



City of Hot Springs

Mayor's Office
133 Convention Blvd.
Post Office Box 700
Hot Springs National Park, AR 71902
(501) 321-6810

1. Applicant Identification
City of Hot Springs
324 Malvern Avenue
Hot Springs, AR 71901
2. Website URL: <https://www.hotspringsar.gov/>
3. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$783,510
4. Location
 - a) City of Hot Springs, b) Garland County, c) Arkansas
5. Property Information
Former St. Joseph Hospital
100 Whittington Avenue
Hot Springs, Arkansas 71901
6. Contacts
 - a. Project Director
Lance Spicer, Deputy City Manager
501-321-6860
lspicer@hotspringsar.gov
133 Convention Blvd.
Hot Springs, AR 71901
 - b. Chief Executive/Highest Ranking Elected Official
Pat McCabe, Mayor
501-276-1409
pmccabe@hotelhale.com
133 Convention Blvd.
Hot Springs, AR 71901
7. Population: City of Hot Springs, AR: 38,023 (US Census: 2019–2023 American Community Survey)

RO6-26-C-001



8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed site(s) is impacted by mine-scarred land.	N/A
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.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

9. Releasing Copies of Applications

Not Applicable.

FY26 EPA Brownfield Cleanup Grant City of Hot Springs, AR



Approximate Site Boundary



America's first Resort

City of Hot Springs, AR

**FY26 Brownfield Cleanup Grant
Narrative**



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields a. Overview of Brownfield Challenges and Description of Target Area: The City of Hot Springs, Arkansas (City), located in Garland County, is a legacy city shaped by its unique natural and cultural assets. Incorporated in 1851, Hot Springs rose to national prominence in the late 19th and early 20th centuries as a health resort destination, drawing visitors to its thermal springs and bathhouses. The City’s economy was historically driven by tourism, hospitality, and health-related services, with supporting industries including rail transportation and light manufacturing. However, in the mid-20th century, spa tourism declined and industrial activity waned. Subsequently, Hot Springs experienced economic stagnation, disinvestment, and the deterioration of its historic neighborhoods. Today, the City faces persistent challenges related to aging infrastructure, blighted and vacant properties, and environmental concerns that hinder redevelopment and community revitalization.

The **geographic boundary and target area** for this Cleanup Grant is **Census Tract 05051010800**, which includes the **Whittington Park Historic District**, nestled between West Mountain and Sugarloaf Mountain in the northwestern part of the City. Over time, the area has suffered from disinvestment and now faces brownfield conditions linked to former dry cleaners, gas stations, hotels, medical facilities, and bathhouses. These properties may harbor contaminants that fuel blight, pose health risks, and create significant barriers to economic growth. This contamination has deterred private investment, perpetuating a cycle of disinvestment and decline in a vital city corridor. The target area is home to sensitive populations, including the **impoverished** (33%) and the **elderly** (26%).¹ Remediation funded by this grant will reduce potential health risks within the target area and promote economic development and quality of life in this distressed community. This project will catalyze economic growth, improve quality of life, and restore vitality to a distressed corridor of Hot Springs.

b. Description of the Proposed Brownfield Site(s): The **Former St. Joseph Hospital**, located at 100 Whittington Avenue, spans approximately 3.42 acres, with the combined footprint of the site at approximately 245,000 square feet. The site includes three connected buildings ranging from five to seven stories, a basement, parking areas, and landscaped grounds. Originally developed in the mid-1920s, the site has a long history of institutional and commercial use. Before hospital construction, the land hosted dwellings and hotels, including the Gilbert Hotel, Hotel Josephine, Nettles Hotel, and Southern Hotel (1886–1925). The original hospital building was completed in 1927, followed by expansions between 1950 and 1983, creating the current configuration. The hospital relocated in 1991, and the property was later repurposed by the **Arkansas School for Mathematics, Sciences, and the Arts (ASMSA)** for classrooms, offices, dormitories, and maintenance operations until the site was **vacated** in May 2025.

Environmental assessments have identified the presence of **asbestos-containing materials (ACM) and lead-based paint (LBP)** throughout the buildings, consistent with their age and construction history. Environmental concerns were first documented in a 1992 Arkansas State Building Services inspection, which recommended evaluation of hazardous materials including **ACM, LBP, and universal waste**. A 2004 environmental scope included an asbestos survey, and a 2024 Phase I Environmental Site Assessment (ESA) recommended updated hazardous materials assessments. In response, a comprehensive 2025 inspection confirmed the presence of friable and non-friable ACM in pipe insulation, floor tiles, and wall systems; LBP throughout interior surfaces; and universal wastes consisting of electrical equipment containing potential polychlorinated biphenyls (PCBs), mercury-containing fluorescent light bulbs, and heating and

¹ US Census 2019–2023 American Community Survey



cooling systems with potential chlorofluorocarbons (CFCs). The severity and extent of contamination pose significant risk to both human health and redevelopment efforts. The deteriorating condition of the structures, combined with their size and complexity, presents substantial barriers to redevelopment without targeted cleanup funding.

Revitalization of the Target Area. c. Reuse Strategy and Alignment with Revitalization Plans: The reuse strategy for the Former St. Joseph Hospital site is guided by two key planning documents: **ASMSA’s 2033 Facilities Plan (FP)** and the **Forward Hot Springs 2040 Comprehensive Plan (FHSCP)**.

As a campus of the University of Arkansas System, ASMSA holds a unique place in the City. It is 1 of only 17 public residential high schools in the nation dedicated to serving talented and motivated students with strong interests in mathematics, science, creativity, humanities, music, and the arts. Ranked among the *Top 25 public high schools in America*, ASMSA provides more than 250 of Arkansas’s most promising young minds with housing, tuition, meals, and books at no cost—ensuring access regardless of family financial need. Since its establishment in Hot Springs in 1993, the partnership between ASMSA and the City has been mutually transformative.

Both the FP and FHSCP share a vision of community-driven growth rooted in education, creativity, and cultural vitality. The FP emphasizes spaces that balance academic rigor with personal development, **identifying the creation of an Arts Zone on the Former St. Joseph Hospital site as a defining priority**. This Arts Zone will elevate performing and visual arts, foster whole-student growth, and integrate creativity into a STEM-rich curriculum. Complementing this vision, Forward Hot Springs prioritizes neighborhood revitalization, downtown development, and higher education as economic drivers. Together, these plans aim to position the City as a regional hub for art, music, film, entertainment, and culture, while expanding its craft and maker economies to support local businesses and tourism.

At the heart of the Arts Zone will be the **Center for the Arts**, anchored by two major facilities:

- **Performing Arts Classroom Building** – a 16,000-square-foot acoustically engineered space designed to elevate student performances, enhance the visibility of the arts across campus, and create opportunities for community engagement. Located at the southern gateway of historic Central Avenue, it will serve as both a cultural landmark and an institutional cornerstone for ASMSA. The facility will feature a flexible rehearsal classroom, a small concert space, and a welcoming lobby and gallery that doubles as a reception venue and exhibition space for student and community artwork.

- **Visual Arts Building** – an 18,000-square-foot facility dedicated to ASMSA’s studio-based arts programming. After the arts transition out of the hospital complex, this building will be essential to sustaining disciplines such as painting, drawing, ceramics, glasswork, digital art, and multimedia production. It will provide students with the tools and space to explore diverse creative mediums while relieving pressure on the Academic Building and Creativity and Innovation Complex, allowing those facilities to be reallocated for emerging academic priorities.

Together, these facilities will showcase the growth and sophistication of ASMSA’s arts programs, advance its legislated arts mission, and provide students with an environment that fosters creativity and interdisciplinary learning. Importantly, public involvement has been central to shaping this reuse strategy. Through surveys, workshops, and stakeholder meetings, community members, students, and families have ensured that the project reflects local priorities for education, cultural expression, and economic revitalization. ***This site is not located in a flood plain.***

d. **Outcomes and Benefits of Reuse Strategy:** ASMSA’s reuse strategy will transform the Former St. Joseph Hospital into the Arts Zone, a cultural and educational anchor that advances both the



FP and FHSCP. This project will **catalyze downtown revitalization** by creating spaces for learning, wellness, and the arts while honoring the site’s historic significance. Tuition-free for Arkansas residents, ASMSA promotes educational equity and prepares future leaders, and the Arts Zone will amplify this mission by **providing low-income students access to high-quality arts education**. These programs will equip students with creative and technical skills that support entrepreneurial pursuits and small business development, fostering pathways to economic mobility. The redevelopment’s economic benefits will include **attracting visitors for performances and exhibitions, generating revenue for local businesses, and strengthening Hot Springs’ position as a regional destination for arts and culture**. It will **create construction and operational jobs** and foster an arts-and-maker economy that supports local artisans and entrepreneurs. Noneconomic benefits include **enhanced walkability, cultural engagement, and whole-student development, contributing to community health and resilience**. The City will guide ASMSA in incorporating **energy-efficient and renewable energy design, weather-resilient landscaping, and sustainable infrastructure** into the redevelopment. These measures will **improve local resilience to extreme weather events and natural disasters**, reduce long-term operating costs, and ensure the site remains a safe and functional community asset for decades to come. By transforming a deteriorating property into a vibrant educational and cultural hub, this project will deliver lasting benefits that strengthen the economic, social, and environmental fabric of Hot Springs.

Strategy for Leveraging Resources. e. Resources Needed for Site Characterization: The previous investigations conducted at the site sufficiently characterized the overall extent and degree of contamination to develop a draft Analysis of Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach. At this time, no additional resources are needed for site characterization. In the event the site needs additional assessment for characterization, alternative funding will be sought from the Arkansas Department of Energy and Environment Brownfield Program and the Arkansas Remedial Action Trust Fund Act (RATFA) program.

f. Resources Needed for Site Remediation: EPA grant funding requested through this application will enable the full remediation of the Former St. Joseph Hospital site. The City will lead the cleanup initiative and engage a qualified environmental contractor to oversee and carry out the remediation activities. Due to budget constraints, the City cannot absorb the cost of the necessary cleanup within its limited redevelopment funds. This partnership with the EPA will help the City achieve its remediation objectives and transition toward the site’s redevelopment and reuse.

g. Resources Needed for Site Reuse: The City and its partners have committed significant resources to support the reuse of the Former St. Joseph Hospital site. The Hot Springs Board of Directors has approved resolutions allocating \$4 million in local funds specifically for the Former St. Joseph Hospital project. ***See attached resolution of secured funding.*** These funds will be applied toward demolition and site-preparation activities necessary to advance redevelopment. In addition, the City is a Community Development Block Grant (CDBG) entitlement grantee, receiving approximately \$500,000 annually in federal allocations. This project meets CDBG national objective requirements, and the City has the ability to direct a portion of these funds toward demolition and related activities. Beyond these secured resources, ASMSA will continue to seek additional funding through state appropriations, philanthropic contributions, and private partnerships to support construction of the Arts Zone facilities. These combined resources demonstrate a strong financial foundation for the project and ensure that cleanup and redevelopment will proceed efficiently once environmental hazards are addressed.



h. Use of Existing Infrastructure: The City intends to use existing infrastructure at the cleanup site, including water/sewer, transportation, buildings, and power. The City has the necessary infrastructure to fully support the proposed redevelopment of the target-area cleanup site. If additional improvements are found to be necessary, the City will use their allotted \$500,000 CDBG funds as needed.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need. a. The Community's Need for Funding: The target area has a critical need for funding to support environmental remediation and redevelopment in its most economically distressed areas. The City's **overall poverty rate stands at 21%** (US 12%).² The **target area** is home to a **small population of 2,596** residents, many with low income.² **Median household incomes further highlight the disparity: \$46,441 for the City and \$33,111 in the target area**, compared to the US median of \$78,538.² The target area's **per capita income is substantially low at \$23,388**, versus \$43,289 nationally.² These economic challenges severely limit the City's ability to generate local revenue or leverage other funding sources. With most of the municipal budget committed to salaries, essential services like police and fire, and infrastructure maintenance, no funds remain for environmental assessment or cleanup of contaminated sites.

Recent **extreme weather-related disasters** have greatly strained the City's budget. In May 2024, an EF2 tornado caused widespread damage to homes, businesses, and critical infrastructure, including the City's wastewater treatment plant, resulting in over \$600,000 in emergency-response and debris-removal costs. Less than a year later, in April 2025, the City endured 11 inches of rainfall over four days, leading to flash flooding and an additional \$400,000 in recovery expenses. These back-to-back weather events depleted local resources, leaving the City unable to support environmental remediation and redevelopment in its most vulnerable areas. Without external support, residents will continue to suffer from the health and economic impacts of environmental hazards and blight. EPA Brownfields Cleanup Grant funding is essential to empower the City to remove hazardous conditions, stimulate redevelopment, and create a healthier, more vibrant future for its distressed residents.

b. Health or Welfare of Sensitive Populations: The target area faces significant welfare challenges, including widespread poverty and a high concentration of blighted properties. **Sensitive populations such as low-income families and the elderly** are disproportionately affected. **Poverty among children under 18 is especially severe, with rates at a staggering 51% in the target area (US 16%).**² Families in the target area headed by **single women without a spouse are particularly affected, with 73% living in poverty**, far exceeding the national rate of 33%.² Additionally, **19% of target-area residents must rely on government assistance such as SNAP benefits (US 11%)—and 8% on social security (US 5%)—to meet basic needs.**² Target-area residents also suffer from a lack of educational attainment. **Eight percent (8%) of the residents 25 and older do not have a high school diploma (US 5%).**² Unfortunately, low educational attainment, high reliance on government assistance, and high poverty levels can cause elevated crime rates in distressed communities. The City has an **extremely high property crime rate index of 95** out of 100 (US 35) and a **violent crime rate of 38** out of 100 (US 23).³

The reuse strategy will directly address these welfare challenges by removing blight and replacing deteriorating structures with a vibrant educational and cultural hub. The Arts Zone will provide tuition-free arts education for Arkansas students, including those from low-income families, creating pathways to higher education and economic mobility. Public spaces within the

² US Census 2019-2023 American Community Survey

³ Bestplaces.net – Hot Springs, AR



Center for the Arts will foster cultural participation and social cohesion, improving neighborhood safety and quality of life. By transforming a health hazard into a landmark center for creativity and learning, this project will deliver lasting benefits for sensitive populations, advance sustainability, and inject growth back into Hot Springs.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Residents in the target area face significant economic hardship and elevated health risks due to long-standing environmental neglect and underinvestment in their communities. Vulnerable populations are particularly susceptible to illnesses such as **cancer and asthma**, which are linked to environmental hazards at the Former St. Joseph’s Hospital site. The site contains harmful substances, including **ACM and LBP**, both of which pose serious health threats. **ACM, in particular, presents an ongoing air quality concern for nearby residents.** The target area ranks in the **88th percentile for lead paint exposure, 82nd percentile for adult asthma, 86th percentile for low life expectancy, 63rd percentile for adult cancer, and 97th percentile for heart disease.**⁴ Garland County’s age-adjusted cancer incidence rate is **376 cases per 100,000 people (2017–2021)**, exceeding the national average of approximately **350 per 100,000** (census tract and city level health data not available).⁵ County level data shows the **adult asthma prevalence at 10%**, and Arkansas reports higher asthma hospitalization rates than the national average (US 8%).⁶

Cleanup of ACM and LBP will eliminate exposure pathways, reduce respiratory and neurological risks, and improve air quality. Post-demolition, the site’s transformation into the Arts Zone will promote wellness and community engagement, replacing a source of contamination with safe, accessible facilities. Incorporating energy-efficient design and weather-resilient landscaping will further strengthen public health outcomes and local resilience. Without EPA Brownfields Cleanup Grant funding, site contaminants will continue to worsen existing health conditions. By contrast, addressing these environmental hazards and advancing the revitalization process offers a transformative opportunity—one that can reshape the future of this distressed community and improve the lives of generations to come.

d. Economically Impoverished/Disproportionately Impacted Populations: The target area is home to populations that are both economically distressed and disproportionately burdened by environmental hazards. With extremely high poverty rates and low median household incomes, residents face barriers to economic mobility. Historically, this community has borne the negative environmental consequences of aging infrastructure and former **institutional and commercial operations**. The Former St. Joseph Hospital site exemplifies this pattern: once a cornerstone of health services, it now stands as a source of contamination and blight. Confirmed hazards such as **ACM and LBP** pose ongoing health threats, particularly for highly sensitive populations like children and the elderly. Environmental challenges rank the area in the **88th percentile for lead paint exposure and 82nd percentile for adult asthma**, underscoring the disproportionate impact on vulnerable populations.⁴

This grant will directly address these inequities by funding the cleanup of hazardous materials and enabling the site’s transformation into the Arts Zone, supporting residents who are most in need, including those from low-income families. The reuse strategy will create pathways to higher education, create employment opportunities, stimulate local economic activity, and restore a sense of safety and pride in a historically significant corridor. By replacing environmental hazards with a landmark center for creativity and learning, this project advances sustainable community

⁴ <https://ejamapi-84652557241.us-central1.run.app/report?fips=05051011500&buffer=0>

⁵ statecancerprofiles.cancer.gov/incidencrates/

⁶ www.cdc.gov/asthma/most_recent_data_states.htm



**City of Hot Springs, AR
FY2026 US EPA Brownfields Cleanup Grant**

revitalization and delivers lasting benefits for populations that have long been burdened by economic and environmental disparities.

Community Engagement. e. Project Involvement & f. Project Roles: Project partners will have meaningful input and will be involved in decisions on cleanup and reuse of the cleanup site.

Name of organization	Entity's mission	Point of contact	Specific involvement /assistance provided
Greater Hot Springs Chamber of Commerce	Advocate and champion for business in the community.	Gary Troutman, President/CEO gary.troutman@growinghotsprings.com	Assistance/Decision Making: future reuse planning and provide meeting space.
Downtown Association of Hot Springs 501(c)(6)	Dedicated to fostering collaboration among a diverse array of businesses, individuals, and organizations that share a common goal of enhancing the growth and prosperity of our vibrant downtown.	Ms. Alexis Hampo, President ahampo@hotsprings.org	Assistance/Decision Making: future reuse planning.
Park Avenue Community Association 501(c)(3)	Promote neighborhood unity, historic preservation, cultural diversity, and safety of persons and property in the Park Avenue area.	Dr. Cynthia S. Rogers, PACA Chair BOD, info@PACAHotSprings.org	Assistance/Decision Making: community outreach and education.
Low Key Arts 501(c)(3)	Connect people and inspire creativity by providing tools, education, and opportunities to experience musical, cinematic, and artistic innovators from around the world.	Sonny Kay, Executive Director, kay@lowkeyarts.org	Assistance/Decision Making: community outreach and education.
The Hot Springs Cultural Alliance (HSCA) 501(c)(3)	Celebrate, advocate, and promote the arts and culture of Hot Springs, Arkansas.	Whitney Bishop, Executive Director, whit@hotspringsarts.org	Assistance/Decision Making: community outreach and education.
Friends of Hot Springs National Park (FHSNP) 501(c)(3)	Dedicated to preservation and enhancement of Hot Springs National Park.	Roxanne Butterfield, President friendshsnp@gmail.com	Assistance/Decision Making: future reuse planning and community outreach and education.
Whittington Valley Neighborhood Association	To enhance the Whittington Valley neighborhood through resident initiatives and planning.	Mark Toth, President [REDACTED]	Assistance/Decision Making: community outreach and education.

g. Incorporating Community Input: The City informed the public of their intent to pursue an EPA Brownfields Cleanup Grant for the Former St. Joseph Hospital site at the City Council meeting held on August 12, 2025. The City understands working closely with community members is the key to implementing a successful Brownfield Program. A public meeting to fulfill the community notification requirements of the EPA Brownfields Cleanup Grant was publicized on December 19, 2025, and held on the evening of December 30, 2025, to solicit community feedback on the draft grant application and draft ABCA.

The City will cultivate productive and thought-provoking interactions between target-area residents and community organizations, as they are the most aware of where its most important needs lie. Upon receiving a grant award, the City will create a Community Involvement Plan (CIP) that will provide an event schedule, an outline of planned community engagement activities, a



project background, and a list of key players. The CIP will be made available for review at City Hall and on the City’s website and will ensure engagement with sensitive populations.

The City will perform community outreach through educational meetings, project partners, social/digital media, and local news and radio outlets. The Brownfield Project Team (BPT), made up of city staff, will solicit, review, and evaluate comments received from the community during quarterly meetings, record all community member suggestions and information in the minutes, and post them on the City’s brownfield webpage. The City will respond to comments received from the community during their next planned community meeting. Depending on the nature of the comment, the City may supplement its response with additional information on its program webpage.

The City’s CIP will incorporate several forms of media. Brownfield Program updates will be posted to the City’s Facebook page in addition to the City’s Brownfield Program webpage. The City will provide resident interaction via website and social media as a supplement to in-person community engagement. The City will disseminate Brownfield Project information through signage in government buildings, press releases, email blasts, and the local newspaper for those without access to the internet. Citizens and project partners will be updated during City Council meetings and community education meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The environmental assessments identified asbestos-containing materials (ACMs) in over 60 different materials and multiple lead paints and universal wastes throughout the building. The hazardous materials have been maintained and are generally in good to fair condition. The recommended cleanup approach is ACM and universal-waste removal pre-demolition with management of lead paints during demolition. The materials would be abated by licensed contractors with exposure controls and testing to ensure the community is not exposed during the cleanup activities. Once removed, hazardous building materials will be transported under manifest to a landfill that is permitted to accept asbestos and universal waste. This alternative would address exposure risks using a proven approach consistent with recognized industry and regulatory standards (e.g., Arkansas Regulations, National Emission Standards for Hazardous Air Pollutants, OSHA). This option remains comparably cost-effective under almost all abatement scenarios and building conditions. Asbestos and universal-waste removal does not require the need for subsequent inspections, maintenance, and/or regulatory oversight. This alternative addresses hazardous materials liabilities, potential contaminant sources, potential limitations to future land use, and brownfields redevelopment potential consistent with the City’s goals and re-use planning.

Description of Tasks/Activities and Outputs

Task 1: Outreach	
b.	<i>Project Implementation: EPA funded:</i> CIP, outreach materials, Brownfield (BF) webpage, and social media posts will be developed by the City’s BF Project Manager with assistance from the qualified environmental professional (QEP). City staff will lead the community/educational meetings discussing project plans and updates. <i>Supplies:</i> printing of outreach materials (brochures/handouts) and office supplies to manage the grant.
c.	<i>Anticipated Project Schedule:</i> CIP created in Q1. Community/educational meetings held Q2 in Y1–4. BF webpage and outreach materials created in Q1 and posted throughout the grant project.
d.	<i>Task/Activity Lead:</i> City: Brooke Bradley, Grants Accountant, BF Project Manager
e.	<i>Outputs:</i> CIP, BF webpage, 4 community/educational meetings, brochures/handouts, social media posts, summary of community meetings in EPA-required quarterly reports.
Task 2: Programmatic Support	
b.	<i>Project Implementation: Non-EPA funded:</i> Using its own funding, the City will procure a QEP to assist with the Brownfield (BF) Grant project. The City’s BF Project Finance Director will oversee grant implementation



**City of Hot Springs, AR
FY2026 US EPA Brownfields Cleanup Grant**

	and administration to ensure compliance with the EPA Cooperative Agreement work plan, schedule, and terms and conditions. EPA funded: The QEP will assist in completing ACRES database reporting, yearly financial reporting, quarterly reporting, and additional programmatic support for the four-year term of the grant. The travel budget allows for two staff to attend three BF training conferences/workshops.
c.	<i>Anticipated Project Schedule:</i> Procure QEP in Q1. ACRES & quarterly reporting begins in Q1 and continues throughout the grant. Annual reporting and forms created in Q5, Q9, Q13, and final closeout.
d.	<i>Task/Activity Lead:</i> City: Karen Scott, Finance Director, BF Project Finance Director
e.	<i>Outputs:</i> ACRES database reporting, 4 annual financial reports, 16 quarterly reports, programmatic support for the four-year grant period. Two staff to attend three conferences.
Task 3: Cleanup Planning	
b.	<i>Project Implementation: EPA funded:</i> The QEP will finalize the draft Analysis for Brownfield Cleanup Alternatives (ABCA) and/or Cleanup Plans, which include evaluating cleanup alternatives, calculating cleanup costs, and determining site-appropriate remediation and/or reuse planning to reduce health/environmental risks.
c.	<i>Anticipated Project Schedule:</i> Plans begin in Q4 and will continue throughout the grant.
d.	<i>Task/Activity Lead:</i> The QEP will implement the technical aspects of the project with oversight from the City: Lance Spicer, Deputy City Manager, BF Project Director.
e.	<i>Outputs:</i> 1 Finalized ABCA, 1 Abatement Specification, 1 Cleanup QAPP
Task 4: Cleanup & Oversight	
b.	<i>Project Implementation: EPA funded:</i> The City will work with the QEP as they manage the site cleanup activities, perform confirmation sampling, contractor oversight, cleanup reporting, and final remedial action report. The City and QEP will work with a remediation contractor as they perform site cleanup activities, including contractor mobilization/demobilization and cleanup implementation.
c.	<i>Anticipated Project Schedule:</i> Oversight will follow Cleanup schedule. Final remedial action report 09/2028. Cleanup implementation 09/2027–05/2028.
d.	<i>Task/Activity Lead:</i> The QEP will conduct cleanup oversight of the project. The remediation contractor will implement cleanup activities with oversight from QEP and City: Brooke Bradley, Grants Accountant, BF Program Manager.
e.	<i>Outputs:</i> 1 cleanup report, 1 final remedial action report, 1 site ready for reuse, 2 jobs for oversight, and 15 jobs for cleanup activities.

f. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.*

- The budget for this project includes travel, supplies, other (conference fees), construction, and contractual costs only.

- No administrative costs are included in the budget.

- Personnel pay rates average \$40 per hour and fringe rate 25%.

Task 1 Outreach: Personnel (\$40/hr): CIP \$400 (10 hrs); BF webpage, outreach brochure/handouts, social media posts \$400 (10 hrs); 4 community/educational meetings \$1,600 (10 hrs per meeting to include preparation and execution; \$400 each meeting). Fringe: \$600 (25% rate). Contractual: CIP \$3,060 (18 hrs × \$170); BF webpage, outreach brochure/handouts, social media posts \$2,040 (12 hrs × \$170); 4 community/educational meetings \$6,800 (\$1,700 per mtg.; 10 hours per meeting to include preparation and execution × \$170). Supplies: \$2,000 (\$1,000 [1,000 printouts at \$1 each]; \$900 [9 display board printouts at \$100 each]; pens, markers, paper \$100).

Task 2 Programmatic Support: Personnel (\$40/hr): \$4,000 (100 hrs). Fringe: \$1,000 (25% rate). Contractual: ACRES database reporting, yearly financial reporting, quarterly reporting \$20,400 (120 hrs × \$170). Travel: 2 staff to attend 3 conferences for a total of \$11,100 (flights at \$700, 3



**City of Hot Springs, AR
FY2026 US EPA Brownfields Cleanup Grant**

nights in hotel at \$250/night, incidentals and per diem at \$100 per day × 4 days × 2 staff × 3 events). Other: \$1,200 conference registration (\$200 per event per person)

Task 3 Cleanup Planning: Personnel (\$40/hr): report review \$240 (2 hrs/report; 3 reports). Fringe: \$60 (25% rate). Contractual: 1 final ABCA \$3,400 (20 hrs x \$170); 1 Cleanup QAPP \$5,100 (34 hrs x \$150). 1 Abatement Specification \$14,110 (83 hrs x \$170).

Task 4 Cleanup & Oversight: Personnel (\$40/hr): \$8,800 (220 hrs). Fringe: \$2,200 (25% rate). Construction: Mobilization/Setup \$13,000; Asbestos abatement \$467,000; Universal waste removal \$20,000; Lead management \$25,000; Hazardous waste disposal \$60,000. Contractual: Abatement oversight \$56,000 (40 shifts x \$1,400/shift); Per diem \$8,000 (40 days x \$200/day); Equipment rental \$16,000 (\$400/day x 40 days); laboratory analysis \$16,000 (400 samples x \$40/sample); Final Reporting \$14,000 (\$140/hour x 100 hours).

Category	Tasks				Totals
	Outreach	Programmatic Support	Cleanup Planning	Cleanup & Oversight	
Personnel	\$2,400	\$4,000	\$240	\$8,800	\$15,440
Fringe	\$600	\$1,000	\$60	\$2,200	\$3,860
Travel		\$11,100			\$11,100
Supplies	\$2,000				\$2,000
Contractual	\$11,900	\$20,400	\$22,610	\$110,000	\$164,910
Other		\$1,200			\$1,200
Construction				\$585,000	\$585,000
Total Budget	\$16,900	\$37,700	\$22,910	\$706,000	\$783,510

g. Plan to Measure and Evaluate Environmental Progress and Results: To ensure timely project completion, the City's internal Brownfield Team, including the QEP, will meet quarterly to track **outputs identified in 3.e.** and will record progress using Excel to track the scope of work, goals, and objectives. The City will submit quarterly and annual reports to the EPA. Project expenditures and activities will be monitored quarterly against the four-year timeline. Site-specific information will be recorded in the ACRES database. Key performance indicators/outputs, such as the number of neighborhood meetings, QAPP; ABCA; cleanup plan development; contractor procurement; quarterly, annual, and closeout reports will be tracked. Additionally, outcomes like community participation; acres assessed; acres made ready for reuse; redevelopment dollars leveraged; and jobs created will be monitored. To address potential project delays, the City/County has contingency plans in place, including monthly communication with the EPA Project Officer and the development of a Corrective Action Plan if necessary to ensure the project is completed on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability a. Organizational Structure & b. Description of Key Staff: The City of Hot Springs is governed by a City Manager form of government. The City has a long history of successful federal and state grant management and project experience. City staff will ensure all technical, administrative, and financial aspects of grant projects are executed efficiently and in full compliance with federal and state regulations. The Deputy City Manager, **Mr. Lance Spicer**, will serve as the **Brownfield Project Director**. Mr. Spicer has held this position since 2009 and currently manages over 150 staff across seven departments. He develops and oversees the City's \$20.5 million annual operating budget, administers three federal grant programs (FTA, FAA, and HUD), and manages state and federal legislative affairs. With his extensive experience in



City of Hot Springs, AR
FY2026 US EPA Brownfields Cleanup Grant

municipal operations and grant oversight, Mr. Spicer will direct activities for this project and ensure full compliance with all requirements. **Ms. Brooke Bradley**, who has worked as the Fixed Assets/Grants Accountant for the last three years, will be the **Brownfield Project Manager**. Ms. Bradley is responsible for project tracking, financial reporting, reimbursement and draw down submissions, and monthly reconciliation for all City grants. She also manages sales tax remittance to the state and oversees project tracking and reporting for capital projects citywide. Her expertise in grant accounting will ensure accurate financial management and reporting for this project. **Ms. Karen Scott**, who has worked as the City’s Finance Director for the past three years, will be the **Brownfield Finance Director**. With over 20 years of municipal and public agency CFO experience. Ms. Scott oversees all financial operations for the City, manages cash balances to include investment of funds, produces monthly financial statements, and works with departments and the City Manager to prepare the annual budget. She will be responsible for managing the use of the ASAP.gov draw down system. A qualified environmental professional (QEP) will be used to ensure technical and reporting aspects of the grant implementation are completed accurately.

c. Acquiring Additional Resources: The City will hire a qualified QEP to support the technical and reporting aspects of the Brownfield Cleanup Grant, adhering to EPA’s Professional Service procurement process and local contracting requirements. Throughout the project, additional resources or contractors will be acquired as needed.

Past Performance and Accomplishments. e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements: (1) Purpose and Accomplishments: The City has successfully managed multiple federal and state grants similar in scope and structure to the proposed Brownfields Grant. In 2019, the City was awarded \$600,000 from the Arkansas Department of Transportation – Recreation Trails Program Grant to create a southern trailhead for the Hot Springs Creek Greenway Trail and make a Tatum Street neighborhood connection. The project includes a restroom building, a twenty-six (26) space parking circle, an 80 ft. long pedestrian bridge, 5,076 sq. ft. of timber boardwalks, and asphalt and concrete trail sections. The trail sections connect to the existing Hot Springs Creek Greenway Trail and will also connect to the kayak launch, which gives access to Lake Hamilton. The trail system currently averages 218 users per day and is continuing to rise with the new expansion. The construction was finished and the grant closed out in October 2025. In 2022, the City was awarded the US Department of Transportation – FAA Airport Improvement Program Grant in the amount of \$605,549. Funding was used to perform a drainage study and construction that included drainage pipe removal and installation, drainage structure installation, and airport perimeter-fence removal and installation. The airport has averaged almost 5,500 passengers per year for their commercial air service to Dallas-Fort Worth alone. The airport averages over 15,800 landings/take-offs per year by a wide variety of aircraft, including single- and multi-engine planes, business jets, helicopters, and military aircraft. Construction was completed and the grant project successfully closed out in July 2025.

(2) Compliance with Grant Requirements: The City consistently adheres to grant work plans, timelines, terms, and conditions, and has a strong track record of submitting timely reports to all awarding agencies. All current grants are progressing on schedule, and the two grants mentioned above closed out on time, with no compliance issues and with all funds expended. Mr. Lance Spicer, together with the Brownfield Project Team, brings extensive project management expertise and will oversee all grant-related activities to ensure full compliance with financial reporting standards. Ms. Bradley is highly experienced in grant reporting and will be responsible for entering all project data into the ACRES system.



America's first Resort

City of Hot Springs, AR

**FY26 Brownfield Cleanup Grant
Threshold Criteria**



Threshold Criteria

1. Applicant Eligibility

- a. The City of Hot Springs, AR (City), is eligible to apply for the EPA Brownfields Cleanup Grant as a unit of local government as defined under 2 CFR § 200.1.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The City affirms the Former St. Joseph Hospital site, located at 100 Whittington Avenue, Hot Springs, Garland County, Arkansas, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City affirms it does not have an open Multipurpose Grant.

4. Site Ownership

The City is the current owner of the site (fee simple title), having acquired the property on August 12, 1992, recorded Warranty Deed File No. 1452390.

5. Basic Site Information

- a) Former St. Joseph Hospital
- b) 100 Whittington Avenue, Hot Springs, Arkansas 71901

6. Status and History of Contamination at the Site

- a) The Former St. Joseph Hospital is contaminated with hazardous substances.
- b) The site is located on an approximately 3.4-acre tract of land and contains the approximately 245,000 sq. ft. Former St. Joseph Hospital. The seven-story hospital was originally constructed in 1927, with additions in the 1970s and 1980s. The hospital remained in operation until 1991. The building was then used for storage, and a portion of the building was used by Arkansas School for Mathematics, Sciences, and the Arts (ASMSA) for dormitories, classrooms, and offices from 1993 to 2025. The building has been vacant since May 2025.
- c) Previous Phase I and Phase II Environmental Site Assessments (ESAs) have been completed for the site. Asbestos-containing materials (ACMs), lead-based paint (LBP), and universal wastes were identified at the Former St. Joseph Hospital.
- d) Materials that were used in the construction of the Former St. Joseph Hospital contain ACMs, LBP, and universal wastes. Sixty-four (64) homogenous materials have been identified as ACM and thirty-one (31) painted surfaces were identified as LBP. Universal wastes consisting of electrical equipment containing potential polychlorinated biphenyls (PCBs), mercury-containing fluorescent light bulbs, and heating and cooling systems with potential chlorofluorocarbons (CFCs) were identified.



7. Brownfield Site Definition

The City affirms the site is:

- a) NOT listed (or proposed for listing) on the National Priorities List (NPL);
- 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 US government.

8. Environmental Assessment Required for Cleanup Grant Applications

Multiple reports have been prepared for the site. The following are the primary reports containing the complete history and data for the site.

- Asbestos Survey: October 5, 1989 (report contained within Analysis of Existing Property Report, June 1992)
- Phase I ESA: September 19, 2024
- Asbestos, Lead-Containing Paint, and Hazardous Building Materials Inspection Report (Phase II equivalent report): July 28, 2025

9. Site Characterization

a. Not Applicable.

b. Not Applicable.

c. The site is contaminated with hazardous building materials and is not eligible for the state's voluntary response program: Elective Site Cleanup Agreement (ESCA).

i. A letter dated January 5, 2026 from the Arkansas Department of Environmental Quality (ADEQ) is attached explaining why the site is not eligible to be enrolled in its voluntary response program.

ii. Mr. Rand Raglin, an Environmental Professional (as defined in 40 CFR § 312.10) has reviewed all available environmental assessment reports and has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

The City affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the Former St. Joseph Hospital property at 100 Whittington Avenue, Hot Springs, Arkansas.

11. Sites Requiring a Property-Specific Determination

The City affirms that the Former St. Joseph Hospital property at 100 Whittington Avenue, Hot Springs, Arkansas does not require property-specific determination to be eligible for EPA Brownfield Grant funding.



12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

Not Applicable.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

(a) The City acquired the property by negotiated sale price from St. Joseph's Regional Health Center. Acquisition was approved by HS Ordinance No. 4240.

(b) The City acquired the property August 12, 1992.

(c) Hazardous substances are associated with the building materials used during the original construction and subsequent renovations prior to the City's acquisition, and therefore, disposal of hazardous substances occurred at the site before the City acquired the property.

(d) The City affirms that it has not caused or contributed to any release of hazardous substances at the site.

(e) The City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

Not Applicable.

Non-Publicly Owned Sites Acquired Prior to January 11, 2002

Not Applicable.



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

- (1) The City affirms that there have been no releases or threats of release of hazardous substances from building materials into the outdoor environment.

b. Property Ownership Eligibility – Petroleum Sites

Not Applicable.

13. Cleanup Authority and Oversight Structure

- a. The site is not currently, nor will it be enrolled in ADEQ’s ESCA due to the nature of contamination (asbestos and lead paint), as these contaminants are not addressed by the ESCA Program. The Arkansas Department of Health (ADH) oversees the Arkansas Lead-Based Paint-Hazard Regulation, which sets forth certification, licensing, and training requirements for those persons and firms who perform lead-based paint abatement activities and training in the state of Arkansas. EPA retains oversight authority over ADH’s Lead-Based Paint Program. The Arkansas Department of Environmental Quality Air Division – Asbestos Section is the cleanup authority for asbestos. Standard Notice of Intent (NOI) and a certified Project Design will be submitted in accordance with ADEQ Regulation 21 prior to commencement of field activities. US EPA will also be consulted to ensure that the asbestos cleanup is protective of human health and the environment.

The City will hire a qualified environmental professional prior to implementing abatement/remediation activities. The City will comply with competitive procurement provisions of 2 CFR 200.317 through 200.327 for contracting the qualified environmental professional. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup, ensuring the adherence to applicable state and federal regulations and requirements.

- b. The site is accessible from public roads. Based on the nature and location of the identified contamination on the subject property, it is not anticipated that neighboring property access is necessary for proposed cleanup/abatement activities.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

The City announced their intent for cleanup funding for the Former St. Joseph Hospital site located at 100 Whittington Avenue, Hot Springs, AR, and the proposed redevelopment on **August 12, 2025**. A draft ABCA for the site and a draft application were made available on December 19, 2025, at <https://www.hotspringsar.gov/CivicAlerts.aspx?AID=4417> and City Manager’s Office, 133 Convention Blvd, Hot Springs, AR 71901, for public review and comment. These draft ABCA summarizes information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.



b. Community Notification Ad

A community notification ad was published on **December 19, 2025**, in the Hot Springs *Sentinel Record* newspaper, a local newspaper. A copy of this grant application and a draft ABCA were made available for public review and comment at <https://www.hotspringsar.gov/CivicAlerts.aspx?AID=4417> and City Manager's Office, 133 Convention Blvd, Hot Springs, AR 71901.

c. Public Meeting

The draft application and ABCA were discussed during an in-person public meeting on **December 30, 2025, at 4:00 p.m.** Central Time at **City Hall – Board Chambers, 133 Convention Blvd, Hot Springs, AR 71901**. The City documented participant attendance at the meeting.

The following documents are included as an attachment to this application:

- the comments of the public comments received at the public meeting (no written comments were received);
- the city's response to those comments;
- meeting minutes of the public meeting; and
- meeting sign-in sheet.

d. Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the newspaper ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at least **14 days** before the application was submitted to the EPA.
- a copy of the meeting attendance sheet and meeting agenda.
- The City received one public comment during the public meeting. The commenter expressed his support for the redevelopment plans and asked for his association of which he is the president, Whittington Valley Neighborhood Association, be included in the application. The City responding by adding this association in the application as a community-based organization partner.

15. Contractors and Named Subrecipients

Not Applicable.



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

January 5, 2026

Electronic Mail Only

Lance Spicer, Deputy City Manager
City of Hot Springs
324 Malvern Avenue
Hot Springs National Park, AR 71901

RE: Federal Fiscal Year (FY) 2026 EPA Brownfields Cleanup Grant Application

Dear Mr. Spicer:

The Division of Environmental Quality Office of Land Resources (DEQ) acknowledges that the City of Hot Springs is applying for a FY26 Brownfields Cleanup Grant. The City of Hot Springs has developed an application requesting site-specific federal Brownfields Cleanup funding for the Old St. Joseph Hospital located at 100 Whittington Avenue, Hot Springs National Park, AR 71901.

Based on the information provided, DEQ has determined that the site is not eligible to be enrolled in the Arkansas Brownfield Program by the City of Hot Springs because the City is the current owner of the property. The Arkansas Voluntary Cleanup Act (Ark. Code Ann. § 8-7-1104) requires an applicant to be a prospective purchaser at the time of application to the Arkansas Brownfield Program. Additionally, the Arkansas Brownfield Program does not oversee cleanups of hazardous building materials unless DEQ is funding the cleanup or has funded Targeted Brownfield Assessments (TBAs) of the site.

Although the site is not eligible for the Arkansas Brownfield Program, it does meet the federal definition of a brownfield property. Remediation activities will be overseen by DEQ's Asbestos Program in the Office of Air Quality.

Please feel free to contact me at (501) 682-0616 or by email at addie.mcclain@arkansas.gov if further assistance is needed.

Sincerely,

A handwritten signature in blue ink that reads 'A. McClain'.

Addie McClain, Brownfield Program Coordinator
Division of Environmental Quality