



R08-26-C-009

APPLICATION INFORMATION SHEET

Applicant Identification

Lakewood Housing Authority d.b.a. Metro West Housing Solutions (MWHS)
575 Union Blvd., STE 100
Lakewood, CO 80228

Website URL

www.mwhs.org

Funding Requested

MWHS requests \$1,000,000 for a Single Site Cleanup.

Location

The subject property is located in Lakewood, CO in Congressional District 7. Please see the attached Vicinity Map.

Property Information

Cedar Gardens Apartments
6990 W. Cedar Ave.
Lakewood , CO 80226

MWHS Contacts

Project Director

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Director of Development
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Chief Executive

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Population

The Cedar Gardens redevelopment site is located in Lakewood, CO which has an estimated population of 156,868 as of 2024.

Other Factors

<i>Factor</i>	<i>Page # in Narrative</i>
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.	5
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4

Releasing Copies of Applications

No confidential business information or trade secrets are included with this application.

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U.S. EPA FY26 Brownfield Cleanup Grant ABCA
 6980 & 6990 W. Cedar Ave., Lakewood, Colorado
 December 2025



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January 26, 2026

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

Via email - Devincenzi.Melisa@epa.gov

RE: Metro West Housing Solutions - FY26 Cleanup Grant Application - Cedar Gardens

Dear Ms. Devincenzi:

I am writing to acknowledge and express Colorado Department of Public Health and Environment's (CDPHE) support for the FY 2026 Cleanup Grant Application for the Cedar Gardens Apartments Redevelopment (Cedar Gardens) located at 6980 and 6990 West Cedar Avenue in Lakewood Colorado. This application from Lakewood Housing Authority d.b.a Metro West Housing Solutions (MWHS) will support the cleanup and revitalization of an underutilized site, providing much needed updated and affordable housing for one of the oldest parts of Lakewood, Colorado.

CDPHE has reviewed the site characterization data associated with this application and determined that the site has been adequately characterized by qualified environmental professionals and the asbestos characterization was completed by a state- and AHERA-certified Qualified Environmental Professional, who followed state and federal regulations in the sampling scope and methodology. While this project is eligible to enroll in the Voluntary Cleanup (VCUP) Program, asbestos abatement projects are cleaned up pursuant to Colorado asbestos abatement regulations overseen by the department's Air Pollution Control Division. Based on the expertise and certifications required for the assessment, CDPHE is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization for the asbestos abatement portion of the cleanup will be made by the department's Air Pollution Control Division following receipt of the permit application for the project. Should additional site characterization be required, the department's brownfields program can assist the applicant in collecting the necessary data prior to the June 15, 2026 deadline specified in the grant solicitation guidelines.

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

In closing, I again want to express the department's support for MWHS's Brownfields Cleanup Grant application for Cedar Gardens. CDPHE hopes that successful cleanup and redevelopment of the site can create a community asset that serves as a catalyst for continued revitalization in the O'Kane Park and surrounding neighborhoods.

Sincerely,



Brownfields Coordinator
Hazardous Materials and Waste Management Division

cc: Ryan McCaw, Metro West Housing Solutions



NARRATIVE CRITERIA

Project Area Description and Plans For Revitalization

Target Area and Brownfields

Overview of Brownfield Challenges and Description of Target Area

The City of Lakewood (City), a first-tier suburb of Denver, grew rapidly after World War II and through the 1980's, adding thousands of homes and numerous light industrial and commercial facilities. During this time, construction incorporated materials like Asbestos that would later be deemed dangerous to human health. Industrial and commercial uses often disposed of contaminants in groundwater and soil, creating isolated "hot spots" as well as extensive plumes throughout the community. Suburban leapfrog development patterns took a toll in the 1990s and 2000's. As environmental regulations emerged, once thriving properties became contaminated, obsolete, or completely abandoned in significant swaths of Lakewood. This trend intensively affected the southern half of the O'Kane Park neighborhood, one of the oldest parts of Lakewood, where Cedar Gardens Apartments (Cedar) is located. The Villa Italia Mall once anchored the neighborhood, its northern edge approximately 450' from Cedar. The mall began a long decline in the late 1980's, was demolished in 2001, and then waited years for redevelopment due to extensive in-building, soil, soil vapor, and groundwater contamination, potentially impacting Cedar and many other properties in the area. A groundwater plume originating from Villa Italia permeated the O'Kane Park neighborhood. Accordingly, all surrounding properties abutting Cedar to the south, east, and west were designated as "blighted" in 1998. Given the longstanding decline in the area and lack of reinvestment, neighborhood residents are exposed to more environmental hazards and experience limited economic development around them.

This grant will help to address these impacts and improve environmental quality for neighborhood residents and businesses by eliminating an enduring, significant source of potential contamination exposure. Moreover, modern highly energy- and water-efficient buildings with an acre of outdoor open and recreation space, in a multi-modal transit-friendly area, will enhance neighborhood environmental quality. The grant will help spur revitalization beyond Belmar and into the O'Kane Park neighborhood, which has experienced muted recent investment relative to other Lakewood neighborhoods. It will help to replace 56 antiquated, unrestricted apartments with 84 safe, modern, and healthy income-restricted apartments. The infusion of 84 affordable new homes that will remain income-restricted for at least 50 years will be critically important to maintain and grow a diverse population and employment base to support the Lakewood community.

Description of the Proposed Brownfield Site(s)

Cedar was constructed in 1961 on a 2.5-acre property with 56 apartments, 2 standalone maintenance and outdoor storage buildings, a leasing office, a variety of outdoor amenities, parking lot, interconnected sidewalks, and manicured open space. The 2 buildings comprise nearly 52,000 square feet (s.f.). MWHS purchased the property in 2004 and has operated it as "naturally occurring affordable housing" ever since, i.e. rents are capped to accommodate low incomes, but the property is unrestricted and operating as a standard market rate apartment complex. Given the age of the property, independent of environmental contamination, the buildings are increasingly

deteriorating, and maintenance costs are growing. Moreover, the buildings are obsolete, with antiquated plumbing and electrical systems, and the structures themselves are being impacted by expanding soil conditions. Furthermore, it was developed before the American With Disabilities Act, so although MWHS has worked extensively over the years to incorporate accessibility, the ability to do so is limited by Cedar's architectural design and the costs associated with accessibility upgrades.

As was typical during the early 1960s, Asbestos was heavily utilized throughout the buildings. Asbestos sampling of exterior breezeways, the leasing office, laundry rooms, mechanical rooms, maintenance rooms, and apartment interiors indicate Asbestos-containing materials (ACM) totaling approximately 158,900 s.f. of total surface area. ACM along the exterior was identified in breezeway surfacing materials and drywall. Indoors, ACM was found in ceiling and wall orange peel and stomp surfacing texture, joint compound, and in mastic for the original kitchen floor tiles.

The Cedar Gardens property is located in a long-developed, mixed-use area with a history of dry cleaners, automotive uses, and light industrial activity, and past environmental investigations and remediation efforts have occurred on neighboring parcels. In light of this broader context, MWHS completed a Phase II Environmental Site Assessment (ESA) in 2024 to evaluate whether off-site contamination may be affecting the property via soil, soil gas, or vapor intrusion pathways. Subsurface soil sampling did not identify any exceedances of EPA Regional Screening Levels for residential soils, and groundwater was not encountered in any borings. One sub-slab soil gas sample was collected and found that Chloroform exceeded EPA screening levels. However, indoor air quality testing in the existing buildings identified eight compounds exceeding EPA residential screening levels: 1,2-Dichloroethane, 1,3-Butadiene, 1,4-Dichlorobenzene, Benzene, Bromodichloromethane, Carbon Tetrachloride, Chloroform, and Naphthalene.

Although these results do not indicate significant soil or groundwater contamination on the site itself, they confirm the presence of a vapor intrusion pathway affecting the existing buildings, likely associated with broader off-site conditions, and support the need for a permanent vapor mitigation system as part of redevelopment.

Revitalization of the Target Area

Reuse Strategy and Alignment with Revitalization Plans

The Cedar reuse strategy, redeveloping the property to increase density by 50% and create 84 deed-restricted affordable apartments, aligns with many City of Lakewood neighborhood, corridor, and City-wide planning goals going back decades. MWHS has formally submitted redevelopment plans to the City Planning Department and has received the first round of review comments, demonstrating that the project is actively moving forward toward implementation. The *Envision Lakewood 2040 Comprehensive Plan's* Future Land Use Map identifies Cedar as part of a "community hub", a mixed-use, urban, higher density and intensity activity area in the community. The Comprehensive Plan prioritizes "the production of housing that is affordable for low- and moderate-income residents by assisting Public Housing Authorities (such as MWHS) through programs, policies, and incentives that ensure long-term affordability." The reuse strategy "supports greater density in areas well-served by transit, while ensuring a

dense pedestrian-network where residents have safe and convenient access to destinations.” Per the *1998 West Alameda Avenue Blight Study*, investment and revitalization in blighted areas along Alameda is paramount, and the Cedar reuse strategy achieves this goal by redeveloping an obsolete, environmentally contaminated property adjacent to designated blighted parcels. Building on this study, the City has invested heavily into Alameda Avenue streetscape improvements to make the heart of Lakewood safer, and to stimulate investment, implementing the *2014 Downtown Lakewood Connectivity and Urban Design Plan*. This plan emphasizes linking Belmar with the O’Kane Park neighborhood for shopping, employment, and recreation. The *Alameda Streetscape Project* began in 2018 and included adding sidewalks, landscaped medians, lighting, public art, trees and aesthetic features such as flagstone accents along Alameda. The reuse strategy helps continue those streetscape improvements deeper into the neighborhood. The reuse strategy proposes facing apartments and a resource center toward the street, and upgrading sidewalks, drainage, and road conditions along the public right-of-way, making the link between the O’Kane Park neighborhood and Belmar safer for pedestrians and bicyclists. The reuse will help to implement strategies outlined in the *2024 Lakewood Strategic Housing Plan* including: “invest in affordable housing; expand overall affordable housing supply; expand housing choices and services for residents; and keep residents stably housed.” The plan also says, “Lakewood is a primarily built-out community and most future housing production will require redevelopment or conversion of property to more productive use.” The reuse strategy redevelops an underutilized site into a more productive use, increasing its housing density by 50%.

In addition to participating in the creation of the plans outlined above with the general public, MWHS has also engaged community stakeholders and prospective funders in the reuse strategy planning process. MWHS has met with CO District 7 staff, City Council representatives for the O’Kane Park area, and Lakewood’s mayor to solicit input on the reuse strategy and make them aware of future funding application timelines. MWHS also met with the Lakewood Reinvestment Authority, Jefferson County, CO Division of Housing, and the CO Housing and Finance Authority (CHFA) to discuss their priorities for depth of affordability in the proposed reuse strategy and to plan for funding.

Outcomes and Benefits of Reuse Strategy

The reuse strategy will stimulate economic development, provide nearly 1-acre of new programmed recreation and green space, and support a 100% non-profit use. Cedar’s apartments are not currently deed-restricted and MWHS could theoretically sell it to a developer that might hold it longer without remediation, raise rents significantly to mirror market conditions, and provide no non-profit use. Instead, with the help of this grant, Cedar can be redeveloped into safe, high-quality housing that will become affordable via deed restriction for at least 50 years. MWHS intends to activate the most prominent corner of the site with a resource center to facilitate supportive services provision to Cedar’s children and adults, such as financial literacy education, after school Homework Club, job training, etc. MWHS partners with 30+ local non-profits to connect residents to these opportunities with physical space to facilitate programming.

Economically, the reuse strategy will benefit Lakewood in multiple ways. The \$40 million+ project will support at least 100 full-time equivalent (FTE) employment positions

in abatement, construction, design, engineering, etc. Once complete, Cedar will employ 3 FTE positions, doubling its current staffing. The temporary and long-term workers will infuse Lakewood with sales tax revenue and support proximate businesses. The neighborhood experienced a 33% increase in rent between 2017 and 2022. 70% of the apartments are planned to rent to households making 50% or less of Area Median Income, freeing potential spending and saving power for low-income families. 30/84 planned apartments will rent for \$780 - \$1,300 or less per month, including utilities, an extraordinarily low number in CO, now the least affordable state for housing costs according to recent data from the U.S. Department of Housing and Urban Development. Moreover, the 50% increase in population will help provide more employees to nearby businesses and generate more sales tax revenue for the City than current.

The initial remediation and future redevelopment will achieve strong outcomes for climate resiliency, energy- and water-efficiency, and multi-modal transportation use. The reuse strategy will realize the highest and best use for the property, increasing density by 50%. Eliminating large amounts of ACM from the environment immediately better protects human and wildlife health. Construction of new buildings to modern code without unhealthy building materials such as Asbestos protects future residents. Furthermore, in the event of an extreme climatic event in the future, avoiding potential for hazardous spills and subsequent exposure is another positive aspect of redevelopment. Further enhancing climatic resiliency, MWHS intends to bury approximately 375' of overhead powerlines, protecting that stretch of electrical capacity from extreme wind, hail, and heat. Cedar will participate in the National Green Building Standard (targeting Silver certification), ensuring a holistic approach to sustainable building design and energy-efficient long-term operations. Mitigating barriers to using multiple forms of transportation is key to driving positive environmental outcomes. MWHS Resident Services staff will provide education for how best to utilize proximate bus service in concert with biking and carpooling. Cedar is approximately 300' from the Alameda high frequency bus corridor with a stop one block away. MWHS has a longstanding partnership with RTD to provide discounted passes to low-income residents and ensure youth residents take advantage of RTD's free youth service. The reuse design also incorporates secure, sheltered bicycle storage and an on-site free electric bike library with 10+ charging stations.

Strategy for Leveraging Resources

Resources Needed for Site Characterization

Minimal additional resources are anticipated for site characterization. MWHS utilized the EPA technical brownfield assessment program to complete the 2024 Phase II ESA, saving \$73,500 that was reinvested into the redevelopment budget. Intensive characterization of in-building contamination has occurred. The only expected additional site characterization is an updated Phase I ESA as required by the CHFA's Low Income Housing Tax Credit (LIHTC) application. Although there are no indications of previous development on-site, there is always potential for encountering unknown contaminants during redevelopment. MWHS will allocate contingency of \$30,000 in the redevelopment budget to accommodate Phase I ESA updates, reliance letters, and currently unanticipated additional site characterization activities.

Resources Needed for Site Remediation

The EPA brownfield cleanup grant is being pursued to pay for all remediation of the property including ACM abatement, the materials for and installation of the subslab vapor mitigation system (SSVMS), and confirmation sampling. Because abatement is not anticipated to commence for approximately 12–18 months, the requested budget includes additional contingency beyond contractor estimates to address potential quantity growth, unforeseen conditions, and inflation. Any unused funds will be returned to EPA. In the event the grant is not secured, MWHS will pursue the CO Contaminated Land Redevelopment Tax Credit to help offset up to \$525,000 of the remediation budget. MWHS has successfully utilized this tax credit before, though there is a cap on available annual funding, and that cap has been met the past few calendar years.

Resources Needed for Site Reuse

Name of Resource	Assessment or Reuse Activities?	Secured or Unsecured?	Amount
U.S. EPA TBA Program	Assessment	Secured	\$73,500
MWHS Equity	Assessment & Reuse	Secured	\$4,000,000
City of Lakewood Fee Waiver	Reuse	Secured	~\$75,000
U.S. EPA Grant	Reuse	Unsecured	\$1,000,000
City of Lakewood CDBG	Reuse	Unsecured	~\$500,000
CHFA LIHTCs	Reuse	Unsecured	~\$24,000,000
Jefferson County Grant	Reuse	Unsecured	~\$750,000
State of Colorado Grant	Reuse	Unsecured	~\$2,000,000
House District 7 Community Project Funding Grant	Reuse	Unsecured	\$1,500,000
Charge Ahead CO Grant	Reuse	Unsecured	~\$75,000
Alameda Connects BID Grant	Reuse	Unsecured	~\$25,000
CO Garden Foundation Grant	Reuse	Unsecured	~\$10,000

Use of Existing Infrastructure

The Cedar redevelopment plan is a textbook example of an urban infill development project, leveraging long-established infrastructure, and improving it on-site and within the public-right-of-way framing the property. For example, because apartments already operate on-site, the existing water taps can be reused for the new development.

Community Need and Community Engagement

Community's Need for Funding

Cedar is a long established naturally occurring low-income housing complex. Given its age and condition, maintenance costs are high, and in order to keep rents low and avoid displacing residents, MWHS needs additional financial support to remediate environmental contamination. The City invests heavily in environmental remediation on public land but does not offer grants for private property remediation.

Health or Welfare of Sensitive Populations

Cedar's population comprises low-income households with a high proportion of children and some multi-generational households. Cedar is located in Census Tract 116.02

which exhibits a variety of health and welfare challenges at rates at or above those of the County. As noted above, decades of decline and disinvestment, heavily influenced by brownfields, negatively impacted quality of life for residents as articulated below.

Factor	Census Tract 116.02	Jefferson County
Population	4,455	578,533
Hispanic Median Household Income (\$)	\$44,607	\$61,526
White Median Household Income (\$)	\$52,667	\$83,819
Females w/ Bachelor's degree (%)	17%	37%
Males w/ Bachelor's degree (%)	5%	34%
Lack of Health Insurance Age 18-64 (%)	18%	8%
Any Disability Among Adults (%)	33%	25%
Fair or Poor Self-Reported Health Among Adults (%)	21%	13%
Adults Reporting Current Asthma (%)	7.4%	9.5%
Modeled Cancer (%)	8.9%	10.2%
<i>Sources: U.S. Center for Disease Control PLACES, 2025 & American Community Survey, 2024</i>		

Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Cedar remediation and reuse strategy will help to reduce these negative indicators. Removing nearly 159,000 s.f. of hazardous materials and vapor pathways to exposure greatly reduces residents' exposure risk. A functioning SSVMS may help to reduce fair/poor self-reported health by improving air quality. Accessibility upgrades will positively impact all residents and visitors, particularly those that may have a disability.

Economically Impoverished/Disproportionately Impacted Populations

The grant will help to alleviate a major impediment to redevelopment, paying for environmental remediation and gaining legal clearance to move forward with reuse. The grant will help to create more financial resources to invest in quality, durability, resiliency, and affordability of the redeveloped housing. 50% more low-income apartments will be created as a result of the reuse strategy, and these homes' affordability will be locked in-place for 50+ years. In addition to eliminating exposure to unhealthy ACM and vapors, the higher quality, modern, and accessible new construction will improve the quality of life for residents now and for decades to come.

Community Engagement

Project Involvement and Project Roles

Organization Name	Entity's Mission	Point of Contact	Specific Involvement
MWHS	Develop and manage affordable housing in Lakewood	Ryan McCaw; ryamcc@mwhs.org	Owner, developer, & property manager that will oversee & facilitate remediation, redevelopment,

			& long-term operations
CDPHE	Facilitate health and environmental protection programs and activities	Fonda Apostolopoulos; fonda.apostolopoulos@state.co.us	Cleanup authorization, VCUP oversight, & closeout
O’Kane Park Neighborhood Association (NA)	A volunteer organization comprising a passionate group of neighbors to represent the neighborhood	Andrew Umyn; info@okanepark.com	MWHS will engage them to minimize potential exposure during remediation & solicit input on design & use of planned resource center & community garden

Incorporating Community Input

Regionally, to help set the stage for redevelopment and inform the Cedar reuse strategy, MWHS participated in the public Comprehensive Plan update process and the creation of the Strategic Housing Plan, sharing data and participating in City-led open houses. MWHS intends to present progress updates at monthly Alameda Connects BID meetings with Alameda corridor businesses. At the property level, a robust multi-year outreach effort engaged residents, MWHS staff, and partner organizations in redevelopment planning. In partnership with CU-Denver graduate students, input was gathered from residents on what type of amenities are most desired and how best to facilitate supportive services. Additionally, MWHS has held multiple open houses for Cedar residents over the past two years to answer questions, address concerns, and solicit input related to redevelopment. Summaries of these open houses and regular redevelopment-related updates are included in a monthly property newsletter distributed to all residents. MWHS’ on-site Resident Services Coordinator will assist with resident engagement as redevelopment gets closer. MWHS has also met with a variety of conventional lenders, mission-based investors, and public funding agencies to engage them in the project.

Task Descriptions, Cost Estimates, and Measuring Progress

Proposed Cleanup Plan

The proposed cleanup plan has three major elements: acceptance into CDPHE’s VCUP; abatement of ACM in the existing structures; and installation of a SSVMS beneath the new buildings following redevelopment. Demolition of the existing buildings will be funded separately using non-EPA funds. ACM abatement will be conducted by a licensed contractor under CDPHE-approved permits and workplans, including required

containment, removal, disposal, and clearance sampling in accordance with CDPHE regulations.

Vapor mitigation will then be incorporated into the construction of new buildings through installation of a SSVMS designed to be readily activated if needed. Post-construction indoor air quality (IAQ) testing will be conducted in coordination with EPA under an approved Site-Specific Quality Assurance Project Plan (SSQAPP). A robust vapor barrier meeting ASTM E1745 Class A standards, such as sheet polyethylene with a 10-mil minimum thickness, is planned for installation across the entire sub-slab area to block vapor entry points. Sealing all penetrations and cracks in the slab will be critical and carefully inspected. A permeable layer of coarse aggregate (e.g., crushed stone) will likely be installed beneath the slab to facilitate the collection and venting of soil gases. In the event vapors are found above EPA residential screening levels during IAQ testing, the SSVMS will be activated by electric fans that will pull air through the piping system above the roofline. Once IAQ confirmation sampling is complete, a No Action Determination (NAD) request and cleanup certification report will be provided to CDPHE.

Description of Tasks/Activities and Outputs

Task Activity: Project Planning, Regulatory Coordination, and Procurement
EPA-funded tasks/activities (note - these activities are not intended to be funded by EPA): Enroll site in CDPHE’s VCUP, finalize ABCA, prepare and obtain EPA approval of SSQAPP, execute EPA cooperative agreement, prepare bid documents and procure abatement and vapor mitigation contractor(s)
Anticipated Project Schedule: 4 th quarter 2026 – 2 nd quarter 2027
Task Activity Lead: MWHS
Outputs: VCUP acceptance/confirmation from CDPHE, final ABCA, EPA-approved SSQAPP and cooperative agreement, executed procurement contract(s)

Task Activity: Asbestos Abatement
EPA-funded tasks/activities: Obtain CDPHE Asbestos abatement permits, perform ACM abatement in unoccupied structures, conduct clearance in accordance with CDPHE requirements, and proper disposal and documentation
Anticipated Project Schedule: 2 nd quarter 2027 – 4 th quarter 2027
Task Activity Lead: MWHS, abatement contractor, and air sampling contractor
Outputs: Removal of approximately 158,900 s.f. of ACM, waste manifests, and abatement completion report

Task Activity: SSVMS Installation and Confirmation Sampling
EPA-funded tasks/activities: Install SSVMS beneath new buildings, conduct post-construction indoor air sampling per SSQAPP, activate system if required, and conduct follow-up sampling if system is activated
Anticipated Project Schedule: 1 st quarter 2028 – 1 st quarter 2029
Task Activity Lead: MWHS and SSVMS contractor, and air sampling contractor
Outputs: Installed SSVMS, laboratory analytical results, EPA-approved final confirmation sampling report, and documentation of system activation (if required)

Task Activity: EPA Grant Closeout and Reporting to EPA and CDPHE
EPA-funded tasks/activities (note - these activities are not intended to be funded by EPA): Final reporting to EPA, creation of ACRES profile, and NAD request documentation package to CDPHE
Anticipated Project Schedule: 1 st quarter 2029 – 3 rd quarter 2029
Task Activity Lead: MWHS
Outputs: Final EPA technical report, active ACRES profile, CDPHE NAD certification

Cost Estimates

Budget Categories	Project Tasks				
	Project Planning, Coordination, Procurement	Asbestos Abatement	SSVMS Installation & Sampling	Grant Closeout & Reporting to EPA & CDPHE	Total
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$0	\$0	\$0	\$0	\$0
Construction	\$0	\$900,000	\$100,000	\$0	\$1,000,000
Other (_____)	\$0	\$0	\$0	\$0	\$0
Total Direct Costs	\$0	\$900,000	\$100,000	\$0	\$1,000,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$0	\$900,000	\$100,000	\$0	\$1,000,000

MWHS intends to pay for all personnel and fringe benefits costs using non-EPA funds. Cost estimates were developed after site visits and sharing all ACM testing results and design plans with multiple qualified contractors experienced in Davis-Bacon and BABA compliance. Conservative estimates were selected for the grant application.

Plan to Measure and Evaluate Environmental Progress and Results

MWHS has successfully implemented and closed out three prior EPA Brownfields Cleanup grants and will use the same internal project management, financial tracking, and reporting systems for this project. MWHS will track and evaluate project progress using a task-based workplan tied directly to the approved cooperative agreement, schedule, and budget. Each task will clearly define activities and measurable outputs. Progress will be measured by completion of objective, verifiable milestones such as

completion of asbestos abatement, installation of the SSVMS, and approval of confirmation sampling results. Progress and expenditures will be documented through quarterly reports to EPA. Final outcomes will be documented through the final EPA technical report and CDPHE closeout documentation which will include invoices, manifests, IAQ test results, etc.

Programmatic Capability and Past Performance

Organizational Structure

MWHS has a highly experienced, tight knit team that understands how to successfully manage and implement multiple Federal funding sources along with State, County, and local sources cohesively within the same project.

Description of Key Staff

MWHS' Chief Real Estate Officer (Brendalee Connors) and Director of Development (Ryan McCaw) have worked together for 12 years on all three past brownfield grant winning projects. MWHS anticipates working with a general contractor and remediation contractors that have past experience with EPA brownfield cleanup grants and the VCUP process.

Acquiring Additional Resources

As a housing authority, MWHS must facilitate procurement per U.S. Housing and Urban Development standards. MWHS employs a full-time Procurement Specialist who will work with Brendalee and Ryan to hire contractors per EPA standards.

Past Performance and Accomplishments

Accomplishments

MWHS has successfully managed nearly \$1,600,000 of direct EPA brownfield technical assessment and cleanup funding since 2012. The three cleanup grant winning projects include Lamar Station Crossing (LSC) (BF-96808801-0), 5800 (BF-968493-01), and Belmar Groves (BF-968986-01). LSC won a 2014 Phoenix Award.

Compliance with Grant Requirements

All three EPA brownfield grant funded projects achieved successful closure with CDPHE and finished well within the schedules outlined in EPA's cooperative agreements. Nearly all anticipated outputs and outcomes were achieved within the anticipated timelines for each project. All three projects met all requirements regarding workplan, schedule, quarterly reports, etc. All three projects are accurately reflected in ACRES.



THRESHOLD CRITERIA RESPONSES

Applicant Eligibility

Per 2 CFR § 200.1, the Housing Authority of the City of Lakewood d.b.a. Metro West Housing Solutions (MWHS) is an eligible unit of local government and eligible to apply.

Tax Exempt and 501(c)(4) Status

As a public housing authority, MWHS is a tax-exempt entity and does not lobby the Federal government. Please see the attached legal opinion.

Previously Awarded Cleanup Grants

MWHS has successfully managed \$1,500,000 of direct EPA brownfield cleanup funding since 2012 across three projects including Lamar Station Crossing (LSC) (BF-96808801-0), 5800 (BF-968493-01), and Belmar Groves (BF-968986-01).

Expenditure of Existing Multipurpose Grants

MWHS does not have an open EPA brownfields multipurpose grant.

Site Ownership Information

MWHS is the sole owner of the property and will retain ownership of the site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site. MWHS is not a tenant, contract purchaser, or operator only.

Basic Site Information

Cedar Gardens Apartments
6980 & 6990 W. Cedar Avenue
Lakewood, CO 80226

Status Of History Of Contamination at the Site

In summary, Cedar Gardens is affected by extensive asbestos-containing materials (ACM) in the buildings and by vapor intrusion concerns documented by a 2024 Phase II ESA, including multiple indoor air exceedances of EPA screening levels. These conditions complicate redevelopment and require cleanup. Cedar Gardens was constructed in 1961, and not surprising for that time period, Asbestos was used. Asbestos sampling indicates extensive ACM totaling approximately 158,900 s.f. throughout the buildings and in exterior breezeway ceilings, a hazardous substance to human health.

Cedar Gardens has operated as multi-family rental apartments since its construction. There is no evidence that the site was previously developed or had any other use.

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Cedar Gardens is in an area with a long history of dry cleaners, auto mechanics and other auto-related uses, and light industrial and manufacturing facilities operating near the property. Past environmental analyses in the area have documented groundwater contamination from solvents (primarily tetrachloroethylene), which may have created a vapor encroachment condition at the site's apartment buildings. The 2024 Phase II analysis evaluated potential off-site concerns that may have impacted the site. No groundwater was encountered at the site in any of six soil boring locations prior to encountering refusal, at more than 12' below ground surface (bgs). Seven grab subsurface soil samples were collected at six locations on the site - one each in the northwest, southwest, northeast, and southeast corners of the site; one along the south-central boundary; and one on the north side of the courtyard between the east and west apartment buildings. Exact sampling locations were determined in the field based on the locations of underground utilities and accessibility. All samples had laboratory reporting levels below the EPA regional screening levels (RSLs) for residential soils. No exceedances of EPA RSLs were recorded in the six subsurface soil samples collected. Only one boring had a PID reading with staining noted at a depth of 12' - 13' bgs during sample collection. This interval was sampled, and no VOC detections were identified. One soil gas sample was collected adjacent to the east apartment building (6980). No detected VOC concentration exceeded the applicable EPA screening level for sub-slab soil gas concentrations with the exception of chloroform at 8.7 µg/m³.

Indoor air samples were collected at four locations – two locations within the west apartment building and two within the east apartment building. One outdoor ambient air sample was collected concurrently with indoor air sampling to represent background concentrations. The following eight compounds were detected above the EPA RSLs for residential indoor air: 1,2-Dichloroethane, 1,3 Butadiene, 1,4 – Dichlorobenzene, Benzene, Bromodichloromethane, Carbon Tetrachloride, Chloroform, and Naphthalene.

Brownfield Site Definition

The Cedar Gardens site meets the definition of a “brownfield site” under CERCLA §101(39)(A) because the presence of ACM and vapor intrusion concerns complicate redevelopment. The site is not listed on the National Priorities List, is not subject to any CERCLA administrative orders or judicial decrees, is not a landfill, and is not otherwise excluded from eligibility.

Environmental Assessment Required for Cleanup Grant Applications

A written ASTM E1903-19 or equivalent Phase II environmental site assessment report was completed by Tetra Tech, Inc. on December 20, 2024. This investigation is sufficient to support the proposed cleanup. Please see the Status Of History Of Contamination at the Site section above for details regarding the type of assessments and information attained from those assessments.

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Site Characterization

The subject property is eligible for the State Voluntary Cleanup Program (VCUP). Please see the attached letter from the Colorado Department of Public Health and Environment (CDPHE).

Enforcement or Other Actions

MWHS affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the Cedar Gardens site.

Sites Requiring a Property-Specific Determination

MWHS affirms that Cedar Gardens does not need a Property-Specific Determination.

Threshold Criteria Related to CERCLA/Petroleum Liability

MWHS acquired fee simple title to the Cedar Gardens property in 2004 through a negotiated purchase from a private party. MWHS has no familial, contractual, corporate, or financial relationship with any prior owner or operator of the property or any other potentially responsible party. MWHS has no direct or indirect affiliation, contractual relationship, or financial relationship with any potentially responsible party other than the instruments by which title was conveyed.

Prior to acquisition, MWHS conducted environmental due diligence consistent with the standards and customary practices in effect at the time of purchase. Specifically, a Transaction Screen Assessment (TSA) was completed by Pinyon Environmental Engineering Resources, Inc. dated February 11, 2004, in accordance with ASTM E1528-00. The TSA included a review of federal and state environmental databases, site reconnaissance, interviews, and review of historical information. The TSA concluded that there were no recognized environmental conditions associated with the historical or current operations of the site and no indication that off-site sources had impacted the property. The report did not identify any releases or threatened releases of hazardous substances at the time of acquisition. All disposal of potential hazardous substances at the site occurred prior to MWHS' acquisition of the property. MWHS did not cause or contribute to any release or threatened release of hazardous substances at the site and has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

Since acquisition, MWHS has owned and operated the property as residential housing. Upon becoming aware of environmental concerns in later years, MWHS took reasonable steps to prevent or limit exposure to hazardous substances, including conducting Phase I and Phase II environmental investigations, installing vapor mitigation systems, implementing an *Asbestos Operations and Maintenance Program*, and managing the property in a manner intended to prevent exacerbation of existing conditions and limit potential exposures.

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MWHS affirms that it is complying with all applicable land use restrictions, has not impeded the effectiveness or integrity of any institutional controls, has cooperated and will continue to cooperate with regulatory authorities, will provide access to the property as required, will comply with all information requests and administrative subpoenas, and has provided and will continue to provide all legally required notices.

Based on the foregoing, MWHS meets the requirements for the bona fide prospective purchaser liability protection under CERCLA § 101(40) and is therefore eligible for Brownfields Cleanup Grant funding.

Cleanup Authority and Oversight Structure

No cleanup response activities at neighboring properties are anticipated. MWHS intends to conduct the cleanup under the oversight of the CDPHE's Voluntary Cleanup Program (VCUP). Asbestos abatement will be performed by a licensed abatement contractor in accordance with CDPHE asbestos regulations and permitting requirements. All required notifications, work plans, and clearance activities will be completed in compliance with CDPHE requirements prior to demolition.

Vapor mitigation will be incorporated into the redevelopment through installation of a passive sub-slab vapor mitigation system designed to be readily activated if needed. Confirmation of the effectiveness of the vapor mitigation system will include post-construction indoor air quality testing, to be conducted in coordination with EPA under an approved Site-Specific Quality Assurance Project Plan (SSQAPP).

This oversight structure ensures that asbestos abatement is conducted under State regulatory authority and that vapor intrusion mitigation and confirmation sampling are conducted in accordance with EPA quality assurance requirements.

Community Notification

Notice of the draft ABCA's availability and the public meeting date and time were advertised in the Denver Post on January 8, 2026. The virtual public meeting occurred on January 20, 2026. A presentation about the site, draft ABCA, and draft grant proposal was facilitated. Time for comments and questions/answers was allotted at the end of presentation. Nine attendees joined the virtual meeting. No one participated by phone or asked follow up questions by phone after the public meeting. Attached with the application are copies of the ABCA, public notice in the Denver Post, affidavit regarding publication, the presentation, attendance sheet, a list of questions/comments received by attendees, and response notes.

Contractors and Named Subrecipients

A contractor has not been procured and no subrecipients have been named or are intended to be named. Solicitation documents have not yet been created.

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