R08-24-C-003

NARRATIVE INFORMATION SHEET

Applicant Identification
Housing Authority of the City of Lakewood d.b.a. Metro West Housing Solutions (MWHS)
575 Union Boulevard
Suite 100
Lakewood, CO 80228

Federal Funding Requested
MWHS requests $500,000 for a Single Site Cleanup.

Location
The subject property is located in Lakewood, CO.

Property Information
Belmar Groves Apartments
259 S. Teller St.
Lakewood, CO 80226

Contacts
Project Director
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Chief Executive
Executive Director
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Population
Belmar Groves Apartments is located in Lakewood, CO which has a population of 156,605 as of 2021.

Other Factors

Factor	*Page # in Narrative*
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.	4-5
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3

Releasing Copies of Applications
Not applicable.

NARRATIVE/RANKING CRITERIA

Project Area Description and Plans For Revitalization

Target Area and Brownfields

The City of Lakewood, a first-tier suburb of Denver grew rapidly beginning after World War II and through the 1980's with new residences and many light industrial and retail facilities. Yet suburban leap frog development patterns took a toll in the 1990s and 2000's as environmental regulations emerged, and once thriving properties became contaminated, underutilized, 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 Belmar Groves Apartments (BGA) is located. The infamous Villa Italia Mall once anchored the neighborhood, its northern edge approximately 500' from BGA. 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 ground water contamination that impacted the site and much of the area. It became a prominent eyesore and took decades to fully redevelop as Belmar, finally finishing in 2021. A groundwater plume originating from Villa Italia permeated to the O'Kane Park neighborhood, narrowly missing BGA but negatively impacting investment in many nearby properties. Along with numerous surrounding properties in the area along Alameda Avenue, BGA was designated as "blighted" by the Lakewood Urban Renewal Authority in the 1998 *West Alameda Avenue Blight Study*. Given the longstanding decline in the area and lack of redevelopment beyond Belmar, neighborhood residents are exposed to more environmental hazards and experience limited economic development around them. Economic, education, and health outcomes demonstrate a noticeable difference relative to the County and U.S. as noted below. This grant will help to improve environmental quality for residents in a highly affected neighborhood by eliminating an enduring, significant source of contamination and help spur revitalization beyond Belmar and into the O'Kane Park neighborhood.

BGA was constructed in 1972, providing 118 homes across 11 buildings (10 for apartments and 1 clubhouse/maintenance facility) in a garden apartment style design on 4.9-acres. As typical for that time, Asbestos and Lead-based paint (LBP) were extensively utilized. The property was rented at market rate prior to MWHS taking ownership and transitioning the housing to income-restricted affordable rental housing. Site characterization has identified that all 118 entry doors are coated in LBP and must be removed and replaced. Asbestos exists in drywall, vinyl sheet flooring, and subfloor fireproofing overspray. All told, more than 250,000 square feet (s.f.) of Asbestos-laden material (ACM) must be remediated at a total cost of nearly $2,500,000 over multiple years in order to stagger funding sources and avoid displacing residents. Because the property is 50 years old and was neglected by previous ownership, site conditions were poor and obsolete prior to beginning redevelopment and renovation.

Revitalization of the Target Area

The comprehensive BGA reuse strategy comprises a two-fold approach across two multi-year phases in order to leverage numerous funding sources staggered across different timelines. The first phase focuses on: the transformation of an antiquated

clubhouse/maintenance facility into a dynamic 2-story community resource center equipped with multiple leasing and human service provision offices, fitness center, a computer lab, 2 large gathering spaces, a conference room, and laundry facility; the relocation of maintenance space to 2 newly constructed detached garages; the installation of some Americans With Disabilities Act (ADA) compliant pathways; and the creation of two accessible apartments. As part of the first phase, 15 project-based housing vouchers have been allocated to the property to serve formerly homeless veterans in partnership with the U.S. Veterans Administration (VA). The second phase comprises: the expansion of the Community Resource Center; the removal of hazardous mansard roofing (fire cavity, water infiltration, pest infestation) to be replaced by a new exterior façade and roofing; subfloor radon mitigation; replacement of deteriorating water supply piping, and antiquated, inefficient water heaters and condensers; installation of a new community garden, playground, and BBQ pavilion; replacement of most sidewalks to ensure ADA-compliance and ease of access between buildings and the public realm; and a deep, comprehensive remodel of 116 apartments that includes floorplan modifications, complete bathroom and kitchen remodels, and the replacement of all lighting and appliances with energy-efficient models.

To inform the BGA reuse strategy, a robust multi-year outreach effort engaged residents, MWHS staff, and partner organizations. Prior to allocating project-based vouchers, MWHS entered into a Memorandum of Understanding with the VA for prospective resident referrals and for the VA to facilitate supportive services on-site. VA staff were engaged in the community resource center design process to ensure the end result would meet their needs. Denver Urban Gardens staff reviewed the community garden design. Over the past few years, BGA residents have been involved in several open houses to provide feedback on the community resource center and outdoor amenities designs in cooperation with CU-Denver's graduate landscape architecture program and independently directly with MWHS staff regarding apartment renovations. As construction has begun, MWHS is keeping residents informed with a newsletter and continues to keep a management office open on-site during business hours.

The BGA reuse strategy aligns with many City of Lakewood neighborhood planning goals going back to the blight study in 1998. The City desires investment and revitalization in blighted areas and the BGA reuse strategy achieves this goal. *Lakewood 2025: Moving Forward Together,* the 2015 Comprehensive Plan, includes two major housing goals: "provide an adequate mix of housing to meet the needs of all segments of the community" and "promote housing rehabilitation for Lakewood's low-income and special needs residents." The City has invested heavily into Alameda Avenue streetscape improvements to make the heart of Lakewood safer, more pedestrian- and bicyclist-friendly, and to stimulate investment. The *2014 Downtown Lakewood Connectivity and Urban Design Plan* emphasizes linking recently developed Belmar with the O'Kane Park neighborhood for shopping, employment, and recreation. That plan laid the foundation for City and BID investment called the *Alameda Streetscape Project* which began in 2018. This includes adding sidewalks, landscaped medians, lighting, public art, trees and aesthetic features such as flagstone accents. The BGA reuse strategy helps continue those streetscape improvements deeper into the neighborhood by upgrading sidewalk, drainage, and road conditions on the public

realm bordering BGA, making the link between O'Kane Park and Belmar clearer and safer for pedestrians and bicyclists.

The BGA revitalization will help to stimulate additional investment in surrounding properties by demonstrating what is possible visually, creating positive change and attention to the area. The aesthetic appearance of BGA has not changed for 50 years. The $30,000,000 infusion will create a noticeable pop of color. More modern, welcoming architecture at a prominent location will help enhance the evolving residential and commercial character of O'Kane Park. MWHS' investment in public infrastructure adjacent to BGA will help support proximate businesses and neighborhood residents. The investment also significantly raises the property value of BGA and will limit vacancy which positively affects other comparable multi-family housing in the neighborhood. By avoiding displacing current residents, local businesses retain consumers they've built a relationship with.

The grant will help to facilitate the critical preservation and redevelopment of existing affordable housing that otherwise could have converted to market rate. After the property was acquired by MWHS in 2004, it was given a 15-year affordability requirement which expired in 2020. At that time, MWHS had the right to convert the property to market rate housing which would have eliminated 118 low-income apartments from the local housing stock. Instead, by leveraging this grant and an array of other funding sources, MWHS is able to complete approximately $30,000,000 worth of improvements *and* extend the affordability requirement another 15 years through 2035. In fact, the property will actually become *more* affordable as a result of the combination of funding sources while also becoming a much healthier, safer, and more modern place to live. Currently all 118 apartments are rented at 60% of Area Median Income (AMI) or below which equates to a 1-person household income of $52,140 or a 4-person household with income of $74,460. Upon the project's conclusion, 24 apartments will be rented at 40% AMI or below, 39 at 50% AMI or below, and 55 at 60% AMI or below, thus greatly increasing affordability from its current position. BGA had a waitlist of 466 when the project began, so creating deeper, lasting affordability is critical as the Denver metro area has experienced tremendous rent growth and diminishing affordability in recent years. Neighborhood rents increased 15.8% between 2020 and 2022 alone (source: MWHS market study, 2022). Nationally, from 2015 to 2022, the share of newly completed rental homes with high-end rents ($2,050 or more) nearly doubled, going from 19% of all rental homes to 36%, while those with asking rents below $1,050 dropped from 22% of all rental homes to 5% (source: Harvard Joint Center and Novogradac, 2023), and Lakewood is no exception. MWHS partners with more than 30 local non-profits and government agencies to connect its clients with supportive services. The grant will also help support the new community resource center as a focal point for community events and activities with partner organizations.

Climatically, the project will achieve Enterprise Green Communities certification and meets a variety of climate change combating objectives. Improving an existing developed site in a sound location less than 500' from a bus rapid transit corridor is an improvement over an isolated greenfield development. The "greenest" building is often the building that already exists. Preservation requires less new materials and thus typically generates less pollution than new construction. Eliminating large amounts of

ACM and LBP ensures that in the event of a significant storm or earthquake, residents are much less likely to be affected by these contaminants. Rebuilding the exteriors to current code will help to ensure lasting durability and the ability to weather high winds, hail, extreme heat and cold, etc. Installing efficient LED lighting, EnergyStar appliances, and high efficiency condensers and water heaters will dilute the property's carbon footprint and help to minimize utility bills. The 10-kW solar powered community resource center will generate much of the building's power needs and serves as a visible commitment to renewable energy. Revamping landscaping that hasn't been touched for decades to a more efficient plan that cleans and utilizes stormwater runoff for watering plants and incorporates native and resilient species is much better for the climate than existing conditions.

Strategy for Leveraging Resources

Resources needed for site characterization have generally been completed and now that redevelopment and renovation is underway, knowledge is being gained about what to expect going forward. Nonetheless, in the event additional assessment is required, MWHS has allocated approximately $190,000 in its budget for soft cost contingency, such as unanticipated additional environmental assessment. Resources needed for site remediation and site reuse have mostly been secured. In the event that additional hard costs related to remediation and/or site reuse are discovered, approximately $911,000 has been allocated in the redevelopment budget for hard cost contingency, though this contingency is being rapidly depleted given continued inflation and labor shortages.

Stretching the project longer term to align with funding opportunity timelines and to avoid displacing residents has been challenging due to inflation, rising interest rates, and labor shortages. As part of the Federal Low Income Housing Tax Credit (LIHTC) application process, MWHS approached the State of Colorado for a Housing Development Grant to contribute toward the project. Based on that communication, MWHS expected to receive $45,000 per unit for the project. However, upon receipt of LIHTCs, the State was only able to offer $30,000 per unit, a net loss of $1,770,000 in anticipated funding, a significant gap for MWHS to close, and thus another reason why the EPA brownfield cleanup grant is so impactful toward ensuring the most durable, high quality, and healthiest project outcomes.

Phase I BGA Reuse Strategy (Complete)			
Name of Resource	**Assessment, Remediation, or Reuse Activities?**	**Secured or Unsecured?**	**Additional Details**
Jefferson County HOME Grant	Remediation and Reuse	Secured	$150,000
HUD Neighborhood Initiative Grant	Remediation and Reuse	Secured	$487,000
Jefferson County CDBG	Remediation and Reuse	Secured	$275,000
Xcel Renewable Energy Trust	Reuse	Secured	$40,000
Lakewood CDBG	Reuse	Secured	$10,000

Phase I BGA Reuse Strategy (Complete)			
Name of Resource	**Assessment, Remediation, or Reuse Activities?**	**Secured or Unsecured?**	**Additional Details**
Colorado Garden Foundation, Inc.	Reuse	Secured	$10,000
Denver Urban Gardens	Reuse	Secured	$5,000
Resources have been spent so attachments verifying receipt of funds have not been included but can be provided upon request			

Phase II BGA Reuse Strategy (In Progress)			
Name of Resource	**Assessment, Remediation, or Reuse Activities?**	**Secured or Unsecured?**	**Additional Details**
LIHTC Equity	Remediation & and Reuse	Secured	$22,618,637
State of CO Housing Development Grant	Reuse	Secured	$3,540,000
MWHS Deferred Developer Fee	Reuse	Secured	$2,442,208
Jefferson County HOME Grant	Remediation and Reuse	Secured	$500,000
Please see attachments verifying receipt of secured funds			

Existing public infrastructure is generally sufficient to connect to internal BGA infrastructure. However, MWHS is upgrading drainage and road and sidewalk quality on the public right-of-way adjacent to the property to improvement safety and the overall experience for pedestrians and bicyclists.

Community Need and Community Engagement

Community Need

Community's Need for Funding

As a low-income housing community with fixed, affordable rents, and owned/managed by a mission-driven non-profit entity, the property cannot be significantly revitalized without outside sources of funding such as an EPA brownfield cleanup grant. The State of Colorado does not offer grants or tax credits for in-building ACM or LBP remediation, so the EPA brownfield cleanup grant is the only source of funding to help pay for remediation directly. The brownfield cleanup grant helps to enhance the health, resiliency, and quality of existing affordable housing and supports the creation of a multi-faceted community resource space for MWHS and its many partner organizations. The grant helps to sustain and deepen affordability for 118 low-income families without requiring relocation. Although avoiding relocation ensures no families are forced to leave, it extends the timeline for the project and thus extends interest payments on the construction loan, and puts the project at risk of inflation-driven cost escalations. A

deep renovation as opposed to new construction requires more contingency due to less predictability, so maximizing funding is critically important to meeting the budget.

The BGA resident population is diverse, comprising many households with children, single people and seniors, and formerly homeless veterans transitioning into permanent housing. Currently, more than 60% of residents identify as Hispanic. Median annual household income is currently approximately $31,000.

Threats to Sensitive Populations

BGA is located in Census Tract 116.02 which exhibits a variety of health and welfare challenges at rates above those of its County, State, and often relative to the national average. As noted above, a multi decade history of decline and disinvestment, heavily influenced by brownfields, has negatively impacted quality of life for residents as articulated below.

	Census Tract 116.02	**Jefferson County**	**Colorado**
Population	4,455	156,605	5,839,926
Hispanic Median Household Income	$44,607	$61,526	$53,929
White Median Household Income	$52,667	$83,819	$74,730
Females w/ Bachelor's degree %	17%	37%	35%
Males w/ Bachelor's degree %	5%	34%	30%
High Cholesterol	32%	28%	28%
High Blood Pressure	26%	23%	24%
Mental Health Not Good	16%	13%	15%
Physical Health Not Good	12%	9%	10%
Sources: U.S. Census Bureau, 2020 and Center for Disease Control, 2021			

Environmental justice issues affect the census tract in addition to what is listed above. Per CEJSTG, BGA is located within a disadvantaged census tract. 20% of the population has less than a high school diploma, twice the national average. Per the EJScreen Tool, relative to the state, the area is in the 95th percentile for hazardous waste proximity, 98th for low life expectancy, 66th for low-income, and 88th for underground storage tank leaks.

The BGA reuse strategy will help to reduce these negative indicators. Removing 250,000+ s.f. of hazardous materials greatly reduces residents' exposure risk. Accessibility upgrades will positively impact all residents and visitors, particularly those that are mobility-challenged. The sensory and edible gardens and playground create healthy, active living amenities. The resource center creates a vibrant space that can be used by many people at the same time in large and small gatherings, for MWHS and partner organization education, recreation, medical, social, and other programming.

An established low-income community with many children will continue to exist in what otherwise may have been converted to market rate housing. Furthermore, the in-place remediation approach (residents are temporarily relocated to other apartments in the complex while their home is remediated and remodeled) mitigates health risks where they live without requiring long-term relocation. Relocation can create economic hardship and induce mental stress. Moreover, if the property were completely redeveloped into new affordable housing, it would have required complete displacement and relocation, and the residential makeup likely would have changed considerably. Typically, less than 37% of low-income housing residents return to redeveloped affordable housing after relocation (source: *HUD HOPE IV Data Compilation and Analysis*, 2017).

The brownfield cleanup grant and BGA reuse strategy will help to mitigate environmental justice issues by greatly enhancing health, climatic durability, efficiency, and quality without requiring displacement. Although time-consuming and still fairly costly, deep renovation and adaptive reuse don't require as intensive of a City review as new construction. This definitely saves time and money. By taking a building-by-building approach to deep renovation, families can be temporarily relocated on-site and able to move into their improved home upon its completion. This approach preserves an existing low-income community, allowing children to continue to attend the same school, parents to continue to work at conveniently located jobs, and residents to continue to patronize local small businesses they are familiar with and want to support.

Community Engagement

Project Involvement and Project Roles

Organization Name	Point of Contact	Specific Involvement
U.S. Veterans Administration	Candice Lown; (720) 695-7751 or John Burk; john.burk@state.us	Candice refers prospective residents; John oversees program
Alameda Connects	Tom Quinn; tom@alamedaconnects.org	Present project updates
O'Kane Park Neighborhood Association	Andrew Umyn; info@okanepark.com	Present project updates regarding stormwater drainage and road and sidewalk quality

Incorporating Community Input

MWHS has engaged stakeholders during design and will continue to provide regular updates through construction and reuse. Methods utilized include past open houses with residents and design meetings with different MWHS staff members that will use the property in different ways. MWHS has on-site management and maintenance staff that are available to communicate about the project with residents. MWHS will attend update Alameda Connects meeting attendees at least once per year regarding project progress. An open house grand opening celebration will occur at the project's conclusion for stakeholders to tour the completed project. Social media including Instagram, Facebook, and LinkedIn will provide milestone progress updates. A property

newsletter is distributed regularly to residents to provide status updates. Feedback received from stakeholders will be addressed by MWHS staff at a weekly project meeting. For the purposes of the EPA cleanup grant application, a public in-person meeting (with the option to participate via Zoom) was held. The meeting was advertised in the Denver Post and the notice was posted prominently in the main office lobby which is visited by dozens of MWHS residents daily.

Task Descriptions, Cost Estimates, and Measuring Progress

Proposed Cleanup Plan

More than 250,000 s.f. of ACM is anticipated in drywall, vinyl sheet flooring, overspray, fireproofing, and TSI. LBP has been found in all 118 apartment entry doors and the doors will be removed as replaced as part of the project. ACM will be properly removed by a licensed contractor that acquires permits from the State of Colorado to remediate ACM. The following outlines the workflow for completing remediation activities:

1. Trained contractor employees will be provided a completed work order that will detail the proposed location and extent of ACM.
2. Trained contractor employees are responsible for collecting all asbestos and lead waste and asbestos and lead contaminated materials (e.g., clothing, PPE, etc.) in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers. All waste must be adequately wet inside the waste bag.
3. Asbestos and lead waste must be delivered to the Waste Storage facility or container on-site. Each waste bag must have an O&M Asbestos or Lead Waste Sticker applied with the following information: date work was completed, Name of O&M trained staff responsible for work, building and apartment number, work order #, material(s) removed, and quantity of material removed.
4. Trained contractor employees will be responsible for coordinating disposal, manifesting, and billing for the asbestos and lead waste generated on an as needed basis.

The remediation contractors are closely following CDPHE regulations to remediate Lead-based paint and ACM and have acquired the necessary CDPHE permits to do so. Please see attached examples of permits acquired by CDPHE to-date.

Description of Tasks/Activities and Outputs

Task Activity: Abatement of ACM and LBP
EPA-funded tasks/activities: Abate ACM and LBP in building-by-building process to limit displacement and disruption of day-to-day operations Non-EPA grant resources needed to carry out tasks/activities: LIHTCs, Jefferson County HOME grant, State of Colorado Housing Development grant, and MWHS cash match and deferred developer fee
Anticipated Project Schedule: 3rd quarter 2023 – 4th quarter 2025
Task Activity Lead: MWHS
Outputs: Removal of approximately 250,000 s.f. of ACM, removal of 118 apartment entry doors coated in LBP, preservation of 118 low-income apartments, creation of

state-of-the-art community resource center, creation of an array of outdoor amenities including a community garden, playground, BBQ pavilion, and native, drought resistant landscaping

Task Activity: Performance Reporting and Monitoring
EPA-funded tasks/activities: Work with contractor, EPA, and CDPHE to ensure safe, proper, and complete remediation and manage the cleanup grant's implementation Non-EPA grant resources needed to carry out tasks/activities: MWHS cash match
Anticipated Project Schedule: 2nd quarter 2024 – 4th quarter 2025
Task Activity Lead: MWHS
Outputs: Final ABCA, community involvement plan, multiple project updates to partner organizations and neighborhood stakeholders, quarterly status reports, draw requests, cleanup completion report, ACRES profile, and grand opening celebration and tour

Cost Estimates

Budget Categories	**Project Tasks**		
	Remediation	Performance Reporting/Monitoring	Total
Personnel	$17,000	$6,500	$23,500
Fringe Benefits	$3,675	$1,945	$5,620
Travel	$0	$0	$0
Equipment	$0	$0	$0
Supplies	$0	$0	$0
Contractual	$0	$0	$0
Construction	$1,000,000*	$2,000	$1,002,000
Other (_____)	$0	$0	$0
Total Direct Costs	$1,020,675	$10,445	$1,031,120
Indirect Costs	$0	$1,250	$1,250
Total Budget	***$1,020,675***	***$11,695***	***$1,032,370***

*Full abatement cost is estimated to be $2,483,211 but a significant portion of abatement will occur more than 90 days prior to award of grant ($430,838 has already been billed) so those costs incurred prior to award are not included

Plan to Measure and Evaluate Environmental Progress and Results

Progress is tracked carefully through weekly MWHS project team meetings that include updates to the overall budget and a checklist style status update on a variety of topics, including brownfield grant administration and implementation. Each output will essentially be its own checklist item and be addressed at each weekly meeting.

Additionally, monthly funding draws occur for the LIHTCs, offering another way to evaluate progress.

Programmatic Capability and Past Performance

Programmatic Capability

MWHS has a tight knit team of experienced developers and administrators that have worked together for many years, most of whom successfully implemented MWHS' past two EPA brownfield grant winning projects. MWHS' Chief Financial Officer and Deputy Executive Director, the AOR, have worked together for nearly 20 years, including two successful EPA brownfield grant implementations. MWHS' Executive Director began working for the City of Lakewood in 1995 and has managed the organization for nearly 30 years. MWHS' Chief Real Estate Officer has been on staff 15 years. Robin Kerns is Project Manager and has been with MWHS for 3 years. Prior to MWHS, he spent many years as a public sector Planner for a metro Denver community known for heavy industry and its many brownfields and prior to that spent years in development and construction. He works closely with the selected general contractor, Calcon Constructors, to implement in the field. Calcon was part of MWHS' first EPA brownfield cleanup grant project. So collectively, there is tremendous and extensive experience with brownfield redevelopment and EPA grant implementation across the project team.

MWHS periodically assembles shortlist of contractors for a variety of project types utilizing Federal procurement guidance. This allows for MWHS to identify the best versed contractor(s) for projects in early planning stages and to rapidly select qualified contractors when time-sensitive issues arise. Please see the Threshold Information attachment for details on the Request for Qualifications for choosing a contractor.

MWHS tries to engage prospective employees through a variety of methods including the internet and websites such as LinkedIn and Indeed, posts flyers, participates in career fairs, and reaches out to residents. If there is interest from residents, MWHS facilitates a construction internship program to match residents with the general contractor for an entry level construction experience.

Past Performance and Accomplishments

MWHS has successfully managed nearly $500,000 of direct EPA brownfield assessment and cleanup funding since 2012. Lamar Station Crossing won a FY12 EPA brownfield cleanup grant (BF-96808801-0). No funds were leftover at closure. The project won a *2014 Phoenix Award*, achieving the outputs and outcomes outlined in the original grant application. The project ultimately had 2 rather than 3 buildings, and 175 total apartments rather than 176. The first phase with 110 units was completed in 2014 and the second with 65 units in 2020. MWHS won a FY16 brownfield cleanup grant for 5800 (BF-968493-01). Almost all anticipated outputs and outcomes were achieved within the anticipated timeline, though the complex ultimately ended up with 152 apartments instead of 155+. No funds were leftover at closure. The project was completed in 2018. Regarding compliance, both projects met all requirements regarding workplan, schedule, quarterly reports, etc. Both projects are accurately reflected in ACRES.

THRESHOLD CRITERIA RESPONSES

Applicant Eligibility
Housing Authority of the City of Lakewood d.b.a. Metro West Housing Solutions (MWHS).

Previously Awarded Cleanup Grants
The proposed site has not been previously awarded an EPA brownfields cleanup grant.

Expenditure of Existing Multipurpose Grants
MWHS does not have an open EPA brownfields multipurpose grant.

Basic Site Information and Ownership
Belmar Groves Apartments
259 S. Teller St.
Lakewood, CO 80226

The property owner is MWHS Belmar Groves LLLP, a partnership formed to utilize Federal Low Income Housing Tax Credits (LIHTC). MWHS is the General Partner and responsible for: carrying out purposes of the partnership and making day-to-day decisions; overall management and control of the business, assets and affairs of the partnership; ensuring compliance with requirements of LIHTC program and financing documents; and performing property development, management, and maintenance duties.

Status and History Of Contamination at the Site
Belmar Groves Apartments was constructed in 1972, providing 118 homes across 11 buildings (10 for apartments and 1 clubhouse/maintenance facility) in a garden apartment style design on 4.9-acres. As typical for that time, Asbestos and LBP were extensively utilized, hazardous substances. Site characterization has identified that all 118 entry doors are coated in LBP and must be removed and replaced. Asbestos exists in drywall, vinyl sheet flooring, and subfloor fireproofing overspray. All told, more than 250,000 square feet (s.f.) of Asbestos-laden material (ACM) must be remediated at a total cost of over $2,500,000 over multiple years. The property's interiors had not been significantly renovated since initial construction, and the ACM and LBP were minimally disturbed until recently. ACM and LBP have been governed by an on-site O&M Manual and training for maintenance staff. The property is mostly occupied as ACM and LBP remediation is occurring in stages to avoid displacement, allowing existing families to relocate temporarily on-site while their building undergoes renovation.

Brownfield Site Definition
Per CERCLA's "brownfield site" definition, the extensive presence of LBP and ACM, hazardous substances, complicates the redevelopment and deep renovation of Belmar Groves Apartments.

Environmental Assessment Required for Cleanup Proposals

The Phase I report, completed by Mosteller Consulting LLC in March 2023, did not indicate any items of concern beyond the potential for ACM and LBP. The *Limited Asbestos and Lead Based Paint Survey* by Geosyntec Consultants, May 2023 confirmed contamination of both substances. MWHS and contractors are closely following CDPHE regulations (Air Quality Control Commission's Regulation No. 8, Part B, Colorado Air Pollution Prevention and Control Act, and the Solid Waste and Hazardous Waste Commission's Regulations Pertaining to Solid Waste Disposal Sites and Facilities, 6 CCR 1007-2 Part 1, Section 5) to remediate LBP and ACM and have acquired the necessary CDPHE permits to do so. The abatement permits for this project are 23JE4938A through 23JE4938A -11 and copies are attached with the application.

Site Characterization

Belmar Groves Apartments is not eligible for the Colorado Voluntary Cleanup Program because the site lacks surface water, groundwater, soil, and/or soil vapor contamination, the criterion for eligibility. However, there is extensive hazardous building material on-site that must be remediated to protect human health, reduce liability, and facilitate redevelopment. An Environmental Professional (as defined in 40 CFR § 312.10), Nick Talocco, PE with Geosyntec Consultants, has certified that there is a sufficient level of site characterization from the environmental site assessments performed to-date for the remediation work to begin on-site. The most recent characterization is a May 2023 *Asbestos and Lead-Based Paint Survey Report*. This is MWHS' first brownfield cleanup application for Belmar Groves Apartments in FY24. A letter of support from the Colorado Department of Public Health and Environment is attached.

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.

Threshold Criteria Related to CERCLA/Petroleum Liability

MWHS purchased the property in 2004 from a private owner and completed a Phase I assessment at that time as a bona fide prospective purchaser. Upon taking ownership, MWHS created an O&M manual and protocols and trained maintenance staff to carefully manage and limit exposures to LBP and ACM when making repairs. The property was converted to income-restricted rental housing shortly after taking ownership and has operated as such since. This the first redevelopment and deep renovation of the property since MWHS took ownership.

Cleanup Authority and Oversight Structure

MWHS' general contractor, Calcon Constructors, has extensive experience with ACM and LBP remediation and oversees qualified subcontractors for this work as well. More than 250,000 s.f. of ACM that must be remediated is anticipated in drywall, vinyl sheet flooring, overspray, fireproofing, and TSI. LBP has been found in all 118 apartment entry doors and will be removed and replaced. ACM will be properly removed by a

licensed contractor that acquires permits from the State of Colorado to remediate ACM. The following outlines the workflow for completing remediation activities:

1. Trained contractor employees will be provided a completed work order that will detail the proposed location and extent of ACM.
2. Trained contractor employees are responsible for collecting all asbestos and lead waste and asbestos and lead contaminated materials (e.g., clothing, PPE, etc.) in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers. All waste must be adequately wet inside the waste bag.
3. Asbestos and lead waste must be delivered to the Waste Storage facility or container on-site. Each waste bag must have an O&M Asbestos or Lead Waste Sticker applied with the following information: date work was completed, Name of O&M trained staff responsible for work, building and apartment number, work order number, material(s) removed, and quantity of material removed.
4. Trained contractor employees will be responsible for coordinating disposal, manifesting, and billing for the asbestos and lead waste generated on an as needed basis.

Community Notification

The pubic meeting was advertised in the Denver Post on October 27, 2023 and a copy of the notice was posted on the entrance to MWHS' main office. The public meeting occurred on November 6, 2023 at the MWHS main office building. A zoom link was also provided in the public notice. A presentation was prepared. No attendees joined the Zoom link or attended in-person. Please see the attached copy of the ABCA, Denver Post ad, affidavit verifying publication, photo from when it was posted on the main office entrance, a copy of the presentation, and a copy of the sign in sheet.

Contractors and Named Subrecipients

MWHS creates shortlists of qualified contractors for various tasks including construction services per 2 CFR Part 200 and 2 CFR Part 1500. Calcon Constructors was selected for the shortlist from a competitive Request for Qualifications (RFQ) procurement process. Then MWHS selected Calcon Constructors from the shortlist for this particular project given their unique experience and skillset, in particular their experience successfully navigating environmental contamination and EPA brownfield cleanup grant requirements in the past with MWHS. The Request for Qualifications (RFQ) was publicized May 24, 2019 on the MWHS website and via BidNET. Responses were due June 28, 2019. The number of firms that applied was 13 and 8 firms were interviewed. Of the 8 that interviewed, 4 firms were offered the opportunity to join the shortlist. Please see the attached copy of the RFQ, attachments, and contract with Calcon Constructors.

COLORADO
Department of Public Health & Environment

November 7, 2023

Environmental Protection Agency
Jennifer Benz
1595 Wynkoop Street (EPR-8)
Denver, CO 80202-1129

Dear Ms. Benz:

The Colorado Department of Public Health and Environment (CDPHE) offers this letter of support to Lakewood Housing Authority d.b.a. Metro West Housing Solutions (MWHS) in applying for an EPA Brownfield Cleanup grant. EPA funding would help to remediate Lead-based paint and Asbestos as part of an affordable housing renovation at Belmar Groves Apartments, a 118-unit 1970's vintage complex located at 259 S. Teller St., Lakewood, CO, 80226.

MWHS and CDPHE have worked together on two previous EPA-funded brownfield cleanup projects, Phoenix Award winning Lamar Station Crossing in 2011 and 5800 Apartments in 2016. Both achieved closure through the Voluntary Cleanup Program and attained LEED Gold certifications. The proposed project is not eligible for the Voluntary Cleanup Program.

MWHS and the Belmar Groves renovation project's contractors are closely following CDPHE regulations to remediate Lead-based paint and Asbestos and have acquired the necessary CDPHE permits to do so. This letter is for the FY24 cleanup grant application, not a previous application.

We feel this project is a worthy endeavor and look forward to working with MWHS to make this a successful renovation of an important community asset.

Sincerely,

Fonda Apostolopoulos
State Project Manager
Voluntary Cleanup Program
Colorado Department of Public Health and Environment