

7/18/2022

Heather Gibb, Deputy
State Historical Society of Iowa
Capitol Complex
East 6th and Locust Street
Des Moines, IA 50319

SUBJECT: Brownfield Cleanup, Asbestos Removal - Area of Potential Effect and Determination of No Effect - 211 and 213 Broadway, City of Stanwood, IA

Dear Deputy Gibb,

The U.S. Environmental Protection Agency (EPA) provides this letter to you to describe a brownfield cleanup that the City of Stanwood, Iowa, proposes through a sub-award and a loan under the East Central Intergovernmental Association (ECIA) EPA Brownfields Revolving Loan Fund Cooperative Agreement (BF97764501) for property located at 211 and 213 Broadway, Stanwood, IA 52337. This letter provides a brief project description, summarizes the efforts to identify historic properties, and provides EPA's initial finding, based on the City of Stanwood's study, that there will be no adverse effect to historic structures by the proposed undertaking.

The site is further described as Part of Lots 12 and 13 in Block 1 of the original town of Stanwood, Cedar County, Iowa (Cedar County parcels 0460-02-24-308-007-0 and 0460-02-24-308-008-0) more particularly as follows:

Commencing at a point 26 feet west of the northeast corner of said Lot 13; thence running south 62 feet; thence West 16 feet; thence south to the southeast corner of said lot 12; thence west 10 feet; thence north to Broadway Street; thence east 26 feet to the place of beginning. For the purposes of this project, the clean-up shall also include the debris located on the balance of Lot 13, as required.

Area of Potential Effect

The City of Stanwood is proposing to demolish, clean-up, and dispose of two vacant, conjoined two-story structures with a combined size of approximately 5,900 square feet. The structures were historically used as a commercial shop and residential apartments. The structures are primarily constructed with brick/block and wood. The structures were constructed with asbestos containing building materials and demolition debris shall be handled and disposed as asbestos containing/contaminated waste. Site conditions do not allow for prior abatement of asbestos containing materials prior to demolition. A draft cleanup plan (attached) includes documentation of building conditions. Therefore, the area of potential effect must include the loss of buildings at 211 and 213 Broadway in Stanwood.

The City of Stanwood submitted supplemental Iowa Site Inventory Forms (ISIF) for both addresses in response to comments received from your office suggesting, "Should there be a federal undertaking in which the building(s) may be located in the area of potential effect, we recommend that the ISIF(s) be revised to include an assessment of a potential historic district and the status of. . ." 211 and 213 Broadway. For your reference the Iowa Review and Compliance numbers for these requests are

211116951 and 211116952, respectively, and supplement ISIFs dated February 14, 2022 (ISIF 211 E Broadway Stanwood.pdf; ISIF 213 E Broadway Stanwood.pdf). The supplements documented that only four buildings remained of significant age within a potential district. Further analysis of that potential district found that the “area of potential effect consists of buildings and structures of varying size, age, and styles. Due to modifications and replacement materials throughout the area, this area of potential effect does not appear to maintain sufficient integrity to qualify as a historic district.” On March 21, 2022, in a reply to the City of Stanwood, your office concurred that, “Based on the ISIF(s), maps, and photos, we agree that there does not appear to be an eligible historic district on the 200 and 300 blocks of Main St.” (SHPO Tech Asst Review 211 E Broadway Stanwood PotenHistDist.pdf; SHPO Tech Asst Review 213 E Broadway Stanwood PotenHistDist.pdf).

In addition to the buildings directly impacted by the undertaking, we also considered the adjacent buildings which may be impacted by the cleanup plan. According to the draft cleanup plan (Cleanup Plan, Pg. 8, Stanwood 211-213 Broadway RACM Clean-up Plan.pdf):

- “3. During initial stages of the deconstruction/demolition, the City may have to temporarily vacate the City Hall Building, located adjacent to the Site.
4. The City shall also provide not less than 72 hours’ notice of activities that will affect operations of adjacent occupied buildings (i.e. the Lodge) and the potential need to vacate the building(s) for a brief time period while portions of the Site are razed.”

The purpose of this closure of adjacent buildings is to ensure the health and safety of people going in and out of the neighboring buildings. EPA considered whether there could be an effect to adjacent historic buildings during the cleanup. The two properties on either side of 211 and 213 E Broadway are 209 Broadway and 215 Broadway, respectively. Neither property shares a wall with the buildings to be demolished. The Municipal Building at 209 Broadway serves as the City Hall and Emergency Services. The Masonic Lodge functions out of 215 E Broadway. Both buildings are almost entirely metal modern construction. Research conducted by the City of Stanwood into whether there is a historic district specifically found only four properties were eligible for inclusion in a historic district. Neither 209 Broadway nor 215 Broadway were one of the four buildings that could be included in a potential historic district. In addition, the research conducted by the City of Stanwood into whether there is a historic district in the downtown has demonstrated that “due to modifications and replacement materials throughout the area, and the loss of historic fabric since 1915, the area of potential effect does not appear to maintain sufficient integrity to qualify as a historic district” (ISIF 211 E Broadway Stanwood.pdf; ISIF 213 E Broadway Stanwood.pdf). EPA finds that that there will be no effect on historic buildings with respect to 209 and 215 Broadway.

EPA attended a public meeting on March 21, 2022, to hear from the public about the proposed cleanup plans and specifically raised the question about historic preservation. There were no comments from the public raised about historic preservation at the meeting or through written comment.

Finding of No Effect

The structures at 211 and 213 Broadway are no longer structurally safe to enter due to ongoing decay as opined by Select Structural Engineering’s Iowa Licensed Professional Engineer (PE) (Cleanup Plan, Attachment A, (Stanwood 211-213 Broadway RACM Clean-up Plan.pdf)). Therefore, asbestos-containing materials cannot be removed prior to demolition and preservation of the building is not possible. Demolition and disposal of the structures shall be conducted as regulated asbestos-containing materials (RACM) by an Iowa-licensed asbestos demolition contractor.

EPA, in consultation with the City, has considered whether the proposed undertaking would impact historic structures or historically significant spaces. Based on extensive review by the City, it appears that there is not an eligible historic district in the 200 or 300 block of Main Street in Stanwood, and therefore the buildings in question are not eligible for listing in the National Register of Historic Places. Further, the buildings adjacent to the demolition site which may have to shut down during the cleanup are also not eligible for historic designation as demonstrated by the City documentation.

EPA requests your review and concurrence with our finding that that no properties eligible for listing in the National Register of Historic Places will be affected by the proposed cleanup. If you have any questions or desire additional information, please contact me at 913-551-7341.

Sincerely,

7/18/2022

X 

Jennifer Morris

Signed by: JENNIFER MORRIS

Jennifer Morris
Project Manager
EPA Region 7 Brownfields Team