

Narrative Information Sheet

1. Applicant Identification:

Volunteers of America
1660 Duke Street
Alexandria, Virginia 22314

2. Website URL: <https://www.voa.org/>

3. Funding Requested:

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$4,000,000

4. Location:

- a. City: Denver
- b. County: Denver
- c. State or Reservation: Colorado

**5. Property Information: Sunset Park Apartments, 1865 Larimer Street, Denver, CO 80202
(map attached)**

6. Contacts:

- a. Project Director: Doug Snyder, 303-726-1055, dsnyder@voa.org, 1660 Duke Street, Alexandria, VA 22314
- b. Chief Executive/Highest Ranking Elected Official: David Nisivoccia, 703-341-5041, dnisivoccia@voa.org, 1660 Duke Street, Alexandria, VA 22314

7. Population: Denver, Colorado: 710,800 (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 territory. | |
| The priority brownfield site(s) is impacted by mine-scarred land. | |
| Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation. | |
| The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | |
| The proposed site(s) is in a federally designated flood plain. | |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | |
| The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures. | 1, 2, 3, 7 |
| The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures. | 1, 2, 3, 6, 7 |
| The target area(s) is located within a community in which a coalfired power plant has recently closed (2014 or later) or is closing. | |

9. Releasing copies of applications: Not applicable

PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION: 1.a. Target Area & Brownfields: 1.a.i.

Overview of Brownfield Challenges & Description of Target Area: Denver, Colorado is a major center for manufacturing, agriculture, and finance in the Rocky Mountain region. Denver has had a brownfield revitalization program for 20 years, identifying hundreds of brownfields ranging from former industrial areas and abandoned gas stations to buildings with asbestos and lead paint. The city has addressed many of these brownfields; however, aging buildings with asbestos and lead paint are still common, especially in the older downtown area. Contaminated buildings and their potential impact on public health represent one of Denver's most challenging brownfield issues.

Located at the heart of the city, Denver's 24-block Lower Downtown ("LoDo") neighborhood is the site of the city's original settlement. Americans settled in what is now LoDo in the 1850s and the area grew steadily until the end of World War II when economic and land use changes drew business, residents, and investment out of downtown, sparking a prolonged economic decline. Through the mid-20th century, LoDo was known as Denver's skid row with many blighted brownfields, boarded up buildings, and vacant warehouses. Residents with the means to leave migrated to newer neighborhoods on Denver's outskirts, leaving concentrated brownfields and poverty in LoDo.

In the 1970s, preservationists noted LoDo's ornate western Victorian architecture and designated the state's first historic district in LoDo, sparking the area's renaissance. By the 1990s, many LoDo brownfields had been redeveloped as venues like Coors Field stadium, restaurants, and high-end housing. But while LoDo's economic turnaround has benefited some, it is also a story of gentrification, displacement, and environmental injustice. Low-income residents are still present in LoDo--**Census Tract 08031001704 (Target Area)** is a prime example. While the median household income in the Target Area is higher than the national median income and the median home value is more than twice the national value, the Target Area poverty rate is nearly twice as high as the national rate, and the senior poverty rate is more than three times higher. Vulnerable low-income Target Area residents face the risk of displacement and homelessness due to the skyrocketing cost of living and demand for housing in LoDo. Affordable housing is extremely limited here, and it is most often found in the area's older, unrehabilitated buildings, many of which still contain lead paint and asbestos.

1.a.ii. Description of the Proposed Brownfield Site: Volunteers of America (VOA, property owner¹) will use an EPA Brownfield Cleanup Grant to abate asbestos in **Sunset Park—a 100% affordable housing building in the Target Area that serves seniors and people with disabilities who earn less than 30% of the area median income.** A 2023 inspection concluded that Sunset Park is in sound physical and structural condition; however, during a survey conducted by an asbestos inspector certified by the Colorado Department of Public Health and Environment (CDPHE), an estimated 1,363,000 square feet (sf) of asbestos-containing materials (ACM) were identified in the building, primarily in drywall and joint compound, wall and ceiling texture, flooring mastic, skim coat, and floor tile.

Sunset Park is a 14-story, 238-unit (253 residents) building at 1865 Larimer Street and was constructed in 1973. VOA is a 501(c)3 nonprofit and owner/manager of Sunset Park since acquiring the building from the City of Denver in 1989 to provide the city's most vulnerable residents with affordable homes and supportive services. VOA provides residents with daily free hot lunch, a community center, a computer lab, and a staff of service coordinators who arrange medical care, help with access to public transit, and plan and conduct community events. Sunset Park is an island of affordable housing and services for an underserved community in a sea of extremely high-cost residences; however, Sunset Park is also a brownfield as the presence of asbestos is a barrier to building rehabilitation plans that will protect this critical resource, and benefit residents, the community, and the environment.

1.b. Revitalization of the Target Area: 1.b.i. Reuse Strategy & Alignment with Revitalization Plans: The reuse strategy is to preserve and upgrade Sunset Park's affordable housing units, enhancing safety, accessibility, livability, and dignity for the residents, and modernizing the building's energy efficiency systems. Sunset Park's heating, ventilation, and cooling (HVAC) systems are out of date, and the building was constructed before Americans with Disabilities Act (ADA) accessibility requirements. The reuse strategy is to conduct building rehabilitation that will: 1) remove asbestos that could pose a health risk;

¹ Sunset Park is owned in partnership by a) Volunteers of America National Services Preservation and Development Holding Corporation, a Minnesota 501(c)(3) nonprofit corporation, (99.99% ownership) and b) Sunset Park, a Colorado 501(c)(3) nonprofit partnership (0.01% ownership).

2) upgrade appliances, lighting, and HVAC systems with energy efficient systems; 3) enhance accessibility in accordance with ADA requirements for people in wheelchairs or with limited mobility in living spaces, and indoor and outdoor common areas; 4) improve safety with features such as grip bars, lighting, and nonskid surfaces; and 5) maintain and expand resident and community services. The reuse plan will be managed by VOA's team of experts in temporary tenant relocation, building design, energy efficiency, and project funding to coordinate the building rehabilitation with minimal disturbance to the residents. Asbestos abatement is the first phase in this comprehensive building rehabilitation plan.

These upgrades can only be accomplished if the asbestos is abated.

Affordable housing rehabilitation and preservation is one of the highest priorities in multiple City of Denver revitalization plans. In 2019, Denver established a new **Department of Housing Stability** to directly address threats to housing affordability and displacement/homelessness risks. The department's **2024 Strategic Plan**, the culmination of two years of community engagement, prioritizes a goal to create/preserve 3,000 affordable housing units. The reuse plan aligns with the **2023 City of Denver Community Needs Assessment** developed through engagement with low-income community members and social service providers. The engagement identified affordable housing, homelessness, and support services as Denver's most urgent needs. The city's prioritization of affordable housing is underscored by **Inclusionary Housing requirements** that state all new housing must include affordable units, with increased incentives in "high-need zones" where home prices are highest, and transit is accessible. **The city has designated the Target Area as a "high-need zone"**. The city engaged with the community for over a year to develop this policy, which took effect in 2022. The Target Area is densely developed, with minimal opportunities for new buildings, making preservation and rehabilitation of Sunset Park's 238 affordable housing units an urgent priority.

The reuse plan also aligns with state, local, and federal climate action goals. The Sunset Park rehabilitation will include energy and resource efficiency upgrades including new high-performance building systems: low flow water fixtures; efficient LED lighting; Energy Star appliances; high efficiency heating and hot water equipment; and native, drought tolerant landscaping. The rehabilitation will achieve **Enterprise Green Communities (EGC) certification**, a nationally recognized green building standard with requirements and credits that reflect the unique nature of affordable housing which includes credits not only for efficiency but for resident engagement. Located within a few blocks of multiple bus and light rail stations on Denver's robust public transit system, Sunset Park's rehabilitation aligns with the city's **transit-oriented development (TOD)** goals to minimize single vehicle use--Colorado's #1 source of greenhouse gas (GHG) emissions. The reuse plan aligns with:

- **City of Denver 80x50 Climate Action Plan** goal of 80% reduction in GHG emissions by 2050 through energy efficiency in buildings and TOD. The plan was informed by a city-wide survey (in multiple languages) collecting community input on climate action priorities.
- **The City of Denver TOD Strategic Plan** emphasizes projects like the Sunset Park redevelopment that preserve affordable housing in walkable, sustainable communities with ample transit options.

The reuse plan aligns with local priorities and local land use/revitalization plans by ensuring that Sunset Park can continue providing long-term affordable housing in downtown Denver for Colorado's most sensitive residents while removing contamination and enhancing climate resilience.

1.b.ii. Outcomes & Benefits of Reuse Strategy:

Economic development: The reuse plan will have economic benefits for Sunset Park's vulnerable residents and the community. Affordable housing is especially scarce for seniors and those with disabilities, particularly in LoDo. In 2021, Colorado ranked first in the US for housing instability, with over 30% of residents 65+ doubtful that they could make rent.² Preserving affordable housing will ease the economic burden for low-income residents and stimulate the economy by enabling residents to allocate limited incomes to healthcare and to local businesses.

A 2017 study found that affordable housing construction/rehab investments in Denver's TOD areas like the Target Area generated 5,366 permanent and temporary (construction/building rehab) jobs.³ The Sunset Park reuse plan will create hundreds of temporary jobs for the relocation, design, abatement, and building rehabilitation team which will be visiting local businesses during the project, further

² Denver Post. *Growing number of older adults can't afford to live in Colorado*. September 26, 2021.

³ Urban Land Conservancy. *Economic Impact of Affordable Housing in TODs in Metro Denver*.

stimulating economic activity. Another study shows that \$1 invested in creating or preserving affordable housing generates \$3 in local economic benefits from jobs created and local businesses supported by local spending.⁴

Affordable housing preservation in the Target Area will also maintain low commuting/transit costs for residents, which increases disposable income for spending on goods and services in the community. Enabling Sunset Park's residents to remain close to Denver's transit system will allow them to take advantage of the city's 50% discount for seniors, individuals with disabilities, and Medicare recipients, leaving income available for critical needs and enhanced quality of life.

Preserving Sunset Park's affordable housing will prevent homelessness, which is costly in terms of emergency services, healthcare, and law enforcement. Denver's Department of Housing Stability reports that the cost of temporary and wraparound support for people experiencing homelessness is \$28,750 per person.⁵ Based on that figure, if Sunset Park is no longer able to provide safe affordable housing and residents were to become homeless, the city would need to direct over \$7 million to their care.

Nonprofit use: The EPA Brownfield Cleanup Grant will facilitate preservation of 238 units of affordable housing which is owned and managed by VOA, a 501(c)3 nonprofit service provider that builds and renovates safe and affordable shelter for seniors, veterans, people with disabilities, and families in need.

Greenspace: Reuse plans include upgrading Sunset Park's outdoor area to make it more accessible and enjoyable for Sunset Park residents. The raised courtyard will have upgraded landscaping and a ramp added to provide easier access to Sunset Park's elderly and handicapped residents. The Sunset Park rehabilitation will also help keep development dense and central, mitigating the need for new development to sprawl into surrounding greenspaces. This improved space will encourage residents to exercise, thereby improving their physical and mental health.

Climate adaptation/mitigation, resilience, and energy efficiency: Abatement of asbestos in Sunset Park will support a range of energy and resource efficiency upgrades, including high-performance building systems, low-flow water fixtures, energy-efficient LED lighting, Energy Star-rated appliances, and high-efficiency heating and hot water equipment. Additionally, the landscaping will incorporate native, drought-tolerant plants to reduce water consumption. The upgrades will achieve EGC green building standards. VOA will use Energy Star Portfolio Manager software to monitor the building's energy use to ensure it meets the City of Denver 2022 Energy Code requirements and efficiency targets, and property management will proactively address consumption energy use spikes if they occur. These upgrades will enhance the building's climate resilience and benefit the community by reducing energy consumption, minimizing its carbon footprint, improving temperature regulation, and enhancing indoor air quality. Additionally, the upgrades will lower operating costs, helping to ensure the long-term affordability of the building for residents.

1.c. Strategy for Leveraging Resources: VOA is one of the nation's largest nonprofit developers and managers of affordable housing with over 100 years of experience securing a range of funding tools including grants, loans, and tax incentives. Since 1968, VOA has sponsored over 200 projects funded under the US Department of Housing and Urban Development (HUD) and/or the Low-Income Housing Tax Credit (LIHTC) programs. VOA develops facilities using a variety of financing methods, including LIHTC, bond financing, conventional financing, and HUD programs. VOA's development department has also been successful in obtaining numerous grants and loans through foundations, and Federal Home Loan Bank programs. VOA will apply its sophisticated expertise in partnering with local, state, and federal entities and private investors/donors to secure funding for Sunset Park rehabilitation.

| Name of Resource | Purpose: 1.c.i Characterization, 1.c.ii Remediation, 1.c.iii Reuse | Secured or Unsecured |
|---|--|----------------------|
| EPA Targeted Brownfield Assessment (TBA) | 1.c.i Characterization | Unsecured, Eligible |
| VOA can access EPA's TBA Program in the unlikely event that more asbestos testing is needed. The TBA program uses contractors paid by EPA for assessments and says the average dollar value of TBAs is \$100,000. | | |
| CDPHE Brownfield Program | 1.c.ii Remediation | Unsecured, Eligible |

⁴ <https://marketspace.capital/affordable-housing-a-catalyst-for-community-revitalization/>

⁵ The Denver Post. *Denver finally puts a price tag on Mayor Mike Johnston's homeless initiative*. June 20, 2024

| Name of Resource | Purpose: 1.c.i Characterization, 1.c.ii Remediation, 1.c.iii Reuse | Secured or Unsecured |
|--|--|----------------------------|
| VOA will apply to CDPHE's brownfield grant program for funding to supplement the EPA Brownfield grant. These grants are offered on a rolling basis, and typically range from \$50K to \$250K. CDPHE has a history of providing supplemental funding for EPA-funded revitalization projects, particularly community benefiting projects like Sunset Park. CDPHE also has a Brownfield Revolving Loan Fund that provides low interest (and sometimes forgivable) loans for cleanup. | | |
| Colorado Housing and Finance Authority (CHFA) | 1.c.iii Reuse | Unsecured, Eligible |
| CHFA provides a range of funding tools for affordable housing including low-income housing tax credit (LIHTC) equity. VOA will apply for 4% LIHTC for Sunset Park. In 2023 CHFA awarded \$78 million in housing tax credits. CHFA administers the \$4.5 million Capital Magnet Fund to support the preservation and construction of affordable multifamily rental housing in Colorado. In 2023, CHFA invested \$510 million in affordable rental housing in Colorado. VOA will apply for Capital Magnet Funds for Sunset Park. | | |
| Tax Exempt Private Activity Bonds (PABs) | 1.c.iii Reuse | Unsecured, Eligible |
| PABs for affordable housing are a tool used to provide low-cost financing for the construction, rehabilitation, or acquisition of affordable housing projects. VOA will access these funds for the Sunset Park rehabilitation. | | |
| HUD | 1.c.iii Reuse | Unsecured, Eligible |
| VOA develops housing using a variety of HUD programs including HOME and Community Development Block Grant (CDBG) programs. VOA will pursue HUD funding for the Sunset Park reuse. | | |
| CO Dept. of Local Affairs (DOLA) | 1.c.iii Reuse | Unsecured, Eligible |
| VOA can apply for flexible, low-interest, below-market rate development loans for transformational affordable housing projects through this new \$150 million fund created in 2022. | | |
| Federal Housing Administration (FHA) 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 of affordable housing units, based on income. | | |
| 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 affordable housing. | | |
| Inflation Reduction Act Energy Efficiency Tax Incentives | 1.c.iii Reuse | Unsecured, Eligible |
| Provides a tax credit for new/substantially rehabilitated multifamily homes that meet certain ENERGY STAR or Zero Energy Ready Home Program energy efficiency standards. For multifamily homes, depending on the standards and whether prevailing wage requirements are met, the credit ranges from \$500 to \$5,000 per dwelling unit. | | |
| Commercial Property Assessed Clean Energy (CPACE) | 1.c.iii Reuse | Unsecured, Eligible |
| This state program provides affordable, long-term financing for energy efficiency upgrades and provides financial incentives to developers who upgrade buildings that will perform above the current energy code. | | |
| Private Fundraising | 1.c.i Assessment, 1.c.ii Remediation, 1.c.iii Reuse | Unsecured, Eligible |
| As a nonprofit, VOA can mount a fundraising effort to provide capital for mission-driven, community serving projects. VOA has relationships with philanthropic foundations and individuals that contribute to the organization's mission of supporting community health for projects like the Sunset Park revitalization. | | |

1.c.iv. Use of Existing Infrastructure: Reuse of Sunset Park supports walkable, transit-oriented development in the center of Denver's downtown, which is fully served by sewer, stormwater, drinking water, electrical, telecommunications, broadband, natural gas, and public transit infrastructure. The grounds of Sunset Park include an outdoor area with grass and trees, and several parks are located within a few blocks. Reuse plans include upgrading Sunset Park's outdoor area to make it more accessible to Sunset Park residents. The building is within a few blocks of multiple bus and light rail stations, including Union Station—Denver's main transit hub. Multiple healthcare facilities/offices are within walking distance, as are grocery stores, government services including city police and fire stations and a post office, and a range of social service and other service providers. Additional services and amenities are easily accessible from Sunset Park by public transit.

The reuse strategy will require no major infrastructure improvements beyond the boundaries of the property. Reuse of the Sunset Park building is, in itself, use of existing infrastructure—rehabilitating an existing building to preserve affordable housing for seniors and people with disabilities in LoDo.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: 2.a. Community Need: 2.a.i. The Community's Need for Funding: The Target Area struggles with a lack of affordable housing, income inequality, and homelessness. 100% of Sunset Park's 253 residents are low income. Most residents have less than \$1,000 in monthly income. All residents are seniors and/or people with disabilities. Some residents are coming directly out of homelessness.

The Target Area is home to a vulnerable population. Target Area poverty rates are higher than city, state, and nationwide rates and 11% of Target Area residents receive cash public assistance. 62% of Target Area residents spend over 30% of income on housing. The residents do not have the financial capacity to pay for asbestos abatement or livability improvements to Sunset Park. VOA is a nonprofit organization that serves sensitive populations across the US and relies on grants and donations to conduct its critical work of providing housing and services to the most vulnerable among us. VOA has expertise in securing public and private funding for affordable housing rehabilitation, but these funds do not cover asbestos abatement. VOA must seek this funding from the EPA for Sunset Park.

The City of Denver is struggling to meet the need for affordable housing and homeless services. Chronic

| Table 1 | Target Area | City of Denver | Colorado | US |
|--|-------------|----------------|----------|------|
| Population | 2,585 | 710,800 | 5.7M | 331M |
| Poverty Rate | 21% | 12% | 10% | 13% |
| Cost Burdened Households | 62% | 47% | 52% | 50% |
| Senior Poverty Rate | 35% | 11% | 8% | 10% |
| Households receiving cash public assistance | 11% | 3% | 2% | 3% |
| Source: US Census 2022 American Community Survey | | | | |

homelessness in Colorado has increased 150% in the last 10 years.⁶ The 2023 Denver Homelessness Services budget was approximately \$48 million for emergency shelters, case management, and outreach programs.⁷ In the past five years the city has invested over \$1 billion in affordable housing development.⁸ With these demands on Target Area and city resources, funding for this cleanup is extremely limited and VOA must rely on EPA Brownfield Cleanup Grant funding to complete the abatement, which will leverage additional sources of redevelopment funding.

2.a.ii. Threats to Sensitive Populations: 2.a.ii(1) Health or Welfare of Sensitive Populations: Sunset Park is in an **Inflation Reduction Act (IRA) Disadvantaged Community**. Likely due to the predominant wealthy population in LoDo, the census tract where Sunset Park is located is not identified as disadvantaged by the Climate and Economic Justice Screening Tool (CEJST); however, both Sunset Park and the Target Area have a high proportion of sensitive populations (Tables 1 and 2). 100% of Sunset Park's 253 residents are low-income (30% or less of area median income), 147 are over age 62, and 76 are disabled. Over half of the residents are people of color, and languages other than English spoken in Sunset Park include Mandarin, Spanish, and Tamil. Seniors make up 62% of the Target Area population (compared to 15% statewide), putting it in the 93rd percentile in Colorado and 92nd percentile in the U.S. Poverty impacts

| TABLE 2 | Sunset Park | Target Area | City of Denver | Colorado | US |
|--------------------------|-------------|-------------|----------------|----------|-----|
| Senior Population | 62% | 34% | 12% | 15% | 17% |
| Minorities | 53% | 21% | 22% | 14% | 26% |
| People with Disabilities | 32% | 23% | 10% | 11% | 13% |

Source: US Census 2022 American Community Survey 5-Year estimates except Sunset Park demographics which are from Sunset Park property management records.

21% of Target Area residents, and seniors are especially hard hit at 35% (Table 1). In the Target Area more residents are housing cost burdened (62%) than citywide (47%) or nationally (50%) (Table 1).

Low-income residents are more likely to be exposed to asbestos. 53% of Denver's housing stock was built before 1980⁹ and is therefore likely to contain asbestos. These older homes, particularly those that

⁶ Colorado Coalition for the Homeless 2023 State of Homelessness Report

⁷ [Denver 9News - September 12, 2023](https://www.denverpost.com/2023/09/12/denver-homelessness-services-budget/)

⁸ <https://news.wttw.com/2021/12/07/city-investing-1-billion-affordable-housing-projects>

⁹ US Census 2022 American Community Survey

haven't been refurbished, are generally more affordable and occupied by lower income residents who are therefore at a higher risk of exposure to asbestos, lead, and other hazardous substances.

Poverty and high housing costs are putting these sensitive residents at risk of displacement and homelessness. Median rent in Denver increased 82% from 2009 to 2021, compared to a 42% increase nationwide¹⁰--conditions ripe for displacement. Poverty also leads to a range of poor health outcomes, particularly for seniors for whom poverty is linked to increased risk of physical and cognitive decline, diabetes, and homelessness.¹¹

The EPA Grant will permanently remove asbestos from a large residential building in the Target Area, eliminating the risk of exposure and reducing building and community residents' cumulative exposure to hazardous materials. The grant will also protect Sunset Park's affordable housing and wraparound services, preventing displacement of sensitive residents.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health

Conditions: 32% of Sunset Park residents and 23% of Target Area residents are people with disabilities, compared to 10% citywide (Table 2). People with disabilities may have limited opportunities to exercise and engage in outdoor activities in fresh air, potentially leading to health problems like diabetes, heart disease, and vulnerability to respiratory diseases. For example, data from the Centers for Disease Control (CDC) shows that during the first two COVID-19 pandemic waves in the US, people with intellectual disabilities were equally as likely as other people to become infected but had 3.5 times the risk of death.¹²

| TABLE 3 | Target Area | Colorado |
|--|-------------|----------|
| Cancer | 10% | 6% |
| Asthma | 10% | 9% |
| High blood pressure | 31% | 25% |
| COPD* | 7% | 4% |
| Stroke | 4% | 2% |
| Source: Centers for Disease Control 500 Cities Project/PLACES Database *Chronic obstructive pulmonary disease | | |

EJScreen shows that the Target Area has a higher rate of respiratory diseases like asthma and COPD than the statewide rate (Table 3). People with asthma are more likely to report depression, spend more days sick in bed, and have limitations or inability to conduct daily activities.¹³

The Target Area has disproportionately high rates of cancer, high blood pressure, and stroke (Table 3). EJScreen also shows that 19% of Target Area residents have low life expectancy, compared to 18% statewide. Asbestos exposure exacerbates diseases like COPD and increases the risk of lung cancer and even death. The EPA Grant funds will permanently remove asbestos from Sunset Park, mitigating contamination that may contribute to disease and low life expectancy.

2.a.ii.3.b Environmental Justice (EJ): Sunset Park and the Target Area have significant low income, senior, and minority populations. These residents are disproportionately exposed a range of environmental burdens. The Target Area is in the 86th to 94th state percentiles for risks associated with poor air quality, proximity to contaminated sites and facilities that handle or store hazardous materials, and lead paint (Table 4). These burdens are associated with a range of health impacts. Air pollution can aggravate heart disease, and increase the risk of strokes, COPD, asthma, and diabetes. Older people are less able to compensate for these negative effects, leading to increased medication use, greater need for health care, and even death.¹⁴ This need for increased healthcare also worsens the financial hardships for the low-income Target Area community.

| TABLE 4 EJScreen Supplemental Index | Target Area State Percentile |
|-------------------------------------|------------------------------|
| Nitrogen Dioxide | 93rd |
| Diesel Particulate Matter | 94th |
| Traffic Proximity | 94th |
| Superfund Proximity | 93rd |
| Hazardous Waste Proximity | 93rd |
| Toxic Releases to Air | 92nd |
| Lead Paint | 86th |

Vulnerable Target Area residents are also in the 66th citywide percentile in Denver for vulnerability during heat waves due to the prevalence of paved surfaces, proximity of busy roads, and other features of the built environment that trap and emit heat.¹⁵ Currently, Sunset Park

¹⁰ <https://www.denverpost.com/2023/07/08/denver-top-in-nation-rent-increases/>

¹¹ https://www.america'shealthrankings.org/explore/measures/poverty_sr/CO

¹² <https://www.cdc.gov/respiratory-viruses/risk-factors/people-with-disabilities.html>

¹³ [CDC Chronic Disease Indicators, Asthma](#)

¹⁴ [AirNow.com](#) accessed November 2024

¹⁵ <https://dashboards.mysidewalk.com/denver-health-assessment/healthy-environments> accessed October 2024

relies mainly on windows for ventilation, which can let in unfiltered outdoor air and fail to provide effective temperature regulation.

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 community of seniors and minorities already overburdened by pollution, extending the life of this critical affordable housing resource. Removing asbestos from the community will reduce the cumulative exposure of sensitive underserved residents to pollution from asbestos, poor air quality, and industrial waste discharges (Table 4). VOA will also use the grant for engagement to increase the community's resilience by enhancing their understanding of pollution sources and health risks and take action to minimize health impacts. Rehabilitating Sunset Park will support compact development in the Target Area that promotes walkability and public transit use, minimizing the need for residents to commute using single occupant vehicles for basic services. Supporting Sunset Park as TOD minimizes air pollution and GHG emissions currently experienced by disadvantaged Target Area residents. The rehabilitation will result in a building free of hazardous materials 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, and common areas. The reuse plan for Sunset Park will provide upgraded ventilation systems which will filter outdoor air prior to circulation and provide effective temperature regulation during extreme weather events.

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

| | |
|---|---|
| Sunset Park Service Coordinators | Contact: Zongqi Zhou zzhou@voacolorado.org |
| Mission: Ensure that Sunset Park resident voices are heard, and their ideas play a prominent role in programming. Role: Sunset Park's onsite Service Coordinators will share news of the project with residents and convey resident feedback and input to VOA for incorporation into building rehabilitation plans. The Service Coordinators interact with and support the residents as part of their day-to-day responsibilities, coordinating healthcare, social activities, translation services, presentations from community partners, and have established trusting relationships that will be essential to ensuring resident engagement. | |
| Denver Commission on Aging | Contact: Anna DeRocchi anna.derocchi@denvergov.org |
| Mission: To make Denver the best community for older adults through outreach, communication and advocacy. Role: The commission will share news of the project throughout its networks and be a resource for Sunset Park staff and residents regarding continuous health and wellness management during the building rehabilitation. | |
| Metro Denver Partnership for Health | Contact: Nicole Weber webern@coloradohealthinstitute.org |
| Mission: Cultivate cross-sector collaboration and innovate and advocate for equitable practices within through our communities. Role: Assist with community engagement around brownfields and contamination, and health benefits of cleanup and reuse. | |
| City of Denver Brownfield Program | Contact: Dave Wilmoth dave.wilmoth@denvergov.org |
| Mission: Revitalize Denver brownfields. Role: Share expertise in EPA Brownfield Grant management, community engagement, and leveraging resources for the Sunset Park cleanup and rehabilitation. | |
| CDPHE Brownfield Program | Contact: Mark Rudolph mark.rudolph@state.co.us |
| Mission: Advancing Colorado's health and protecting the places where we live, learn, work, and play. Role: Provide technical expertise and share agency funding options including grants, loans, and brownfield tax incentives. | |

2.b.iii. Incorporating Community Input: VOA held a community meeting on October 18, 2024 to share the plan to apply for an EPA Brownfield Grant with building residents and the community. VOA will continue engagement by hosting at least two community meetings before the cleanup begins, and at least one meeting when cleanup is complete. Meetings will be posted on Sunset Park's community bulletin board and social media, publicized by the Sunset Park service coordinators, posted on partner websites and social media, and printed in the local newspaper. VOA will prepare fact sheets related to the cleanup and revitalization of Sunset Park for the residents and community. VOA will prepare outreach materials in English and Mandarin, as it is the primary language of 22 units in Sunset Park and can provide additional translations as needed. VOA will prepare signage for display during the abatement work explaining the activity and noting that it was funded by an EPA Brownfield Grant.

VOA will solicit community input using tools such as question and answer sessions during resident and community meetings and will publicize the cleanup plan and project contact information to invite community input. Community input will be considered by VOA and project contractors and responses will be posted to the Sunset Park bulletin board, website and social media as frequently asked question documents or fact sheets. Community input and project team responses will be summarized in the quarterly project progress reports to EPA.

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

Contaminated Media to be Addressed: 1) Abate by removal ACM comprised of drywall and joint compound, wall and ceiling texture, flooring mastic, skim coat, and floor tile.

Cleanup Method: ACM will be abated by removal. VOA will solicit competitive bids from CDPHE-certified abatement contractors, following procedures compliant with 2 CFR 200.317-327 and EPA's Six Good Faith measures for hiring Disadvantaged Business Enterprises (DBEs). ACM abatement will consist of site setup; permitting; constructing abatement containment and monitoring areas; removing, packaging, and labeling ACMs for disposal; waste disposal at a certified landfill; post-abatement cleanup; and third-party asbestos clearance monitoring and sampling. The abatement will be completed in accordance with CDPHE Regulation 8, which regulates asbestos abatement including contractor training and certification, permitting, safety, and waste disposal.

Disposal Requirements: ACM waste will be disposed at a landfill authorized by CDPHE to accept non-hazardous, class 9, friable ACM waste.

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

| Task 1 – Grant Management | Lead: VOA with support from the Qualified Environmental Professional (QEP) |
|---|--|
| <p>Implementation: <i>EPA grant funded activities:</i> None <i>Non-EPA grant funded activities:</i> VOA will contribute internal funding for personnel/fringe, costs for grant management including procuring a QEP following EPA procurement guidelines. Internal VOA funding will be used for 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. VOA will use internal funds for travel/attendance at two brownfield conferences/workshops.</p> | |
| <p>Schedule: Procure QEP Q1 or 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.</p> | |
| <p>Outputs: QEP contract; quarterly reports with budget and schedule status; annual reports and forms; ACRES reporting; final closeout reporting; attendance at two conferences/workshops.</p> | |
| Task 2 – Community Outreach | Lead: VOA with support from the QEP |
| <p>Implementation: <i>EPA grant funded activities:</i> None <i>Non-EPA grant funded activities:</i> VOA will contribute internal funding for personnel/fringe and QEP fees for: planning/facilitating 3 community meetings; preparing outreach materials (fact sheets, press releases, website/social media updates, site signage, etc.); solicitations of and responses to community input.</p> | |
| <p>Schedule: Public meetings: after grant award, when ABCA is final/before cleanup begins, after cleanup is complete; outreach materials available before and during cleanup; input gathered at community events and when provided directly to VOA via in person comments, email, social media, electronic survey, or other method.</p> | |
| <p>Outputs: At least 3 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; Frequently Asked Questions publication; project updates on Sunset Park bulletin board, website and social media.</p> | |
| Task 3 – Cleanup | Lead: QEP will oversee abatement contractor under the direction of VOA |
| <p>Implementation: <i>EPA grant funded activities:</i> Abatement Contractor: 1) Abate ACM using methods described in Section 3.a and removal/disposal of ACM waste; and 2) preparation by the cleanup contractor of a Closure Report documenting all project activities.</p> | |

Non-EPA grant resources: VOA will contribute internal funding for: **Pre-Work Preparation:** 1) Permitting and pre-work submittals, health and safety plan, 2) Site setup. **Abatement Contractor:** 1) Abate remaining ~843,000 sf (62%) of ACM using methods described in Section 3.a. **QEP Fees:** 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. **VOA personnel/fringe costs:** QEP & abatement contractor management.

Schedule: Final ABCA and SAP/QAPP completed by 1/15/26; Site setup and abatement 1/15/26-1/15/28; Cleanup report draft submitted by 6/15/28, final by 8/15/28.

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

3.c. Cost Estimates: Cleanup costs are based on estimates provided to VOA by abatement contractors in March 2024.

Task 1 Grant Management: EPA Grant: \$0 (Cost will be paid by VOA)

Task 2 Community Outreach: EPA Grant: \$0 (Cost will be paid by VOA)

Task 3 Cleanup Planning and Abatement: EPA Grant: \$4,000,000: Abatement Contractor:

- Abate 520,000 sf (38%) of ACM at average cost of \$7.50/sf = \$3,900,000
- Permit for ACM abatement = \$5,000
- Post abatement air clearances = \$45,000
- Waste disposal, 500 tons at \$100/ton = \$50,000

(VOA will fund cleanup costs over \$4 million.)

| Budget Categories | | Task 1 | Task 2 | Task 3 | Totals |
|---------------------|-------------------------|-------------|------------|--------------------|--------------------|
| | | Grant Mgmt. | Outreach | Cleanup | |
| Direct Costs | Personnel/Fringe/Travel | \$0 | \$0 | \$0 | \$0 |
| | Equipment/Supplies | \$0 | \$0 | \$0 | \$0 |
| | Construction/Cleanup | \$0 | \$0 | \$4,000,000 | \$4,000,000 |
| | Contractual | \$0 | \$0 | \$0 | \$0 |
| Total Direct Costs | | \$0 | \$0 | \$4,000,000 | \$4,000,000 |
| Indirect Costs | | \$0 | \$0 | \$0 | \$0 |
| Total Budget | | \$0 | \$0 | \$4,000,000 | \$4,000,000 |

3.d. Measuring Environmental Progress & Results: When preparing the project work plan, VOA 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, VOA 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. VOA will increase monitoring and communication during the active cleanup phase to act quickly to address any unanticipated changes during this critical period. VOA will monitor the project budget concurrent with tracking the schedule, on at least a monthly basis. VOA 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 VOA will track include:

- Square feet of building prepared for energy and accessibility upgrades
- Units of affordable housing preserved
- Number of cleanup jobs created
- Funding leveraged
- Square feet of building in which ACM cleanup is completed
- Increased accessibility for disabled people
- Number of affordable housing residents served
- Enhanced community understanding of asbestos

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE: 4.a. **Programmatic Capability:** 4.a.i. **Organizational Structure** and 4.a.ii. **Description of Key Staff:**

VOA is one of the nation's largest affordable housing developers providing centralized asset management for a housing portfolio valued at almost \$900 million. VOA has highly qualified staff of construction, funding, grant management, finance professionals who will manage this EPA Brownfield Grant. Doug Snyder, VOA's Vice President of Development, will serve as the EPA Brownfield Cleanup Grant day-to-day Project Manager, procuring and directing all VOA staff and project contractors. Doug has been with VOA for 12 years and has 30 years of real estate investment and development experience including asbestos abatement and construction projects. Doug will manage project contractors, communicate with EPA, onsite project coordinators, and stakeholders, and ensure the work plan is executed. He will lead procurement of 1) a QEP experienced with EPA Brownfield Grants management and compliance as well as asbestos abatement, and 2) a CDPHE licensed asbestos abatement contractor. He will ensure procurements are completed in compliance with 2 CFR 200.317-327 and VOA's established best practices. Doug will be assisted by VOA's team of construction, administration, and finance professionals including Martin Zahariev, VOA Senior Accounting Manager who will manage the financial aspects of the grant funded project. Martin has degrees in accounting and finance and will report to Doug for accountability and tracking of all funds and review all quarterly budget and final summaries for accuracy and consistency.

4.a.iii. Acquiring Additional Resources: VOA 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. VOA will advertise for contractor services on their website and through the Rocky Mountain E-Purchasing System and reach 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:

4.b.ii.(1) Purpose and Accomplishments:

Capital Magnet Fund (CMF): VOA has received 7 awards from the U.S. Department of the Treasury for development and preservation of over 3,500 affordable housing units, helping leverage \$633 million in total development costs. In the past three years, VOA has received yearly awards totaling \$15.5 million. For example: VOA managed a \$250K CMF award as part of the capital stack for construction of a 53-unit senior affordable housing development that opened in July 2020 and managed a \$350K award for development of a similar 55-unit development in Fort Collins, CO which opened in 2022.

HUD Section 202 Supporting Housing for the Elderly: VOA managed \$2 million interest free loan from HUD to help complete a new 80-unit senior affordable housing development that opened in December 2023. VOA prepared and submitted required financial statements, cost certifications, and all required forms to HUD in accordance with generally accepted accounting principles (GAAP).

HUD HOME Investment Partnership: VOA received a \$2.4 million grant from HUD and completed construction at a new 40-unit affordable housing development in 2015. VOA tracked compliance, performance, and outcomes and provided all required plans, reports, and other required data to HUD.

4.b.ii.(2) Compliance with Grant Requirements:

Meeting Reporting Requirements: VOA consistently meets all reporting requirements for funded agreements, with a robust system for tracking project progress, finances, and compliance. Quarterly and final reports are timely and include detailed outputs, outcomes, and performance metrics, such as number of units constructed or rehabilitated, as well as outcomes related to improved housing stability for vulnerable residents, allowing VOA to address any deviations from goals in real time. Challenges are documented transparently, with corrective action plans to keep projects on track.

Documentation and Progress Reporting: VOA employs rigorous monitoring and documentation of grant and loan funds, tracking key project indicators, maintaining detailed records, and conducting regular reviews to ensure compliance with project and funder goals and requirements. Any setbacks are documented, with corrective actions applied to stay on track. Final reports consistently show VOA meeting or exceeding expected outputs and outcomes, ensuring successful project completion.

THRESHOLD CRITERIA RESPONSES

EPA Brownfield Cleanup Grant Application Sunset Park Apartments – Denver, Colorado

1. **Applicant Eligibility:**

- a. Documentation of applicant eligibility if other than a city, county, state, or tribe:
Sunset Park (the “site”) is owned by VOA Sunset Housing, L.P which is comprised of Volunteers of America National Services Preservation and Development Holding Corporation, a Minnesota 501(c)(3) nonprofit corporation, (99.99% ownership) and Sunset Park, a Colorado 501(c)(3) nonprofit partnership (0.01% ownership). These entities are 100% owned by Volunteers of America National Services. The owner of the property is referred to as “Volunteers of America (VOA)” herein.

Documentation of the owners’ eligibility to apply for an EPA Brownfield Cleanup Grant as tax exempt organizations under section 501(c)(3) of the Internal Revenue Code is attached.

- b. A statement of the applicant’s 501(c)(4) tax exempt status: Not applicable.

2. **Previously Awarded Cleanup Grants:**

No EPA Brownfield Cleanup Grants have been awarded to or expended on this brownfield site (Sunset Park Apartments).

3. **Expenditure of Existing Multipurpose Grant Funds:**

Not applicable, the applicant does not have an open EPA Brownfield Multipurpose Grant.

4. **Site Ownership Information:**

Sunset Park (the “site”) is owned by VOA Sunset Housing, L.P which is comprised of Volunteers of America National Services Preservation and Development Holding Corporation, a Minnesota 501(c)(3) nonprofit corporation, (99.99% ownership) and Sunset Park, a Colorado 501(c)(3) nonprofit partnership (0.01% ownership). These entities are 100% owned by Volunteers of America National Services. The title is fee simple.

5. **Basic Site Information:**

- (a) Name of Site: **Sunset Park Apartments**
(b) Property Address: 1865 Larimer Street, Denver, CO 80202

6. **Status and History of Contamination at the Site:**

- a. whether this site is contaminated by hazardous substances or petroleum:

Sunset Park Apartments is impacted by hazardous materials. The contaminant of concern (COC) is asbestos.

- b. the operational history and current use(s) of the site: Sunset Park Apartments is a 14-story, 238-unit deeply affordable residential building at 1865 Larimer Street. The building was constructed in 1973 for multifamily residential use and has been in residential use since that time.
- c. environmental concerns, if known, at the site: In 2023, an asbestos survey was conducted throughout Sunset Park Apartments. 1,363,000 sf of asbestos-containing material (ACM) was identified in the building, primarily in drywall and joint compound, wall and ceiling texture, flooring mastic, skim coat, and floor tile.
- 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 building materials, and Sunset Park Apartments has been documented to contain building materials that contain asbestos. Over 1.3 million sf of ACM has been identified in the building, primarily in drywall and joint compound, wall and ceiling texture, flooring mastic, skim coat, and floor tile.

7. Brownfields 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. VOA 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 *Limited Asbestos Survey, Sunset Park – 1865 Larimer Street, Denver, Colorado, Project Number 225445* was completed on March 27, 2023. This report assessed the nature, extent, and concentration of asbestos in building materials in Sunset Park Apartments. 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 in regulated building materials, and

- b) there is a sufficient level of characterization from the assessments performed to date for the abatement work to begin.

10. Enforcement or Other Actions:

There are no known ongoing or anticipated environmental enforcement or other actions related to the 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 site. There are no environmental liens on the site.

11. Sites Requiring a Property – Specific Determination:

Based on our review, the VOA affirms that the site 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 site 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 Substance Sites

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

Asbestos-containing materials contained in Sunset Park Apartments 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. In Colorado, the Colorado Department of Public Health and Environment (CDPHE) oversees asbestos and lead paint abatement projects. CDPHE does not require asbestos/lead paint abatement projects to join the Voluntary Cleanup Program but will consult with the site owner to ensure the cleanup is protective of human

health and the environment. The owner will procure an independent third-party oversight contractor and asbestos and lead abatement contractor with the required technical expertise to implement cleanup. The procurements will be completed in accordance with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327.

- b. Access to neighboring properties will not be required because remedial actions will be performed wholly within Site boundaries. All asbestos abatement activities will be conducted in containment 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 are posted at the Sunset Park Apartments and available to review at the front desk. A notification of the availability of the documents was published in the local newspaper (The Denver Post) on October 10, 2024. The draft ABCA is attached and summarizes:

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

b. Community Notification Ad

VOA published an ad in The Denver Post notifying the community of the intent to apply for an EPA Brownfield Cleanup Grant for the Sunset Park Apartments building. The newspaper ad appeared in The Denver Post on October 10, 2024 (over 14 days before the application was submitted to EPA). The meeting notification was also published to the VOA Facebook page. The Denver Post notification clearly stated:

- A copy of the grant application, including the draft ABCA is available for public review and comment;
- How to comment on the draft application and ABCA;
- Where the draft application is located for review;
- The date, time, and location of the public meeting.

c. Public Meeting

An in-person meeting was held at Sunset Park on October 18, 2024, to solicit and consider public comments prior to the submittal of this application.

d. Submission of Community Notification Documents

The follow documents are attached:

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

- Meeting participant list

15. Contractors and Subrecipients

- Contractors: Not Applicable
- Subrecipients: Not Applicable

November 12, 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: Volunteers of America - Sunset Park - FY25 Cleanup Grant Proposal

Dear Ms. Benz:

I am writing to express support of the Volunteers of America (VOA) FY 2025 Cleanup Grant proposal for Sunset Park in Denver, Colorado. Skyrocketing costs have left lower income residents of Denver's Lower Downtown ("LoDo") neighborhood struggling to find safe and affordable housing to remain in their community. Cleanup of Sunset Park, a 238-unit multifamily affordable housing building will allow VOA to make critical updates to the building's accessibility, energy efficiency, and resiliency and continue providing much needed affordable housing and community services for seniors and people with disabilities.

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. A review of the site assessment information submitted by VOA indicates that the site has been adequately characterized by a qualified environmental professional, and site data 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, CDPHE'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 Volunteers of America, 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. CDPHE has informed VOA of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express CDPHE's strong support for Volunteers of America's Grant Proposal that will allow the cleanup and revitalization of this important community asset.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Knox".

Kathleen Knox
Superfund/Brownfields Project Manager
Hazardous Materials and Waste Management Division

cc: Doug Snyder, Volunteers of America
Carrie Rackey, Stantec

