center, and a YMCA. The City acquired the site from the school district in 2015, using a portion of the building for city offices; however, due to the building's structural defects, water damage, mold, and asbestos, the City moved its operations to a new facility. The building is in extremely poor condition, having surpassed its useful life, and has been primarily vacant since 2020. Abatement of asbestos in the building will pave the way for safe demolition and redevelopment that meets the community's current and future needs.

In 2021, Fountain completed a Phase I Environmental Site Assessment (ESA), Phase II ESA, and asbestos survey of Lorraine Center site and building. Soil and groundwater sampling was conducted, and no indication of a release was found. No further assessment or cleanup of soil or groundwater was

_

¹ Theurbannavigator.com, Navigating Colorado's Front Range Urban Corridor, accessed October 2024

² US Census 2022 American Community Survey

recommended. An asbestos survey of Lorraine Center building materials was conducted in 2021 by an inspector certified by the Colorado Department of Public Health and Environment (CDPHE), the state regulatory agency for asbestos. Over 500 building material samples were collected and analyzed for asbestos. A total of 129,000 square feet (sf) of asbestos containing material (ACM) was identified in masonry block filling, floor tile and mastic, door and window caulking, fire doors, and insulation. The survey detailed the types of asbestos detected, location, quantity, friability, and condition. By Colorado law, ACM must be abated by a CDPHE-licensed abatement contractor prior to demolishing the building.

1.b. Revitalization of the Target Area: 1.b.i. Reuse Strategy & Alignment with Revitalization Plans: Fountain is working with the community and partner agencies to bring the Lorraine Center site back to life with housing, medical and retail services, and a community center. The City's 2021 brownfield inventory identified the Lorraine Center site as a top revitalization priority. Due to its location in an established community and its contamination, underutilization, and poor condition, and as it is a large contiguous parcel in public ownership, the site represents a powerful revitalization opportunity.

In December 2022, the City used EPA Brownfield Coalition Assessment Grant funding to prepare the *Lorraine Center Reuse Plan*, a community-supported revisioning of the site. The City convened a project Working Group of residents, elected officials, city staff, and project partners including representatives of the Olde Town District organization to guide the plan. The Working Group hosted an online survey to solicit public input on redevelopment preferences, receiving nearly 600 responses documenting support for a community center, specialty (affordable/senior) housing options, and new businesses and services at the site. Outreach was directed to the population surrounding the Lorraine Center site which includes historically underserved populations like seniors, people with low incomes, and Hispanic communities. Five reuse concept options were prepared, and the Working Group used community input to identify a preferred concept to use in leveraging developer and investor interest. The preferred concept master plan includes a new 20,600 sf community center; a new 85,000 sf 106-unit multi-family specialty (affordable and/or senior) housing complex, and four two-level 5,000 sf medical office/business retail buildings. The new housing complex includes outdoor gathering spaces including a playground, patios, and community garden plots, and sidewalks/pathways will connect the site into a planned multi-use trail adjoining the site that connects to the regional trail network.

Cleanup and redevelopment of the Lorraine Center site with specialty housing, recreational amenities, and shops/services advances multiple local and regional land use and revitalization plans. The City established the Olde Town URA in 2008 specifically to address blight and underutilization in the Target Area and to attract investment. In 2024, the City participated in the Downtown Colorado, Inc. (DCI) Colorado Challenge Communities Accelerator Program, using input from community stakeholders to identify a set of actions to prioritize and advance Target Area revitalization. Through this process the Lorraine Center site was noted as a pivotal redevelopment opportunity. The December 2023 Pikes Peak Area Council of Governments (PPACG) Comprehensive Economic Development Strategy (CEDS) identified the area's aging population, lack of affordable housing, and lack of access to social/healthcare services as challenges for the local community, needs which the Lorraine Center reuse plan would help address. Goals identified in the CEDS align with the Lorraine Center reuse plan, including revitalizing town centers, expanding housing choices for people of all ages and incomes, and minimizing consumption of resources through smart development policies such as in-fill and brownfield reuse.

<u>1.b.ii.</u> Outcomes & Benefits of Reuse Strategy: Economic Development: The community's preferred reuse concept will expand housing options and generate economic vitality. Fountain residents are in the 84th state percentile for low incomes. El Paso County's 2021 Assessment of Fair Housing Plan documents substantial waitlists for publicly supported housing, and high pressure for smaller, affordable housing units and housing for people with disabilities. The plan documents that housing affordability, demand, and access to senior housing worsened since the 2017 fair housing study. Making more affordable housing available will free up discretionary income for residents, improving quality of life and encouraging spending at local businesses which will in turn generate additional sales tax revenues. The addition of 20,000 sf of medical/office/retail space will bring new small businesses to the community,

addressing the \$385M valuation in unmet demand for retail services in Fountain, and attract new living wage jobs. The new housing and new job generation will enable locals at a range of ages and incomes to live in Fountain's historic center, which will retain businesses and attract new companies in need of a ready local workforce and customer base.

Reuse of the Lorraine Center site will also have the economic benefit of easing food insecurity in the Target Area. The site is located one block from the nonprofit Connections4Life food pantry, where future residents can access free healthy food—a critical service given that the Target Area is a food desert according to a 2016 study by the Colorado Housing and Finance Authority (CHFA).

Recreation and Open Space: The reuse plan includes the development of outdoor spaces for community gathering including community garden plots, a playground, and greenspace/trail that will connect residents with outdoor amenities including Metcalfe Park, Adams Open Space, and the recent extension of the Front-Range regional trail of Colorado. Based on reuse plan survey conducted in 2022, 62% of participants indicated a need for recreation and open space. The addition of a community garden will enhance public health, mitigate food insecurity, and provide opportunities for recreation and exercise. Climate Adaptation/Mitigation (Resilience): The Target Area is vulnerable to climate change impacts including drought, heat, and wildfires. The Climate and Economic Justice Screening Tool (CEJST) shows the Target Area is in the 82nd state percentile for wildfire risk. Infill reuse of the Lorraine Center site will protect greenspaces, on and offsite—areas that provide a buffer against wildfires, improve air quality, and provide cooling effects during heat waves. Infill housing and commercial use in the Target Area will increase the accessibility and walkability of the Olde Town District and reduce single vehicle trips and associated greenhouse gas (GHG) emissions. In addition, the City-owned Public Transit System plans to establish a new bus stop at the redeveloped Lorraine Center site to enhance mobility and connectivity. Renewable Energy/Energy Efficiency: The Lorraine Center building is over 70 years old, with outdated/inefficient windows, lighting, and HVAC systems. Redevelopment presents an opportunity to incorporate energy efficiency measures into new buildings in line with Fountain's recently adopted a new Building Code that includes robust energy efficiency requirements such as expansion of lighting control and metering/monitoring systems, and higher minimums for Seasonal Energy Efficiency Ratio ratings on HVAC systems. The US Department of Energy states that installation of a modern HVAC system can reduce energy use by 50%.

1.c. Strategy for Leveraging Resources: No additional assessment needs are anticipated, and the City is requesting EPA Brownfield Cleanup Grant funds to cover the entire cost of the abatement. Funding is available if unforeseen assessment and additional cleanup needs arise. Funding is also available to the City and site developer for the reuse costs.

NAME OF RESOURCE	PURPOSE	SECURED OR UNSECURED		
EPA Targeted Brownfield Assessment (TBA)	1.c.i Assessment	Unsecured, Eligible		
The City can access EPA's TBA Program which uses contractors paid by EPA for assessments to minimize uncertainties at brownfields. EPA states that the average dollar value of TBAs is \$100,000.				
CDPHE Statewide EPA Brownfield Assessment Grant	1.c.i Assessment Unsecured, Eligibl			
CDPHE has a EPA Brownfield Assessment Grant that could be accessed for additional assessment of the Lorraine Center site as needed.				
CDPHE Brownfield Program 1.c.ii Cleanup Unsecured, Elig				
CDPHE's brownfield program offers: 1) cleanup grant funds on a rolling basis that could be accessed by the City if needed. CDPHE has a history of providing supplemental funding for EPA-funded revitalization projects; 2) Brownfield Revolving Loan Fund that provides low interest (and sometimes forgivable) loans for cleanup. The City/developer has the option to apply for a loan from the RLF if needed for unfunded cleanup costs.				
Private Developer	1.c.iii Reuse	Unsecured, Eligible		
The City has received several developer inquiries about the Lorraine Center site and has identified a development partner to steward the site's reuse. The City must abate the asbestos to be able to formalize a Purchase and Redevelopment Agreement. The developer has specific capabilities to develop both the Community Center and the specialty housing components of the concept reuse plan.				

NAME OF RESOURCE	PURPOSE	SECURED OR UNSECURED	
Federal Housing Administration Housing Funds	1.c.iii Reuse	Unsecured, Eligible	
FHA offers Tax Credit Partnerships with developers to use FHA's tax-exempt status in exchange for the development offering affordable housing units, based on income.			
CO Department of Local Affairs (DOLA)	1.c.iii Reuse	Unsecured, Eligible	
The City and/or developer can apply for: 1) DOLA Strong Communities Grant to support infill affordable housing projects. Grants typically range from \$1M to \$4M; 2) Local Planning Capacity Grant to expedite development review, permitting, and zoning of affordable housing (awards approximately \$200K); 3) Flexible, low-interest, below-market rate development loans for transformational affordable housing projects through this new \$150M fund created in 2022.			
CO Department of Housing and DOLA	1.c.iii Reuse Unsecured, Eligible		
The City is eligible to apply for funds under Colorado's Proposition 123, which provides funding and land use planning resources to support public-private partnerships for new affordable housing.			
Colorado Housing and Finance Authority (CHFA)	1.c.iii Reuse	Unsecured, Eligible	
CHFA manages the state's Affordable Housing and New Markets Tax Credits programs that the City or site developer can access as part of the redevelopment capital stack.			
Commercial Property Assessed Clean Energy (CPACE)	1.c.iii Reuse	Unsecured, Eligible	
This state program provides affordable, long-term financing for energy efficient new construction and provides financial incentives to developers who construct buildings that will perform above the current energy code.			
Charge Ahead Colorado	1.c.iii Reuse	Unsecured, Eligible	
This state program provides grant funding to businesses, multifamily housing, and public entities for community-based Level 2 and DC fast-charging (DCFC) electric vehicle charging stations.			

1.c.iv. Use of Existing Infrastructure: The EPA Cleanup Grant will facilitate in-fill redevelopment in Fountain's established Target Area, which is fully served by infrastructure including sidewalks, sewer, stormwater, drinking water, electrical, telecommunications, broadband, natural gas, and transportation. Americans with Disabilities Act (ADA) ramp improvements were made to sidewalks in the Target Area via El Paso County CDBG and State of Colorado Revitalizing Main Streets funds between 2022 and 2024, and the area's major intersections are equipped with signaled and marked crosswalks to enhance safety and walkability. The Fountain Municipal Transit System provides scheduled bus service linking the Target Area to the rest of the City and the City of Colorado Springs. Fountain has a complete network of streets and access to US Hwy 25 which connects Fountain to all Front Range communities. Additionally, the City completed a 1.67-megawatt solar array to offset or reduce the electricity demand from all City facilities including buildings, streetlights, and traffic lights in the Target Area and beyond.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: 2.a. Community Need: 2.a.i. The Community's Need for Funding:

Due to its small size and low incomes, Fountain and the Target Area community do not have other sources of funding for cleanup. Fountain is a small community with a population of around 30,000. The Target Area population is just 1,978. The Target Area is a CEJST Disadvantaged Community and is in the 80th US percentile for low incomes.

TABLE 1 EJScreen Indicators (state percentile)	Target Area*	Fountain
Low Income	84 th	64 th
Unemployment Rate	90 th	75 th

^{*0.5-}mile radius from the center of the Olde Town District

Both the City and the Target Area have high rates of unemployment (Table 1), limiting funds for brownfield cleanup. With its small population and high unemployment, income tax revenues in the Target Area are insufficient to meet the demands of the growing City let alone pay for brownfield cleanup. In 2023, the City had to implement a Public Safety Fee on commercial and residential property taxes to fund 12 new police and fire department staff. Over half of Fountain residents are housing cost burdened, further limiting discretionary spending on brownfield cleanup. 56% of Fountain residents spend more than 1/3 of income on housing, compared to 52% in Colorado and 50% in the US.

The City is reliant on grants and loans for critical revitalization and infrastructure projects. Without the EPA grant funding to remove the asbestos, the costs to clean up the Lorraine Center site are beyond the means of the City and inhibit private investment in the Target Area.

2.a.ii. Threats to Sensitive Populations: 2.a.ii(1) Health or Welfare of Sensitive Populations: Target Area brownfields pose a threat to vulnerable low-income residents and seniors; women of childbearing age; and people of color (Table 2). Due to low incomes and environmental burdens, **the Target Area is in a CEJST Disadvantaged Community.** ³ 43% of Target Area residents live in poverty, and the impacts are particularly acute for seniors. The poverty rate for seniors in the census tract that includes the Target Area is 9.2%, which exceeds county (6.5%) and state (7.6%) rates. ⁴ Poverty also disproportionately impacts minority communities in Fountain, where the poverty rate for Hispanic, Black, and Native American residents ranges from 12% to 28% compared to 6% for white residents. ⁵

Sensitive Target Area residents struggle with housing costs due to Fountain's 1,200-unit housing shortage. Nearly 80% of residents in the Target Area census tract are housing cost burdened. Residents also face unemployment levels nearly 3x higher than citywide (Table 2) due to limited local employment options and insufficient income to commute to distant locations for work. The EPA grant will address these threats to sensitive Target Area residents by facilitating the construction of 106 new specialty housing units for working people and seniors and opportunities for new jobs and economic vitality, and a reduced need to commute out of Fountain for work, medical care, and other services.

Table 2: EJScreen Sensitivity Indicator	Target Area*	Fountain	Colorado	US
Low Income (less than 2x the federal poverty rate)	43%	27%	24%	30%
Unemployment	11%	4.4%	3.1%	3.4%
Hispanic population	26%	27%	22%	19%
Women of childbearing age (20-44)	Not available	21%	18%	16.8%
Source: EJScreen; *0.5-mile radius from the center of the Olde Town District				

Sensitive residents are disproportionately exposed to asbestos. 37% of Fountain's housing stock was built before 1980 and is therefore likely to contain asbestos. These older homes are generally more affordable and occupied by lower income residents who are therefore at a higher risk of exposure to hazardous substances.

Pregnant women are also particularly vulnerable. Pregnant women exposed to asbestos are at risk of developing cancer and lung disease, and if a woman develops an asbestos-related disease during pregnancy, it can impact fetal respiratory health and nutrient absorption. The EPA Grant will address these threats by removing a significant source of potential asbestos exposure from the Target Area. The grant will also facilitate the creation of new affordable housing and job opportunities, alleviating economic pressure for the City's most sensitive residents.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: The Target Area community has a large proportion of residents with disabilities that faces high rates of asthma, low life expectancy, and maternal health threats. Asbestos exposure exacerbates asthma and increases the risk

of lung disease including cancer. The Target Area is in the 87th state percentile for asthma, which can be triggered by asbestos fibers causing wheezing, shortness of breath, and even death.⁷ The 2022-2024 El Paso County Community Health Needs Assessment found that cancer incidence in the county is 412.2 per 100,000 residents, which is higher than the state average. Cancer, which can be caused by asbestos,

Table 3: Heath Issue	Target Area* State Percentile	
Asthma	87 th	
Low life expectancy	75 th	
Persons with disabilities	62 nd	
Source: EJScreen; *0.5-mile radius from the center of the Olde Town District		

³ Climate and Economic Justice Screening Tool (CEJST), accessed October 2024

⁴ 2022 American Community Survey Five-Year Data (data.census.gov)

⁵ https://worldpopulationreview.com/us-cities/colorado/fountain, accessed October 2024

⁶ https://www.lanierlawfirm.com, accessed October 2024

⁷ https://www.aft.org/sites/default/files/media/2014/fs asbestos-exposure.pdf, accessed October 2024

is among the leading causes of death in the county. The county's Needs Assessment also shows disproportionately high occurrence of low birthweights in the county. These high rates of disease contribute to the Target Area's position in the 75th state percentile for low life expectancy. The EPA Grant funds will permanently remove asbestos from the Lorraine Center site, mitigating contamination that may contribute to disease and low life expectancy.

<u>2.a.ii(3)</u> Environmental Justice (EJ): 2.a.ii(3)(a) Identification of Environmental Justice Issues: Low-income Target Area residents and people of color bear disproportionate environmental burdens. The Target Area contains a CEJST disadvantaged census tract based on low incomes. The Lorraine Center site is two blocks (650 feet) east of the disadvantaged census tract, and the 7,195 people who live in that disadvantaged tract will experience the benefits of the Lorraine Center site revitalization. The proportion of Hispanic people in the Target Area is 26%, higher than statewide (22%) and nationwide (19%).

Target Area EJ issues include poor air quality, risk of exposure to asbestos and lead paint, and nearby industrial discharges to air and water. The EJScreen data in Table 3 show that Target Area low-income communities and communities of color are disproportionately exposed to air pollutants. The CEJST shows that the Target Area is in the 95th state percentile in terms of wildfire risk and smoke exposure, exacerbating its already poor air quality. This wildfire risk also increases the likelihood of asbestos being released due to fire damage. The effects of air pollution on this disadvantaged community include an increased risk of cancer and respiratory illnesses.

Low-income Target Area residents tend to live in older housing, which often contains asbestos and lead paint. 27% of Target Area housing was built prior to 1950 (compared to 10% statewide). CDPHE also identifies the Target Area as moderate-high risk for lead exposure based on housing age and poverty rates, the two most common risk factors for lead poisoning which is linked to nervous system and kidney damage, develop

TABLE 3 EJScreen EJ Indicators (state percentile)	Target Area
Ozone	60 th
Diesel Particulate Matter	63 rd
Nitrogen Dioxide	69 th
Lead paint	83 rd
Toxic Releases to Air	65 th
RMP Proximity	75 th
Hazardous Waste Proximity	67 th
Underground tanks	65 th
Wastewater Discharge	85 th

poisoning¹⁰ which is linked to nervous system and kidney damage, developmental delays, fetal health problems, and miscarriage.¹¹

The low-income and minority Target Area community has also potentially been exposed to per- and poly-fluoroalkyl substances (PFAS), which were detected in Fountain's drinking water in 2015 from firefighting foam used at nearby Peterson Space Force Military Base. PFAS exposure can cause long term health effects including cancer, birth defects, elevated cholesterol, weakened immunity, and cardiovascular impacts. The City shut down its wells in 2015 when PFAS was detected and worked with the US military to build a permanent treatment plant that began operating in 2022.

2.a.ii(3)(b) Advancing Environmental Justice: The grant and reuse strategy will advance environmental justice by removing a source of contamination from a low-income, minority community already overburdened by pollution. Removing 129,000 sf of asbestos from the community will reduce the cumulative exposure of sensitive residents to pollution from asbestos, poor air quality, and industrial discharges (Table 3). The concept master plan identifies 106 new safe and affordable units of housing, providing an alternative to older homes with hazardous building materials. Fountain will also use the grant for engagement to increase the community's understanding of pollution sources and health risks and take action to minimize health impacts.

The Lorraine Center site reuse plan is for compact development in the Target Area to enhance walkability and promote public transit, reducing the need for residents to leave Fountain for basic services. This reduction in commuting will decrease the local and regional air pollution and GHG

⁸ 2022-2024 El Paso County Community Needs Assessment

⁹ EJScreen, accessed October 2024

¹⁰ CDPHE Targeted Lead Outreach Tool cdphe.coorado.gov/targeted-lead-outreach-tool, accessed October 2024

¹¹ https://www.epa.gov/lead/learn-about-lead

emissions currently experienced by disadvantaged Target Area residents. The concept will result in buildings with modern, efficient energy and HVAC systems in line with Colorado's code that will reduce energy use, heat island effects, and ensuring the quality of indoor air in the residences, offices, and other new spaces.

The reuse concept will not cause displacement of residents as the site is currently vacant. In fact, the reuse plan will prevent the displacement of vulnerable low-income, minority, and senior residents, by enhancing access to housing, medical offices, goods and services, and job opportunities in the established Target Area while attracting further investment, job creation, and improving economic health and opportunity in these underserved communities.

2.b. Community Engagement: 2.b.i. Project Involvement and 2.b.ii. Project Roles:

Fountain Valley Chamber Contact: Jennifer Gates, President, fountainvalleychamberinfo@gmail.com

<u>Mission</u>: Promote business and community growth. <u>Role</u>: Act as liaison with the business community to publicize the project and provide community input on site cleanup and reuse plans and activities.

Olde Town Steering Committee Contact: Teresa Vieira, Ambassador, <u>businessoffice@peaksnpinesbrewery.co</u>

<u>Mission</u>: Adoption and implementation of the 2014 Olde Town Revitalization Plan. <u>Role</u>: The committee represents the businesses, property owners, and residents of the Olde Town district to work on behalf of advocacy in the areas of economic vitality and public improvements.

Fountain Housing Authority Contact: Ashlei Reeder, Executive Director, areeder@fountaincohousing.org

<u>Mission</u>: Provide housing options for low-income families. <u>Role</u>: Engage with the City on project progress, share resources for affordable housing development, and share project information with low-income families.

Fountain Urban Renewal Authority Contact: Paul Aragon, Chair, paularagon@restchurch.org

<u>Mission</u>: Per State Statue, on behalf of blight remediation. <u>Role</u>: To revitalize the community's under-served assets through partnership programs and sole-source project capacity funding with a Sense of Place for Development to encourage new business entry for a resilient local economy.

Fountain Valley Senior Center Contact: Mark Bowers, Director, info@fvscenter.org

<u>Mission</u>: Help older adults receive services to enhance dignity, support independence and self-sufficiency, and encourage involvement in the community. **Role**: Share news of the project with seniors and convey input on project goals and plans.

Pikes Peak Area Council of Governments Center for Aging

Contact: Andy Gunning, Executive Director, agunning@ppacg.org

<u>Mission</u>: Help older people live independently. <u>Role</u>: Share news of the project with seniors to gain occupancy and convey input on project goals and plans.

El Paso County Public Health Contact: Susan Wheelan, Director, susanwheelan@elpasoco.com

<u>Mission</u>: Promote & protect public health and environmental quality. <u>Role</u>: Assist with public engagement around health impacts of brownfields and contamination, and benefits of cleanup and reuse.

Downtown Colorado Inc. Contact: Bill Shrum , Director, operations@downtowncoloradoinc.org

<u>Mission</u>: Bring stakeholders together with education, visioning, and financial resources for brownfields revitalization and economic development. <u>Role</u>: Assist with creative engagement and facilitation approaches, provide reuse planning expertise, and connect the City with project funding sources.

CDPHE Brownfield ProgramContact: Doug Jamison, Unit Leader, 303-913-9375, doug.jamison@state.co.us

<u>Mission</u>: Advancing Colorado's health and protecting the places where we live, learn, work, and play. <u>Role</u>: Provide technical expertise and share agency funding options including grants, loans, and tax incentives.

2.b.iii. Incorporating Community Input: To share project plans and progress and solicit community input, the City will: 1) host at least two public meetings at project milestones such as when the ABCA is final and before cleanup begins. Meetings will be posted on the City's website events page and social media, and in the local newspaper and publicized by partner organizations; 2) present project information and provide opportunities for input at ongoing local meetings such as the Fountain Valley Chamber; 3) prepare fact sheets, social media posts, newsletter articles, and press releases related to the cleanup

and revitalization of the Lorraine Center site; and, 4) work with project partners to provide translations and outreach support to communities with limited English language skills, senior residents, and those with limited mobility. The City will prepare signage for display during the abatement work explaining the activity and noting that it was funded by an EPA Brownfield Grant.

The City will solicit community input using tools such as question and answer sessions during public meetings (in-person, virtual, or hybrid) and will publicize the cleanup plan and project contact information to invite community input. The City will consider the input and plan adjustments and/or responses will be posted to the City website and social media as "FAQ" documents or fact sheets. Community input and project team responses will be summarized in the quarterly project progress reports to EPA during the grant term.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS: 3.a. Proposed Cleanup Plan:

<u>Contaminated media to be addressed</u>: approximately 129,000 sf of ACM primarily consisting of plaster, drywall, floor tile, and insulation with numerous lower-volume areas of vinyl wall base/mastic, linoleum countertops, and plaster patching. <u>Cleanup method</u>: ACM will be abated by removal by a CDPHE certified contractor. ACM abatement will consist of site setup; permitting; constructing containment, barrier, and monitoring areas; removing, packaging, and labeling ACMs for disposal; waste transport and disposal at a certified landfill; post-abatement cleanup; and third-party asbestos clearance monitoring and sampling. <u>Disposal Requirements</u>: ACM waste will be disposed at a landfill authorized by CDPHE to accept non-hazardous, class 9, friable ACM waste.

<u>3.b. Description of Tasks/Activities & Outputs</u>: <u>3.b.i. Project Implementation</u>: Task descriptions including implementation methods, schedule, leads, and outputs are provided in the table below.

Task 1 – Grant Management

Lead: City of Fountain with support from the Qualified Environmental Professional (QEP)

Implementation: <u>EPA grant funded activities</u>: Grant management including procuring a QEP following EPA procurement guidelines. City personnel/fringe and QEP fees for: grant oversight; quarterly reporting; annual disadvantaged business enterprise and financial reporting; entries in the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; and grant closeout reporting. The City will use EPA funds for travel/attendance at two brownfield conferences/workshops.

Schedule: Procure QEP Q1 of grant term; Procure abatement contractor Q2 of grant term; quarterly reports submitted 30 days after each quarter ends; annual reports/forms by 10/30; ACRES entries and closeout reporting when cleanup is complete; National Brownfield Conference August 2025; A second conference/workshop will be attended during the grant term.

Outputs: QEP contract; Abatement contract; quarterly reports with budget and schedule status; annual reports and forms; ACRES reporting; final closeout reporting; attendance at 2 conferences/workshops

Task 2 – Community Outreach

Lead: City of Fountain with support from the QEP

Implementation: <u>EPA grant funded activities</u>: planning/facilitating at least two public meetings; preparing outreach materials (fact sheets, press releases, website/social media updates, site signage, etc.); solicitations of and responses to community input.

Schedule: Two public meetings, one when ABCA is final/before cleanup begins (anticipated Q1 2026), and one after cleanup is complete (anticipated Q2 2027). Outreach materials will be made available before and during cleanup. Community input will be gathered at community events and when provided directly to the City via email, social media, electronic survey, or other method. Responses to questions and input will be provided via direct responses, community meetings, and social media posts. Input and responses will be documented in quarterly progress reports and the final closeout report.

Outputs: At least two community meetings held and notes/presentation materials/sign-in sheets; 2-3 project fact sheets (hard copy for community members with limited internet access and electronic for posting online); site signs; project updates on website and social media.

Task 3 – Cleanup

Lead: QEP will oversee abatement contractor under the direction of the City

Implementation: EPA grant funded activities: City personnel/fringe: Contractor oversight, status report

and final report reviews. <u>Abatement Contractor</u>: 1) Abate 129,000 sf of ACM including all permitting and pre-work submittals, health and safety plan, mobilization and site setup, and removal/disposal of ACM waste; and 2) prepare Closure Report documenting all project aspects. <u>QEP Fees</u>: 1) Finalize ABCA; 2) prepare and obtain EPA approval of an integrated sampling and analysis plan (SAP)/quality assurance project plan (QAPP) that details all cleanup-related sampling protocols and quality assurance/quality controls; 3) oversee cleanup contractor and review draft/final cleanup reports.

Schedule: Final ABCA and SAP/QAPP completed by Q1 2026; Site setup and abatement Q2 2026 – Q3 2026; Cleanup report draft submitted by Q4 2026, final by Q2 2027.

Outputs: Final ABCA; SAP/QAPP; HASP; permits; draft and final Cleanup Reports.

- <u>3.c. Cost Estimates</u>: QEP costs are based on an average of \$175/hour. City personnel=\$45, fringe=\$30. Cleanup costs are based on estimates provided by abatement contractors in March 2024.
- **Task 1 Grant Management (\$51,580):** Personnel/Fringe: \$22,500 (300 hours for conference attendance, technical and financial management and reporting). Travel: \$7,280 (two City personnel attend one national and one regional brownfield conference [airfare to national conference \$600/person = \$1,200]; [hotel, meals, rental car/mileage and incidental costs \$280/day, 8 days total for two conferences, two people = \$4,480]). Conference registration fees: \$800 (four registrations @ \$200 per conference). Contractual: \$21,000 (120 hours for reporting and project management).
- **Task 2 Community Engagement (\$23,750):** Personnel/Fringe: \$15,000 (200 hours for meeting planning, attendance, and input evaluation; outreach material preparation; and website construction and maintenance). Contractual: \$8,750 (50 hours for meeting planning, attendance, input evaluation, and outreach material preparation).
- **Task 3 Cleanup (\$1,849,670):** Personnel/Fringe: \$27,000 (360 hours for contractor procurement, and QEP/contractor oversight). Contractual: \$87,500 (500 hours for ABCA, CDPHE coordination, SAP/QAPP preparation, cleanup contractor oversight, draft/final cleanup report preparation). Construction: \$1,735,549 (CDPHE permit, \$4,000; mobilization \$22,000; asbestos abatement of 120,000 sf @ \$13/sf = \$1,560,000; 250 tons of ACM waste, loading, transport, and disposal @ \$275/ton = \$68,750; post abatement clearance sampling, \$80,000.

Project Tasks (\$)					
Budget Categories		Task 1 Grant	Task 2	Task 3	Total
		Management	Outreach	Cleanup	
	Personnel	\$13,500	\$9,000	\$16,200	\$38,700
	Fringe Benefits	\$9,000	\$6,000	\$10,800	\$25,800
Costs	Travel	\$7,280	\$0	\$0	\$7,280
	Equipment	\$0	\$0	\$0	\$0
ect	Supplies	\$0	\$0	\$0	\$0
٥	Contractual	\$21,000	\$8 <i>,</i> 750	\$87,500	\$117,250
	Construction	\$0	\$0	\$1,734,750	\$1,734,750
	Other (conference registration)	\$800	\$0	\$0	\$800
Total	Direct Costs	\$51,580	\$23,750	\$1,849,250	\$1,924,580
Indire	ect Costs	\$0	\$0	\$0	\$0
Total	Budget	\$51,580	\$23,750	\$1,849,250	\$1,924,580

3.d. Measuring Environmental Results: When preparing the project work plan, the City will develop a detailed schedule of key project milestones such as SAP/QAPP completion, scheduling and holding outreach events, and beginning abatement work. At least monthly, the City will track and evaluate progress in achieving outputs and milestones against the work plan schedule, in addition to communicating with the QEP and abatement contractor. The City will increase monitoring and communication during the active cleanup phase to act quickly to address any unanticipated changes and/or residential neighborhood concerns during this critical period. The City will monitor the project budget concurrent with tracking the schedule, on at least a monthly basis. The City will document

project outputs, outcomes, and results in the quarterly progress reports to EPA and in EPA's ACRES database. Anticipated outputs are described in Section 3b. Anticipated outcomes and results that the City will track include:

- Square feet of land prepared for reuse
- Access to recreation facilities
- Units of affordable housing supported
- Number of cleanup jobs created
- Increase in local property values
- Enhanced access to services
- Reduction in volume of hazardous materials
- Funding Leveraged

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE: The City has ample qualifications to complete all Cleanup Grant tasks within the grant term. Since 2022 and thereafter, the Government Finance Officers Association awarded Fountain the Certificate of Achievement for Excellence in Financial Reporting--the highest form of recognition in governmental accounting and financial reporting. Kimberly Bailey, Economic Development/Urban Renewal Director, will manage the project. Kimberly has been with the City 10 years and has previously managed projects and budgets for both large metro and suburban communities. Kimberly managed development of two Brownfield Reuse Plans as a coalition partner on the City of Colorado Springs FY20 EPA Brownfield Grant and the regional FY23 CEDS. Kimberly will manage project contractors, communicate with EPA and stakeholders, and ensure the work plan is executed. She will lead procurement of 1) a QEP experienced with EPA Brownfield Grant administration and compliance and asbestos abatement and 2) an asbestos abatement contractor in compliance with EPA requirements and Six Good Faith Efforts for procuring Disadvantaged Business Enterprises (DBE). Nathaniel Shull, Economic Development Specialist, has been with the City for 1.5 years, will support Kimberly in managing the Cleanup Grant. Kimberly will convene the project team at least monthly to discuss project status, budget, and any course corrections needed to remain on time and within budget. Shawna Dail, Finance Director, has 20 years of experience in government finance and helps manage the City's grant related budgets and drawdowns. Shawna will report to Kimberly for accountability and tracking of all funds and review all quarterly budget summaries for accuracy and consistency. 4.a.iii. Acquiring Additional Resources: Fountain has procured construction and abatement contractors and consultants on other projects and has competitive procurement processes in place that comply with 2 CFR 200.317-327 in the event additional resources are required. The City advertises for contractor services on their website and through the Rocky Mountain E-Purchasing System and reaches out directly to DBEs listed in the online Colorado Dept. of Transportation DBE directory.

4.b. Past Performance & Accomplishments: 4.b.ii. City Has Not Received an EPA Brownfield Grant but Has Received Other Federal or Non-Federal Assistance Agreements: The City of Fountain recently received grant funding for two infrastructure projects: (1) Purpose/Accomplishments: (A) \$1,350,000 DOLA Renewable and Clean Energy Initiative Grant (FY22-23) for construction of a Green Power 1.7-megawatt solar array to diversify the City's power supply. Outputs: 869,355 sf of occupied land; estimated 2.9 million kilowatt hours of energy produced annually. Outcomes: i) enhance long-term electric rate stability; ii) reduced reliance on fossil fuels and iii) estimated reduction of 2,074 metric tons of CO2 emissions. (B) Community Development Block Grant (FY 21 & 22). Awarding agency El Paso County via HUD. \$232,102 for construction of curb, gutter, sidewalks, cross pans and ramp improvements. Outputs: 6,271 sf of new sidewalk and 1,720 linear ft. of new curb and gutter. Outcomes: improved accessibility and direct benefit to approximately 1,375 persons (439 households).

(2) Compliance with Grant Requirements: (A) All \$1,350,000 grant funds were expended within the established grant period, closed out on 12/31/23. City complied with original workplan and schedule; monthly reporting to DOLA on project status; no missed reporting deadlines, required extension, or any compliance issues. This specific project was audited by DOLA. City demonstrated successful record keeping and compliance and passed its audit. Project broke ground in August of 2022 and was completed in November 2023. (B) All \$232,102.00 grant funds were expended within the established grant period(s). City complied with workplan and schedule; provided engineering design, project management, materials to include asphalt patch back and inspections. No missed reporting deadlines, required extension, nor any compliance issues.

THRESHOLD CRITERIA RESPONSES

- Applicant Eligibility: The City of Fountain, Colorado (the City) is the grant applicant and owner of the Lorraine Center (the Property). The City meets the definition of a General Purpose Unit of Local Government as defined in 2 CFR 200.1 and is therefore eligible for funding.
 - a. <u>Documentation of applicant eligibility if other than a city, county, state, or tribe:</u>
 Not applicable
 - b. A statement of the applicant's 501(c)(4) tax exempt status: Not applicable
- 2. <u>Previously Awarded Cleanup Grants</u>: the proposed site (Lorraine Center) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
- 3. <u>Expenditure of Existing Multipurpose Grant Funds</u>: The applicant does not have an open EPA Brownfield Multipurpose Grant.

4. Site Ownership Information:

The City of Fountain is the sole owner of the Property. The title is fee simple. The single tax parcel forming the Property was acquired by the City on May 27, 2016.

5. Basic Site Information:

Name of Site: Lorraine Center Site

Address: 301 East Iowa Avenue, Fountain, Colorado 80817

6. Status and History of Contamination at the Site:

a) whether this site is contaminated by hazardous substances or petroleum: The Lorraine Center site building is impacted by hazardous materials. The contaminant of concern (COC) is asbestos.

b) the operational history and current use(s) of the site: The Lorraine Center site was vacant or in agricultural use until the 1950s when the earliest sections of the present-day building were constructed. The single-story site building was constructed in phases from the 1950s to the 1970s and was in use as an elementary school until approximately 2000. From the early 2000s until at least 2010, the site was used as both an elementary

school and various public and private offices including a dentist, El Paso County offices, health services, and a workforce center, and as a YMCA community center. Since applicant ownership of the site, the building was partially used as City office space but was mostly vacant. The Property has been vacant since 2021.

c) environmental concerns, if known, at the site:

An asbestos survey of the Lorraine Center building materials was conducted in 2021 by an inspector certified by the Colorado Department of Public Health and Environment (CDPHE), the state regulatory agency for asbestos. Over 500 bulk suspect asbestos samples were collected and submitted to a certified laboratory for analysis in accordance with CDPHE's Regulation 8 governing asbestos surveys and cleanup. A total of 129,000 square feet of building materials meeting the definition of an asbestos containing material (ACM) was identified in a range of building materials including masonry block filling, floor tile and mastic, door and window caulking, fire doors, and insulation.

d) how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination:

Asbestos was commonly used in construction prior to the regulation of asbestos, and the Lorraine Center has been documented to have multiple building materials containing asbestos. Since the building has been vacated, building materials have degraded, and the potential for exposure has increased. The City of Fountain has taken steps to ensure that the building is secure and regularly inspected, with no means for release of building materials to the environment. Approximately 129,000 square feet of asbestos has been identified in the Lorraine Center building, primarily in masonry block filling, floor tile and mastic, door and window caulking, fire doors, and insulation.

7. **Brownfield Site Definition**:

The site meets the definition of a brownfield under CERCLA 101(39). It is real property where the redevelopment and reuse are complicated by the presence of hazardous substances. The City of Fountain affirms that 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 Application

A report entitled *Pre-Demolition Asbestos Containing Material Inspection Report Multi- Tenant Commercial Building 301 East Iowa Avenue, Fountain, Colorado 8017* was completed on November 16, 2021. This report assessed the nature, extent, and concentration of asbestos in building materials in the Lorraine Center site building. This report constitutes a Phase II Environmental Site Assessment (ESA) equivalent to the ASTM E1903-19 standard.

9. Site Characterization

A letter from the Colorado Department of Public Health and Environment (CDPHE) is attached that explains:

- a) the site is not required to be enrolled in the state voluntary cleanup program because the only COC is asbestos; and
- b) an environmental professional (as defined in 40 CFR 312.10) has affirmed that there is sufficient level of characterization from the assessment performed to date for the asbestos abatement work to begin.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Lorraine Center site. There have been no inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the hazardous substances at the property. There are no environmental liens on the site.

11. Sites Requiring a Property – Specific Determination

Based on our review, the City of Fountain affirms that the Property is not subject to this determination review process for the following reasons

- There are no planned or ongoing removal actions under CERCLA;
- The site has not been issued or entered into a unilateral administrative order, a
 court order, an administrative order on consent, or judicial consent decree or to
 which a permit has been issued by the United States or an authorized state under
 the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution
 Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking
 Water Act (SDWA);
- The site is not subject to RCRA corrective action to which a corrective action permit
 or order has been issued or modified to require the implementation or corrective
 measures;
- The site is not a RCRA land disposal unit;

- There has been no documented release of PCBs requiring that the property is subject to TSCA remediation; and
- The site is not receiving monies for cleanup from the LUST Trust Fund.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substances Sites

iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT

Asbestos-containing materials contained in the Lorraine Center building have not been released (and there is no threat of release) into the outdoor environment (i.e., air, groundwater, land surface, etc.) based on site conditions.

13. Cleanup Authority and Oversight Structure

- a. The Colorado Department of Public Health and Environment (CDPHE) oversees asbestos abatement projects. CDPHE does not require asbestos abatement projects to join the Voluntary Cleanup Program but the property owner will consult with CDPHE and EPA to ensure the cleanup is protective of human health and the environment. The City will procure a Qualified Environmental Professional (QEP) with the expertise to procure, select, and oversee a CDPHE-certified asbestos abatement contractor with experience on similar projects and references. The procurements will be completed in alignment with the competitive procurement provisions of f 2 CFR §§ 200.317 through 200.327.
- b. Access to neighboring properties will not be required because remediation actions will be performed wholly within the Lorraine Center site boundaries. All friable asbestos abatement activities will be conducted under containment with negative air pressure and critical barriers to prevent the release of asbestos.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

The draft grant application and the draft ABCA, were posted online for public review and a notification of the availability of the documents was published in the local newspaper (The Colorado Springs Gazette) on October 23, 2024. The draft ABCA is attached and summarizes:

- Site contamination issues, cleanup standards, and applicable laws;
- The cleanup alternatives considered; and

• The proposed cleanup

b. Community Notification Ad

The City published an ad in The Colorado Springs Gazette (local, City of Fountain, Colorado printed newspaper) on October 23, 2024 notifying the community of the intent to apply for an EPA Brownfield Cleanup Grant for the Property. The meeting notification was also published on the City of Fountain website. The notifications clearly stated:

- That a copy of the grant application, including the draft ABCA, is available for public review and comment;
- How to comment on the draft application;
- Where the draft application is located (City of Fountain website); and
- The date, time, and location of the public meeting.

c. Public Meeting

A hybrid meeting (in person and virtual) meeting was held on October 30, 2024, to solicit and consider public comments prior to the submittal of this application.

d. <u>Submission of Community Notification Documents</u>

The following items are attached:

- A copy of the draft ABCA;
- Public notification newspaper ad and website posting
- The comments and questions received
- The City's response to the public comments and questions
- Meeting notes or summary from the public meeting
- Meeting participant list

15. Contractors and Subrecipients

• <u>Contractors:</u> Not Applicable

• <u>Subrecipients</u>: Not Applicable



November 6, 2024

Jennifer Benz Environmental Protection Agency Region 8 Brownfields Program 1595 Wynkoop Street (EPR-B) Denver, Colorado 80202-1129

Via email - Benz.Jennifer@epa.gov

RE: City of Fountain - Lorraine Center - FY25 Cleanup Grant Proposal

Dear Ms. Benz:

I am writing to express support of the FY 2025 Cleanup Grant proposal for the Lorraine Center in Fountain, Colorado. Rapid growth in the City over the past few decades have increased the need and City's effort to address brownfields to remove barriers for infill development including new affordable housing, new businesses, and spaces for services and amenities. Cleanup of the Lorraine Center property would continue the City's effort, paving the way for a redeveloped and revitalized property that meets the community's needs for housing, commercial space, and community gathering spaces.

CDPHE has reviewed the site characterization data associated with this proposal and determined that the site has been adequately characterized by qualified environmental professionals and the asbestos characterization was completed by a state- and AHERA-certified Qualified Environmental Professional, who followed state and federal regulations in the sampling scope and methodology. While this project is eligible to enroll in the Voluntary Cleanup (VCUP) Program, asbestos abatement projects are cleaned up pursuant to Colorado asbestos abatement regulations overseen by the department's Air Pollution Control Division. Based on the expertise and certifications required for the assessment, CDPHE is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization will be made by the department's Air Pollution Control Division following receipt of the permit application. Should additional site characterization be required, the department's brownfields program can assist the applicant in collecting the necessary data prior to the June 15, 2025 deadline specified in the grant solicitation guidelines.

Pending a successful proposal by the City of Fountain, CDPHE has additional resources to assist completion of the activities outlined in the proposal. These resources range from technical and planning resources to financial resources to assist with the cleanup. CPDHE has informed the City of Fountain of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express the department's support for the Lorraine Grant Proposal. CDPHE hopes that successful cleanup and redevelopment of the Lorraine Center can catalyze revitalization of additional properties in Fountain.

Sincerely,

Kathleen Knox

Superfund/Brownfields Project Manager

Kathler Moof

Hazardous Materials and Waste Management Division

cc: Nathaniel Shull, City of Fountain

Carrie Rackey, Stantec