



## **COMMUNITY RELATIONS PLAN**

**1000 BLOCK OF SOUTH 4<sup>TH</sup> STREET  
1000, 1002, 1004, 1006-1008 and 1010-1012 SOUTH 4<sup>TH</sup> STREET,  
CLINTON, IOWA 52732**



**CITY OF CLINTON  
611 South 3<sup>RD</sup> Street  
CLINTON, IOWA 52732**

**FUNDED IN PART BY: US EPA REGION 7 BROWNFIELDS REVOLVING LOAN FUND  
AND CLEANUP**

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## 1.0 INTRODUCTION

The City of Clinton applied for a cleanup grant with the United States Environmental Protection Agency (U.S. EPA) and two loans from ECIA Brownfields Coalition Revolving Loan Fund with East Central Intergovernmental Association (ECIA) to cleanup identified environmental contaminants of the South 4<sup>th</sup> Street block located at 1000, 1002, 1004, 1006-1008 and 1010-1012 South 4<sup>th</sup> Street, Clinton, Iowa (1000 Block of South 4<sup>th</sup> Street Site). The City will utilize a U.S. EPA Brownfields Cleanup Grant program to evaluate, design and implement a permanent cleanup remedy for the contaminated site. The City will also utilize two loans with ECIA's Brownfields Coalition Revolving Loan Fund (RLF) program to provide additional technical and financial assistance for the cleanup project.

The cleanup of the South 4<sup>th</sup> Street Site will enable the City to make a sound decision regarding the future use of the site and help protect the environment and mitigate the risk of potential human exposure. The City plans to seek a developer to remodel and redevelop the site. Redevelopment of the site would eliminate the blight and nuisances and add incoming producing commercial properties to the downtown area along with the creation of jobs.

The purpose of the Community Relations Plan (CRP) is to describe the approach proposed by the City for informing and engaging citizens of the community on the objectives, approach and proposed cleanup and reuse of the 1000 Block of South 4<sup>th</sup> Street site. Outreach is critical for assuring the local investment of public funds considerate of community priorities, neighborhood livability and environmental justice and equality.

The CRP has been designed to reach active citizens in the Clinton community who will provide meaningful input and active involvement on the proposed cleanup and reuse project. The long-term success of the project will be enhanced through a community that has a say during the development phase, and ultimately supports the project mission.

## 2.0 CONTACTS AND INFORMATION REPOSITORY

The City Contact for this project is Tammy Johnson, Community Development Director who may be contacted at:

City of Clinton  
611 South 3<sup>rd</sup> Street  
Clinton, Iowa 52732  
[tammyjohnson@cityofclintoniowa.us](mailto:tammyjohnson@cityofclintoniowa.us)  
(563) 594-6730

The information repository for this project including the environmental assessments and Analysis of Brownfields Cleanup Alternatives is located electronically at:

<https://www.cityofclintoniowa.gov/359/Brownfield-Grants-for-the-1000-Block-of->

Individuals may view the public repository online 24/7 or for individuals who do not have a computer access to the public repository can be made with public computers at the Clinton Public Library, 306 8<sup>th</sup> Avenue South, Clinton, Iowa during normal business hours of Monday – Thursday, 9:00AM - 8:00PM; Friday, 10:00AM - 5:00PM; and Saturday, 10:00AM - 2:00PM.

The U.S. EPA Region 7 Project Manager is Jennifer Morris, who may be contacted at:

Brownfields and Land Revitalization  
Region 7 EPA  
11201 Renner Blvd  
Lenexa, KS 66219  
[Morris.jennifer@epa.gov](mailto:Morris.jennifer@epa.gov)  
(913) 551-7341  
<http://www.epa.gov/region07/>

The environmental consultant assisting with this project is Krista Brodersen, of Blackstone Environmental, Inc. who may be contacted at:

Blackstone Environmental, Inc.  
1465 41<sup>st</sup> Street, Suite 13  
Moline Illinois 61265  
[kbrodersen@blackstone-env.com](mailto:kbrodersen@blackstone-env.com)  
(309)-581-5095

The project manager for the ECIA Brownfields RLF program is Dawn Danielson, who may be contacted at:

ECIA  
7600 Commerce Park  
Dubuque, Iowa 52002  
[ddanielson@ecia.org](mailto:ddanielson@ecia.org)  
(563)580-1976

### 3.0 SITE LOCATION AND DESCRIPTION

The Site, consist of approximately 0.4 acres of land identified as City Assessor Parcel #s: 8059700000, 8059730000, 8059740000, 8059750000, and 59620000 and addressed as 1000, 1002, 1004, 1006-1008, and 1010-1012 South 4<sup>th</sup> Street, Clinton, Iowa (refer to Appendix A & B).

The Site is located on the corner of South 4<sup>th</sup> Street and 11<sup>th</sup> Ave South in downtown Clinton and consist of five 2- and 3-story buildings. The buildings were constructed between 1868 and 1912 and were used for retail purposes on the first floor and residential apartments on the second and third floors. The total square footage of the buildings is approximately 37,681 square feet. Former retail occupants have included a grocery store, laundromat, hardware store, resale shop, upholstery store, furniture, antique store, used clothing store, offices, barber shop, drug store, restaurants, taverns, and a meeting hall. The buildings have been vacant for a decade.

The buildings addressed as 1000, 1002, 1004, and 1006-1008 South 4<sup>th</sup> Street are connected and share walls, comprising the North Building Block. The building located at 1010-1012 South 4<sup>th</sup> Street comprise South Building Block. The City acquired ownership of 1000 South 4<sup>th</sup> Street in August 2023. The remainder of the properties were acquired through tax sale, Iowa Code 657(a) or due to safety concerns.

The Site is in an area of mainly commercial and residential use. Surrounding properties historically consisted of residential dwellings and commercial business. Commercial businesses included a grocery store, retail and supply store, office space, etc. Adjacent properties include:

- To the north: Residential and commercial
- To the east: Vacant land and grocery Store
- To the south: Vacant land
- To the west: Residential and commercial - supply company

South 4th Street is located on the northwest corner of the intersection of South 4<sup>th</sup> Street and US Highway 30/67, an entrance to Downtown Clinton. This intersection represents the eastern limits of the Liberty Square Area. Historically, Liberty Square was a transition area between the city's residential and industrial areas. Over time, the area's industrial uses left behind contaminated conditions that fostered disinvestment and blighted conditions resulting in a neighborhood characterized with high unemployment and poverty rates along with low household incomes. The site has good visibility to traffic. It has been deemed a potential catalyst site for redevelopment in the downtown area.

## 4.0 SITE HISTORY

Downtown Clinton has served the central business district for this riverfront community.

Historical city directories and Sanborn maps along with aerial photographs reflect the following timetable for Property use:

**1000 South 4<sup>th</sup> Street:** This structure was built in 1864 with a commercial storefront. The building was utilized as a laundromat from 1960 to the early 1980s. The property was quick

claimed to the city on August 24, 2023, given the share walls with 1002 South 4<sup>th</sup> Street and the condition of the property.

**1002 South 4<sup>th</sup> Street:** This structure was built in 1868 and was last occupied by apartments on the upper floor with commercial space on the lower level. The property is missing a large portion of its roof, and a portion of the structure has collapsed within the structure. Property was acquired by the City in 2019 through tax sale.

**1004 South 4<sup>th</sup> Street:** Built circa 1900, this building has been used as a pawn shop, barber shop, and beer distribution facility. The building structure is sandwiched between the 1002 and 1006-1008 South 4<sup>th</sup> Street buildings and shares outside walls with tax foreclosure properties. The structure is collapsing and abandoned. It would be difficult to safely demolish the attached structures on each side of this property without further damaging the integrity of this structure. Based on the condition of the property the City acquired the property in October 2020.

**1006-1008 South 4<sup>th</sup> Street:** First recorded development on the site occurred in 1900. Prior uses included a furniture and upholstery store with upper-level apartments. Most recently the building was used as a bar. The City acquired the property in 2021 under IA Code 657A as the structure was abandoned and unsafe with squatters living in it. The roof on the building was missing in sections causing portions of the structure to collapse. The building was in severe disrepair and had many failed structural elements resulting in the upper two stories collapsing on August 11, 2023.

**1010-1012 South 4<sup>th</sup> Street:** First recorded development on the site occurred in 1885. The first usage was a candy store with residences on the top floor. The original building was demolished, and a drug store-apartment building was constructed in 1917. Currently the property is vacant. The City acquired the property in 2019 through tax sale.

Unfortunately, the buildings were not updated or properly cared for over the last decade or more. The structures have become a detriment to the downtown, contributing to the blight in the City. Due to being underutilized and vacant in recent years, the buildings were vandalized and attracted squatters. Therefore, the City applied for an EPA Brownfields Cleanup grant in 2022 to fund a cleanup / Regulated Asbestos Containing Material (RACM) demolition of the structures. The City was selected to receive a \$500,000 grant to assist with the project and also obtained additional financing from ECIA's RLF program to cover some of the project cost.

## 5.0 ENVIRONMENTAL CONDITION

Collectively the structures of the 1000 Block of South 4<sup>th</sup> Street are dilapidated and pose a public safety and health risk. The buildings are currently unoccupied. Trash and debris including furniture, appliances, and miscellaneous building material are scattered throughout the buildings. There is significant water and structural damage throughout the buildings. In September 2022, a structural engineer deemed each of the buildings as unstable and unable

safely abate asbestos. Therefore, given the age of the structures the City must complete a RACM demolition to safely dispose of the hazardous materials.

Several environmental assessments have been conducted between 2017 and 2023 at the 1000 Block of South 4<sup>th</sup> Street, property. Below outlines a summary of the assessment work completed and the findings:

Funded by ECIA's Brownfields Assessment Grant, a Phase I Environmental Site Assessment (ESA) was conducted for the property located at 1006-1008 South 4<sup>th</sup> Street by Impact 7G dated February 3, 2017, the report indicated that the building was constructed in approximately 1900 and was formerly used as commercial on the first floor and residence on the second and third floors. Recognized environmental conditions (RECs) were not identified. Non-ASTM considerations were also noted and included the possible presence of asbestos containing material (ACM) and lead-based paint (LBP) based on the age of the buildings.

**Recommendation:** Further ACM and LBP investigation may be recommended prior to any renovations or demolition activities.

Phase I ESA was conducted for the properties located at 1000-1004 South 4<sup>th</sup> Street by Impact 7G dated February 28, 2018, funded by ECIA's Brownfields Assessment Grant. The report indicated that the buildings were constructed between 1864 and 1900 and were formerly used as commercial on the first floor and residences on the second and third floors. RECs were identified and included: 1) A vent pipe was observed in the basement of 1000 South 4<sup>th</sup> Street and was presumed to be a former heating oil underground storage tank (UST); 2) A brick lined cistern was identified in the basement of the 1000 South 4<sup>th</sup> Street building; and 3) the adjacent property to the west was occupied by an auto repair shop from 197-1992. Non-ASTM considerations were also noted and included the possible presence of ACM and LBP based on the age of the building.

**Recommendation:** Further ACM and LBP investigation may be recommended prior to any renovation or demolition activities.

A phase II ESA was conducted by Impact 7G at the properties located at 1000-1006 South 4<sup>th</sup> Street in 2018 under ECIA's Brownfields Assessment Grant. The report dated December 12, 2018, detailed the investigation. Five soil borings were advanced and soil samples were collected for analysis of Resource Conservation and Recovery Act (RCRA) Metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and total extractable hydrocarbons (TEH). Groundwater samples were not collected due to lack of water volume. The analytical results were compared to the Iowa Administrative Code (IAC) 567 Chapter 137; Iowa Land Recycling Program and Response Action standards. The soil did not detect any contaminants of concern above the Iowa Statewide Standards (SWS) and/or above the laboratory detection limit.

**Recommendation:** Bases on the analytical results, further action was not recommended other than additional investigation in the 1000 South 4<sup>th</sup> Street property basement to further evaluate



the present of a suspected UST. In the event that a UST is found additional recommendations may be necessary depending on the reuse of the property and the condition of the tank and surrounding soil and groundwater.



An Asbestos Inspection Report was prepared by Environmental Management Services of Iowa, Inc. for the buildings located at 1010 – 1012 South 4<sup>th</sup> Street detailing an ACM inspection that was conducted on April 29, 2022. The report identified roofing materials, floor tile, and linoleum in the building as ACM. The south and southwest portions of the second and third floors were not able to be inspected due to severe deterioration of the structure.

**Recommendation:** The report concluded the building would need to be demolished as a RACM project by a demolition contractor with an Iowa Asbestos Contractor Permit.

A Phase I ESA, funded by the ECIA Brownfields Assessment Grant, was conducted for the properties located at 1010 - 1012 South 4<sup>th</sup> Street by Blackstone Environmental, Inc. (Blackstone) dated August 12, 2022. The report indicated the property was developed with a three-story building constructed in 1912. RECs were not identified. Non-ASTM considerations were also noted and included the presence of ACM and possible LBP.

**Recommendation:** Removal of ACM prior to demolition or disposal of building materials as regulated RACM was recommended.

A Phase I ESA was conducted for the property located at 1000 South 4<sup>th</sup> Street by Blackstone dated August 24, 2023, and June 20, 2022. The report concluded that although a Phase II ESA had been conducted, the soil samples were over 40 feet from the suspect UST and cistern and the Phase II ESA had not adequately assessed the concerns. Further assessment of the suspect UST and cistern were recommended. However, based on the location of the UST and cistern, it was not possible to assess these items at the time as there was limited access in the basement. Additionally, the sidewalks around the building are raised with very thick concrete around the building, and any accessible boring locations would be too far from the UST to access it properly.

**Recommendation:** It is proposed that the UST and cistern be assessed once the building has been demolished and clean-up completed.



### **Structural Integrity:**

On September 23, 2022, Willett Hofmann & Associates, Inc. prepared letter reports for the buildings located at 1002, 1006 – 1008, and 1010- 1012 South 4<sup>th</sup> Street, indicating that an Iowa licensed engineer had inspected the buildings to provide recommendations to whether the buildings were safe to enter for asbestos mitigation. The engineer indicated that the buildings were in severe disrepair, were beyond the point of repair, and are unsafe to enter.

Given the structures have been deemed structurally unsafe to abate asbestos the City was unable to have ACM investigations completed on the properties located at 1000-1004 South 4<sup>th</sup> Street and 1006-1008 South 4<sup>th</sup> Street. All the structures have deteriorated, and sections of the buildings have collapsed posing a danger to anyone who may enter or be around the perimeter of the structures.

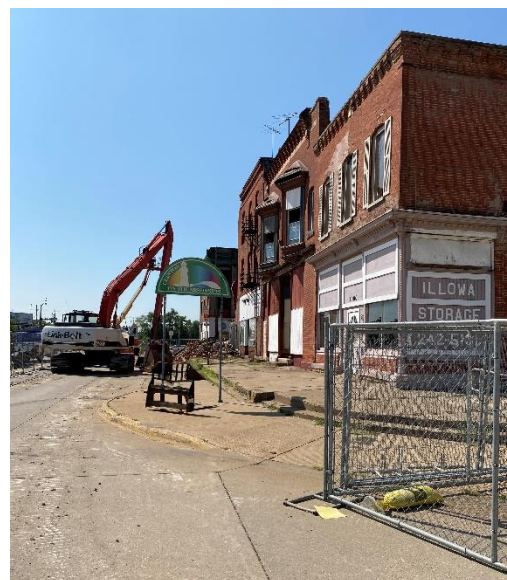
The City of Clinton applied for and was selected for a US EPA Brownfields Cleanup Grant to assist the City in funding RACM demolition of structures located at 1000 – 1012 South 4<sup>th</sup> Street. The City also applied for funding from Iowa Department of Natural Resources (IA DNR) Brownfields Cleanup program and for a loan with ECIA Brownfields RLF program to provide additional financial support for the RACM demolition and make the sites ready for reuse.

On August 11, 2023, two stories of the building located at 1006-1008 South 4<sup>th</sup> Street collapsed and compromised the adjoining structures located at 1000 to 1004 South 4<sup>th</sup> Street. On August 15, 2023, a structural engineer deemed that the remaining structures north of the alley off 4<sup>th</sup> Street must be taken down immediately to prevent any property damage and for public safety concerns.

## **6.0 SITE REMEDIATION PROCESS**

The remediation plan for 1000 Block of South 4<sup>th</sup> Street includes completing a RACM demolition of the structures located from 1000 to 1012 South 4<sup>th</sup> Street. Building materials will be handled as ACM and disposed of properly. Material will be removed properly and a certified professional in accordance with IA DNR requirements and the requirements of the EPA Brownfields Clean up Grant, the ECIA Brownfields Coalition Revolving Loan Fund, and in agreement with the Loan Agreement between ECIA and the City. The City of Clinton procured for a qualified environmental professional (QEP) to assist and oversee the cleanup project. Blackstone was selected to be the QEP for this project.

The Cleanup Plan outlines the method for cleanup of



the asbestos containing material while minimizing exposure to the public. A future plan will address removal of the UST, if present. A Quality Assurance Project Plan (QAPP) and health and safety plan will be developed by the QEP. In addition, an Analysis of Brownfields Cleanup Alternatives (ABCA) is being prepared by Blackstone that will identify potential corrective remedies that are evaluated to determine the most efficient and effective methods to manage the asbestos on the property with respect to proposed future redevelopment. The ABCA will be part of the city's public repository webpage.

On August 11, 2023, the City of Clinton notified U.S. EPA, Iowa Department of Transportation (IA DOT), and the IA DNR immediately of the partial collapse of 1006-1008 South 4<sup>th</sup> Street. On August 15, 2023, a structural engineer deemed that the remaining structures north of the alley off of 4<sup>th</sup> Street must be taken down immediately to prevent any property damage and for public safety concerns.

Given the emergency nature of the project, the City hired contractors to take down the partially collapsed structures and the remaining structures that posed a risk of falling and were a public and health safety concern. The demolition of the unstable structures north of the South 4<sup>th</sup> Street alley was conducted from August 28-31. The debris is being treated as asbestos containing material and stockpiled on site. The City covered the stockpile with a tarp and will dispose of the debris when the RACM demolition of 1010-1012 South 4<sup>th</sup> Street takes place in the next couple of months. Air sampling was conducted during the demolition and will be conducted periodically until the ACM material can be safely disposed of.

The ABCA will outline the approach of the RACM demolition. A public notification and comment period intended to inform the community of the City's prior actions taken to reduce public safety and health concern along with recommendations will be conducted by the City. Upon addressing public comments, the ABCA will be finalized, and the public repository will be updated.

At this point in the process, bid documents are being prepared for implementation of the abatement. The City will solicit costs and qualifications to implement the RACM demolition of the 1010 – 1012 South 4<sup>th</sup> Street along with removal and disposal of the ACM debris. The QEP will prepare a Site-Specific Quality Assurance Project Plan (SSQAPP) including a health and safety plan to be submitted to EPA for review and comments. The City is also coordinating with EPA and Iowa State Historic Preservation Office (SHPO) to ensure any state or federal requirements are included in the SSQAPP.

The contractor will notify I DNR ten days prior to commencing or request emergency waiver for the demolition project. Once approval from I DNR is obtained, the contractor will implement demolition in compliance with all state, federal, and program requirements. During the abatement compliance samples are collected and analyzed to monitor air quality in compliance with the SSQAPP. Upon completing the demolition, the QEP will prepare final documentation for review by ECIA and EPA.

## 7.0 COMMUNITY PROFILE

Clinton is the county seat of Clinton County in east-central Iowa, situated along the Mississippi River. First known as New York, it was renamed in 1855 in honor of DeWitt Clinton, then the governor of New York State. During the same time period, this small hamlet was regarded as the sawmill capital of the nation. With the City's location on the Mississippi River and major roads and railroad lines, the City became a transportation hub. Numerous sawmills were established supplied by raw timber floated down the river from the forests of Minnesota and Wisconsin.

In the late 1970's the manufacturing industry became fiercely prosperous in Clinton as the sawmill industry diminished. The river and railroad lines provided affordable and comparatively rapid transportation of raw goods and finished products.

The community is served by U.S. Highways #30 and #67 and Iowa Highway #136. Highway #30 provides four-lane freeway access to Interstate #80 (via U.S. #61), about 45 miles to the southwest, and two-lane access to Interstate #88, about 30 miles east. Clinton is served by a publicly operated intra-city bus system.

Barge traffic is available on the Mississippi River. Rail service is provided by the Union Pacific and Iowa, Chicago, and Eastern Railroads. There are 13 motor freight carriers in the community.

The municipally-owned airport is five miles west, just outside Clinton city limits on U.S. Highway #30. The airport has paved and lighted runways of 4,200 and 5,200 feet. All airport services are private carriers. The Quad Cities International Airport, in Moline, Illinois, (45 miles south) is the nearest airport that provides commercial flights.

Major cities within a 300-mile radius include Chicago, Illinois, (150 miles east), St. Louis, Missouri, (225 miles south), Des Moines, Iowa, (195 miles west), and Minneapolis, Minnesota, (300 miles north).

Below is a list of major employers within the region. The region's workforce is employed at a wide variety of sectors ranging from health care and education to manufacturing and retail trade. At 20.3%, most of the City's population is employed in the manufacturing industry, followed by 18.9% in Health Care, and 11.6% in retail trade.

Employer	Sector	Employees
Mercy One	Health Care	950
ADM	Manufacturing	750
Custom Pak Inc	Manufacturing	725
Clinton Community School District	Education	575
3M	Manufacturing	450
Hy-Vee	Retail	438
Metform	Manufacturing	400
Timken Drives	Manufacturing	400
West Rock	Manufacturing	246
Source: Clinton Regional Development Corporation, 2023		

With a 2020 population of 24,469, Clinton is the 19<sup>th</sup> largest city in Iowa. Clinton reached its highest population of 34,719 in 1970. Population for both the City of Clinton and Clinton County has decreased every census year.

Between 2010 and 2018, the Iowa Population Report published in April 2019 found that 69 of Iowa's 99 counties have experienced a population loss. Among these, Clinton County suffered the greatest loss, with 2,600 residents moving to other counties or states. However, Iowa's population continues to increase.

The average household income in Clinton is \$61,422 with a poverty rate of 1.34%. The median rental costs in recent years comes to \$687/month, and the median house value is \$99,500. The median age in Clinton is 40.9 years according to the US Census 2019 ACS 5-Year Survey.

A summary of the population is below.			
Year	Population	Growth	Annual Growth Rate
2021	25,037	-28	-0.11%
2020	24,469	-624	-2.55%
2019	25,093	-28	-0.11%
2018	25,121	-287	-1.13%
2017	25,408	-244	-0.95%
2016	25,652	-200	-0.77%
2015	25,852	-251	-0.96%
2014	26,103	-244	-0.93%
2013	26,347	-251	-0.94%
2010	26,855	-508	-0.18%
2000	27,772	-1,429	-0.50%
1990	29,201	-3,627	-1.16%
1980	32,828	-1,891	-0.56%
1970	34,719	1,130	0.33%

Below is a table that reflects the city and county workforce data available through June 2021.

Clinton Area Workforce									
	2013	2014	2015	2016	2017	2018	2019	2020	Jun-21
<b>Clinton Workforce</b>	12,888	12,893	12,605	12,077	11,719	11,545	11,983	11,010	11,235
Clinton Unemployed	694	674	618	605	446	393	508	619	718
<b>County Workforce</b>	24,960	24,850	24,450	23,910	22,860	22,710	23,216	21,256	21,714
County Unemployed	1,438	1,320	1,240	1,200	850	650	946	1,056	1,268

Source: Bureau of Labor Statistics / Iowa Workforce Development (through June 2021)

As the labor force decreased, organizations such as Clinton Regional Development Corporation, Clinton County Community Student Loan Assistance Program, and Home Base Iowa have established initiatives to draw new employees into the region, offer student assistance for graduates, and connect veterans with job opportunities throughout the local region and state.

## 8.0 COMMUNITY INVOLVEMENT

With the assistance of ECIA and YTT Designs Solutions, the City created a Site Revisioning Plan and Traffic Review Study of the area in 2023 that included feedback from a variety of stakeholders and individuals from throughout the community. Through the planning process, the Clinton community envisioned the South 4<sup>th</sup> Street Area providing more vibrant commercial space that is attractive to residents and visitors alike. Using the engagement feedback, the project team identified four community priorities to enhance the 1000 Block of South 4<sup>th</sup> Street

Area for both economic development and quality of life.

**Priority 1. Create a safe and inclusive environment**

Improving safety within the study area and in the surrounding neighborhood is a key community priority for the South 4<sup>th</sup> Street area. Safety priorities include addressing unsafe structures and environmental contamination in the area and improving pedestrian safety around the area by adding lighting, repairing sidewalks, and making crosswalk improvements.

**Priority 2. Adaptive reuse rooted in tradition**

Community members indicated that they would like to see the study area reused in a way that adapts to the local market realities and reflects the historical development patterns in Clinton. Many comments received suggested that a commercial development with a mixture of green space would be ideal in this location.

**Priority 3. Provide infrastructure needed to support existing and future development**

Community members indicated that surrounding infrastructure such as sidewalks, streetlights, crosswalks, and vehicle parking should be maintained or enhanced to accommodate future development on the site. Correcting the existing double curb along South 4<sup>th</sup> Street was identified as one of the Site's most critical infrastructure needs. The Site is located at the intersection of South 4<sup>th</sup> Street and US Highway 30/67, a key intersection in the City's transportation network. Redevelopment plans should account for future traffic and safety needs at the intersection and should consider the potential impacts of redevelopment on the city-wide transportation network.

**Priority 4. Improve the aesthetics of the project area**

A key theme provided by the community was the idea that the South 4<sup>th</sup> Street Area should be an aesthetically pleasing because of its high visibility to residents and those passing through Clinton on Highway 30/67. Desired improvements include adding green space, infrastructure updates, welcome signage, and revitalizing/removing dilapidated structures along the corridor.

The City seeks to engage the community with the 1000 Block of South 4<sup>th</sup> Street cleanup project. Many methods of communication will be utilized to keep the community familiar with the status of the project. These methods will offer citizens the chance to ask questions, offer suggestions, and provide comments.

**KEY COMMUNITY CONCERNS:** To date, no concerns related to the environmental cleanup portion of the project have been communicated. All concerns have focused on the economic and socioeconomic effects of the proposed 1000 Block of South 4<sup>th</sup> Street redevelopment project. The City will continue to document and evaluate all community concerns moving forward.

The following table summarizes the community involvement activities completed to date:

Date	Description
January 2019 – August 2019	City of Clinton worked with MSA to create Downtown Master Plan in 2019. Public engagement/meetings held.
October 8, 2022	City of Clinton published public notice in Clinton Herald indicating intent to apply for EPA Brownfields Cleanup Grant
October 8, 2022	City created an electronic public repository on its website devoted to the brownfields cleanup and conceptual reuse of 1000 Block of South 4 <sup>th</sup> St Site. <a href="https://www.cityofclintoniowa.gov/Brownfield-Grants-for-the-1000-Block-of-South-4th-Street">Brownfield Grants for the 1000 Block of South 4th Street   Clinton, Iowa (cityofclintoniowa.gov)</a> ; Website contain draft ABCA regarding analysis of brownfields cleanup of site and requested comments from public
October 19, 2022	City of Clinton held public meeting (attendees 11 residents plus city staff) to discuss the city's EPA Brownfields Cleanup grant application and obtain comments/feedback from the public; City also sent flyers to 70 businesses and residents that live near the 1000 Block of South 4 <sup>th</sup> Street area. Flyer was also posted to <a href="https://cityofclintoniowa.civicweb.net/Portal/MeetingInformation.aspx?Id=3264">https://cityofclintoniowa.civicweb.net/Portal/MeetingInformation.aspx?Id=3264</a> & on Facebook at <a href="https://www.facebook.com/ChooseClintonIowa/">https://www.facebook.com/ChooseClintonIowa/</a> Meeting was posted on you Tube at <a href="https://www.youtube.com/watch?v=XjnJHCIEqRk">https://www.youtube.com/watch?v=XjnJHCIEqRk</a> The survey requesting public feedback posted on repository and had 122 responses. Residents provided feedback on concerns, issues for area and potential reuse ideas
October 2022	City approved submission of application to EPA for Brownfields Cleanup Grant
January 12, 2023	City held public meeting to obtain public feedback on 1000 Block of South 4 <sup>th</sup> Street site requesting feedback regarding potential reuse
June 2023	City approved submission of ECIA Brownfields Revolving Loan Fund Application
June 7, 2023	EPA presented ceremonial check and City invited EPA, I DNR and the public to tour the 1000 Block of South 4 <sup>th</sup> Street project site
June 27, 2023	City approved mayor executing loan documents with ECIA for Brownfields Coalition RLF
August 11, 2023	City posted on its Facebook webpage (Choose Clinton) regarding the unexpected collapse of 1006-1008 South 4 <sup>th</sup> Street
August 12, 2023	City posted on Facebook webpage regarding road closure resulting from collapse and detour to South 3 <sup>rd</sup> Street
August 21, 2023	City posted an update on Facebook page of truck route for traffic due to closure of the street in front of South 4 <sup>th</sup> Street due to the collapse

The City of Clinton will continue its community involvement efforts on the 1000 block of South 4<sup>th</sup> Street site. Below outlines methods the City will utilize to continue its outreach with the public.

**Online Presence:** A webpage titled South 4<sup>th</sup> Street/Brownfields Cleanup created under Economic Development on city of Clinton website located at <https://www.cityofclintoniowa.gov/359/Brownfield-Grants-for-the-1000-Block-of-> . This

webpage includes a repository of project information. When appropriate, project updates and other information will be shared on the City's Choose Clinton Facebook page. This online presence will serve as a source of news and information regarding the site and its status.

**SSMID II – Downtown Clinton Alliance:** Downtown Clinton Alliance will be invited to participate in the public meeting and be asked to provide feedback on the proposed cleanup plan for the site.

**Public Notice:** The City will post a Public Notice with comment period and public meeting on an updated draft ABCA. The notice will be published on the city website, in the local newspaper and at public buildings (e.g., city office, library).

**30-Day Comment Period:** The City will hold a 30-day comment period to allow the community an opportunity to review and provide feedback on the draft ABCA. The draft cleanup plan and related background documents will be available at the City office and on the City's website. The City will accept written comments on the ABCA and Cleanup plan and will prepare a written response to significant concerns.

**Additional Public Meetings:** Following the comment period, the City plans to host one or more public information meetings regarding the cleanup program. City representatives and/or consultants will be present to fully answer the community's questions. When applicable, public meeting announcements, including date, time, place, and purpose of the public meetings will be submitted by press release to appropriate media outlets including the local newspaper.

**Project Signage:** Signage will be posted at city hall located at 611 South 3<sup>rd</sup> Street to direct residents to sources of project information including City representatives and City of Clinton website.

**Meeting Notices and Email Updates:** When applicable, public meeting announcements, including date, time, place, and purpose of the public meetings will be submitted by press release to appropriate media outlets, including *The Clinton Herald*, the local newspaper.

Updates on the project will be posted on the city website and documents will be added to the information repository, such as public meeting minutes, draft remediation work plan and closure documents.



## 9.0 PROJECT SCHEDULE

The City of Clinton seeks to procure a contractor to complete a RACM demolition of the 1010-1012 South 4<sup>th</sup> Street and clean-up of the debris site from 1000-1008 South 4<sup>th</sup> Street by November 2023.

In accordance with the City's goals, the following milestones and associated schedule has been developed. The schedule is preliminary and may change based on subcontractor availability, weather conditions, and by turnaround time for review of documents by the City, regulators, and other stakeholders, among other factors.

Table below outlines the timeline for 1000 Block of South 4<sup>th</sup> St Cleanup project.

Task	Description	Start Date	End Date
1	Prepare/Submit SHPO to Iowa Historic Preservation Office	September 2023	September 2023
2	Community Relations Plan (CRP) draft, comment period, final	September 2023	October 2023
3	Draft of Remediation Plan	September 2023	November 2023
4	Draft QAPP	September 2023	November 2023
5	Draft Site-Specific Assurance Quality Plan	September 2023	November 2023
6	Bid package preparation, bid request, contractor selection	October 2023	November 2023
7	Public Meeting	September 2023	October 2023
8	Public Notice of draft Cleanup Plan, ABCA for review and available for public comment	September 2023	November 2023
9	Submit Cleanup Plan, ABCA, CRP, QAPP to EPA for review/approval	September 2023	November 2023
10	Cleanup Implementation	November 2023	Spring 2024
11	Closeout Report Completed	Spring 2024	Summer 2024

## Appendix A: Site Aerial Map

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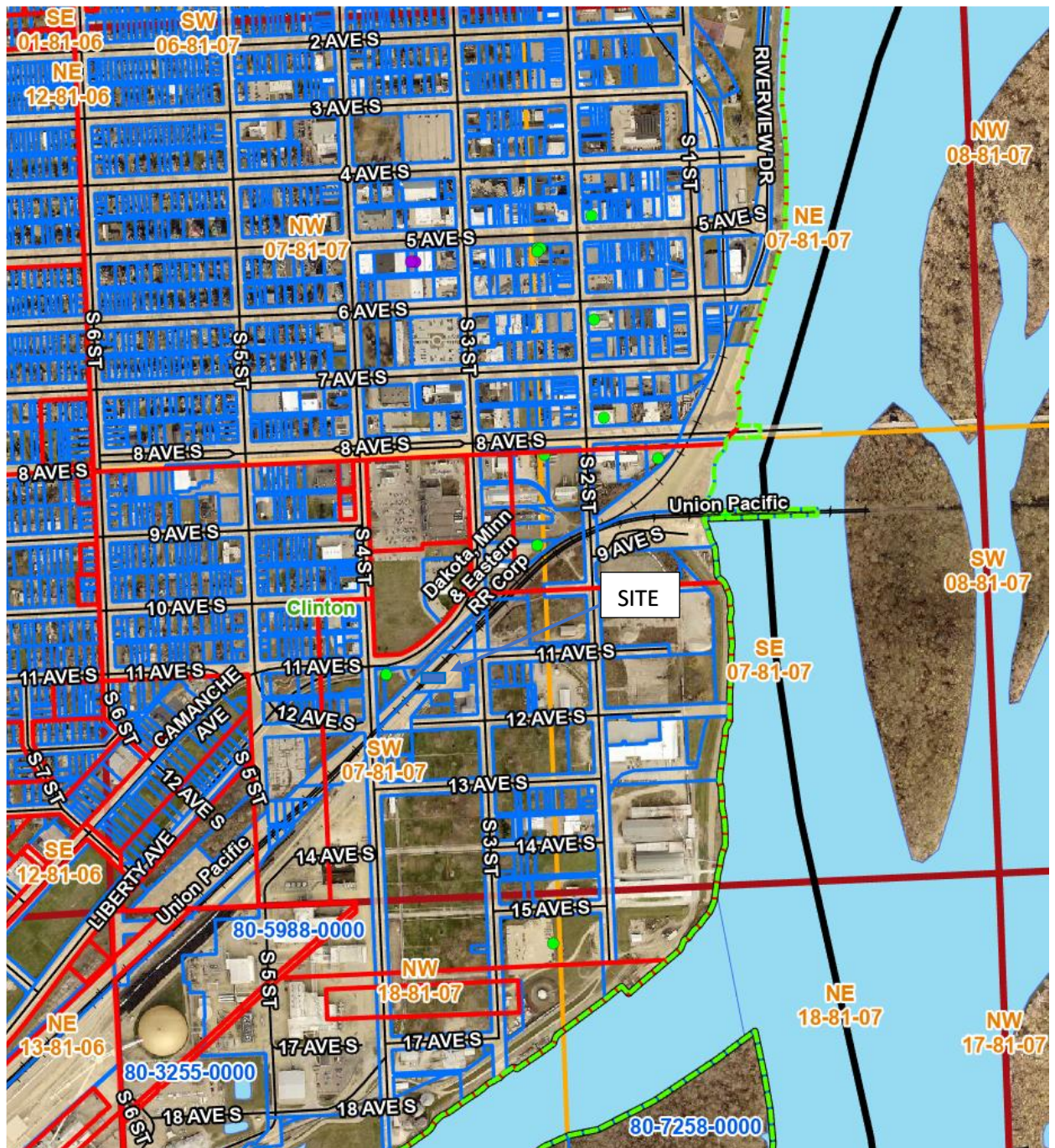
Subject property



Source: Google maps <https://www.google.com/maps/place/1000+S+4th+St,+Clinton,+IA+52732/@41.8348528,-90.1939845,171m/data=!3m1!1e3!4m6!3m5!1s0x87e264797d13adf9:0x5c51ce12829d7411!8m2!3d41.8351711!4d-90.1934991!6s%2Fg%2F11bw4lr5wn?entry=ttu>



## Appendix B: Site Vicinity Map



Topographic Site Map from ARCGIS Map Server  
<http://services.arcgisonline.com/ArcGIS/services>

## Appendix C: Acronyms

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AAI	All Appropriate Inquiries
ABCA	Analysis of Brownfields Cleanup Alternatives
ACM	Asbestos containing material
BFPP	Bona Fide Prospective Purchaser
BRF	Brownfields Revolving Fund
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CPO	Contiguous Property Owner
CRP	Community Relations Plan
DBE	Disadvantaged Business Enterprise
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
I DNR	Iowa Department of Natural Resources
ILO	Innocent Landowner
LBP	Lead-based paint
LUST	Leaking Underground Storage Tank
NPL	National Priorities List
SHPO	State Historic Preservation Office
RACM	Regulated Asbestos Containing Material
RCRA	Resource Conservation and Recovery Act
RECs	Recognized environmental conditions
USEPA	United States Environmental Protection Agency

## Appendix D: Glossary

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This glossary defines some terms associated with Iowa's Brownfields Cleanup Program.

### **All Appropriate Inquiries (AAI)**

Steps a prospective owner must take to qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner liability protections. A property owner must perform "all appropriate inquiry" into the previous ownership and uses of property before acquisition of the property. EPA published the Final Rule for All Appropriate Inquiries (AAI) on December 15, 2022. This rule became effective on February 13, 2023. The ASTM E1527-21 Phase I Environmental Site Assessment standard is consistent and compliant with the EPA final rule and may be used to comply with the requirements for AAI.

### **Administrative Record**

A record of all documents (hard copies, electronic files, briefing charts, files, photographs, or other documents and records) relied upon in preparing an EPA document. The administrative record documents the proponent's consideration of all relevant and reasonable factors and should include evidence of diverging opinions and criticisms of the proposed action or its reasonable alternatives.

### **Analysis of Brownfields Cleanup Alternatives (ABCA)**

An analysis of various alternative environmental cleanups for the site that meet the targeted cleanup levels.

### **ASTM International Phase I Environmental Site Assessment**

Provides standards for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and petroleum products. Use of this practice permits a user to satisfy one of the requirements to qualify for the innocent landowner, bona fide prospective purchaser, and contiguous property owner, defenses to CERCLA liability: that is, the practices that constitute "all appropriate inquiry into the previous ownership and uses of the facility in accordance with generally accepted good commercial or customary standards and practices" as defined in 42 USC § 9601(35)(B).

### **Beneficial reuse**

A use for the property that benefits the community and is the highest, best use of the property.

### **Bona Fide Prospective Purchaser (BFPP)**

A CERCLA liability protection for property owners that have acquired property after January 11, 2002. The specific requirements that a landowner must meet to qualify for this liability protection is described in CERCLA § 101(40) and § 107(r).

**Brownfield**

Real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. (CERCLA § 101(39)(A).)

**Community Relations Plan**

Specifies the community involvement activities that the borrower plans to undertake during the cleanup.

**Compliance**

Refers to systems to comply with relevant laws and regulations.

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**

Commonly known as Superfund, this law was enacted by Congress on December 11, 1980. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment.

**Contamination**

Introduction into water, air, and soil of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use. Also applies to surfaces of objects, buildings, and various household and agricultural use products.

**Contiguous Property Owner (CPO)**

A CERCLA liability protection that “protects parties that are essentially victims of pollution incidents caused by their neighbor’s actions.” Contiguous property owners must perform all appropriate inquiries prior to acquiring property to qualify for this protection. Persons who know, or have reason to know, prior to purchase, that the property is or could be contaminated, cannot qualify for the CPO liability protection. A landowner must meet the criteria set forth in CERCLA § 107(q) to qualify. Note that a purchaser who does not qualify as a CPO may still qualify as a bona fide prospective purchaser (BFPP).

**Data Quality Objectives/Quality Assurance Project Plan (DQO/QAPP)**

Data Quality Objectives, or DQOs are qualitative and quantitative statements that specify the quality of data required from a particular activity to support specific decisions. A Quality Assurance Project Plan, or QAPP, is a written document outlining the procedures a monitoring project will use to ensure the data it collects and analyzes meets project requirements and/or DQOs.

**Greenfields**

Greenfields (aka greenspace) are generally parkland, undeveloped open space and agricultural lands located near the outskirts of towns, cities, and larger metropolitan areas. These areas help delineate one village, city, or town from another, or where development is occurring and where it is not. When they are protected, greenfields can serve to promote growth in already-developed areas and curb urban sprawl. As parks and greenways, they also provide the green infrastructure essential to livable communities.

**Exposure**

The amount of pollutants present in a given environment that represents a potential health threat to living organisms.

**Hazardous waste**

By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.

**Information Repository**

A location where all documents related to site activities are stored and made available to the public.

**Innocent Landowner (ILO)**

A CERCLA liability protection for property owners who have performed all appropriate inquiries prior to purchase and who did not know, or have reason to know, of contamination. A person must meet the criteria set forth in CERCLA § 107(b)(3) and CERCLA § 101(35) to qualify as an innocent landowner.

**Institutional control**

A legal or administrative action or requirement imposed on a property to limit or prevent property owners or other people from coming into contact with contamination on the property. Institutional controls may be used to supplement a cleanup (by limiting contact with residual contamination) or may be used instead of conducting a cleanup.

**Land Recycling Program (LRP)**

The Land Recycling Program (LRP) allows owners or other stakeholders of a property to voluntarily assess and implement remedial actions at a site that is contaminated or is perceived to be contaminated. The assessment of the property must address the severity of the contamination problems and the risks associated with the contamination. The Department will provide a No Further Action Certificate for the site following assessment and implementation of appropriate cleanup activities and/or other remedies to ensure



the protection of public health and the environment. This certificate shall provide limited liability protection from further regulatory action relative to the problem(s) addressed.

**Licensed Remediation Specialist (LRS)**

An individual certified by the WVDEP to perform professional environmental services and to supervise the remediation of contaminated sites through the West Virginia Voluntary Remediation Program.

**Resource Conservation and Recovery Act (RCRA)**

This law was enacted by Congress on October 21, 1976, to address the increasing problems the nation faced from the growing volume of municipal and industrial waste. RCRA gives the U.S. EPA authority to control hazardous waste from “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

**Resource Conservation and Recovery Act Corrective Action (RCRA CA)**

Corrective action is a provision under the Resource Conservation and Recovery Act that requires facilities which treat, store, or dispose of hazardous wastes to investigate and clean up releases into soil, groundwater, surface water, and air. Corrective action is principally implemented through RCRA permits and orders.

**Revolving Loan Fund (RLF)**

RLF is a self-replenishing pool of money, utilizing interest and principal payments on old loans to issue new ones. RLFs are a gap-financing measure primarily used for development and expansion of small businesses.

**Risk Evaluation and Response Action (RE/RA) plan**

Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants and how that risk can be resolved.

**Standards**

Values, which represent concentrations of contaminants in groundwater and soil for which normal, unrestricted exposure is considered unlikely to pose a threat to human health.

## Appendix E: Resources

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The following is a list of website links to the agencies, laws, codes, and rules mentioned throughout the document:

U.S. EPA Brownfields Program: <https://www.epa.gov/brownfields>

IA Department of Natural Resources: Land Recycling Program:  
<https://www.iowadnr.gov/environmental-protection/land-quality/contaminated-sites/land-recycling-program-lrp>

Comprehensive Environmental Response, Compensation, and Liability Act (Superfund):  
<https://www.epa.gov/superfund/superfund-cercla-overview>

Brownfields All Appropriate Inquiries: <https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries>

CERCLA Liability and Local Government Acquisitions:  
<https://www.epa.gov/enforcement/guidance-superfund-liability-protections-local-government-acquisitions>

Resource Conservation and Recovery Act (RCRA): <https://www.epa.gov/rcra>