



**RE: FY2026 EPA Brownfield Cleanup Grant Application**

THA, Inc. is pleased to submit this proposal for Fiscal Year (FY) 2026 Brownfield Cleanup Grant funding. Below we provide the information requested.

<b>1. Applicant Identification</b>	<b>THA, Inc.</b> 2010 Southeast (SE) California Avenue (Ave) Topeka, KS 66607	
<b>2. Website URL</b>	<a href="https://www.thainc.org/">https://www.thainc.org/</a>	
<b>3. Funding Requested</b>	<b>(a) Grant Type:</b> Single Site Cleanup <b>(b) Federal Funds Requested:</b> \$673,935	
<b>4. Location</b>	<b>(a) City:</b> City of Topeka <b>(b) County:</b> Shawnee County <b>(c) State or Reservation:</b> State of Kansas	
<b>5. Property Information</b>	<b>Property Name:</b> Former Van Buren School <b>Property Address:</b> 1601 Southwest (SW) Van Buren Street (St) Topeka, Shawnee County, Kansas 66612 Parcel Identification Numbers: 133-06-0-20-28-016.00-0 & 133-06-0-20-28-001.00-0	
<b>6. Contacts</b>	<b>Project Director</b>	<b>Chief Executive/Highest Ranking Elected Official</b>
Name:	Trey George - Executive Director of THA, Inc.	Trey George - Executive Director of THA, Inc.
Phone:	(785) 286-7277	(785) 286-7277
Email:	<a href="mailto:tgeorge@tha.gov">tgeorge@tha.gov</a>	<a href="mailto:tgeorge@tha.gov">tgeorge@tha.gov</a>
Mailing Address:	2010 SE California Ave. Topeka, KS 66607	2010 SE California Ave. Topeka, KS 66607
<b>7. Population (2020)*</b>	<b>Population of the City of Topeka Jurisdiction: 126,103</b> * Census estimated population, between 2018-2023, <a href="http://www.policymap.com">www.policymap.com</a> , downloaded on 12/30/2025.	

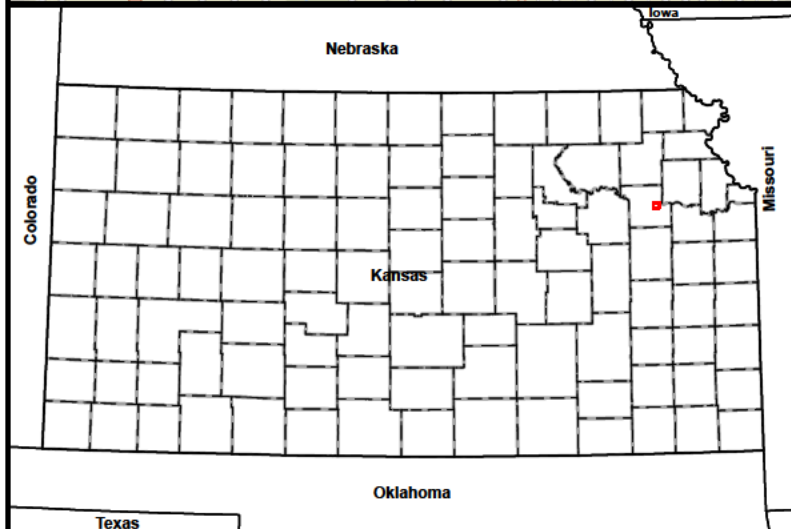
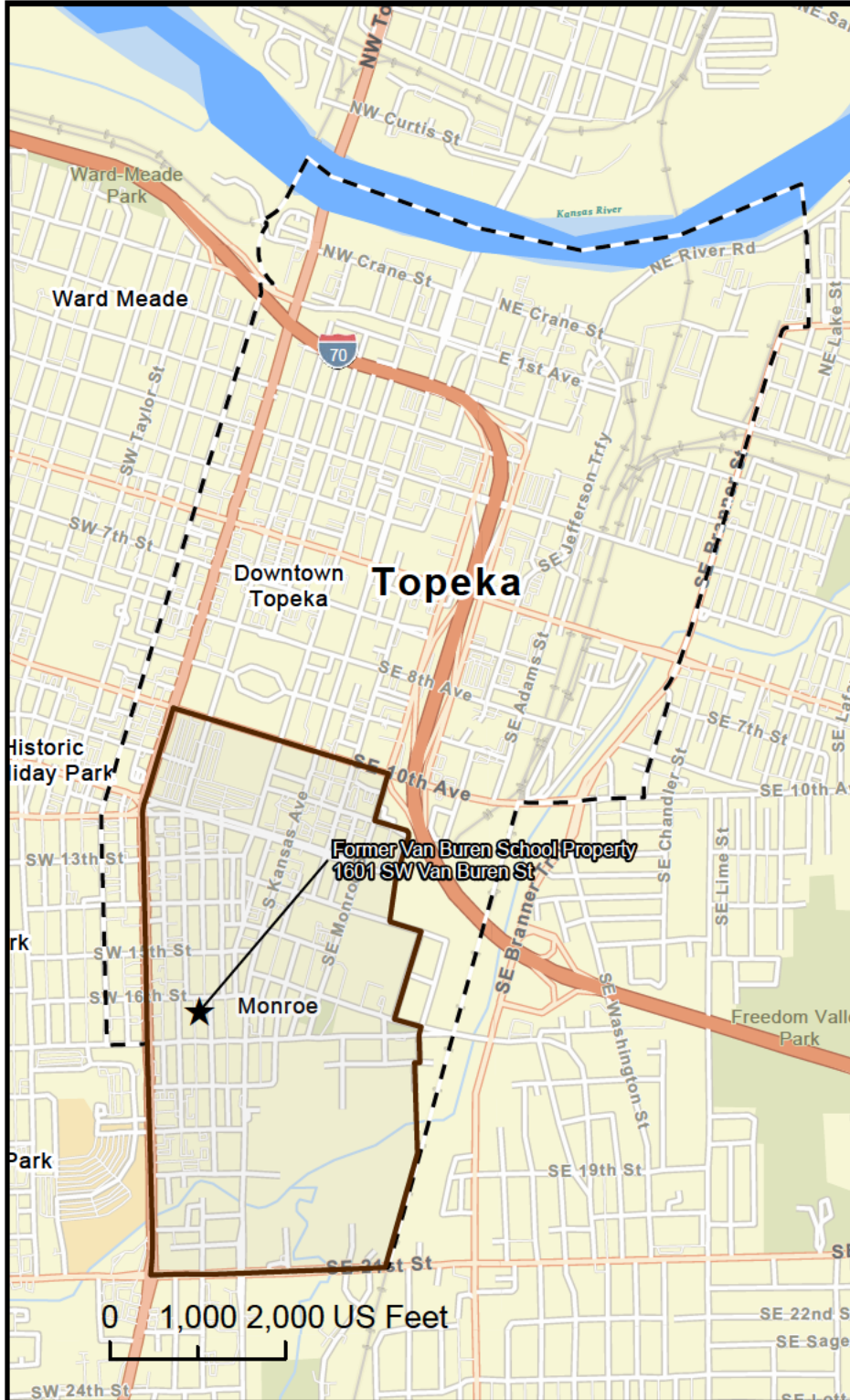


# THA, Inc.

2010 SE California Ave. Topeka, KS 66607 ■ 785-357-8842 ■ Fax: 785-357-2648

8. Other Factors	Page #
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield 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.	Page 3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	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.	Page 3
The reuse of the proposed site(s) will incorporate energy efficiency measures.	Page 3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Page 2
The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.	N/A

**9. Releasing Copies of Applications:** The application does not contain confidential, privileged, or sensitive information.



**Legend**

- Census Tract 20177004000 Boundary
- Monroe Neighborhood Boundary/Target Area
- Parcel Boundary
- Proposed Brownfield Boundary
- Proposed Brownfield Site

**Proposed Grant Implementation Area**



## **1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**

**Target Area & Brownfields: 1.a. Overview of Brownfield Challenges & Description of Target Area:** The City of Topeka (the City) is the capital of Kansas (KS; the State) and is home to the Brown v. Board of Education National Historic Site, which preserves the legacy of this transformative 1954 Supreme Court decision.<sup>1</sup> The City is in northeast portion of the State on the banks of the Kansas River (population 126,103)<sup>2</sup>. Settlers began passing through the area in the 1840s when a ferry crossing was established on the Kansas River on an eastern segment of the Oregon Trail.<sup>3</sup> The first permanent settlement was created in 1854.<sup>3</sup> Although the City has been a center of government since its founding, manufacturing and other industry and commerce have played a significant role in the local economy throughout its history. The peak of manufacturing employment in the City occurred in 1980 (coinciding with the approximate peak of manufacturing employment in the United States [US]).<sup>4</sup> The number of manufacturing workers declined by 25% between 1980 and 2000.<sup>5</sup> Additionally, in 1974, Forbes Air Force Base closed and more than 10,000 people left Topeka, influencing the City's growth patterns for years.<sup>6</sup> Although industry has provided many benefits to area residents and their communities, it also produced an undesirable legacy of old and obsolete brownfield sites adjacent to and within residential neighborhoods such as the Monroe Neighborhood (geographic area/Target Area [TA] of this application), with higher percentages of low income, elderly/children in poverty, and other socially or economically disadvantaged residents (see Section 2a; Table 2).

The **Monroe Neighborhood (Target Area/geographic area)**, located in the City, is bordered by Southwest (SW) 10th Avenue (Ave) to the north, 21st Street (St) to the south, SW Topeka Boulevard (Blvd) to the west, Interstate 70 to the northeast, and the Burlington Northern-Santa Fe Railroad tracks and Shunganunga Creek to the east. This area encompasses approximately 263 total acres. The neighborhood is located in Census Tract (CT) 20177004000 (CT 40), a **Persistent Poverty Tract**, which is indicative of 20 percent or more of its population living in poverty over the past 30 years.<sup>7</sup> Following the Monroe Neighborhood settlement, the area remained stable until a deadly 1966 F5 tornado outbreak hit the neighborhood and caused one of the most-costly tornado disasters in US history resulting in nearly \$2.3-billion in damages (in 2023 dollars).<sup>8,9</sup> The tornado cut a 22 mile long path and up to a half a mile wide along an 8 block portion of the Monroe Neighborhood. The Monroe Neighborhood has decreased substantially in population in recent decades. Between the periods of 2010 through 2020, CT 40 experienced a 16.6% decrease in population.<sup>10</sup> Much of the former residential areas have been razed, particularly within the northern section of the neighborhood. These areas now lie mostly vacant or have been converted to surface parking lots. The southern portion of the neighborhood consists primarily of open space, a large industrial area occupied by the City, and an asphalt batch plant. According to the *2025-2027 Neighborhood Revitalization Plan*, this area is primarily located within the “intensive care” census block groups of the City’s Neighborhood Health Map which indicate areas with serious distressed conditions that need immediate attention and intervention due to health, poverty, public safety, and property value risk.<sup>11</sup> This much needed grant will allow **THA, Inc.**, a 501(c)(3) nonprofit development entity for the Topeka Housing Authority, to conduct cleanup of the “**Former Van Buren School Property**” which is located on two of 10 vacant parcels slated for a planned affordable housing infill redevelopment. This grant and overall project will help address the preponderance of vacant parcels and non-residential land uses in the Monroe Neighborhood and advance revitalization efforts.

**1.b. Description of the Proposed Brownfield Site(s):** The “**Former Van Buren School Property**” (the proposed brownfield site; the Site) is located in the heart of the Monroe Neighborhood at the corner of SW 16<sup>th</sup> and SW Van Buren Streets (1601 SW Van Buren St). The 0.92-acre Site consists of one 11,262 square foot (SF) two-story former school building with a 5,655 SF basement and one single-story 768 SF storage and office use building. The school was built in 1910, operated until 1964, and thereafter served several purposes including an audiovisual center for the Topeka Unified School District 501, storage for the Kansas State Archives, and lastly housing the Kansas Surplus Exchange (a Kansas non-profit clearinghouse for charitable organizations, recycling surplus equipment, and supplies).<sup>12,13</sup> The buildings have been vacant since 2003 and are in extremely poor condition.

<sup>1</sup> <https://www.nps.gov/articles/brownvboard.htm>, accessed on 1/6/2026.

<sup>2</sup> [www.policymap.com](http://www.policymap.com), American Community Survey, Estimated population, between 2019-2023, accessed on 12/29/2025.

<sup>3</sup> <https://www.legendsofamerica.com/topeka-kansas/>, accessed on 1/6/2026.

<sup>4</sup> <https://www.bls.gov/opub/mlr/2016/article/current-employment-statistics-survey-100-years-of-employment-hours-and-earnings.htm>, accessed on 1/6/2026.

<sup>5</sup> <https://www.bls.gov/opub/mlr/2018/beyond-bls/the-fall-of-employment-in-the-manufacturing-sector.htm>, accessed on 1/6/2026.

<sup>6</sup> <https://worldpopulationreview.com/us-cities/kansas/topeka>, accessed on 1/6/2026.

<sup>7</sup> [Policymap.com](http://www.policymap.com), Concentrated persistent poverty, as of 2019, accessed on 1/27/2026.

<sup>8</sup> <https://www.weather.gov/top/1966TopekaTornado>, accessed on 1/6/2026.

<sup>9</sup> [https://www.spc.noaa.gov/faq/tornado/damage\\$.htm](https://www.spc.noaa.gov/faq/tornado/damage$.htm), accessed on 1/6/2026.

<sup>10</sup> <https://www.arcgis.com/apps/instant/sidebar/index.html?appid=b6cf315a28aa4089873ee3442d4a2597>, accessed on 1/6/2026.

<sup>11</sup> [https://topeka.gov/how\\_do\\_i/programs-services/neighborhood-revitalization/index.php](https://topeka.gov/how_do_i/programs-services/neighborhood-revitalization/index.php) 1/20/2026

<sup>12</sup> THA Inc. to continue affordable housing development plans without Van Buren School, December 20, 2023, <https://tinyurl.com/AffordH>, accessed 12/29/25.

<sup>13</sup> <https://abandonedks.com/van-buren-school/>, accessed on 1/21/26.

In 2013, a City administrative order found that structure(s) were unfit for human use for habitation.<sup>14</sup> Due to the age of the buildings, asbestos sampling was conducted in 2014 where asbestos-containing material (ACM) was confirmed in floor tiles, boiler insulation, cement board, felt paper, and roof flashing mastic.<sup>15</sup> A lead-based paint (LBP) survey was completed in 2017 where LBP was present on the exterior walls, door/window components, vents, plaster/tile walls and ceilings, cement base trim, chair rails, and pipes.<sup>16</sup> According to a structural assessment completed in 2016 and almost ten more years of deterioration, the structural integrity of the buildings' interior is compromised due to water damage and weathering, and the ubiquitous presence of severely weathered LBP, ACMs, and universal wastes; that are comingled with collapsed roofing/building materials.<sup>17</sup> Finally, an additional fire occurred on December 2, 2023, where the Topeka fire department responded several times due to reignition of the fire.<sup>18</sup> The fire department described the building as "extremely hazardous" as the interior has collapsed and is "incredibly difficult (for us) to put out safely." As a result, the roof, floors and select wall components have collapsed into the basement and additional burnt debris are comingled with the building materials. The building is currently boarded and the property is fenced to restrict access. Therefore, the focus for the grant application and the funding if awarded will be solely on proper disposal of comingled hazardous building materials.

**Revitalization of the Target Area: 1.c. Reuse Strategy & Alignment with Revitalization Plans:** The City acquired the *Former Van Buren School Property* (two lots) and 8 additional vacant lots near South Kansas Avenue and Southwest 16<sup>th</sup> Street, funded by donations, City capital improvement funds, and block grant funding. The City subsequently donated the lots to THA, Inc. for the development of affordable infill housing (Van Buren Homes). Van Buren Homes is a proposed 20-to-24-unit rental housing project to be occupied by the senior population located in Topeka. The project will be built in duplex design and consists of up to 10 single-story one and two-bedroom duplex rental units (ten buildings) along with a 600 SF Property Management Office. All units will be American with Disabilities Act (ADA) accessible and include a single car-attached garage, garage door opener, storm shelter, washer, dryer, range, refrigerator, dishwasher, garbage disposal and microwave. Lawn care, snow removal, and trash will be provided and paid for by the project. The units will be leased to households whose incomes are 60% or less of the area median income (AMI) and 30% of the units will be targeted for tenants at or below 40% AMI.

As described in 1.a., the project is consistent with the *2025-2027 Neighborhood Revitalization Plan*<sup>13</sup> and will help address the preponderance of vacant parcels and non-residential land uses, which presents a constraint to developing a critical mass of population that can thrive as an urban community, support commercial services, and provide much-needed property tax revenue to the City. The project will also further the *Land Use and Growth Management 2040*<sup>19</sup> plan, which stresses the need for compact urban density with a sense of place, walkability, diversity, and transportation choices to attract residents. The *Topeka Bikeways Plan and Updates*<sup>20</sup> and *Pedestrian Master Plan*<sup>21</sup> provides for extension of existing pedestrian trails with linkage to other areas of the city (Landon Nature Trail, Schunga Trail, and Soldiers Creek Trail) which will be available to area residents. The Topeka Metropolitan Transit Authority provides bus and paratransit service to seniors in the site area and works with other organizations to meet mass transit needs. The above recent plans are an extension of work initiated and completed by the City, Topeka-Shawnee County Metropolitan Planning Department, and Monroe Neighborhood Improvement Association (NIA), who began land use and revitalization planning in the Monroe Neighborhood beginning in 2003. The plans include elements that support the US Department of Housing and Urban Development (HUD)-Department of Transportation-United States Environmental Protection Agency (EPA) Livability Principles with the intention of creating a resilient, sustainable, livable, and revitalized community. The project partners described in Section 2.e.-2.f. have participated in land acquisition and planning, and will further assist in project implementation, per the plans and vision for the area.

**1.d. Outcomes & Benefits of Reuse Strategy:** The proper disposal of the comingled hazardous building materials of the *Former Van Buren School Property* buildings will remove an ongoing environmental and public safety and health risk for the neighborhood. Removal of hazardous building materials will provide resilience to the impacts of extreme weather events and natural disasters in the future by reducing the potential for mobilization of hazardous building materials throughout the neighborhood during these events and providing for the construction of new buildings free of hazardous building materials. This work will also facilitate reuse/infill of the abandoned property and provide much needed affordable senior housing for members of the Topeka community<sup>22</sup>.

<sup>14</sup> Administrative Hearing Order, City of Topeka, Case #: 2013-H-00052, RE: 1601 SW Van Buren St (school), August 8, 2013, accessed on 1/20/2026.

<sup>15</sup> Asbestos Inspection Report & Roof Sampling Report, Former School, 1601 SW Van Buren, Advanced Environmental Testing and Abatement, Inc., January 14 & February 18, 2014, accessed 1/26/2026.

<sup>16</sup> Notice of Lead Based Paint Inspection, HERNY Environmental, Inc., October 10, 2017, accessed on 1/26/2026.

<sup>17</sup> Stabilization Assessment, Van Buren School Building, Topeka, Kansas, Project #HP16.027.00B, TreanorHL, December 30, 2016, accessed on 1/26/2026.

<sup>18</sup> 'Extremely Hazardous': Firefighters battle smoke, fire at abandoned school in central Topeka, December 2, 2023, accessed 12/29/2025, <https://tinyurl.com/FireAtSchool>

<sup>19</sup> Land Use & Growth Management Plan, <https://tinyurl.com/LandGrowth2040>, accessed on 1/26/2026.

<sup>20</sup> <https://topekampo.org/bikeways-master-plan/>, accessed on 1/26/2026.

<sup>21</sup> <https://topekampo.org/pedestrian-master-plan/>, accessed on 1/26/2026.

<sup>22</sup> <https://tinyurl.com/EconBenLeis.>, accessed on 1/21/26.



Affordable housing increases disposable income by residents since they can direct more of their income toward other spending such as dining out, shopping, and other leisure activities; thereby stimulating economic development within the TA/Monroe Neighborhood. New construction on the site will allow for use of renewable solar energy and other energy efficient measures afforded by new construction techniques and energy efficient systems such as incorporation of energy efficient appliances, windows, etc. thereby decreasing emissions and improving air quality<sup>23</sup>. Providing low-income senior housing in the area will also benefit residents who can utilize existing bus and paratransit services, as well as the bike and pedestrian trail system and area parks.

**Strategy for Leveraging Resources: 1.e.-1.g. Resources Needed for Site Characterization, Remediation, and Reuse:**

The Van Buren Homes project will be funded with Low Income Housing Tax Credits (LIHTC) and Conventional Bank Permanent Loans. The City, who initially acquired the property and donated it to THA, Inc. will also provide the project with a property tax rebate over ten years to offset/reduce the LIHTC ask for the project. Midwest Housing Equity Group through MHEG Fund L.P. will be the primary investor in the project. The approximate total project cost is \$5,750,000. The use of a fiscal year (FY)2026 Cleanup Grant will further support the financial viability of the project. The amount requested for the FY2026 Cleanup Grant should be sufficient to complete the remediation of the Former Van Buren School Property. The financial sources and strategy for redevelopment have a **high likelihood of success** as the approach has been completed on similar low-income housing projects by THA, Inc. in the City<sup>24</sup>.

Further detail of resources needed for Site Characterization, Remediation, and Reuse are described below with documentation of secured resources, commitment letters, etc. provided in Attachment A.

Table 1: Name of Resource	Is the Resource for (1.e) Assessment, (1.f) Remediation, or (1.g) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
City of Topeka FY2025 EPA Brownfield Assessment Grant	Assessment and Remediation Planning (ABCA report)	Secured (see Cooperative Agreement in Attachment A)	Includes Hazardous Building Materials assessment, if needed.
KDHE Targeted Brownfield Assessment (TBA) Program	Assessment and Remediation (ABCA report)	Eligible, Unsecured	Includes Hazardous Building Materials assessment, if needed.
EPA TBA Program	Assessment and Remediation (ABCA report)	Eligible, Unsecured	Includes Hazardous Building Materials assessment, if needed.
The City of Topeka property tax rebate	Reuse	Pending, Eligible, Unsecured	Over 10 years to offset LIHTC
Kansas Housing Resource Corporation Low Income Housing Tax Credits (LIHTC)	Reuse	Pending, Eligible, Unsecured <b>Expected July 31, 2026</b>	15-year tax credit compliance period.
Midwest Housing Equity Group through MHEG Fund L.P.	Reuse	Pending, Eligible, Unsecured <b>(See loan commitment letters in Attachment A)</b>	Investing Member
Private Funds and Donations	Assessment, Remediation and Reuse	Eligible, Unsecured	Will be utilized as applicable/available;

Notes: KDHE = Kansas Department of Health and Environment; ABCA = Analysis of Brownfield Cleanup Alternatives

**1.h. Use of Existing Infrastructure:** The Former Van Buren School Property and Monroe Neighborhood represent one of the oldest developed communities in the City and one that is serviced by an established road network as well as municipal water, wastewater, and storm water systems, electricity (3-phase, etc.), natural gas, and other infrastructure, which will enhance sustainability, resiliency, and reduce redevelopment costs. If the need for infrastructure improvements arises, the funding methods described in 1.e.-1.g. can be leveraged.

**2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: Community Need: 2.a. The Community’s Need for Funding:**

The proposed brownfield site and Target Area are disproportionately affected with the inability to draw on other funding sources to carry out environmental remediation and subsequent reuse, which impacts their ability to subsequently reuse underutilized critical spaces within the Target Area due to low-income prevalence. The Target Area suffers from higher-than-normal rates of **unemployment, lower per capita income, and poverty** compared to the City, Shawnee County (the County), KS, and the US (Table 2). The per capita income is almost half of the US average and the poverty rate is almost double the US rate (Table 2).

<sup>23</sup> “Quantifying the Comprehensive Greenhouse Gas Co-Benefits of Green Buildings”, <https://escholarship.org/uc/item/935461rm>, accessed 1/21/26.

<sup>24</sup> <https://www.thainc.org/>, accessed on 1/26/2026.



Additional select demographic data is provided below showing critical need:

<b>Table 2: Demographic Indicators<sup>1</sup></b>	<b>CT 20177004000</b>	<b>City</b>	<b>County</b>	<b>KS</b>	<b>US</b>
Estimated Population	2,131	126,103	178,315	2,937,569	332,387,540
Unemployment <sup>2</sup>	<b>8.43%</b>	<b>4.91%</b>	4.16%	3.91%	5.2%
Estimated per capita income	<b>\$22,104</b>	<b>\$33,290</b>	<b>\$37,072</b>	\$39,638	\$43,289
Poverty rate <sup>3</sup>	<b>20.7%</b>	<b>15.56%</b>	12.37%	11.52%	12.44%
Median family income <sup>4</sup>	<b>\$60,938</b>	<b>\$76,734</b>	<b>\$88,932</b>	\$93,497	\$96,922
Children in Poverty <sup>5</sup>	<b>36%</b>	<b>18.01%</b>	14.42%	13.7%	16.32%
Median home value <sup>6</sup>	<b>\$37,000</b>	<b>\$130,600</b>	<b>\$170,400</b>	\$203,400	\$303,400
Subsidized Housing with Disabilities <sup>7</sup>	<b>67%</b>	<b>35%</b>	35%	28%	24%
65+ Poverty <sup>8</sup>	<b>11.43%</b>	<b>12.38%</b>	9.14%	8.5%	10.36%

Notes: **Bold font** designates where the Site has greater levels of distress or greater percentages than the City of Topeka. Underlined font designates where the Site has greater levels of distress than Shawnee County. **Red font** designates where the Site has greater levels of distress than the state of Kansas. **Shading** designates where the Site has greater levels of distress or greater percentages of sensitive population groups than the US. N/A = insufficient data (1) All data were downloaded from www.PolicyMap.com and are 2019-2023 5-Year Estimates from the ACS downloaded on 12/29/2025. (2) Estimated percent of people age 16 years or older who were unemployed (3) Estimated percent of all people that are living in poverty (4) Estimated median income of a family (5) Estimated percent of all people under 18 years who live in poverty (6) Estimated median value of an owner-occupied home (7) Percent of population in subsidized housing that live in a household where a person has a disability (8) Estimated percent of all people 65 or older who live in poverty.

For all criteria in Table 2, clear disparities in low income/poverty conditions are evident when comparing the Target Area CT to the City, County, State, and US. The Target Area is located in a **Persistent Poverty Tract**, which is indicative of 20 percent or more of its population living in poverty over the past 30 years.<sup>25</sup> Award of a FY2026 grant to THA, Inc. will provide critical supplemental services, which include remediation of the contamination on the proposed brownfield site to reduce blight and health threats as well as increase affordable housing for the community, promote health life choices, increase the tax base, and overall improved welfare in the Target Area. The grant will be essential to provide initial sources of funding (seed money) for redevelopment that is not available from other funding sources.

**2.b. Health or Welfare of Sensitive Populations:**

<b>Table 3: Sensitive Populations<sup>1</sup></b>	<b>CT 20177004000</b>	<b>City</b>	<b>County</b>	<b>KS</b>	<b>US</b>
Disabled <sup>2</sup>	<b>25.34%</b>	<b>16.4%</b>	14.76%	13.45%	13.04%
People 65-74 <sup>3</sup>	<b>16.71%</b>	10.19%	11.31%	9.83%	10.02%
Children with a disability <sup>4</sup>	<b>18%</b>	<b>5.47%</b>	5.17%	4.86%	4.69%
Children <sup>5</sup>	3.22%	22.86%	23.65%	24.48%	22.47%
Renters Housing Burdened <sup>6</sup>	<b>27.48%</b>	<b>21.29%</b>	20.86%	19.04%	23.59%
Housing Vacancy <sup>7</sup>	<b>30.34%</b>	<b>9.45%</b>	7.86%	9.69%	10.43%
Housing built before 1980 <sup>8</sup>	<b>93.7%</b>	<b>69.62%</b>	64.49%	56.6%	50.5%

Notes: **Bold font** designates where the Site has greater levels of distress or greater percentages than the City of Topeka. Underlined font designates where the Site has greater levels of distress than Shawnee County. **Red font** designates where the Site has greater levels of distress than the state of Kansas. **Shading** designates where the Site has greater levels of distress or greater percentages of sensitive population groups than the US. (1) All data were downloaded from www.PolicyMap.com and are 2019-23 5-Year Estimates from the ACS downloaded on 12/29/2025 (2) Estimated percent of people with one or more disabilities (3) Estimated percent of all people age 65-74 (4) Estimated percent of people under 18 years with one or more disabilities (5) Estimated percent of all civilian noninstitutionalized population under 18 years (6) Estimated percent of all renters who are severely cost burdened (7) Estimated percent of housing units that were vacant (8) Estimated percent of all housing units built in 1979 or before.

The proposed brownfield site Target Area has higher percentages of sensitive populations in economic stress (Table 2; Section 2.a) compared to the City, County, State, and/or the US which compounds the severity of their welfare and/or health issues. For example, **elderly poverty** surpasses the City, County, State, and US rates in the TA and **subsidized housing utilized by those with a disability** is almost **3x the US rate**. **Children in poverty >2x the US rate** yet children only constitute 3.22% of the population in the TA.<sup>26</sup> Finally, the County has a higher incidence of **food insecure children** (as of 2023; 19.7%) compared to the rest of the State (18.4%)<sup>27</sup> and US (17.9%).<sup>28</sup> The Target Area is located in the Neighborhood Revitalization Area (NRA) of the City, of which the area has a substantial number of deteriorated or **deteriorating structures**: 63% of all secured and unsafe structures (*A secured structure is one of the most evident physical displays that will undermine confidence in an area for investment and precipitates a downward spiral for the block and/or neighborhood*) in the City are located within the NRA boundary yet only constitute 27.5% of all housing units in the city.<sup>29</sup>

<sup>25</sup> Concentrated persistent poverty, as of 2019, policymap.com, accessed on 1/25/2026.  
<sup>26</sup> Estimated percent of all civilian noninstitutionalized population under 18 years, policymap.com, accessed on 1/25/2026.  
<sup>27</sup> Percent of children (under 18) who are food insecure in 2023, policymap.com, accessed on 1/25/2026.  
<sup>28</sup> USDA, "Household Food Security in the United States in 2023", September 2024, pg. 9, accessed on 1/25/2026.  
<sup>29</sup> Topeka Planning Department, Neighborhood Revitalization Plan, 2025-2027, effective January 1, 2025, accessed on 1/25/2026.



The Target Area has a **housing unit vacancy** rate of 30.34%, which is almost 3x the US rate. The Target Area is also located within the “Intensive Care” area of the NRA where seriously distressed conditions needing immediate attention and intervention has been established, including up to 35 crimes reported within the last two years per 100 persons.<sup>31</sup> A US Department of Justice study indicates blocks with unsecured buildings have three times the number of drug calls and twice the incidence of reported theft as blocks with occupied property.<sup>30</sup> The blighted nature of the proposed brownfield site is a public welfare concern amplified by its **proximity to residential neighborhoods** and these sensitive populations. Reuse after remediation also eliminates vagrants and criminals from using the buildings and vacant sites, thus increasing neighborhood safety, further stabilizing, and revitalizing these neighborhoods. As seen on Table 3, almost 100% (93.7%) of the housing in all the Target Area were built pre-1980, increasing the potential for lead exposure to the (sensitive) child/elderly poverty population. Research has found that children from low income families, have higher proportions of detectable and elevated blood lead levels and these levels increase as the degree of poverty increases.<sup>31</sup> The projected site reuse will not only reduce/remediate the proposed brownfield site, but also reduce these threats that are currently plaguing these sensitive populations.

**2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions:** Based on data available from the Centers for Disease Control (CDC), the **death rate for chronic obstructive pulmonary disease (COPD)** diseases, potentially attributable to environmental factors (e.g., LBP and/or ACM) in Shawnee County (99.1) is almost 20% higher in incidence than the State (83.7)<sup>32</sup> and 2.25x higher than the US (44.2<sup>33,34</sup>). Long-term effects of **childhood lead poisoning** include decrements in neurological function and deficit hyperactivity, which may persist into adulthood.<sup>35</sup> The most recent data from 2020 indicates that **87% more of the children tested for blood lead** in the County had elevated blood lead levels compared to the State average (3.73% compared to 1.99%; *only county-level data available*).<sup>36</sup> Lead may be harmful to the developing immune system, causing production of excessive inflammatory proteins; this mechanism may mean that lead exposure is a risk factor for asthma in children.<sup>37</sup> Lead poisoning during pregnancy increases risks of **birth defects**, of which the TA has a higher incidence than the State (see Table 4.b).<sup>38</sup> According to the CDC, **asthma, high blood pressure, COPD, coronary heart disease, and birth defects** have higher occurrences in the Target Area/proposed brownfield site CT compared to the City, County, US, and sometimes State averages as noted in Table 3.a and 3.b below:

	TA CT	Topoka County	KS <sup>1</sup>	US
Current asthma prevalence among adults aged ≥ 18 years	<b>11.1%</b>	<b>11%</b>	10.5%	10.6%
High blood pressure among adults aged ≥ 18 years	<b>43.2%</b>	<b>39.3%</b>	39%	34.3%
COPD among adults aged ≥ 18 years	<b>9.9%</b>	<b>8.0%</b>	7.4%	N/A
Coronary heart disease among adults aged ≥ 18 years	<b>8.0%</b>	<b>7.2%</b>	7.4%	N/A

*Bold font designates where the Site has a greater percentage of prevalence than the City. Underlined font designates where the Site has greater percentages of prevalence than the County. Red font designates where the Site has greater prevalence than the state of Kansas. Shaded font designates where the Site has greater percentages of prevalence than the US Source: <https://www.cdc.gov/places>; 2023 data, accessed on 1/25/2026. (1) <https://ephtracking.cdc.gov/DataExplorer/>; 2021 data is the latest year available, accessed on 1/25/2026.*

	County <sup>1</sup>	Kansas
Birth defects – Prevalence of cleft lip without cleft palate per 10,000 births over a 5-year period (2017-2021)	<b>9.41</b>	6.53
Birth defects – Prevalence of hypospadias per 10,000 births over a 5-year period (2017-2021)	<b>37.93</b>	34.12
Birth defects – Prevalence of limb deficiencies combined per 10,000 births over a 5-year period (2017-2021)	<b>3.96</b>	2.18
Birth defects – Prevalence of Trisomy 21 per 10,000 births to mothers <35 years of age over a 5-year period (2017-2021)	<b>11.06</b>	7.00

*Shaded/Bold font designates where the County exceeds the State prevalence for birth defects. Data only available at the County-level. Source: Centers for Disease Control and Prevention. Environmental Public Health Tracking Network. Birth Defects Prevalence, <https://ephtracking.cdc.gov/DataExplorer/>; accessed 11/11/24. (1) data smoothed. \*\*Data not available by CT nor City.*

Potential ingestion, inhalation, and dermal contact with contamination, such as ACM/LBP from the proposed brownfield site, poses a public health risk, especially to children and elderly individuals (sensitive population).

<sup>30</sup> <http://cjonline.com/news/state/2015-02-05/topeka-officials-seek-leverage-deal-abandoned-homes>, accessed on 1/25/2026.

<sup>31</sup> “Mitigating Childhood Lead Exposure and Disparities...” <https://tinyurl.com/527xrmxy>, accessed on 1/25/2026.

<sup>32</sup> 2022 Mortality from COPD, crude death rate from COPD among people ≥25 years per 100,000 population, <https://ephtracking.cdc.gov/DataExplorer/>, accessed 1/25/2026.

<sup>33</sup> National Vital Statistics System, Deaths: Final Data for 2022, Vol. 74, No. 4, Table B, June 10, 2025, accessed on 1/25/2026

<sup>34</sup> CDC, COPD-Related Mortality by Sex and Race Among Adults Aged 25 and Over: United States, 2000-2014, September 8, 2016, COPD accounted for approximately 96% of all chronic lower respiratory disease deaths every year, <https://blogs.cdc.gov/nchs/2016/09/08/3221/>, accessed on 1/25/2026.

<sup>35</sup> <https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf>, accessed 1/25/2026.

<sup>36</sup> <https://maps.kdhe.state.ks.us/ksrph/>, accessed 1/26/2026.

<sup>37</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>, accessed 1/25/2026.

<sup>38</sup> <https://tinyurl.com/PbBirthDefect>, accessed on 1/27/2026.



THA, Inc. will use this grant funding to remediate the ACM/LBP contaminant concerns at the proposed brownfield site, recognizing that many of the adverse health conditions that exist within the Target Area may be caused by the contaminants at the proposed brownfield site. Cleanup of this site will lead to a reduction in inhalation and direct contact of these contaminants to sensitive populations.

**2.d. Economically Impoverished/Disproportionately Impacted Populations:** Sensitive populations in the TA are at higher risk of being exposed to a variety of cumulative pollution sources. As noted in Table 2 (Section 2.a), the TA has a disproportionate number of **economically impoverished sensitive populations** (elderly and children in poverty). Table 5 below summarizes disproportionate sensitive population impacts in the TA (compared to the rest of the State and US) and in a community disproportionately burdened with **poor air quality** (top 3-8%), increased risk from **lead exposure** and socioeconomic vulnerability (LBP indicator; top 5-6%), and **hazardous waste** (top 16-18%) **Underground Storage Tank (UST) proximity** (top 5-6%) due to industrial, governmental, and/or commercial operations/policies:

<b>Table 5: Burden Proximity Percentile Rating (2022)**</b>	<b>State Percentile</b>	<b>US Percentile</b>
Particulate Matter 2.5	<b>97%</b>	<b>92%</b>
Ozone Level in Air	<b>96%</b>	<b>73%</b>
Diezel Particulate Matter Level in Air	<b>89%</b>	<b>82%</b>
Lead Paint / LBP	<b>94%</b>	<b>95%</b>
Hazardous Waste Proximity	<b>86%</b>	<b>84%</b>
Traffic Proximity and Volume	<b>95%</b>	<b>88%</b>
USTs	<b>94%</b>	<b>95%</b>

*Notes: Bold font designates where the TA has greater than the 70th percentile for the State. Red/Underlined font designates where the TA has greater than the 80th percentile for the State. Shaded font designates where the TA has greater than the 90th percentile for the State. Source: policymap.com, State percentile, Supplemental Index data, accessed on 1/25/2026. \*\*Data is not available on the County level.*

As documented in Table 3 (Section 2.b), 93.7% of the residents in the TA were constructed pre-1980, which poses a disproportionate potential LBP/ACM exposure risk to TA residents. Polychlorinated biphenyls (PCBs) were also historically used in wood floor varnish and caulk in older homes, which poses additional exposure risks to residents in the TA. The blight associated with brownfields and dilapidated buildings in the TA (as described in Section 2.b) contributes to the low property values in the Monroe Neighborhood (Table 2; Section 2.a), which in turn, reduces the incentive for homeowners or landlords to invest in renovations that could reduce the exposure.

**Reuse Strategy Threat Reduction:** Through this affordable housing-focused reuse strategy, this FY2026 grant will transform the proposed brownfield site from a source of environmental risk into an asset that will protect public health. The project will measurably reduce exposure pathways associated with ACMs, LBP, hazardous waste proximity, and USTs—delivering lasting benefits to children, elderly residents, and households living in poverty in the TA.

**Community Engagement (2.e and 2.f) Project Involvement and Project Roles.** The Brownfields Advisory Committee (BAC) will be formally established immediately upon notice of grant award (estimated June 2026) to provide oversight/input on the project. BAC members will bring important community voices to the table and were selected to address needs discussed in Section 2.a. The general public and those affected directly by the proposed brownfield site development will be engaged through a Community Involvement Plan (CIP) developed in Quarter 1 (Q1) FY2027 in collaboration with the BAC. The members below affirm their commitment to serve on the BAC.

<b>Table 6: List of Organization/Entity/Group</b>	<b>Entity's Mission</b>	<b>Point of Contact (name &amp; email)</b>	<b>Specific Involvement in the Project or Assistance Provided</b>
<b>City of Topeka Planning and Development</b>	The Capitol City of Kansas – Provide development, housing, and planning services.	Dan Warner, AICP Planning Division Director <a href="mailto:dwarner@topeka.org">dwarner@topeka.org</a>	The City will serve on the BAC and also provide a Property Tax Rebate for the project. The City may also utilize their existing EPA Brownfield Assessment Grant for additional assessment or remediation planning, if needed.
<b>Topeka Housing Authority</b>	Accessible Affordable Housing – Treating people with dignity and respect.	Trey George President/CEO <a href="mailto:tgeorge@tha.gov">tgeorge@tha.gov</a>	The Topeka Housing authority works hand in hand with THA, Inc. and will assist on the BAC and assist with all components of the project.
<b>Monroe Neighborhood Improvement Association (NIA)</b>	Monroe NIA uses a multifaceted approach to improve the lives and change the narrative of the neighborhood for its residents.	[REDACTED]	The Monroe NIA will support the project by attending the BAC meetings and distributing information, particularly with respect to the historic significance of the former Van Buren School and Monroe Neighborhood.



<b>Topeka City Parks and Recreation</b>	Inspire active and healthy lifestyles through a diverse system of parks, facilities, programs and people.	Tim Laurent <a href="mailto:tim.laurent@snco.us">tim.laurent@snco.us</a>	Shawnee County will serve on the BAC and will specifically own and maintain Shunga, Landon, and Soldiers Creek Trails and area parks.
<b>Greater Topeka Partnership/GO Topeka</b>	GO Topeka creates county-wide economic success for all companies and citizens through implementation of an aggressive economic development strategy that capitalizes on the unique strengths of the community.	Matt Pivarnik <a href="mailto:matt.pivarnik@topekapartnership.com">matt.pivarnik@topekapartnership.com</a>	The Partnership will support the project by distributing information and attending the BAC meetings. with a goal of encouraging more local businesses to undertake this type of development in the City's distressed neighborhoods.

Other members/partners that will be called upon as necessary include the EPA Project Manager, KDHE, Other City Departments and the Shawnee County Health Department.

**2.g. Incorporating Community Input:** In pursuing this grant, THA, Inc. held a two-week comment period on the ABCA for the Former Van Buren School Property Project. A public hearing was held January 26, 2026, to update the community, elicit feedback and answer questions. Documentation is provided in Attachment B. If awarded the grant, community involvement will continue as described below.

Within one month of award, THA, Inc. will develop a site-specific CIP to leverage the expertise and networks of the BAC members. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2026 to integrate community involvement utilizing THA, Inc. to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Property. The timeline for notices and community meetings will be outlined in the CIP. THA, Inc. will hold at least one meeting per quarter and at key points during the project, including: (A) a meeting and press release after grant award to discuss the project/grant with the community, the project process and expectations, and timeframe of key activities; (B) a 30-day public notice for review and comment of the completed ABCA and meeting to discuss the project and solicit comments (to be held prior to posting the final ABCA); (C) a meeting when cleanup activities begin; (D) periodic meetings during active cleanup; and (E) a final meeting when cleanup is complete, as appropriate.

It is anticipated that most project communications will be in English; however, it is important that non-English speaking households (primarily Spanish in the CT; up to 10% of residents speak Spanish<sup>39</sup>) are aware of environmental activities that directly impact them THA, Inc. will develop and distribute information in Spanish as well as offer translation and interpretation services as needed as impacted families are identified. Meetings will be held in ADA accessible community facilities. Although in-person BAC meetings will be held, THA, Inc. will provide virtual participation options for BAC and other meetings as well. Additional methods used to communicate progress and solicit input will include additional updates on the THA, Inc. website, BAC websites, fact sheets, social media, and mailers as appropriate. The programmatic quarterly reports, site technical reports, fact sheets, and success stories will be posted on the THA, Inc. website to communicate progress to all stakeholders and will summarize completed or scheduled activities, funding sources secured or identified, and outreach activities performed. An Administrative Record will be established and maintained at THA Inc. offices and will be available for public review. The record will include: all project documents/reports, including the CIP, ABCA, Remedial Specifications/Bid Package, and the Remedial Documentation Report.

**3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:**

**3.a Proposed Cleanup Plan** The site buildings (approximate 11,262 SF two-story former school building and 768 SF office/storage building) have been vacant since 2003 and are in extremely poor condition. LBP, ACM, universal waste, potential UST, and burnt debris from a recent fire are present. The roof, floors, and select wall components have collapsed into the basement. As a result, the hazardous building materials are commingled with other inseparable building components. The building is currently boarded, and the property is fenced to restrict access and address the danger of additional wall collapses. The focus for the grant will be solely on proper disposal of comingled hazardous building materials. Upon award, the ABCA will be finalized, a Quality Assurance Project Plan (QAPP) prepared for any pre-design waste characterization and post remediation confirmation sampling. A performance-based bid specification will be prepared and requests for proposals will be issued. Permits and plans will be prepared per EPA, KDHE and local requirements with an emphasis on safety due to the poor structural integrity of remaining walls. The selected contractor will load, transport, and dispose of the comingled materials at a licensed landfill. Post remediation sampling will be performed, and A remedial documentation report will be prepared. The work will be completed per Davis Bacon Act (DBA) prevailing wage requirements.

<sup>39</sup> Policymap.com, Estimated percent of people age 5 or older who speak Spanish or Spanish Creole at home between 2011-2015, accessed on 1/27/2026.



**3.b – 3.e Description of Tasks/Activities and Outputs.** THA, Inc. has developed the appropriate tools and procedures to immediately begin implementation of the grant. THA, Inc. will develop a request for proposal (RFP) and hire a qualified environmental professional (QEP) per 2 Code of Federal Regulations (CFR) 200.317-200.326 and 2 CFR 1500 in Q1 FY2027. This shovel-ready project will be completed within the 4-year grant performance period, as reflected below:

<b>Task 1 - Activity: Program Management</b>	
b. <u>Project Implementation:</u> Retain and manage QEP, prepare Quarterly Reports, Annual Financial Reports, update Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; prepare Grant Closeout Report	
c. <u>Anticipated Project Schedule:</u> Retain QEP (Q1 FY2027). Quarterly progress reports will be submitted by January 30th, April 30th, July 30th, and October 30th of each year, with the first due on January 30, 2027. Annual financial reports will be submitted by October 30th, with the first due on October 30, 2027. Grant closeout by Q1 FY2031.	
d. <u>Task/Activity Leads:</u> THA, Inc. project lead, Trey George, and project coordinators, Doug Guy and Chris Carter (with input from QEP)	
e. <u>Outputs:</u> Admin Records; Contractor Procurement Documentation; (15) Quarterly Reports; (3) Annual Financial Reports; (1) Grant Closeout Report. (number of outputs assumes schedule holds)	
<b>Task 2 - Activity: Cleanup Oversight</b>	
b. <u>Project Implementation:</u> Finalize ABCA, prepare QAPP, and complete remedial design waste characterization and post-completion sampling. Develop bid specifications, obtain necessary permits, retain remedial contractor, oversee cleanup activities and DBA compliance. Conduct post-cleanup sampling and prepare Remedial Documentation Report.	
c. <u>Anticipated Project Schedule:</u> Finalize ABCA, prepare QAPP, and complete remedial design waste characterization sampling (Q1 FY2027). Develop bid specifications, obtain necessary permits, retain remedial contractor (Q2 FY2027-Q3 FY2027), oversee cleanup activities and DBA compliance (Q4 FY2027 - Q4 FY2028). Conduct post-cleanup (Q3 FY29) sampling and prepare Remedial Documentation Report summarizing all work under Task 2 (Q4 FY2030). The schedule may be compressed if appropriate.	
d. <u>Task/Activity Leads:</u> THA, Inc. project lead and coordinators, QEP, with input from KDHE and EPA project managers (PMs)	
e. <u>Outputs:</u> ABCA; QAPP; bid specifications; DBA summaries; Remedial Documentation Report	
<b>Task 3 - Activity: Cleanup (Remediation Contractor Only)</b>	
b. <u>Project Implementation:</u> Implement cleanup plan described in Section 3.a .	
c. <u>Anticipated Project Schedule:</u> Commingled hazardous building materials removal. (Q4 FY2027-Q4 FY2028); As above, the schedule may be compressed, if appropriate.	
d. <u>Task/Activity Leads:</u> THA, Inc. lead and coordinators, Remedial Contractor(s) PM(s) (to be retained by Q3 FY2027), and QEP PM	
e. <u>Outputs:</u> Daily activity logs; waste manifest records	
<b>Task 4 - Activity: Community Outreach</b>	
b. <u>Project Implementation:</u> Prepare and implement a Site-Specific CIP. Host (8) biannual public meetings to discuss site cleanup and redevelopment plans; community events; attend National Brownfield Conference.	
c. <u>Anticipated Project Schedule:</u> First quarterly meeting Q1 FY2027; Brownfield Conference in 2028 (estimated)	
d. <u>Task/Activity Leads:</u> THA, Inc. lead and coordinators, BAC, with input from QEP	
e. <u>Outputs:</u> CIP, meeting deliverables, reuse plans, presentation materials	

**3.f. Cost Estimates.** Personnel (\$50/hour [hr]) and fringe (\$15/hr) rates represent average THA, Inc. staff rates. QEP (\$175/hr) rate represents an average hourly rate. Construction estimates are based on engineering estimates provided in the ABCA reflective of similar projects subject to DBA. No administrative costs are requested:

Budget Categories		Task 1	Task 2	Task 3	Task 4	Administrative Costs	Total
		Program Management	Cleanup Oversight	Cleanup	Community Outreach		
Direct Costs	Personnel	\$10,000	\$5,000		\$3,200	\$0	\$18,200
	Fringe Benefits	\$3,000	\$1,500		\$960	\$0	\$5,460
	Travel				\$2,400	\$0	\$2,400
	Equipment				\$0	\$0	\$0
	Supplies				\$1,250	\$0	\$1,250
	Contractual	\$14,000	\$169,100		\$7,000	\$0	\$190,100
	Construction			\$454,325		\$0	\$454,325
	Other (Conference Fees)				\$700	\$0	\$700
	Other (KDHE Fees)		\$1,500			\$0	\$1,500
<b>TOTAL BUDGET</b>		<b>\$27,000</b>	<b>\$177,100</b>	<b>\$454,325</b>	<b>\$15,510</b>	<b>\$0</b>	<b>\$673,935</b>



<p><b>Task 1 – Program Management: Total Budget = \$27,000</b></p> <p><b>Cost Basis and Assumptions:</b> Personnel/Fringe Costs of \$10,000/\$3,000 are budgeted for an estimated 200hrs (\$50/hourly rate + \$15/hr fringe) of work by the THA, Inc. lead and coordinators to manage the cooperative agreement as follows: hire (40hrs) and manage QEP activities (1.5hr/month x 48 months=72hrs), preparation of quarterly reports and maintenance of the ACRES database (3hrs/quarter x 16 quarters=48hr), annual financial reporting (5hrs/year x 3 years=15hrs), prepare grant closeout report (25hrs). Contractual Costs of \$14,000 are budgeted for an estimated 80hrs (\$175/hr) of work by QEP in providing assistance in completing various required reports.</p>
<p><b>Task 2 – Cleanup Oversight: Total Budget = \$177,100</b></p> <p><b>Cost Basis and Assumptions:</b> Personnel/Fringe Costs of \$5,000/\$1,500 are budgeted for an estimated 100 hr (\$50/hourly rate + \$15/hr fringe) of work by THA, Inc. lead and coordinators for developing and issuing bid specifications (40hrs); review project deliverables (20hrs); and coordination during onsite field work (40hrs). Contractual Costs of \$169,100 are budgeted for the following work to be performed by the QEP: finalize ABCA, prepare QAPP, and complete remedial design waste characterization and post cleanup sampling (240hr at \$175/hr) and laboratory fees (\$20,000). Develop bid specifications and assist the THA, Inc. in bidding (100hr at \$175/hr), securing appropriate permits (40hr at \$175/hr); remedial contractor oversight and DBA compliance documentation (360 hrs at \$175/hr); and prepare Construction Documentation Report (112hr at \$175/hr). Other Costs of \$1,500 includes KDHE review/permit fees.</p>
<p><b>Task 3 – Cleanup: Total Budget = \$454,325</b></p> <p><b>Cost Basis and Assumptions:</b> Remedial Construction Costs of \$454,325 are budgeted for onsite preparation (tracking pad, silt fence, etc.) and loading of comingled ACM, LBP, universal wastes, and fire damaged materials (\$64,800); transportation/trucking of material to the landfill (\$95,725) and landfill disposal costs (\$293,800). Further details are provided in the draft ABCA in Attachment B.</p>
<p><b>Task 4 – Community Outreach: Total Budget = \$15,510</b></p> <p><b>Cost Basis and Assumptions:</b> Personnel/Fringe Costs of \$3,200/\$960 are budgeted for by THA, Inc. lead and coordinators to plan/host (8) bi-annual outreach activities (8hr/meeting [64hr] with an hourly rate of \$50/hr + \$15/hr fringe). Supply Costs of \$1,250 are budgeted for printing costs (\$850) and mailing costs for public notices (\$400). Travel Costs of \$2,400 are for (2) THA, Inc. staff to attend the three-day National Brownfield Conferences in 2027 [\$1,560 for meals and for lodging (\$260/person/night for 3 nights); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@\$70/person)]. Other (Conference Fee) of \$700 for National Brownfield Conference registration fees for two staff (@ \$350/person). Contractual Costs of \$7,000 are budgeted for an estimated 40 hr of work by the QEP (@ \$175/hr) to prepare a site-specific CIP and assist with outreach activities.</p>

**3.g. Plan to Measure and Evaluate Environmental Progress and Results.** Project results/outputs and outcomes will be tracked, and progress measured/evaluated weekly using existing tools developed by THA, Inc. and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1, as described in Section 3.b-3.e. Project outputs, progress, and schedule will be tracked continuously to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring and evaluating progress, outputs will be compared to the project schedule proposed in Section 3.c; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a **monthly/quarterly** basis in the ACRES database to further measure progress. Project-specific outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: (1) The Former Van Buren School Property will be suitable for low-income senior residential redevelopment and (2) leveraged investment in the Property. Outcomes advancing the THA, Inc.'s plans and objectives include increase in property values of the Property and other properties in the vicinity of the Former Van Buren School Property. If the timelines for advancing one or more phases of work at the Target Property are not well-aligned with the EPA grant project period, THA, Inc. and QEP will work with EPA to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be tracked long-term by THA, Inc. and reported in future brownfield conferences, fact sheets, and/or on the THA, Inc. website.

**4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

**4.a Organizational Structure and 4.b Description of Key Staff.** THA, Inc. is the 501(c)(3) nonprofit development entity for the Topeka Housing Authority. THA, Inc. is a component unit of the Topeka Housing Authority, and all employees are employed by the Topeka Housing Authority and loaned to THA, Inc. as needed (see Attachment A). Topeka Housing Authority is the Housing Authority for Topeka and Shawnee County and provides safe, decent, affordable housing to low-income families. Topeka Housing Authority receives two major federal grants on an annual basis under the Annual Contributions Contract (ACC) from Housing and Urban Development (HUD). These grants are a capital fund grant which is in excess of \$2,300,000 annually and an operating grant in excess of \$3,200,000 annually. Topeka Housing Authority/THA, Inc. have a staff of 42 full-time employees in various roles.



For this project specifically **Trey George, President/CEO and Executive Director** will be the project lead and primary contact. Trey will be supported by project coordinators, **Doug Guy, Contracting Officer** and **Chris Carter, Director of Facilities Management**. Doug oversees all Procurement for Topeka Housing Authority/THA, Inc. and manages all Capital Fund grant work and reporting. Chris oversees all Housing Authority/THA, Inc. Facilities totaling 980 homes, multiple community buildings, playgrounds, vehicle and tool assets. Trey, Doug and Chris have a combined 60 years of federal grant management.

**4.c. Acquiring Additional Resources:** Topeka Housing Authority/THA, Inc. has capable staff and resources, experience, and expertise to recruit qualified replacements for any key Project staff that depart. Topeka Housing Authority/THA, Inc. has strong relationships with engineering and environmental services agencies and has all the management and procurement procedures in place to procure additional services through a competition qualifications evaluation, and/or bidding process, and to manage the RFQ and RFP as needed. Topeka Housing Authority's procurement practices recruit locally and provide additional points for Section 3 companies.

**4.e. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance**

**Agreements:**

**(i) Federal Home Loan Bank Topeka (FHLB) – Affordable Housing Program (AHP) Grant (FY2019; \$1,000,000)**

**4.e.(1) Purpose & Accomplishments:** THA received a \$1,000,000 grant from FHLB through their AHP competitive grant process in 2019. THA used the funds to help preserve 202 federally funded homes in the Pine Ridge neighborhood, the oldest and largest public housing development in Topeka. The grant replaced the roofs, gutters, downspouts, splash blocks, facia repairs and added forced air ventilation to each home's bathrooms.

**4.e.(2) Compliance with Grant Requirements:** THA met all grant requirements, on time and on budget. THA also was required to provide income compliance documentation on all families living in the homes and must continue to do so for the next 15 years. This requires periodic reviews of the property, file reviews of the families living at the property and ongoing compliance with all state and federal regulations.

**(ii) Federal Home Loan Bank Topeka (FHLB) – Affordable Housing Program (AHP) Grant and THA Capital Fund (FY2021; \$1,410,103)**

**4.e.(1) Purpose & Accomplishments:** THA received a \$750,000 grant from FHLB through the AHP competitive grant process in 2021. THA also put \$660,103 from its capital fund grant to make the total project cost \$1,410,103. THA used the funds to preserve 92 federally funded homes in the Deer Creek neighborhood, THA's second largest public housing development. THA was able to replace the roofs, gutters, down spouts, splash blocks, window and siding on 92 homes.

**4.e.(2) Compliance with Grant Requirements:** THA met all grant requirements, on time and on budget. THA also was required to provide income compliance documentation on all families living in the homes and must continue to do so for the next 15 years. This requires periodic reviews of the property, file reviews of the families living at the property and ongoing compliance with all state and federal regulations.



## Threshold Criteria for Cleanup Grants

### **1. APPLICANT ELIGIBILITY:**

**(a) Applicant Type:** Nonprofit Organization

**(b) Eligibility:** THA, Inc. is a nonprofit organization with tax-exempt status under section 501(c)(3) of the Internal Revenue Code and is therefore eligible to receive a United States Environmental Protection Agency (EPA) Brownfield Cleanup grant. Documentation is provided in Attachment B1.

### **2. PREVIOUSLY AWARDED CLEANUP GRANTS:**

The City of Topeka (the City) applied for the Fiscal Year (FY) 2018 EPA Brownfields Cleanup Grant for the Former Van Buren School Property located at 1601 Southwest (SW) Van Buren Street (St), Topeka, Shawnee County, Kansas (KS; proposed site) in 2017. The City was notified by EPA of the award in 2018, although the funds were rescinded/given back to the EPA since the City did not retain ownership of the site for the duration of time in which Brownfields Cleanup Grant funds were disbursed (was sold to Pioneer Midtown Homes, LLC in December 2017).

The proposed site has **not expended funding** from a previously awarded EPA Brownfield Cleanup Grant.

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

The applicant does not currently have an open EPA Brownfields Multipurpose Grant.

### **4. SITE OWNERSHIP:**

THA, Inc. is the sole owner of the Former Van Buren School Property located at 1601 SW Van Buren St, Topeka, Shawnee County, KS – parcel identification numbers (PIDs) 133-06-0-20-28-016.00-0 & 133-06-0-20-28-001.00-0 (approximately 0.92 acres). The proposed site was purchased on January 28, 2026, via fee simple title.

### **5. BASIC SITE INFORMATION:**

(a) Name of Site: Former Van Buren School Property  
(b) Site Address: 1601 SW Van Buren St, Topeka, KS 66612  
PIDs. 133-06-0-20-28-016.00-0 & 133-06-0-20-28-001.00-0

### **6. STATUS AND HISTORY OF CONTAMINATION AT THE SITE:**

The Former Van Buren School Property is located in the heart of the Monroe Neighborhood at the corner of SW 16th and SW Van Buren Streets. The school was built in 1910 and operated as a whites-only school before being integrated after Brown v. Board in 1954.<sup>1</sup> The school closed in 1964 and served several purposes thereafter including an audiovisual center for the Topeka Unified School District 501, storage for the Kansas State Archives, and lastly housing the Kansas Surplus Exchange (a Kansas non-profit clearinghouse for charitable organizations, recycling surplus equipment, and supplies).<sup>1,2</sup> Both buildings have been vacant since 2003 and are in extremely poor condition. In 2013, a City administrative order found that structure(s) located at the proposed site were unfit for human use for habitation.<sup>3</sup>

<sup>1</sup> Abandoned KS – Van Buren School, August 6, 2020, accessed 12/29/25, <https://abandonedks.com/van-buren-school/>

<sup>2</sup> THA, Inc. to continue affordable housing development plans without Van Buren School, December 20, 2023, accessed 12/29/25, <https://www.wibw.com/2023/12/21/tha-inc-continue-affordable-housing-development-plans-without-van-buren-school/>

<sup>3</sup> Administrative Hearing Order, City of Topeka, Case #: 2013-H-00052, RE: 1601 SW Van Buren St (school), August 8, 2013.



## Threshold Criteria for Cleanup Grants

In June 2014 the City found that the estimated cost of razing the building — initially thought to be \$48,900 — had risen up to \$400,000 as a result of the discovery of asbestos contamination.<sup>4,5</sup> Weatherization and structural stability tactics were recommended in December 2016 to address retained moisture and safety concerns at the proposed site to retain the structure for redevelopment, but these measures were intended to be temporary for a period of up to ten years with regular inspection and maintenance of the proposed site.<sup>6</sup> The proposed site was owned by Jerry R. Shelor (2012-2015) and Joshua Mattox (2015-2017) prior to donating to the City in December 2017 (due to the high demolition costs). In 2019, the City sold the building to Ross Freeman’s Pioneer Midtown Homes, LLC for \$1, intending the proposed site and eight adjacent vacant lots to be turned into affordable housing. The proposed site and eight adjacent vacant lots have been sold to THA, Inc. on January 28, 2026 within 180 days of a Phase I environmental site assessment (ESA) being completed to satisfy all-appropriate inquiries (AAI). **THA, Inc. plans to redevelop the proposed site and eight adjacent vacant lots to multifamily housing.**

The school was built in 1910 and operated as a school before being closed in 1964. Due to the age of the buildings on the proposed site, asbestos sampling was conducted in 2014 where asbestos-containing material (ACM) was confirmed in floor tiles, boiler insulation, cement board, felt paper, and roof flashing mastic.<sup>7</sup> A lead-based paint (LBP) survey was completed in 2017 where LBP was present on the exterior walls, door/window components, vents, plaster/tile walls and ceilings, cement base trim, chair rails, and pipes.<sup>8</sup> According to a structural assessment completed in 2016 and almost ten more years of deterioration, the structural integrity of the buildings’ interior is compromised due to water damage and weathering, and the ubiquitous presence of severely weathered LBP, ACMs, and universal wastes that are comingled with collapsed roofing/building materials.<sup>9</sup> Finally, an additional fire occurred at the proposed site on December 2, 2023, where the Topeka fire department responded several times due to reignition of the fire.<sup>9</sup> The fire department described the building as “extremely hazardous” as the interior has collapsed and is “incredibly difficult (for us) to put out safely.” Therefore, the focus for the grant application and the funding if awarded will be solely on disposal of comingled hazardous building materials.

### **7. BROWNFIELDS SITE DEFINITION:**

The proposed site is a real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or presence of a hazardous substance, pollutant, or contaminant. The proposed site targeted for this site-specific cleanup 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 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); and c) not subject to the jurisdiction, custody, or control of the United States (US) government.

---

<sup>4</sup> City considering selling ex-Van Buren school, other property for \$1 to be used for affordable housing purposes, December 26, 2017, accessed 12/29/25, <https://www.cjonline.com/story/news/politics/government/2017/12/26/city-considering-selling-ex-van-buren-school-other-property-1/16516308007/>

<sup>5</sup> Van Buren School project & disposal of real property, Executive Summary memorandum, City of Topeka, December 21, 2017, accessed 12/29/25, <https://topeka.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=13255&MeetingID=653>

<sup>6</sup> Stabilization Assessment, Van Buren School Building, Topeka, Kansas, Project #HP16.027.00B, TreanorHL

<sup>7</sup> Asbestos Inspection Report & Roof Sampling Report, Former School, 1601 SW Van Buren, Advanced Environmental Testing and Abatement, Inc., January 14 & February 18, 2014.

<sup>8</sup> Notice of Lead Based Paint Inspection, Hernly Environmental, Inc., October 10, 2017.

<sup>9</sup> Extremely Hazardous: Firefighters Battle Smoke, Fire at Abandoned School in Central Topeka, December 2, 2023, accessed 12/29/25, <https://www.ksnt.com/news/local-news/firefighters-battle-smoke-fire-at-abandoned-school-in-central-topeka>



## Threshold Criteria for Cleanup Grants

### **8. ENVIRONMENTAL ASSESSMENT REQUIRED FOR CLEANUP GRANT APPLICATIONS:**

Environmental assessments at the proposed site are detailed below:

- January 14, 2014 – Advanced Environmental Testing and Abatement Inc (Advanced Environmental). Completed for the Topeka Police Department. Asbestos Survey. ACM was identified in floor tile, mastic, boiler insulation debris, cement board felt paper on subfloor throughout the main building.
- February 18, 2014 – Advanced Environmental. Completed for the Topeka Police Department. Limited ACM Survey of roofing materials in the main building. The four layers of the roof sample tested negative while the roof flashing mastic tested positive for ACMs.
- December 24, 2015 – Environmental Works, Inc. (EWI). Completed for the City of Topeka. Phase I ESA for both the main building and the storage building. Identified surface soil staining on the west side of the building within the retaining wall and a suspect pipe was observed entering the building on the west wall of the former boiler room.
- December 24, 2015 – EWI. Completed for the City of Topeka. Limited Phase II ESA. Ground penetrating radar survey was undertaken to determine if there was underground heating oil tank serving the main building – no evidence of a tank was observed. Soil and groundwater investigation occurred – Total Petroleum Hydrocarbons (TPHs)- High Range Hydrocarbons (HRHs) were detected at a concentration below the Kansas Department of Health and Environment (KDHE) residential risk based screening levels in the surface soil sample. TPH-HRH was not detected in the subsurface soil or the groundwater.
- December 28, 2015 – Tier II Statutory Checklist as required under 24 Code of Federal Regulations (CFR) 58.5 and 24 CFR 58.6. Completion for Department of Housing and Urban Development (HUD). Document included a Site-Specific Field Contamination Checklist for the main building and the storage building.
- January 27, 2016 – Lawyers Title of Topeka, Inc. Commitment for Title Insurance. Completed for the City of Topeka. Listings of real estate taxes and special assessments due for 2011, 2012, 2013, 2014, and 2015 which were in arrears on the proposed site. 2010 and prior years were paid. A Kansas State Tax Lien was placed on the proposed site on November 21, 2014. In addition, the City also had a utility lien placed on the proposed site.
- December 30, 2016 – TreanorHL Stabilization Assessment. Completed for the City of Topeka. Main building found to be in a very deteriorated/unstable condition. Several suggestions made on how to stabilize and secure the building by improving weatherization and structural stability.
- December 30, 2016 – STAND Structural Engineering Inc. Completed for the City of Topeka. Structural Assessment. Several structural deficiencies were noted in the main building including mold and water issues throughout, missing floor joists, cracks in exterior masonry, collapsed floor structure, and missing portions of the roof.
- October 2, 2017 – Hernly Environmental, Inc. Completed for the City of Topeka. LBP survey of the main building was conducted where LBP was noted on the exterior school front entry wall tiles & overhang, door & window components, and vents, on the interior school plaster/tile walls & ceilings, cement base trim, chair rails, door & window components and pipes.
- December 30, 2025 – Stantec Consulting Services Inc. Completed for the City of Topeka. Phase I ESA for both the main building and the storage building. Identified five business environmental risks (BERs) associated with LBP, ACM, building stability, potential heating oil tank, and the potential presence of buried historic fill.



## Threshold Criteria for Cleanup Grants

### **9. Site Characterization:**

A letter from KDHE and an Environmental Professional (*as defined in 40 CFR § 312.10*) Certification is provided in Attachment B2.

### **10. ENFORCEMENT OR OTHER ACTIONS:**

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

### **11. SITES REQUIRING A PROPERTY-SPECIFIC DETERMINATION:**

The City of Topeka (under Cooperative Agreement Number [CA#] BF-96723601-0) submitted a property-specific eligibility determination to EPA on October 29, 2025, to facilitate completion of due diligence prior to the THA, Inc. acquiring the proposed site. The eligibility determination was approved by the City's EPA program officer (Bobbie Pennington; EPA Region 7) on November 19, 2025.

As EPA has already approved a property-specific determination for the proposed site, submitting an additional property-specific determination associated with this grant application does not appear warranted. The following provides a summary of information provided previously in the eligibility determination supplemented with details of work recently completed at the proposed site.

- Properties subject to planned or ongoing removal actions under CERCLA:  
**None known.**
- Properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the US or an authorized State under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA):  
**None known.**
- Properties with facilities subject to RCRA corrective action (§ 3004(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures:  
**None known.**
- Properties that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit:  
**None known.**
- Properties where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation:  
**None known.**
- Properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund:  
**None known.**



## Threshold Criteria for Cleanup Grants

### **12. THRESHOLD CRITERIA RELATED TO CERCLA/PETROLEUM LIABILITY:**

The proposed site cleanup will be predominantly hazardous substances.

(i) Exemptions to CERCLA Liability: N/A

(ii) Exemptions to meeting the requirements for asserting an affirmative defense to CERCLA liability: N/A

(iii) Landowner protections from CERCLA Liability: (1) Bona Fide Prospective Purchaser Liability Protection:

a. Information on the Property Acquisition:

- i. **How THA, Inc. acquired ownership:** THA, Inc. acquired ownership of the proposed site via negotiated purchase from a private individual.
- ii. **Date THA, Inc. acquired the proposed site:** THA, Inc. acquired the proposed site on January 28, 2026.
- iii. **Nature of THA, Inc. ownership:** fee simple title (recorded deed)
- iv. **Name and identity of the party from whom THA, Inc. acquired ownership:**  
Pioneer Midtown Homes, LLC (Pioneer)
- v. **Familial, contractual, corporate, or financial relationships or affiliations that THA, Inc. has or had with any prior owners or operators (or other potentially responsible parties) of the proposed site (including the entity from which THA, Inc. acquired the property):**  
Pioneer Midtown Homes, LLC and Topeka Housing Authority were invited to be part of an Affordable Housing Task Force formed by the City of Topeka Mayor in 2016. In the summer of 2017, Pioneer, Topeka Housing Authority, and the City's Neighborhood Relations Department began discussions regarding the potential for a scattered site affordable housing project and the possibility of a public/private partnership to facilitate the development of the project. Pioneer was to serve as the developer, while Topeka Housing Authority was to serve as the property manager once the project was complete and the City facilitated the development with the contribution of real estate (the Former Van Buren School Property). THA, Inc. is an instrumentality / 501(c)(3) nonprofit arm to the Topeka Housing Authority where the same board governs both organizations. Neither Pioneer, Topeka Housing Authority, nor THA, Inc., are liable in any way for contamination at the proposed site or affiliated with any other person potentially liable for the contamination.

b. Pre-Purchase Inquiry:

- i. **Types of assessments performed:** A Phase I ESA was completed by Stantec on December 30, 2025, per the AAI rule detailed in 40 CFR §312.21 utilizing ASTM 1527-21 on behalf of the City of Topeka (the User) under the City of Topeka's EPA brownfields community-wide assessment grant (CA# BF-96723601-0). A reliance letter was completed regarding the Phase I ESA report to THA, Inc. on December 31, 2025, to provide protection from CERCLA Liability prior to purchase of the proposed site. See Section 8 of this Threshold Criteria document for a list of all assessments completed to date.



## Threshold Criteria for Cleanup Grants

- ii. **AAI Performed by an Environmental Professional:** The 2025 Phase I ESA was completed by an Environmental Professional (as defined in 40 CFR § 312.10) and the required declaration by the environmental professional is included in a written report (per 40 CFR § 312.21(d)).
- iii. **AAI within 180 days of purchase:** The Phase I ESA was completed on December 30, 2025 and ownership transfer occurred on January 28, 2026. All appropriate updates in the original Phase I ESA assessment were completed within 180 days prior to THA, Inc.'s acquisition of the proposed site to take advantage of the bona fide prospective purchaser provision.
- c. **Timing and/or Contribution Toward Hazardous Substances Disposal:** Disposal of all hazardous substances at the site occurred before the proposed site was acquired by THA, Inc. THA, Inc. has not caused or contributed to any release of hazardous substances at the proposed site. Further, THA, Inc. has not, at any time, arranged for the disposal of hazardous substances at the proposed site or transported hazardous substances to the proposed site.
- d. **Post-Acquisition Uses:** Following acquisition, the proposed site has remained vacant.
- e. **Continuing Obligations:** The following provides the reasonable steps THA, Inc. took with respect to hazardous substances found at the site to:
  - i. **Stop any continuing releases:** THA, Inc. is continuing to secure and restrict access at the proposed site by preventing people from entering the structure to restrict the disturbance of hazardous materials such as ACM and/or LBP. The proposed site is fenced and boarded to prevent access. No anomalies consistent with underground storage tanks were identified and no aboveground storage tanks are apparent. Therefore, all potential sources of releases appear to have been removed prior to acquisition of the proposed site by the THA, Inc. As such, no sources of ongoing releases are known to remain on the proposed site. Therefore, THA, Inc. has taken all reasonable steps to identify and stop continuing releases.
  - ii. **Prevent any threatened future release:** As noted above, all potential sources of releases appear to be contained within the building prior to acquisition of the proposed site by the grant applicant. As such, no sources of threatened future release are known to exist on the proposed site. The proposed site is secured and City of Topeka police drive by the proposed site during regular patrols to prevent illicit dumping. Therefore, THA, Inc. has taken all reasonable steps to identify and prevent a threatened future release.
  - iii. **Prevent or limit exposure to any previously related hazardous substance:** THA, Inc. is maintaining compliance with existing activity use limitations and institutional controls. The proposed site is secured and City of Topeka police drive by the proposed site during regular patrols to prevent illicit dumping. Therefore, THA, Inc. has taken all reasonable steps to limit exposure to previously released hazardous substances.



## Threshold Criteria for Cleanup Grants

THA, Inc. affirms that they will continue to (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and providing access to the proposed site; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the proposed site; and (iv) provide all legally required notices.

(iv) Sites with hazardous building material that is not released into the environment:

The proposed site has hazardous substances contained in the building materials and the hazardous substances have not been released (and there is no threat of release) into the outdoor environment (i.e., air, groundwater, land surface, etc.).

### **13. CLEANUP AUTHORITY AND OVERSIGHT STRUCTURE:**

- a. Cleanup Oversight: The proposed site is eligible to be enrolled in the Kansas Brownfields Program for ACM assessment and/or abatement. However, the ACM is comingled with other hazardous building materials and therefore, THA, Inc. does not plan to enroll in this program.

Our understanding is that enrollment in the Voluntary Cleanup & Property Redevelopment Program (VCPRP) or equivalent oversight program is not applicable to the cleanup activities to be funded by the EPA grant, which will be limited to disposal of comingled hazardous building materials (such as LBP, ACM and universal wastes) which will require demolition/disposal of the buildings due to the degraded structural integrity.

Abatement projects in Kansas are overseen by staff at the KDHE. THA, Inc. will rely on outside consultants procured in accordance with procurement provisions in [2 CFR Part 200](#), [2 CFR Part 1500](#), and [40 CFR Part 33](#), to provide necessary oversight and technical expertise necessary for cleanup.

- b. Access to Neighboring Properties (if required): Not applicable. No cleanup activities will be performed using EPA funds will require access to neighboring properties.

### **14. COMMUNITY NOTIFICATION:**

- a. Draft Analysis of Brownfield Cleanup Alternatives: The draft ABCA and application narrative were made available for public review at a public meeting hosted by THA, Inc. on January 26, 2026. Copies of the draft ABCA and narrative were posted on the THA, Inc. website on January 8, 2026. A copy of the draft ABCA, as updated in response to public comments, is provided as [Attachment B3](#).
- b. Community Notification Ad: A community notification ad was placed on the THA, Inc. website on January 8, 2026, and a notice for the meeting was also posted in the Topeka Capital-Journal on January 12 & 13, 2026. A copy of the community notification documentation is provided as [Attachment B4](#).



## Threshold Criteria for Cleanup Grants

- c. Public Meeting: A public meeting was held on January 26, 2026. The meeting was hosted by THA, Inc. Documentation for this meeting is attached (Attachments B5 through B8). A meeting summary (which includes public comments and THA, Inc.'s responses) is provided. Attendees at the meeting are identified in the meeting summary. No additional questions or comments regarding the grant and/or draft narrative or draft ABCA beyond those at the meeting on January 26, 2026.
- d. Submission of Community Notification Documents: Per the grant guidelines, the following is attached:
  - Draft ABCA (Attachment B3)
  - Community notification ad (Attachment B4)
  - A summary of the comments received (Attachment B5)
  - The applicant's response to those public comments (Attachment B6)
  - Meeting notes or summary from the public meeting (Attachment B7)
  - Meeting sign-in sheet/participant list (Attachment B8)

### **15. Contractors and Subrecipients:**

- Contractors: Not applicable. THA, Inc. has not retained a contractor for work that will be paid for by the grant if awarded.
- Named Subrecipients: Not applicable. There are no subrecipients named in the grant application

### **ATTACHMENTS TO THRESHOLD CRITERIA RESPONSE**

- B1 – Documentation of Applicant Eligibility
- B2 – Letter from KDHE & Environmental Professional (*as defined in 40 CFR § 312.10*) Certification
- B3 – Draft ABCA
- B4 – Proof of Public Notice Publication
- B5 – Summary of Comments from Public Comment Period
- B6 – Response to Comments from Public Comment Period
- B7 – Meeting Notes from Public Meeting
- B8 – Roll Call and Attendance Documentation

Division of Environment  
Curtis State Office Building  
1000 SW Jackson St., Suite 400  
Topeka, KS 66612-1367



Phone: 785-296-1535  
Fax: 785-559-4264  
[www.kdheks.gov](http://www.kdheks.gov)

Janet Stanek, Secretary

Laura Kelly, Governor

January 12, 2026

Trey George  
Executive Director  
Topeka Housing Authority  
2010 SE California Ave.  
Topeka, KS 66607

**Re: FY26 Brownfields Cleanup Grant for THA, Inc., Van Buren School**

Trey George:

This letter is written in support of the Brownfields Cleanup Grant Application to be submitted by THA, Inc., of Kansas to the U.S. Environmental Protection Agency (EPA). KDHE understands the purpose of the grant is to dispose of comingled hazardous building material. The funds received from the U.S. EPA will be utilized to abate, protect, and restore the environmental integrity included in the Brownfield target sites. KDHE confirms THA, Inc. has the programmatic capabilities to administer such a grant, and that the site has been sufficiently characterized by the environmental site assessments performed to date for remediation work to begin.

KDHE commends THA, Inc.'s revitalization efforts in these communities, which represent the very ideals and goals of the Brownfields Program. The City of Topeka has previously utilized the KDHE Brownfields Program for brownfields assistance in this and other areas of the community and such support will continue during this project.

Regulatory authority for the licensing, handling, and abatement of asbestos containing building materials lies with the KDHE Bureau of Air Asbestos Control Unit, who implements KSA Chapter 65, Article 53 and KAR 28-50-1 to 28-50-14. It is KDHE's expectation and understanding that THA, Inc. will work with KDHE Bureau of Air-Asbestos Control Unit for guidance on the proper handling and disposal of abated asbestos and utilize a Kansas state-licensed asbestos abatement contractor for the cleanup, as directed. It should be noted that this site would not be eligible for the Voluntary Cleanup Program, within Bureau of Environmental Remediation, as the KDHE Voluntary Cleanup Program does not have regulatory authority for the handling or cleanup of asbestos containing building materials.

KDHE fully supports your grant application and looks forward to working with you on this and future Brownfields projects within your area. If you have any questions, please feel free to contact me at (785) 291-5519 or email at [timothy.speer@ks.gov](mailto:timothy.speer@ks.gov).

Sincerely,

A handwritten signature in black ink that reads "Tim Speer".

Timothy Speer  
Brownfields Coordinator  
Long Term Stewardship & Brownfields  
Bureau of Environmental Remediation