

City of Mason City, Iowa Brownfields Cleanup Grant Application

B. Application Information Sheet:

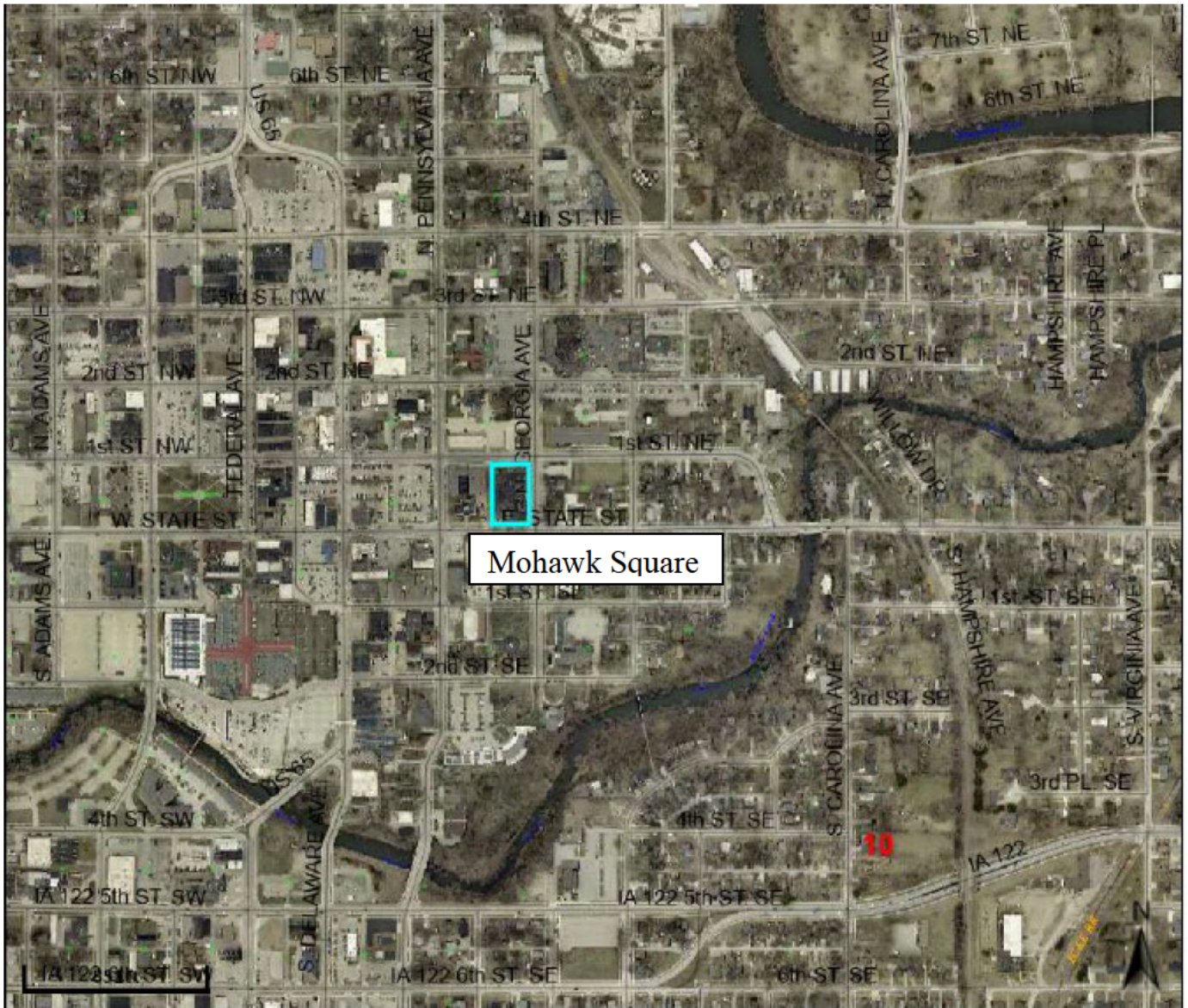
(1) Applicant Identification	City of Mason City 10 First Street NW Mason City, IA 50401	
(2) Website URL	https://www.masoncityiowa.gov/default.aspx	
(3) Funding Requested	a. Grant Type: Single Site Cleanup	
	b. Federal Funds Requested: \$1,515,600	
(4) Location	a. City: Mason City	
	b. County: Cerro Gordo	
	c. State: Iowa	
(5) Property Information	Mohawk Square 220 E. State Street Mason City, IA 50401	
(6) Contacts	a. Project Director	b. Highest Ranking Elected Official
	Aaron Burnett (641) 421-2701 aburnett@masoncity.net 10 First Street NW Mason City, IA 50401	John P. Lee, Mayor (641) 421-3600 mayor@masoncity.net 10 First Street NW Mason City, IA 50401
(7) Population	27,338 (2020 U.S. Census)	

8. Other Factors	Page #
Community Population is 15,000 or less	No
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	No
The proposed brownfield site(s) is impacted by mine-scarred land.	No
Secured firm leveraging commitment ties directly to the project and will facilitate completion of remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3 & Attachment 1
The proposed site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	No

The proposed site(s) is in a federally designated flood plain.	No
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resiliency to protect residents and community investment.	2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later or is closing).	No

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

Mohawk Square Location Map



(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 Mason City, known as the “The River City” based on Meredith Wilson’s “The Music Man,” in north central Iowa serves as the county seat of Cerro Gordo County. This city was settled in 1853 at the junction of Lime Creek (Winnebago River) and Willow Creek. Renowned architect Frank Lloyd Wright and his associates designed several structures within the community including the Stockman House, Park Inn Hotel, City National Bank, and the largest group of Prairie School style homes on a unified site, the Rock Crest and Rock Glen neighborhoods. John Dillinger, Baby Face Nelson, and their gang robbed the First National Bank of Mason City in 1934.

The establishment of the railroad in 1866 allowed the city to grow quickly, becoming a significant retail and manufacturing center in the Midwest. The lime, brick, and tile industry developed rapidly with the opening of the Northwest State Portland Cement Plant in 1906 and the Lehigh Portland Cement Company in 1910. At its height, Mason City was shipping the largest freight tonnage in the State of Iowa and producing more brick, tile, and Portland cement than any city in the world, with its nine brick companies. With the addition of the sugar beet and pork packing industries in the 1950s and 1960s, Mason City became the largest urban center between Des Moines and Minneapolis. However, change came with the onset of the 1970s with loss of businesses, jobs, and brownfield sites as a result. Economic hardship began with the loss of approximately 3,000 jobs (nearly 10% of the total city’s population) when several major industries closed. American Crystal Sugar closed its plant in 1973, followed by Armour in 1974, Iowa Beef Processors in 1977, and finally the brickyards in 1979. The 1980s ushered in another blow with the farm crisis that caused an economic crisis of epic proportions throughout the Midwest, furthering the mass population exodus with a 4 percent decline between 1980 to 1990. While still trying to recover from the previous decades, the city was dealt another blow in 2009 with the closure of the Holcim Cement Company (Northwestern State Portland Cement Plant), leaving 165 people without employment and a \$60 million deficit to the Iowa economy.

Mason City has a population is 27,135 according to the American Community Survey (ACS) 2023 5-year estimates. The economic downslide that began in 1970s resulted in decades of population decline (10% since 1970), concentrations of brownfields sites in the target area with over 600 facilities, according to Platform for Exploring Environment Records (PEER), and decreased property values. The target area of this cleanup project is the same as the city’s Community-Wide Assessment Grant which encompasses Cerro Gordo County Census Tracts 9503 and 9504.02. A brownfields inventory of the target area identified over 40 brownfields properties. The area is comprised of the city’s two prime commercial areas, Federal Avenue Corridor and the downtown, with Willow Creek the north/south halfway marker. The target area is comprised of 8,702 people and has a poverty rate as high as 17.1 percent, nearly double the city (10.6%) and county (11.7%) rates, according to the ACS 2023 5-year estimates. Past and current land uses within the target area include industrial, commercial, institutional, downtown mixed use, medical, office, and residential. Several adopted long-range planning documents including the *North Iowa Corridor Joint Comprehensive Plan 2024*, *Downtown Plan*, *South Federal Avenue Corridor Study*, and the *Willow Creek Master Plan* identify this area as a priority for redevelopment.

b. Description of the Proposed Brownfield Site: Mohawk Square is the proposed site for this cleanup application. Located at 220 East State Street, this 1-acre property is in a downtown fringe neighborhood that includes a vacant five-story building. The site was developed in 1918 as Mason City High School. Due to overcrowding from rapidly growing student population caused by the “baby boom” of 1946-1964 a new high school was constructed and opened in 1965. Following the original high school’s closure, the property housed the Mason City Junior College and then office space for the Cerro Gordo County Department of Public Health. Mohawk Square has remained vacant since a portion of its roof collapsed in May 2019 as a result of a severe storm and heavy rains. This unfortunate situation has exposed the property’s interior to natural elements and has generated extensive deterioration; an independent analysis completed by a structural engineering firm has confirmed significant structural weaknesses, pervasive mold, and widespread water damage. The same inspection concluded the

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building is not safe for human occupancy. Because the previous owner made no meaningful effort to repair or rehabilitate the property, the building continued to pose significant safety hazards, including the presence of dead animals, weakened structural components, and conditions unfit for human occupancy. In March of 2025, the City of Mason City filed a petition to have Mohawk Square declared an abandoned property and have the site legally transferred to the city through Iowa's 657A Abandoned and Unsafe Buildings framework.

The city utilized its current U.S. EPA Brownfields Community-Wide Assessment Grant to conduct Phase I and Phase II Environmental Site Assessments (ESAs) and a Supplemental Phase II ESA Asbestos Containing Materials Inspection (ACM). The Phase II ESA Evaluation of soil gas intrusion risk from near-source soil gas was conducted by utilizing the EPA's Vapor Intrusion Screening Level (VISL) calculator. A cancer risk was determined to be less than 1×10^{-4} , which represents an acceptable cumulative cancer risk for the residential and commercial exposure scenarios. The non-cancer hazard quotient was determined to be less than 0.1, which represents an acceptable cumulative non-cancer risk for the residential and commercial exposure scenarios. No Resource Conservation and Recovery Act (RCRA) metals constituents were detected at concentrations greater than IDNR Statewide Standard (SWS). Based on the laboratory results compared to the applicable regulatory standards and combined with the results of the IDNR Cumulative Risk Calculator, the detected soil concentrations represent a non-cancer risk to human health for site residents and site-workers. The Supplemental Phase II ESA ACM Survey identified approximately **110,380** square feet of floor and ceiling materials (tile, mastic, tar, and adhesives), **20** linear feet of pipe insulation, and **31** fixtures have some concentrations of ACM. It was determined that approximately 22,000 square feet of the property will require remediation via Regulated Asbestos Containing Material (RACM) demolition as a result of structural deficiencies associated with the roof collapse of 2019.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans: The cleanup and revitalization of Mohawk Square aligns with adopted city objectives as identified in, the 2024 North Iowa Corridor Joint Comprehensive Plan, and the 2023 Mason City Housing Initiative. Both plans identify improving housing options, opportunities, and affordability as a need with the community. Each plan is grounded in the commitment to protect public health and general welfare, and to support the development of neighborhoods that are safe, vibrant, and thriving. The removal of ACM from Mohawk Square removes a significant source of contamination and allows the site to be redeveloped. Stakeholder and public engagement efforts as part of the city's current Brownfields Community-Wide Assessment Area-Wide Brownfields Revitalization Plan has identified Mohawk Square as a prime site for residential redevelopment. Preliminary site plans call for a 100-unit multi-family complex to be constructed on the Mohawk Square site. The draft Area-Wide Brownfields Revitalization Plan will be available for additional public comment on the Mason City Brownfields website (www.masoncitybrownfields.com) in the Spring of 2026.

d. Outcomes and Benefits of Reuse Strategy: The remediation of ACM within the Mohawk Square building is a critical first step in the redevelopment process. The site is well positioned for new residential construction located just four blocks from Central Park, Mason City's downtown square. The Mason City Housing Initiative Study found that the lack of new units and prevalence of older housing stock in Mason City illustrates that the community has a housing shortage. Rental housing is a top challenge for attracting new workers and families to Mason City. There is a demand for 800 units with rent prices between \$1,000 to \$1,400 per month. The proposed 100-unit multi-family development is anticipated to cost approximately **\$10 million** to construct. According to projections from the National Home Builders, the development will create **125 jobs** and generate **\$5.5 million** in taxes and revenue for local, state, and federal governments.

New affordable housing at Mohawk Square strengthens community resilience by providing safer, modern housing that is better able to withstand extreme weather and reduce residents' exposure to hazard-prone areas. This development will include energy-efficient systems, helping households shelter safely and recover more quickly after disasters. By creating stable, accessible housing near services and employment, it will also reinforce social and economic stability, key factors in the community's ability to prepare for, respond to, and rebound from natural disasters. The city will encourage the developer to implement renewable energy, if feasible.

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Strategy for Leveraging Resources

e. Resources Needed for Site Characterization/f. Resources Needed for Site Remediation/g. Resources Needed for Site Reuse: The city of Mason City has a proven history of securing funding from governmental and private sources to help fill funding gaps for brownfields projects. Since 2017 the city has secured over \$40 million for improvements within the target area. The table below highlights resources that have been invested into the site and resources planned for the revitalization of Mohawk Square.

Resources Needed for Acquisition, Assessment, Remediation, and/or Site Redevelopment of Mohawk Square			
Resource	Phase	Status	Details
Local Funds	Acquisition	Completed	\$50,000 to acquire the building through 657A Abandoned or Unsafe Buildings
EPA Brownfields Assessment	Assessment	Completed	\$40,000 in assessment work completed on Mohawk Square from the city's \$500,000 assessment grant awarded.
IDNR Brownfields	Cleanup	Unsecured	Up to \$25,000 available for site remediation.
EPA Brownfields Cleanup	Remediation	Applying	\$1,515,600 to remove ACM from the site.
Iowa Economic Development Authority Brownfields/ Grayfields Tax Credit	Remediation	Unsecured	Up to \$1,000,000 in tax credits to clean up and redevelop the site.
Workforce Housing Tax Credits	Reuse	Unsecured	\$1,000,000 in tax credits for the rehabilitation and creation of workforce housing units.
Local Funds	Reuse	Secure	\$125,000 in city Capital Improvement Plan allocation towards cleanup and redevelopment activities. (Attachment 8 - Letter)
Local Funds	Reuse	Unsecure	10-year; 100% in tax abatement planned, based on similar previous projects, is expected.

Developers have expressed interest in converting the site into residential units. Once the cost-prohibitive remediation is complete, the local nonprofit Community Housing Initiatives (CHI) will partner with the city to advance redevelopment. CHI will take the lead in pursuing financing opportunities, including Low-Income Housing Tax Credits, HOME Partnership Program funds, and state and local housing trust funds.

h. Use of Existing Infrastructure: Public-private partnerships are not new to Mason City. Mohawk Square is an infill redevelopment project and prioritizes access to existing utilities (streets, sidewalks, water, sewer, electricity, gas, etc.). The city understands that upfront public investments are needed to stimulate change. Initial investments in the public realm can create conditions for economic growth that are otherwise unlikely to happen. The city has and will continue to utilize public investments in streets, water, sewers, parks, and civic facilities as tools to promote private development. While it is not anticipated that infrastructure improvements will be needed for the proposed reuse project, the city will continue its history of making public investments to stimulate economic development should the need arise during the redevelopment phase.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding: The City of Mason City has experienced several years of budget challenges, particularly from state policies that have decreased overall property revenue. The phase-out of the state's commercial property tax backfill, reduction in residential rollbacks, and the implementation of Iowa House File 718 New Property Tax Law continue to put pressure on the city's budget. While the city's strong fiscal management has put the city in a good financial position, the city is still facing economic hardships as a result of these state policies. Since fiscal year 2022, the city has experienced a deficit between revenues and expenditures

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averaging \$4.8 million annually. This is on top of Mason City's small (26,865 people) and declining population (-12% since 1960). Older housing, commercial, and industrial building stock further economic woes. These factors limit the city's ability to generate additional tax revenues and thus have limited the city's ability to clean up Mohawk Square without outside funding. U.S. EPA Brownfields Cleanup Grant funding will greatly assist the community by providing the necessary remediation funding that is stalling the redevelopment of Mohawk Square into needed affordable workforce housing.

b. Health or Welfare of Sensitive Populations: Sensitive populations living in the target area are comprised of children and seniors, representing 49.95 percent of the target area's population according to the U.S. Census. Minorities make up 18.39% of the sensitive population for the target area, which is higher than the city's rate of 13.84% (U.S. Census). There is a disproportionate population of low-income persons within the target area; the proportion is higher than the nation, state, and City by up to seven percentage points (U.S. Census). Another indicator of the hardships experienced in this area is the considerable number of households receiving food stamp assistance, which is double the nation, state, and City's rates (U.S. Census). The area's housing stock is older; over 80 percent of the structures were built before 1960 (U.S. Census). Those living in lower-income areas may be at a higher risk of accidental exposure to environmental contaminants due to older building stock and limited financial means. Sensitive populations in the target area are disproportionately impacted by exposure to asbestos contamination. This is shown in the above normal rates for low life expectancy (76.4 years), high incidence rate for cancer (516 per 100,000), and asthma (3.84 per 10,000 for hospitalizations), according to the Iowa Department of Health and Human Services. The pervasiveness of ACM within the Mohawk Square property is unfortunately adding to these public health outcomes.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: ACM poses a significant health risk when damaged or left to deteriorate. As detailed earlier in this application, the physical condition of Mohawk Square is rapidly declining. Prolonged exposure to natural elements will cause asbestos to become friable, thus putting residents of the nearby low-income neighborhoods at risk. Introducing asbestos fibers into the lungs is a known human carcinogen. Recent health studies indicate exposure to carcinogens in the area is higher in Cerro Gordo County than other counties in Iowa (see below).

- A University of Iowa study entitled *2025 Cancer in Iowa* includes Cerro Gordo County within its highest rates category at 325 cases of new cancer diagnosis per 100,000 people.
- The National Cancer Institute (NCI) lists Cerro Gordo County cancer incidence rate as 516 per 100,000 (twenty-first highest in the state), higher than both the U.S. (444.4) and Iowa (491.8).
- Cerro Gordo County was ranked 83rd out of Iowa's 99 counties in terms of health factors (1 best to 99 worst) by County Health Rankings, a Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute collaboration (smallest data set available). The rankings include factors such as high school graduation rates, obesity, smoking, unemployment, access to healthy foods, the quality of air and water, income inequality, and teen births. Potential exposure to numerous contaminants via direct contact, inhalation of airborne particulates, and vapor intrusion pathways negatively impact individuals within the target area.

In conclusion, the target area has a high prevalence of cancer, a low life expectancy rate (76.4 years) (Iowa Health and Human Service), and contains a considerable concentration of contaminated sites. The numerous brownfield sites, especially Mohawk Square, are likely adversely impacting nearby residents and the environment. The high cancer incidences make it critical for the city to protect the health of all residents, especially those living near brownfield sites, like Mohawk Square. Remediating contamination at Mohawk Square will reduce exposure to known carcinogens. Revitalizing the urban core will benefit the sensitive population through improved community health outcomes, and access to affordable workforce housing.

d. Economically Impoverished/Disproportionately Impacted Populations: The target area, according to U.S. HUD has a 27.58% low-income population and a low- and moderate-income population of 51.20%. Years of disinvestment have left the area with legacy pollution, resulting in elevated contaminant levels that pose health

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risks and create ongoing economic burdens for residents. The CDC’s Social Vulnerability Index identifies the target area as having a high social vulnerability, which refers to demographic and socioeconomic factors that contribute to a community having an increase adverse effect from public health emergencies and other external hazards that can cause injury and disease. According to EPA’s UST Finder, there are forty underground storage tanks (UST) facilities and there have been seventeen releases within 2,500 feet of Mohawk Square since 2018. This is in addition to the two superfund and two RCRA sites within 1.5 miles of Mohawk Square. The target area has a high lead exposure risk due to the number of homes built prior to 1950, according to the Iowa Department of Public Health. The cleanup and redevelopment of Mohawk Square will remove a contributing source of pollution exposure to the target area residents, while providing affordable workforce housing that will remove a source of blight.

Community Engagement

e. Project Involvement/f. Project Roles: Mason City has an established and active brownfields program that will promote the cleanup project and conduct community engagement opportunities. The table below provides a summary of the partner and the role they will play.

Mason City Brownfields Program Partners	
Iowa Department of Natural Resources	
Mission:	To conserve and enhance our natural resources in cooperation with individuals and organizations to improve the quality of life in Iowa and ensure a legacy for future generations.
Contact:	Mel Pins, Mel.pins@dnr.iowa.gov
Role:	Provide technical input on cleanup approach and additional grant funding if necessary.
North Iowa Corridor Economic Development	
Mission:	Foster growth and prosperity within the community by creating opportunities for everyone, from local entrepreneurs to major corporations.
Contact:	Shelley Oltmans, shelley@northiowacorridor.com
Role:	Ensure resident and business involvement while assisting with the dissemination of program information. Will work with the city to get the site redeveloped.
Cerro Gordo Public Health	
Mission:	Support healthy communities through prevention, promotion, and protection to achieve a safer and healthier tomorrow.
Contact:	Kara Vogelson, kvogelson@cghealth.com
Role:	Assist in answering health-related questions exposure to asbestos.
North Iowa Corridor Housing Development Corporation	
Mission:	Increase the supply of affordable housing.
Contact:	Chad Schreck, cschreck@northiowacorridor.com
Role:	Help promote community engagement and the redevelopment of the site into housing.
Mason City Chamber of Commerce	
Mission:	Promote progressive community and economic development to benefit Chamber members and the North Iowa region.
Contact:	Colleen Frein, cfrein@masoncityia.com
Role:	Assist with community engagement and site redevelopment efforts.
Main Street Mason City	
Mission:	Empowering our community’s growth, Main Street Mason City is dedicated to fostering vibrant local businesses, enriching cultural experiences, and creating a welcoming atmosphere for all. Together we strive to revitalize our historic district, nurture a thriving economy, and celebrate the essence of Mason City’s unique heritage.
Contact:	Lindsey James, director@mainstreetmasoncity.com

Role:	Promote community outreach meetings and encourage downtown property owners to offer input.
North Iowa Youth Center	
Mission:	We inspire young people to believe that change is possible and that they play an important role in achieving it. We mobilize youth to live a healthy lifestyle with spirit, mind, and body for all.
Contact:	Regan Banks, [REDACTED]
Role:	Assist with community engagement efforts, especially reaching sensitive populations within the target area.

g. Incorporating Community Input: Mason City recognizes that community engagement is a vital component of a successful brownfields program and is essential in building social strength and program stability. The city is committed to informing the community of cleanup activities and progress. This includes seeking input and buy-in for the public-private redevelopment of Mohawk Square. The development of a Community Input Plan (CIP) will guide the city’s community engagement efforts ensuring that citizens, elected officials, local non-elected public officials, and ancillary organizations are engaged and able to provide input on cleanup and redevelopment efforts. The city will build off previous community engagement efforts by hosting two open house events (in person and/or virtual) at varying times and locations (such at churches, libraries, schools, or city hall) to keep citizens interested and aware of the program’s progress, schedule, and proposed redevelopment. The city’s brownfields program partners will help promote the program and disseminate information through in person interactions and their organization’s social media. The city will work to keep interested citizens updated on the progress, findings, next steps, and a place to submit input through its brownfields program website (www.masoncitybrownfields.com). Annual program updates will be provided to the City Council, which is another opportunity for the public to provide comments. A brochure regarding the cleanup of Mohawk Square will be developed and will provide information on the site’s history and known contamination, project milestones, timeline, potential redevelopment, and how to provide input. Any new project technical reports, like the Analysis of Brownfields Cleanup Alternatives (ABCA), or the cleanup report, will be added to the city’s brownfields repository of reports available for public review at city hall.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The City of Mason City will competitively procure the services of a Qualified Environmental Professional (QEP) and a remediation contractor(s) in accordance with 2 CFR §§ 200.317 through 200.327 and 40 CFR Part 261. The QEP will assist city staff in overseeing the response action of this project. The city will require the QEP to have the necessary qualifications and certifications (asbestos inspector and asbestos contractor/supervisor) to handle the cleanup of Mohawk Square. Asbestos was detected in 35 of the 293 samples analyzed from the property.

Asbestos was detected in 35 of the 293 samples analyzed from the property. The following table details building materials that tested positive for asbestos and shows the estimated amounts of each material present in the property.

Mohawk Square ACM Material & Quantities			
Material	Quantities	Material	Quantities
Floor Tile, Adhesive, & Mastic	6,500 square feet	Pipe Insulation	20 linear feet
Ceiling Tile Puck Adhesive	102,000 square feet	Sink Insulation	6 total
Ceiling Texture	800 square feet	Light Fixture Insulation	25 total
Roof Tar	1,000 square feet	Mudded Elbow	23 total
Wall Adhesive	20 square feet		

Chrysotile asbestos concentrations range from <0.25 percent to 70 percent. Abatement of all ACM (110,380 square feet, 20 linear feet, and 31 fixtures) are identified in the ABCA, which is an integral part of cleanup activities and follows State and Federal regulations. This project will develop a comprehensive project design manual for remediation of all ACMs present at the property. The document will define the expectations of the

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city, requirements of the work, scope of the project, and will inform the bidding process for selecting a qualified contractor. Abatement of asbestos shall be performed only by a properly trained, licensed, and insured contractor. The cleanup contractor must be aware and adhere to 40 CFR Part 61, Subpart M and 40 CFR Part 261. Abatement of the interior ACMs will occur within containment under negative air pressure and containment associated with friable materials will include a three-cell decontamination unit with a shower. Following completion of asbestos abatement, the QEP will complete a visual clearance to ensure asbestos materials have been removed. Once the visual clearance has passed, the QEP will then collect air clearance samples as documentation the containment was thoroughly cleaned and is safe for reentry. ACM will only be disposed of at a regulated landfill that accepts asbestos waste. When selecting a cleanup contractor, the city will focus on qualifications and cost. This process will evaluate previous work experience, skills in a similar work environment, length of service history, and business or company stability, along with cost. This cleanup will be planned in rigorous detail.

Description of Task/Activities and Outputs

Task 1: Cooperative Agreement Oversight	
b. Project Implementation	<p><u>EPA Funded Activities:</u> EPA cooperative agreement (CA) execution, compliance, and oversight. EPA Funded Activities: Solicitation, selection, and contracting of QEP using EPA acceptable procedures. •Reporting: Quarterly progress and ASAP account management; ACRES; Annual disadvantaged business enterprise and federal financial report; Final cleanup and closeout reports •Travel and attendance at National Brownfields conference •Coordination with state and federal agencies.</p> <p><u>Non-EPA Funded Activities:</u> Workplan</p>
c. Anticipated Project Schedule:	<p>Quarters 1 – 16: The solicitation and selection of the QEP will be completed within the first quarter following the execution of the CA. Quarterly and annual reports will be submitted within 30 days of the end of the quarter/year. •ACRES updated at the same time as quarterly report submittal. •Final reports submitted when cleanup is complete. •Conference attended during the 4-year grant term.</p>
d. Task Lead:	<p>City Administrator (CA), Deputy City Administrator & Finance Director (DCAFD) and Grant Administrator (GA)</p>
e. Outputs:	<p>•Executed CA •QEP Procurement & Selection •Quarterly, Annual, and Final Reporting •ASAP Account Management •Attendance at National Brownfields Conference</p>
Task 2: Community Engagement	
b. Project Implementation:	<p><u>EPA Funded Activities:</u> This task involves conducting community engagement activities to inform the public about cleanup plans, implementation, and redevelopment of Mohawk Square while providing opportunities for the public to provide feedback. Emphasis will be on the target area. Activities include outreach events, updating the city's brownfields website, and creating a project brochure. An Administrative Record of all relevant cleanup documents will be posted and made available to the public.</p> <p><u>Non-EPA Funded Activities:</u> None</p>
c. Anticipated Project Schedule:	<p>Quarters 1-16: Website – Quarter 1; CIP – Quarter 1; Brochure – Quarter 2; Open House Events – Quarters 3, 8; City Council Updates – Quarters 4, 8, 12, 16</p>
d. Task Lead:	<p>CA, GA, and Development Services Director (DSD)</p>

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e. Outputs:	•CIP •Project Brochure •Update Brownfields Website •Open House Event (2) •Annual City Council Updates •Attendance at National Brownfields Conference
Task 3: Cleanup Planning	
b. Project Implementation:	<u>EPA Funded Activities:</u> Prior to site remediation work, the QEP will prepare a Site-Specific Quality Assurance Project Plan (SSQAPP) including the Health & Safety Plan (HASP), NHPA/Section 106 compliance, finalize the ABCA (a draft has been presented to public as part of the application process), develop Cleanup Plans and Bid Specs, and conduct the bidding process. <u>Non-EPA Funded Activities:</u> None
c. Anticipated Project Schedule:	This task will begin after a QEP has been selected and is anticipated to be completed by the end of quarter 4.
d. Task Lead:	CA, GA, and DSD
e. Outputs:	•Final ABCA •Site-specific QAPP •HASP •NHPA/Section 106 compliance •Cleanup plan •Technical specifications for site cleanup •Bid specifications •On-site pre-bid meeting •Bid results/tabulation •Remediation contract •Permits
Task 4: Cleanup Activities	
b. Project Implementation:	<u>EPA Funded Activities:</u> This task includes the cleanup work and monitoring of ACM remediation, post-remediation confirmation sampling, and regulatory compliance <u>Non-EPA Funded Activities:</u> None
c. Anticipated Project Schedule:	Quarters 5 – 16
d. Task Lead:	CA, GA, and DSD
e. Outputs:	•Pre-construction meeting •Davis Bacon records •Remediation of contamination •Monitoring for Regulatory Compliance/confirmation sampling •Post removal action cleanup report

f. Cost Estimates:

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel ¹	\$6,000	\$7,000	\$5,000	\$7,000	\$25,000
	Fringe Benefits ²	\$1,700	\$2,000	\$1,300	\$2,000	\$7,000
	Travel ³	\$2,500	\$2,500	-	-	\$5,000
	Equipment ⁴	-	-	-	-	-
	Supplies ⁵	-	\$1,200	\$1,300	-	\$2,500
	Contractual (QEP) ⁶	\$19,150	\$12,300	\$30,000	\$188,550	\$250,000
	Contractual (Remediation) ⁷	-	-	-	\$1,225,450	\$1,225,450
	Construction ⁸	-	-	-	-	-
	Other ⁹	\$650	-	-	-	\$650.00
Total Direct Costs		\$30,000	\$25,000	\$37,600	\$1,423,000	\$1,515,600
Indirect Costs		-	-	-	-	-
Total Budget		\$30,000	\$25,000	\$37,600	\$1,423,000	\$1,515,600
Budget Explanations						

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¹Personnel: CA has an hourly wage of \$114.38; DCAFD has an hourly wage of \$85.56; GA has an hourly wage of \$30.53; DSD has an hourly wage of \$66.31 for an average hourly rate of \$74.20. It anticipated that staff would spend 337 hours on the project for a total of \$25,005.40 (round down to \$25,000)

²Fringe Benefits: CA has an hourly fringe benefit wage of \$27.96; DCAFD has an hourly fringe benefit wage of \$23.03; GA has an hourly fringe benefit wage of \$13.63; DSD has an hourly fringe rate of 19.31 for an average hourly rate of \$20.98. With 337 hours planned the total fringe benefits equal \$7,070.26 (round down to \$7,000).

³Travel: (to attend EPA Brownfields Conference/Training): Airfare - \$1,500 (2 people x 750 each); Mileage to airport - \$175 (266 miles x 0.70 per mile (round down)); Airport Parking - \$125 (5 days x \$25); Hotel - \$2,400 (2 rooms x \$300 per night for 4 nights); Meals - \$800 (round down) (based on the federal per diem rate of \$92 per day and \$69 on the first and last days of travel for 5 days for two people) (Total: \$5,000)

⁴Equipment: None budgeted for this project.

⁵Supplies: Includes the purchase of a computer for city staff to manage the program.

⁶Contractual (QEP costs): Reporting/Cooperative Agreement Requirements: \$19,150 (153 hours x \$125 per hour = \$19,150 (round up)); Community Engagement: \$12,300 (98 hours x 125 per hour (round up)); Cleanup Planning (final ABCA, NEPA/Section 106, project specifications, health and safety plan; and cleanup bidding): \$30,000 (240 hours x \$125 per hour); Cleanup Monitoring (on-site cleanup monitoring, air monitoring, final inspection, Davis Bacon, Post-Removal Action Cleanup Report, and lab analysis for sampling: \$73,400 (1,509 hours x \$125 = \$188,550 (round down)) (costs determined by an average hourly rate of \$125 from QEPs in the state).

⁷Contractual (Cleanup): An asbestos abatement contractor provided a remediation rate range of \$7.00 to \$10.00 a square foot (110,380 sf) for regular ACM removal and \$15.00 to \$20 a square foot (22,000 sf) for RACM. Based on these numbers the remediation of Mohawk Square is estimated to cost \$1,225,450.

⁸Construction: None budgeted for this project

⁹Other: Registration for National Brownfields Conference \$325 x 2 = \$650

g. Plans to Measure and Evaluate Environmental Progress and Results: Mason City will develop a project tracker to monitor the status of outputs and anticipated short- and long-term outcomes to allow for easy project monitoring and reporting to EPA (quarterly, annual, and grant closeout reports) and into ACRES. Quarterly reports will list accomplishments and planned activities for the next quarter. Project tracking will include: (1) community input/relations plan; (2) number attendees at community open house events; (3) number of comments/inputs submitted via the brownfield’s website; (4) number of attendees/inputs received during city council meeting updates; (5) number of acres cleaned up; (6) amount of ACM removed; and (7) number of jobs created. As necessary, the city will refine the project schedule/milestones as part of the Cooperative Agreement (CA) Work Plan to ensure all activities are completed within the four-year period of performance. The city will continue to update ACRES as progress is made on the site.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

Organizational Structure/b. Description of Key Staff: The City of Mason City has the necessary processes, procedures, and systems in place to ensure successful completion of all technical, administrative, and financial components of the grant. Mason City has a proven record of successfully achieving project objectives, reporting, implementing programmatic requirements of both state and federal grant programs. This includes managing grant funds from EPA, Department of Justice, Department of Homeland Security, and Department of Transportation. Mason City operates under the mayor-council form of government with daily operations overseen by the city administrator. Policy-making and legislative authorities are vested in a mayor and six council members. The City Council is responsible for passing ordinances and resolutions. The City Administrator is accountable to oversee the day-to-day management of the city and that City services are delivered and provided to the citizens efficiently and effectively. The finance department administers the city’s finances, information technology coordinator, geographic information system analyst and maintains the city’s financial records, which includes monthly records of receipts, expenditure, and account receivable billings as well as payments to vendors. The finance department

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has received 22 Certificate of Achievement for Excellent in Financial Reporting and four Distinguished Budget Presentation Awards. The Development Services Department is responsible for implementing the vision for the community's overall growth and development as found in the Comprehensive Plan and further defined by the city's Zoning and Subdivision Ordinance.

With over a decade of city administration experience, including grant management, *Mr. Aaron Burnett, City Administrator*, will serve as the Project Manager and is responsible for overseeing the grant. Mr. Burnett began his service with the city of Mason City in 2018. As the first administrator for the city of Keokuk, Iowa, he established a strong culture of professional city management within the City and received the Iowa City Manager of the Year award for 2017. Additionally, Mr. Burnett was recognized by the International City/County Management Association with the designation of Credentialed Manager. He is a graduate of the University of Iowa and has a Master of Public Administration from the University of Nebraska at Omaha. The City's *Deputy City Administrator and Finance Director, Brent Hinson* has worked in city government for over 20 years, serving the cities of Iowa Falls, Garner, Washington, and Mason City. Mr. Hinson is an ICMA Credentialed Manager and holds a Master of Public Administration from Drake University. He will provide a supporting role in fiscal management of the grant. The *Director of Development Services, Steven Van Steenhuyse*, AICP, has been with the city since 2012, after eight years consulting. Mr. Van Steenhuyse will support Mr. Burnett with project management, city permitting, monitoring, and reporting. The City's *Grant Administrator Rachel VanHauen* holds a Bachelor of Arts from the University of Northern Iowa with an emphasis on non-profit management. Ms. VanHauen will support Mr. Burnett with project management and grant reporting activities. She remains up to date on grant and project management through courses, including the Community Development Block Grant and the Department of Justices' Grant Financial Management Training. Each staff member is actively engaged in managing the city's current EPA Brownfields CA.

c. Acquiring Additional Resources: The city will prepare a Request for Proposals/Qualifications to procure a QEP. The city will focus on securing the services of a firm experienced in performing environmental cleanups and familiar with program requirements. The city envisions its role will include providing overall management of the QEP's work, implementing public involvement, and assuming responsibility for the fiscal management of the program (draw requests, quarterly reports). In addition, the city will issue a Request for Proposals and hire a qualified environmental remediation firm to assist with the cleanup of Mohawk Square. All hiring for this program will follow federal, state, and local procurement policies. The city will also require that all firms have adequate experience and hold the appropriate state certifications/licenses to work on projects involving hazardous materials. Mason City will utilize Iowa's Targeted Small Business (TSB) Program and the Iowa Department of Transportation Disadvantaged Business Enterprise (DBE) Program to promote project work to women, individuals with minority status, service-disabled veterans, and individuals with disabilities.

Past Performance and Accomplishments

d. Currently Has EPA Brownfield Grant: (1) Accomplishments/(2) Compliance with Grant Requirements: *The \$500,000 Community-Wide Grant (start date of October 1, 2023)* awarded was to conduct 15 Phase I and 8 Phase II ESAs, 3 supplemental ACM/lead-based paint inspections, 4 site specific cleanup plans and community engagement and revitalization planning. The city is beginning year three of the four-year grant and is on track to meet or exceed workplan milestones/tasks. The city is on track to meet or exceed all milestone outputs. To date the program has completed 12 Phase I and 3 Phase II ESAs and one site cleanup plan. The city has achieved great redevelopment success from this program including a new 36-unit apartment complex that includes an anticipated \$5 million taxable valuation, assessment of the former mall positioned the largely vacant property for a city-led entertainment, conference center, and mixed-used redevelopment, and a 45-unit affordable senior living development with an estimated \$15 million construction investment. The city has held four out of the five required public meetings/open house events/presentations and is underway with revitalization planning. All programmatic requirements have been met, including, but not limited to, the required quarterly reports, annual MBE/WBE and financial reports, and ACRES reporting.

B. Threshold Criteria

(1) Applicant Eligibility:

a) The City of Mason City is an incorporated municipality in the State of Iowa and is eligible for funding. (See Attachment)

b) The City of Mason City is exempt from Federal taxation. The City of Mason City is not a 501(c)(4) of the IRC entity and does not lobby the Federal government.



(2) Previously Awarded Cleanup Grants:

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

The City of Mason City affirms that the proposed site (Mohawk Square at 220 East State Street) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

(3) Expenditure of Existing Multipurpose Grant Funds:

The City of Mason City, Iowa affirms it does not have an open EPA Brownfields Multipurpose Grant.

(4) Site Ownership:

The City of Mason City acquired the property, through 657A of the Iowa Code, on March 27, 2025. The city will retain ownership throughout the period of the grant. (See Attachment 2)

(5) Basic Site Information (See Attachment 3):

- a) Site Name: Mohawk Square
- b) Address: 220 E State Street
Mason City, IA 50401

(6) Status and History of Contamination at the Site:

a) Hazardous Substances or Petroleum: The Site is contaminated by **hazardous substances**. Asbestos containing materials (ACM) have been identified in building materials throughout the Site. (Attachment 5a Draft ABCA)



b) Operational History and Current Uses: The site was developed in 1918 as Mason City High School. Due to overcrowding from rapidly growing student population caused by the “baby boom” of 1946-1964 a new high school was constructed and opened in 1965. Following the original high school’s closure, the property housed the Mason City Junior College and then office space for the Cerro Gordo County Department of Public Health. Mohawk Square has remained vacant since a portion of its roof collapsed in May 2019 because of a severe storm and heavy rains.

c) Environmental Concerns: The Site has documented ACM within and throughout the building. The ACM requires abatement prior to redevelopment.

d) How Site Became Contaminated & Source, Nature, and Extent of Contamination:

The site became contaminated through standard building materials (asbestos containing materials) that were popular during the time the site was constructed. An asbestos inspection report was completed November 11, 2025, and found that building materials used at the time Mohawk Square was constructed are the source of Site contamination. The asbestos inspection collected 293 samples throughout the building and revealed the presence of asbestos above one percent in 35 samples. Positive building materials include floor tiles, adhesive, and mastic, ceiling tile puck adhesive, ceiling texture, roof tar, wall adhesive, pipe insulation, sink insulation, light fixture insulation, and mudded elbows. The widespread use of ACM across the Site hinders future redevelopment plans.



(7) Brownfields Site Definition:

The City of Mason City affirms the site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

(8) Environmental Assessment Required for Cleanup Grant Applications:

An Asbestos Survey report was completed by Eocene Environmental Group (Eocene) on November 11, 2025. The purpose of the ACM Inspections was to identify and sample all suspected building materials located on the Site.

Asbestos was detected in 35 of the 293 samples analyzed from the November 2025 report submitted to the City by Eocene include:

Mohawk Square ACM Material & Quantities			
Material	Quantities	Material	Quantities
Floor Tile, Adhesive, & Mastic	6,500 square feet	Pipe Insulation	20 linear feet
Ceiling Tile Puck Adhesive	102,000 square feet	Sink Insulation	6 total
Ceiling Texture	800 square feet	Light Fixture Insulation	25 total
Roof Tar	1,000 square feet	Mudded Elbow	23 total
Wall Adhesive	20 square feet		

All building materials similar in appearance, color, and/or texture to those determined to contain asbestos are assumed to contain asbestos throughout this building.

ACMs must be removed by a certified asbestos-abatement contractor using full containment procedures, with all asbestos waste properly handled and disposed of in accordance with regulatory requirements.

The asbestos containing materials inspection containing the documented locations and estimated amounts are included in Appendix B of the inspection report (Draft ABCA is in Attachment 5a).

(9) Site Characterization

a) Not applicable

b) Not applicable

c) While the Iowa Department of Natural Resources (IDNR) does not enroll asbestos containing building materials within structures into the Land Recycling Program (Iowa's Voluntary Response Program), the program oversight will be through compliance with the Federal National Emission Standards for Hazard Air Pollutants (NESHAP) and supporting regulations for oversight of asbestos abatement through NESHAP.

- i. Iowa Department of Natural Resources Letter (Attachment 4)
- ii. It is the opinion of Jon Reis, an Environmental Professional (as defined in 40 CFR § 312.10), that based on review of the previously completed asbestos inspections, there is sufficient level of Site characterization to date for the remediation work to begin on the Site.



(10) Enforcement or Other Actions:

The city is unaware of any ongoing or anticipated environmental enforcement or other actions related to this Site. The city has been in close coordination with IDNR, the agency which would lead and be aware of such enforcement actions.

(11) Sites Requiring a Property-Specific Determination:

The City of Mason City affirms that the Site does not require a "Property-Specific Determination" from the EPA to be eligible for Grant Funding.

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

a) Property Ownership Eligibility – Hazardous Substance Sites:

i. Exemptions to CERCLA Liability:

(1) Not applicable

(2) Not applicable

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

(a) The City of Mason City Iowa acquired ownership of the Site through Iowa Code 657A Abandoned or Unsafe Buildings.

This allows for a city in which a building that has been abandoned for at least six consecutive months to petition the court to enter judgement awarding title to the abandoned property to the City. The city was awarded title on March 27, 2025. The Site had been abandoned since 2019.



(b) March 27, 2025, is the date in which the City acquired the property.

(c) The City of Mason City affirms that the disposal of hazardous substances at the Site occurred before the City acquired the property.

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

(e) The City of Mason 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.

ii. Not applicable

iii. Not applicable

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

b) Property Ownership Eligibility – Petroleum Sites
Not applicable

(13) Cleanup Authority and Oversight Structure:

a) Oversight: The city does not plan to enroll the Site into the Iowa DNR’s Land Recycling Program, or any other state response program. The city will hire, through a competitive bid procurement process, a qualified environmental professional to oversee the cleanup process. A qualified cleanup contractor will be hired through a competitive bid process to remove and dispose of asbestos containing materials. The contractors will be responsible for performance of cleanup activities, complying with all applicable local, State and Federal laws, and will provide full documentation and reporting on all removal activities. The City of Mason City will comply with competitive procurement provisions of 2 CFR 200.317 through 300.326 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b) Access: The City has ample access to all areas of the Site necessary for cleanup and does not anticipate impacting adjacent properties.

(14) Community Notification (Attachment 5):

a) Draft Analysis of Brownfield Cleanup Alternatives: The City prepared a Draft Analysis of Brownfields Cleanup Alternatives which met the stated criteria and provided it to the public for comment. The Draft ABCA was completed on December 31, 2025.

b) Community Notification Ad: The city published a community notification ad in the local newspaper (*Globe Gazette*) on December 31, 2025 (Attachment 5). The community notification identified: (1) a copy of the draft application and draft ABCA were available for public review and comment; (2) how to comment on the draft application; (3) where the draft application was located for review; and (4) the date, time, and location of the public meeting.

c) Public Meeting: The city held a public meeting as advertised, on January 8, 2026.

d) Submission of Community Notification Documents (Attachment 5):

- Attachment 5a: Draft ABCA
- Attachment 5b: Community Notification Ad
- Attachment 5c: Public Meeting Summary
- Attachment 5d: Public Comments
- Attachment 5e: Meeting Sign-in Sheet

(15) Contractors and Named Subrecipients:

- **Contractors:** The city will acquire additional technical expertise and resources through the service of a qualified EPA brownfield experienced QEP, subject to a competitive selection process. The QEP will assist with project management, community engagement, cleanup planning, and Site cleanup activities. The city has implemented this resource acquisition process successfully on previous brownfield grants resulting in the achievement of all cooperative agreement objectives. The city has a significant history collaborating closely with the executive officer of the Iowa Department of Natural Resources Brownfield Redevelopment Program (Mel Pins) to provide technical expertise and advice. All contracts for this program will be completed and consistent with applicable and competitive Procurement Standards in 40 CFR Parts 30 or 31 and will include guidance to attract and utilize minority- and women-owned businesses, as possible.
- **Named Subrecipients:** The City of Mason City does not plan to utilize any subrecipients with these grant funds.

Attachments:

1. Applicant Eligibility
2. Community Notification Ad
3. Public Comments & Meeting Summary
4. Response to Comments
5. Meeting Sign-In Sheet
6. Site Ownership
7. IDNR Letter
8. Leveraged Funds Documentation
9. Draft ABCA

