

COMMUNITY INVOLVEMENT PLAN – HAYSWOOD PROJECT

FRONTIER HOUSING, INC.

The Community Involvement Plan (CIP) serves as a guide for Frontier Housing, Inc. to engage and inform the community members, local officials, community groups, and other interested parties, in environmental and cleanup activities of the Hayswood Project. The project is being funded by the US EPA Brownfield Cleanup Program, Cooperative Agreement # 02D62023.

This CIP is a living document and will be updated or revised as appropriate and as circumstances change.

Revision Log

Revision #	Revision Date	Revision Description

List of Acronyms

ACM	Asbestos Containing Materials
ADD	Area Development District
AST	Aboveground Storage Tank
ASTM	American Society of Testing & Materials
AULs	Activity and Use Limitations
BTADD	Buffalo Trace Area Development District
CA	Corrective Action
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIP	Community Involvement Plan
DBE	Disadvantage Business Enterprise
DEP	Department of Environmental Protection
DoD	Department of Defense
DOE	Department of Energy
DQA	Data Quality Objective
EC	Engineering Control
EDR	Environmental Data Resource
EI	Environmental Indicator
EJ	Environmental Justice
ESA	Environmental Site Assessment
FLB	Fluorescent Light Bulb
FR	Federal Register
GC	General Contractor

GIS	Geographic Information System
GPS	Global Positions System
GWPS	Groundwater Protection Standard
ICMA	International City/County Management Association
KBP	Kentucky Brownfield Program
KHC	Kentucky Heritage Council
KYDOW	Kentucky Division of Water
KYEEC	Kentucky Energy and Environment Cabinet
KYFW	Kentucky Fish & Wildlife
KYSHPO	Kentucky State Historic Preservation Office
LBP	Lead Based Paint
MCL	Maximum Contaminant Level
mg/kg	milligram per Kilogram
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NJIT	New Jersey Institute of Technology
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
OBLR	Office of Brownfields and Land Revitalization
OECA	Office of Enforcement and Compliance Assurance
OSHA	Occupational Safety and Health Act
PCB	Polychlorinated Biphenyls Ballasts
PPM	Part per Million
QAPP	Quality Assurance Project Plan
QEP	Qualified Environmental Professional
RAP	Remedial Action Plan
RFP	Request for Proposals
RFQ	Request for Qualifications
SOP	Standard Operating Procedure
TAB	Technical Assistance to Brownfields Communities
US	United States
USACE	United States Army Corp of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish & Wildlife Service
USGS	United States Geologic Survey
UST	Underground Storage Tank

Section 1: Introduction

1.A. PROJECT DESCRIPTION

Frontier Housing, Inc., located in Morehead, Kentucky, has recently been awarded \$1,999,900 in US EPA Brownfield Cleanup Funds for the Abandoned Hayswood Hospital in Maysville, Kentucky. Funds will be used towards environmental cleanup of the site, per the standards as set forth by the Brownfield Program. The grant performance period is July 1, 2023, to September 30, 2027. Funds will be used at this targeted site only for planned cleanup activities, as based on both Phase I and Phase II Environmental

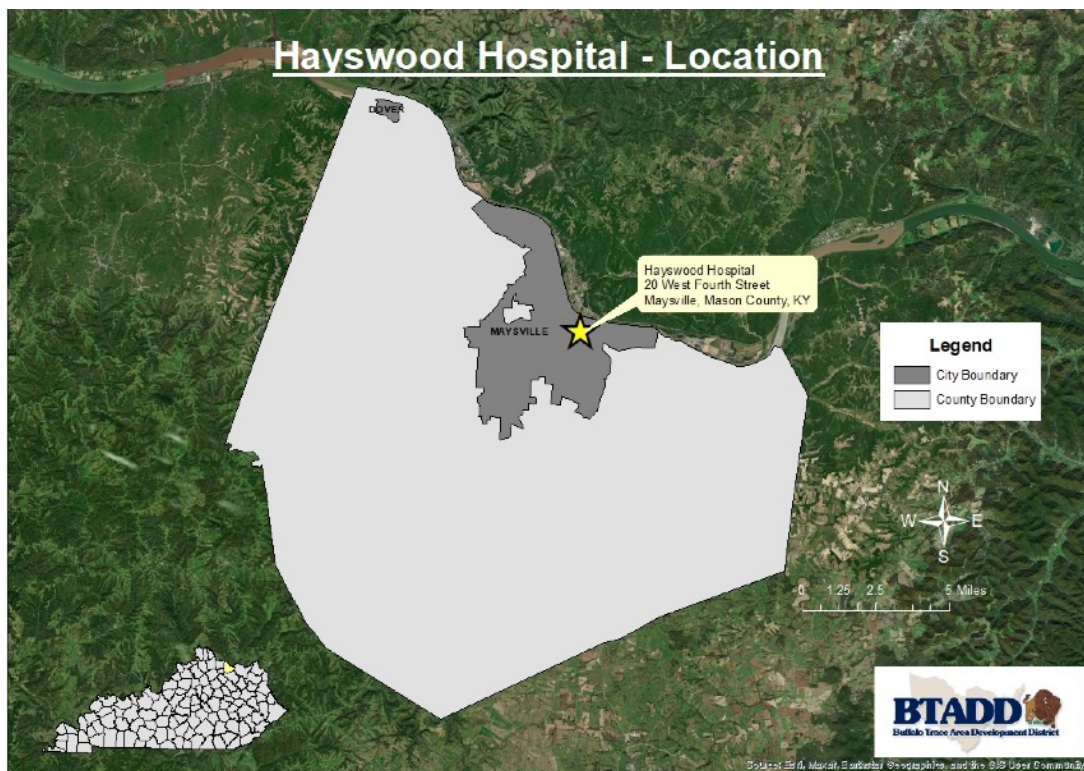
Site Assessments, which are anticipated to include full removal/abatement of Lead Based Paints (LBP), Asbestos Containing Materials (ACM), Fluorescent Light Bulbs (FLB), and Polychlorinated Biphenyls Ballast (PCB).

Frontier Housing Inc is a non-profit agency that has been in operation for 48 years, providing affordable housing solutions to low-income families of the Appalachian Region, specifically with new home construction and rental assistance. Through various collaboration efforts, Frontier acquired the former Hayswood Hospital, which has become a focal point of opportunity for addressing the unmet community need affordable housing. With direct partnership and support of the local units of government, Frontiers re-use strategy plan is to redevelop the site into affordable residential housing units, with the possibility of mixed-use commercial/business.

1.B. SITE DESCRIPTION, LOCATION, & HISTORY

The former Hayswood Hospital is located at 20 West Fourth Street, which is in a residential area of the south edge of downtown Maysville, Kentucky. The Hospital is situated on 2.46 acres. The main building, a four-story structure that contains more 65,000 square feet, is situated at the northeast of the property, with a separate boiler/maintenance building at the rear, and courtyard in the center of the hospital facility. Two walkway bridges cross over the courtyard to connect the main building to the south annex and west wing. A small parking lot is located at the southwest corner of the property.

The building was constructed in 1923 as a hospital facility, with additional floors added in 1952 and 1960. Renovations on the multi-story facility were completed in 1971. The hospital was closed in 1983 and has remained vacant since. Prior use of the property, from 1886 to 1908, contained a structure used as a private seminary for female students (Hayes Female Seminary).



Hayswood Hospital - Site



Legend

- KYTC Road
- Property Boundary (approx.)



1.C. COMMUNITY & COMMUNITY NEEDS

Maysville is located along the Ohio River in Northeast Kentucky, approximately 60 miles southeast of Cincinnati/NKY area, 65 miles north of Lexington, Kentucky, and approximately 80 miles west of the Ashland/Huntington area. The City of Maysville is the county seat of Mason County and has been since 1848.

According to the USEPA EJScreen Data Resource (which pulls information from the 2020 US Census ACS), the City of Maysville has a population that contains 14.4% with 'Less than High School' education, and 15.7 % are living below poverty levels. The poverty rate of the area is 23.6%, with 49% considered 'low-income'. High unemployment numbers through COVID, and pre-COVID, were seen with impacts of the coal decline. However, the area continues to make a comeback with unemployment, and at current is averaging close to the states average for employment rates. The area has a higher-than-average population of 'older persons' than that of Kentucky and of the United States. US Census numbers below highlight this attribute. The EJ Mapper indicates the Haywood project site specifically is within a census tract that ranks 81st percentile nationally for having individuals over the age of 64. US Census data shows that 16.3% of the population of Maysville residents that are under the age of 65, have a disability. This is double that of the US average.

Below are some highlighted quick facts regarding the City of Maysville in comparison to the State of Kentucky.)

	City of Maysville	Kentucky
Population	8,873	4,505,836
Total Households	3,703	1,828,680
Median Household Income	\$41,171	\$59,341
Older Persons (65+)	20.9%	17.5%
Poverty	23.6%	16.5%
Employment Rate	53.7%	56.8%
Total Housing Units	4,516	1,994,323
Median Gross Rent	\$690	\$891
Persons Without Health Coverage	4.2%	5.6%
Educational Attainment (Bachelor's or higher)	21.8%	27.9%

Provided by US Census Bureau 2022 ACS <https://data.census.gov/all?q=Maysville%20city,%20Kentucky>

Although the City of Maysville and Mason County Fiscal Court are in processes of updating the Maysville Mason County Comprehensive Plan, previous versions of the plan indicate various community needs that have been identified. Specifically, the last updated plan recognizes the following areas of need for the community: Industrial development; transportation and communication systems improvement; economic development that leads to improved quality of life and provides new opportunities; attaining adequate level of community facilities and services for basic needs and improved quality of life; support development of, and have adequate supply of, standard housing; and historic preservation efforts.

1.D. REDEVELOPMENT PLAN, REMEDIAL ALTERNATIVES, AND SCHEDULE

The property is currently vacant and has not been used since its closure in 1983. Frontier Housing intends to rehabilitate and redevelop the property into housing units, after cleanup is completed, with the possibility of mixed-use development for both residential and commercial. No plans have been finalized to date.

According to the findings of the Phase I & II EPA funded Environmental Site Assessments, performed by the Kentucky Brownfields Program (KBP) and the US EPA, the former hospital contains PCBs, mercury, lead-based paint, and asbestos containing materials (ACM's). Phase II concluded that identified substances should be removed with proper disposal. The Phase II ESA also states that conditions at site are not above regulatory concern that would require any limitations regarding future re-use of the property (once the site is fully remediated). An underground storage tank was properly removed and cleared in 1992.

Frontier will conduct cleanup planning activities based on evaluation and selection of appropriate remediation strategies. A draft Analysis of Brownfield Cleanup Alternatives indicated the following remedial alternatives as recommended. The draft will require review and finalization of the alternatives, which could possibly change and/or alter the initial list of alternatives, as well as the recommendations.

- Alternative 2 – Removal/Abatement of LBP, ACM, FLB, PCB
- Alternative 5 – Discarding of Affected Materials

The grant performance period is July 1, 2023, to September 30, 2027, for cleanup activities at the site, which includes abatement/remediation and proper disposal. This period is not for rehabilitation or redevelopment of the property. Those activities will not commence until after the successful completion and closeout of the US EPA grant funded activities.

Section 2: Community Involvement Plan Goal & Objectives

The CIP has been prepared in accordance with requirements of the EPA Brownfield Program, as a way to engage and inform the community. The CIP is a living document and will be updated and/or revised as necessary and appropriate. The main goal of the CIP is to disseminate information to the public and create opportunities for community input.

The following objectives of the CIP have been identified:

- Provide general Brownfields program information to interested community members.
- Provide timely, project specific information to community members.
- Provide opportunities for community input.
- Ensure community is well informed about site activities and Brownfield processes.
- Enhance communications between Grantee and media to help ensure reporters are provided timely information.

- Maintain administrative record files and information repositories.
- Maintain an Interested Parties Mailing List
- Maintain information distribution and communication.

Section 3: Community Involvement Activities and Timing

3.A. POINTS OF CONTACT

Questions, Comments, Concerns, and/or Public Input should be directed to the Project Points of Contact listed below. Please refer to Section 3.C for more information on formal public commenting periods.

- Local Agency POC: Buffalo Trace Area Development District
Kristie Dodge, Community Development Director
201 Government Street
PO Box 460
Maysville, KY 41056
Phone: (606) 564-6894
Fax: (606) 564-0955
Email: kdodge@btadd.com
- Lead Agency POC: Frontier Housing, Inc.
Stephanie Cooley, Director of Real Estate Development
5445 Flemingsburg Rd
Morehead, KY 40351
Phone: (606) 784-2131, ext 224
Fax: (606) 784-2171
Email: s.cooley@frontierky.org

Online Information can be found by visiting www.frontierky.org or <http://btadd.com>

3.B. COMMUNITY UPDATES & INFORMATION DISTRIBUTION

Informational Fact Sheets will be made available to the public and updated as needed quarterly. Fact Sheets will include updates to the project, as well as progress, explanations of events and/or issues pertaining to the project, relevant data pertaining to the site, and other such information.

An Interested Parties Mailing List will be maintained, that includes federal, state, and local elected officials; local school district officials; community groups; media contacts; and interested community members. Parties on this list will receive notification whenever key documents are published or the status of the project changes.

The development of the interested parties mailing list will be compiled and kept on file at the offices of Buffalo Trace ADD and Frontier Housing, Inc. This list will be continually updated as needed. Residential names, addresses, phone numbers, and emails will be kept confidential.

Residents wishing to be added to the interested parties mailing list may directly contact either Point of Contact (listed within this Community Involvement Plan in Section 3.A). Persons wishing to be added to the interested parties list should indicate if transmittal is acceptable via email and/or postal mail.

Information will be made available for public viewing, via in person or online at the listed locations below.

- City of Maysville – 216 Bridge Street, Maysville, KY 41056; Hours: M-F 8:30 am - 4:30 pm
- Mason County Fiscal Court – 221 Stanley Reed Court, Maysville, KY 41056; Hours: M-F 8:30 am -4:30 pm
- Mason County Public Library – 218 E. Third Street, Maysville, KY 41056; Hours: M-F 8:00 am -6:00 pm & Sat 9:00 am - 2:00 pm
- Buffalo Trace ADD – 201 Government Street, Suite 300, Maysville, KY 41056; Hours: M-F 8:00 am - 4:30 pm
- Frontier Housing, Inc – 5445 Flemingsburg Rd, Morehead, KY 40351; Hours: M-F 8:00 am - 5:00 pm
- Online at <https://frontierky.org> or <http://btadd.com>

Information, which may include fact sheets, notices, community participation opportunities, news releases, and announcements, will be distributed to the following local media sources.

- Maysville Ledger Independent
- Maysville Radio WFTM

The Administrative Record File and Information Repository will house site specific environmental investigative reports and other pertinent project information that has been or will be considered or relied upon with project action. Information repositories are located at:

- Buffalo Trace Area Development District – 201 Government Street, Suite 300, Maysville, KY 41056; Hours: M-F 8:00 am – 4:30 pm
- Frontier Housing Inc. - 5445 Flemingsburg Rd, Morehead, KY 40351; Hours: M-F 8:00 am – 5:00 pm

3.C. PUBLIC COMMENT PERIODS

Public comment periods are formal time periods during which Frontier accepts comments from the public. Notices to the public indicating dates/times of comment periods will be made available to the public. Notices will contain information for comment submittal.

Appendix B contains previous and current notice information. This section will be updated and/or revised as necessary to include notices as they occur.

General questions, comments, concerns, may be submitted any time by mail, email, fax, or by phone call to the Points of Contact listed in Section 3.A.

3.D. PUBLIC MEETINGS, FORUMS, & WORKSHOPS

Various public meetings, forums, and workshops will be held during the duration of the project to provide information and allow for community input. Meetings will focus on various topics, including but not limited to, project updates, future planning processes, and educational workshops on brownfield topics. The Community is encouraged to participate in these meetings. Language translation will be made available with written materials for such meetings. Community input and information is encouraged as it will help facilitate open lines of communication.

Meetings will be held locally, preferably at City or County municipal buildings, as these are easily accessible and ADA compliant meeting spaces with adequate parking. Times and dates of such meetings will be publicly advertised in advance of the meetings. Quarterly meetings will be held during the duration of the project. More meetings will be established as necessary.

Appendix D contains previous meeting information, including topics, handouts, comments, questions, and answers. This section will be updated and/or revised as necessary to include meetings as they occur.

Information on public meetings, forums, workshops, Q&A, and FAQ's, can be found at <http://btadd.com>

Section 4: Site Selection process & Surrounding Area

4.A. SITE SELECTION

Frontier Housing has worked closely with local officials in determining possible avenues for the development of housing within the Mason County area. Through ongoing collaboration, the Hayswood Hospital was identified as a viable opportunity for such a need. Frontier purchased the property from private ownership in late 2022 and applied for EPA Brownfield Cleanup Funds to remediate identified environmental hazards.

4.B. SURROUNDING AREA

The structure is located within a residential area of the south edge of the downtown area; however, it is also in very close proximity to a mix of amenities, including businesses, churches,

restaurants, entertainment venues, government offices, and other such amenities. The downtown area hosts frequent tourism and public events, festivals, and outdoor entertainment.

Immediately adjoining properties to the abandoned hospital are commercial and residential, and are identified as below:

- North Adjacent property is West 4th Street which contains residences and a church
- South Adjacent property is a wooded hillside with a utility right of way.
- East Adjacent property is Market Street which contains residences.
- West adjacent property is a single family residence.

APPENDIX

APPENDIX A

List of Contacts

A.1 FEDERAL ELECTED OFFICIALS

U.S. Senator Mitch McConnell
361-A Russell Senate Office Building
Washington, DC 20510
202-224-2499

U.S. Senator Rand Paul
167 Russell Senate Office Building
Washington, DC 20510-1703
202-224-4343

U.S. Congressman Thomas Massie
2453 Rayburn House Office Building
Washington, DC 20515-1704
202-225-3465

A.2. STATE ELECTED OFFICIALS

KY Senator Steve West
702 Capital Ave
Annex Room 228
Frankfort, KY 406001
502-564-8100

KY Representative William Lawrence
702 Capital Ave
Annex Room 424E
Frankfort, KY 40601
502-564-8100

A.3. LOCAL ELECTED OFFICIALS

Mason County Judge Executive Owen J. McNeill
221 Stanley Reed Court
Maysville, KY 41056
606-564-6706

Mayor Debra Cotterill, City of Maysville
216 Bridge Street
Maysville, KY 41056
606-564-9419

A.4. EPA REGION 4 OFFICIALS

Sarah S. Janovitz, Manager
Brownfields & Redevelopment Section
USEPA Atlanta Federal Center

61 Forsyth Street, S.W.
Atlanta, GA 303-8960
404-562-9870

Austin Gilly, Project Manager
Brownfields & Redevelopment Section
USEPA Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 303-8960

A.4. STATE ENVIRONMENTAL AGENCY OFFICIALS

Tony Hatton, Commissioner
Department for Environmental Protection
300 Sower Blvd
Frankfort, KY 40601
502-782-6648

Amanda Lafevre, Deputy Commissioner
Department for Environmental Protection
300 Sower Blvd
Frankfort, KY 40601
502-782-6398

Lynn True, KY Brownfield Coordinator
300 Sower Blvd
Frankfort, KY 40601
502-782-6484

A.6. LOCAL MEDIA SOURCES

WFTM Radio
626 Forest Ave
Maysville, KY 41056
wftmsales@maysvilleky.net
606-564-3361

Maysville Ledger Independent
120 Limestone Street
Maysville, KY 41056
606-564-9091

A.7. OTHER MEDIA SOURCES (TWITTER, FACEBOOK, ETC)

Buffalo Trace Area Development District Facebook <https://www.facebook.com/BufaloTraceAreaDevelopmentDistrict/>

Frontier Housing, Inc. Facebook
<https://www.facebook.com/frontierkentucky/>

APPENDIX B

Information Repositories and Potential Meeting Locations

B.1. PUBLIC INFORMATION LOCATIONS – FACT SHEETS AND NOTICES

Mason County Public Library
218 E. Third Street
Maysville, KY 41056
606-564-3286

B.2. POTENTIAL PUBLIC MEETING LOCATIONS

City of Maysville
216 Bridge Street
Maysville, KY 41056
606-564-9419

Mason County Fiscal Court Room
221 Stanley Reed Court
Maysville, KY 41056
606-564-6706

B.3. ADMINISTRATIVE RECORD LOCATION

Buffalo Trace Area Development District
201 Government Street, Suite 300
Maysville, KY 41056
606-564-6894

Frontier Housing, Inc.
5445 Flemingsburg Rd
Morehead, KY 40351
606-784-2131

APPENDIX C

E.1. COMMUNITY GROUP NAMES

Mason County Public Library
218 E. Third Street
Maysville, KY 41056
606-564-3286

APPENDIX D

D.1. PUBLIC MEETINGS, FORUMS, WORKSHOPS, Q&A, FAQs

COMMUNITY NOTIFICATION & PUBLIC MEETING NOTICE

DRAFT GRANT APPLICATION PROPOSAL FOR A US EPA BROWNFIELD CLEAN UP GRANT

Frontier Housing, Inc., is applying for a United States Environmental Protection Agency Brownfields Cleanup Grant to remediate hazardous substance contamination at a property located at 20 West Fourth Street, Maysville, Kentucky. A public meeting is being held to discuss the draft grant proposal and to solicit public comments on the proposal and the proposed use of funds. The meeting will be held Monday, November 14, 2022, at 5:30 p.m. at the City of Maysville, City office building, 216 Bridge Street, Maysville, KY 41056. The meeting will also be accessible by virtual meeting platform, via computer or smartphone, at <https://us02web.zoom.us/j/84064086762?pwd=RzIeY1ZzMnJTGzEwUj90Vm1CbklJPT09>; Meeting ID: 840 6408 6762; or by calling 1-646-931-3860 and entering in Meeting ID 840 6408 6762 and Passcode 587765. To find your local number for dial in, you can go to <https://us02web.zoom.us/j/kc18YqaRjr>

Copies of the draft grant proposal, including the draft Analysis of Brownfields Cleanup Alternatives (ABCA), will be available for review and comment at the office of the Buffalo Trace Area Development District, 201 Government Street, Suite 300, Maysville, KY 41056, during the hours of 8:00 am to 4:30 pm Monday thru Friday. Copies of the draft grant proposal, with ABCA, can also be obtained by visiting <https://frontierky.org> or <http://btadd.com>. Comments can be submitted up through November 17, 2022, to Kristie Dodge, Community Development Director, Buffalo Trace Area Development District, PO Box 460, Maysville, KY, by calling 606-564-6894, or via email at kdodge@btadd.com.

**Frontier Housing Inc. – Former Hayswood Hospital Brownfield Project
Public Meeting Minutes
November 14, 2022 – 5:30 pm
City of Maysville Offices & Via Zoom**

Frontier Housing, Inc., held a public meeting at the above listed date and time, to discuss the former Hayswood Hospital Brownfield Project. The meeting was held in person, but also made available in virtual platform via zoom for remote access of the public.

Frontier Project Director Stephanie Cooley, and Kristie Dodge, of Buffalo Trace Area Development District, opened the meeting at 5:30 pm, by discussing Frontiers submission for an EPA Brownfield Cleanup Grant and the ABCA, regarding this project. Frontiers efforts in trying to clean up the existing site and future plans for re-use, if awarded funding, was also relayed to the public. Kristie Dodge, BTADD, provided information on EPA Brownfield opportunities. The floor was opened up for question and comment. Answers were provided by Frontier Housing and Buffalo Trace ADD.

Q: How many retail units are expected to be in the reuse?

A: That has not been determined yet. We (Frontier) are not at the planning phase for the reuse and redevelopment of the project, so the number of retail units are unknown at this time.

Q: Is the application reviewed with a scoring system? Will added points be given for certain criteria? For example, if the application shows new tenants are from ARC region, would that get extra points? And do you see there being any place in the application where points might be added or lost?

A: In trying to answer all those questions. Yes, the applications are scored on a point system. The application requires various sections, and within those sections are subsections of information. Each main section has a designated amount of points, and then those points are divided up with ability under each subsection. Points are given on how well each area addresses the information being requested. There are no points specifically for things like 'if your project will serve ARC region' but there are points to show how the project can address health and environmental issues and impacts, especially to disadvantaged and/or sensitive populations. The only place we see points being hard to obtain, in comparison to other applications that may go in, is with having lower numbers of community health incidences than other applications may have. Maysville has less pollution and health problems than other areas in the state and US that may be denser population and more metropolitan. The application won't lose points but may not get as high a number of points that a community who has more evidence of disparity and higher health issues might get. We do show in the application that intended use of the hospital will be for housing geared towards both low-income families and individuals, as well as market-based rentals, which is the purpose and vision of Frontier – to provide housing to individuals that may not otherwise qualify. Of course, the project will also help the area by eliminating hazards that could have health impacts.

Q: Does the property have to be owned in order to pursue the grant? Does it have to be owned prior to the application being submitted? When is the deadline for the grant? Has the property already been purchased?

A: Yes, the applicant has to own the property before the application can be submitted. Frontier has not taken ownership of the property yet but anticipates ownership to be transferred this week. The deadline for submittal of the grant is November 22nd.

Q: On the housing units....the application states there are going to be 70 units. Is this right? And what kind of housing will this be? Single apartments, family?

A: The draft application on file for review to the public was a draft and was noted that it was subject to change. The scope of work and proposed use of funding has not changed from that draft, but there have been some edits to formatting and also, getting it into the constraints of the page limits. Seventy was an early estimated projection that has since been revised in the application to a lower number. I would like to put emphasis on these numbers being estimates. This is because the facility as it is now, is not accessible to architects; so the estimates are based on what is believed to be possible usable square footage. This number will be better pegged in planning processes of redevelopment when the architect can go into the building and access the space to create actual redevelopment plans. The units, as of now, are planned to be geared towards low-income families and individuals, with some market-based rentals available too.

With no other comments or questions, the meeting was adjourned at 5:45 pm.