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October 15, 2009

**VIA OVERNIGHT MAIL**

Environmental Management Support, Inc.  
**Mr. Don West**  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Dear Mr. West:

Enclosed is Southern Windsor County Regional Planning Commission's proposal for the EPA's Brownfields Assessment Grant program. The following required information is provided pursuant to the Proposal Guidelines for Brownfields Assessment Grants:

- a. Applicant Identification:** Southern Windsor County Regional Planning Commission, Ascutney Professional Building, Route 5 South, P.O. Box 320, Ascutney, VT 05030-0320.
- b. Funding Requested:**
  - i. Grant Type:** Brownfields Assessment
  - ii. Amount:** \$200,000
  - iii. Contamination:** Hazardous Substances
  - iv. Type:** Community-wide
- c. Location:** The SWCRPC serves the following ten member towns: Andover, Baltimore, Cavendish, Chester, Ludlow, Reading, Springfield, Weathersfield, West Windsor, and Windsor.
- d. Project Director:** April Harkness, Brownfields Coordinator, Southern Windsor County Regional Planning Commission, P.O. Box 320, Ascutney, VT 05030; p: (802) 674-9201, f: (802) 674-5711; **email:** aharknes@swcrpc.org.  
**Chief Executive:** Thomas Kennedy, Executive Director, SWCRPC, (address, phone and fax same as above); tkennedy@swcrpc.org.
- f. Date Submitted:** October 16, 2009 via USPS Overnight Mail.
- g. Project Period:** October 1, 2010 – September 30, 2013.
- h. Population:** The SWCRPC Region has a population of 25,105 (2000 U.S. Census).

The Southern Windsor County Planning Commission would like to thank the EPA for its ongoing commitment to brownfields efforts, as well as this opportunity to seek additional brownfields assessment grant funding. Please contact me if you have any questions or need further information.

Respectfully submitted,

Thomas Kennedy, Executive Director

Cc: Diane Kelley, EPA Region

**SOUTHERN WINDSOR COUNTY BROWNFIELDS REUSE PROJECT  
PROPOSAL FOR 2010 EPA BROWNFIELDS HAZARDOUS SUBSTANCE ASSESSMENT GRANT**

**Narrative Proposal**

**III.C. Threshold Criteria for Assessment Grants**

**1. Applicant Eligibility**

The Southern Windsor County Regional Planning Commission (RPC) is a Regional Planning Commission, created under Vermont statute, V.S.A. T.24 § 4341 (*see Attachment A* for statutory language). The RPC Board of Commissioners (Board) consists of representatives of its ten member towns (Andover, Baltimore, Cavendish, Chester, Ludlow, Reading, Springfield, Weathersfield, West Windsor and Windsor) who are appointed by the local legislative bodies each year.

**2. Letter from the State**

A letter from George Desch, Acting Director of the Waste Management Division/Program Manager of the Brownfields Response Program, Vermont Department of Environmental Conservation (DEC), is enclosed (*see Attachment B*).

**3. Site Eligibility and Property Ownership Eligibility**

This section is not applicable as this is a Community-Wide assessment application.

**V.B. Ranking Criteria for assessment grants**

**1. Community Need**

The RPC region is rural and hard-hit by the downturn in the precision machine tool industry. The two towns with the most critical brownfields sites are Springfield and Windsor, both of which border the Connecticut River, a designated American Heritage River. The Connecticut River Scenic Byway passes through four towns in the region, and the downtown areas of Windsor and Springfield are Vermont Designated Downtowns, receiving priority for state funding initiatives and tax incentives for commercial revitalization. Windsor is also a recognized Preserve America Community. This federal recognition is for those communities that protect and celebrate their heritage, use their historic assets for economic development and community revitalization, and encourage people to experience and appreciate local historic resources.

**a. Health, Welfare and Environment**

While the exact number of brownfields sites in the Region is unknown, the RPC does know that the region, specifically the towns of Springfield and Windsor, contain some of the largest in the state. The Goodyear, Cone Blanchard, Jones & Lamson (J&L), Jones Center, and PVDC (formerly Fellows Gear Shaper) properties each have building space of at least 200,000 square feet each, and sit on parcels ranging from 6 to 35 acres. Properties near to these sites are also in question as to whether pollutants have migrated and contaminated these properties. In addition, according to the Vermont Hazardous Sites Database maintained by the DEC, the region contains 141 *known* active hazardous waste sites. Identifying brownfields sites has been a priority since the creation of the Southern Windsor County Brownfields Reuse Project (SWCBRP) in 1999.

It is a fact that the region still has almost *1 million square feet of vacant industrial space*, much of which is in or adjacent to downtowns. This is due to the fact that the towns of Springfield and Windsor were built around the machine tool industry in the early part of the twentieth century, and at a peak of production during World War II. The industry went into a gradual decline after the war and most of the largest companies left or downsized dramatically during the 1980s. In 2000, the last three machine tool giants closed their doors in Springfield, leaving even more vacant manufacturing buildings and economic destruction. Such hardship, however, not only affected their economies but also the residents of the entire region. Springfield and Windsor not only suffered huge losses in high-paying manufacturing jobs, but their downtowns were also left with numerous historic industrial buildings that are abandoned and/or underused and possess huge environmental problems, e.g. PCBs.

The environmental impacts of these sites continually threaten the valuable natural resources, health and welfare of nearby residents. Groundwater is the region's primary resource of drinking water. Due to Vermont's geology, groundwater is often unpredictable as it travels through a maze of cracks in bedrock formations. Once contamination occurs, control and abatement are extremely difficult, if not impossible. With many brownfields sites located in close proximity to water resources, the need to reclaim and protect these resources is tantamount. Such is the case in the towns of Springfield and Windsor that were built around or near major rivers. The Black River in Springfield has at least six brownfields sites that potentially threaten this highly valued natural resource. Such conditions present monumental hurdles to reclaim these properties and return them to viable and productive uses.

#### b. Financial Need

The RPC's ten member towns make up the southern region of Windsor County's twenty-four towns. The region's northernmost towns are a 20-minute drive south from the booming economy of the core Upper Valley towns of Hanover and Lebanon, NH, but do not share the same economic prosperity of these wealthier neighbors. There is also a wide disparity of incomes and economies between towns within the region. Ludlow and West Windsor host ski resorts and are considered "wealthy" towns, with a large percentage of second homes in these towns owned by out of state residents. However, wages are low because a majority of the employment opportunities are in the service sector, and housing prices are unaffordable due to the pressures from the second home market.

While poverty rates have decreased between 1989 and 1999, data indicates that job quality is eroding. The once high-wage manufacturing jobs have been replaced by lower-paying employment opportunities. The overall wages are 8% lower than the reported state averages of \$33,589. The overall industry wage was less than the national industry average of \$40,259.

The loss of industry has also brought about a decline in population. Springfield and Windsor lost almost 10% of their populations from 1970 to 2000 and the U.S. Census Bureau estimated that this decline will continue. Between 1980 and 2000, the manufacturing sector in Windsor County saw a loss of 2,821 jobs – a 42.5% loss compared to the state's loss of only 3.9% in this same sector. In addition, the unemployment rate in both Springfield (5.8%) and Windsor (5.9%) exceeds both the state (5%) and county's (5.2%) (VT Dept. of Labor).

Wages and Per Capita Income (PCI) lag behind county and state levels. Springfield's wage rate has been gradually increasing, but it took a dip from \$29,477 to \$28, 919 between 2000 and

2001. In that year, the number of people in town that were employed dropped by 138 (a 2.8% drop). This compared to a statewide gain in employment of 0.5% (VT Dept. of Labor). Per capita income (PCI) is much lower than the wage rate in Springfield and Windsor. At \$18,452 and \$17,640 respectively, both Springfield and Windsor lag behind the Vermont PCI of \$27,992 and even behind the county's PCI of \$22,369 (U.S. Census).

In 2007, 1 in 9 children in Windsor County lived in poverty. Over 50% of the individuals in Vermont's Reach-Up program (its form of TANF) and over 40% of individuals on food stamps in Windsor County live in Windsor and Springfield (VT Dept. of Labor), which only represent 22% of the population of Windsor County. While the minority population and non-English speaking population are negligible, there is a large income gap in the region. It is also worthy to note that the towns with the most brownfields and hazardous sites also host the majority of the population in poverty.

A number of the brownfields sites in the region have been on the market for years, but were turned down by potential buyers in part due to the presence of hazardous substances or other environmental contamination. Past and present assessment work has and continues to spark the interest of developers. Many of the larger sites are located directly adjacent to the major waterways of the Connecticut and Black Rivers, and are starting to look like waterfront property rather than eyesores to potential developers. Assessment and cleanup of these properties will contribute to cleaning up the important natural resources that were the original draw to many of the communities.

The area immediately surrounding the old machine tool facilities in Windsor shows dramatic evidence of the decline of the community as a direct result of the decline of the manufacturing industry in the town. The average sale price of the single-family residences on Jarvis and National Streets, immediately adjacent to the former Goodyear campus, has been \$35,000 - \$40,000 in recent years, over 75% less than the average sale price of homes elsewhere in Windsor, which is \$168,000. Several homes in this area are located above a plume of PCE contamination that was delineated in a targeted brownfields assessment project that the State completed in the downtown area. Home values in other parts of Windsor are generally rising due to the high cost and limited availability of housing in the Hanover and Lebanon area twenty minutes to the north.

Brownfields assessment funds have made a difference in the long road toward recovery. While we have done a significant amount of the site assessment work on the most difficult sites in the region, additional funding is critically needed to perform site assessments of the remaining priority sites as well as those sites that need additional assessment work as required by the DEC. It is anticipated that the remaining funds in the present 2008 hazardous assessment grant will be encumbered by spring 2010 with work comprising of Phase II assessments and remediation plans at both the Ludlow Armory Site in Ludlow, and the EdgarMay Health and Recreational Center in Springfield (*see* Sections 4 a. and b. for further detail on these important redevelopment and community projects). Without additional hazardous assessment funds, the SWCBRP will not be able to either complete outstanding Phase II assessment work on sites presently in the program, or address additional sites in the region that continue to threaten the health and welfare of the residents as well as the region's natural resources.

## 2. Project Description and Feasibility of Success

### a. Project Description

Funding assistance for the SWCBRP will continue to support the ongoing environmental site assessment work through remediation planning (or a determination that a site is clean and needs no further site assessment work) for each priority site in the program. The program will serve all ten towns in the region. While, it is anticipated that the bulk of the work will be targeted in the two former industrial communities of Springfield and Windsor, the RPC has recently seen an increase in site nominations in its other towns as residents become more aware of the benefits of redeveloping brownfields sites. Concurrent planning activities that complement the SWCBRP will be funded through the Agency of Commerce and Community Development (ACCD).

### b.i. Budget for EPA Funding

<b>Proposed Budget &amp; Project Tasks for Hazardous Substance Assessment Grant</b>					
<b>Budget Categories</b>	<b>Task 1: Program Oversight and Development</b>	<b>Task 2: Community Involvement</b>	<b>Task 3: Site ID and Prioritization</b>	<b>Task 4: Site Assessments &amp; Remediation Planning</b>	<b>Total</b>
<b>Personnel</b>	\$15,000	\$4,000	\$2,500	\$6,000	\$27,500
<b>Travel</b>	\$1,800	\$100	\$0	\$100	\$2,000
<b>Equipment</b>	\$0	\$0	\$0	\$0	\$0
<b>Supplies</b>	\$500	\$0	\$0	\$0	\$500
<b>Contractual</b>	\$0	\$0	\$0	\$170,000	\$170,000
<b>Other</b>	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	<b>\$17,300</b>	<b>\$4,100</b>	<b>\$2,500</b>	<b>\$176,100</b>	<b>\$200,000</b>

#### ***Task 1 – Program Oversight and Development***

The RPC will be responsible for program oversight and development of the SWCBRP. The RPC's Brownfields Coordinator (BC) will also act as Site Manager on all projects and will work closely with the State's assigned DEC brownfields project manager. The BC will act as an advisor to the RPC's Brownfields Steering Committee (Steering Committee) with respect to site inventory and selection, procuring for Qualified Environmental Professionals (QEP's), and the overall progress of each project. The RPC will coordinate outreach to stakeholders and property owners, as well as utilizing its Financial Administrator in the financial management and budget reporting. The BC will also be responsible for all reporting requirements including, but not limited to, EPA quarterly progress reports and data entry into ACRES. The \$1,800 budgeted represents the costs associated with the RPC attending EPA sponsored workshops, conferences and participating in other available brownfields training and networking opportunities.

#### ***Task 2 – Community Involvement***

Pursuant to the SWCBRP bylaws, the Steering Committee meets monthly with the BC to discuss projects. In addition, at its annual meeting, the Steering Committee nominates members and makes recommendations to the RPC Board of Commissioners (Board) for Chair and Vice Chair as well as any new members as deemed necessary. The Steering Committee currently includes up to five Board members representing member towns, two local representatives, and a representative from the Springfield Regional Development Corporation (SRDC), the regional economic development corporation. The Steering Committee will ensure that the program

objectives are achieved, will continue to have oversight and policy making responsibility for activities, and will make decisions and recommendations in compliance with EPA rules and regulations.

The RPC will strengthen its brownfields marketing plan by continuing to create and disseminate up to date user-friendly financial, technical and educational materials that outline brownfields redevelopment issues. It will hold meetings to update the public and to solicit input. In addition to the public meetings, the RPC will continue to provide regular updates about the project throughout the community. This will include participating in regularly scheduled meetings of organizations such as Selectboards (televised on local access television), Chambers of Commerce, and downtown development groups to present information about the progress of the project and to solicit feedback. When applicable, the RPC will reach out to and coordinate with low and moderate-income populations close to sites to ensure that their concerns are heard and addressed.

### ***Task 3 – Site Identification and Prioritization***

Under the direction of the Steering Committee, the RPC will coordinate with property owners of sites that have been identified as potential targets for new assessment funds. In addition, a Call for Sites will be advertised quarterly in order to seek out potential site nominations. The Call for Sites will be sent to selectboards and planning commissions of member towns, realtors, banks, nonprofit development corporations, property owners and developers. Criteria used to prioritize sites will include public benefit of redevelopment, potential impacts to public health and environment, location, service by public infrastructure, local priority, cost, and proximity to disadvantaged residential areas.

### ***Task 4 – Site Assessment and Remediation Planning***

This task involves contracting with QEPs, management and oversight of site assessment work and remediation planning. The RPC is budgeting \$170,000 with a goal of completing four Phase I assessments at no more than \$3,500 each (\$13,000), two Phase II assessments on separate sites totaling no more than \$115,000, and completing a Corrective Action Plan (CAP) on at least one site with the remaining funds. It has been our experience that many of the Phase II site assessments on the larger sites in the region are very costly, and often require supplemental testing in order to reach the point of a CAP. The CAP will contain information that is consistent with what is required for the SWCBRP's RLF eligibility so as to streamline the transition of sites from remedial action plans to remediation through the SWCBRP's RLF and other state and federal funding resources (*see* 2b.ii. Leveraging below).

In addition, Quality Assurance Project Plans (QAPPs) will be prepared and submitted for EPA for all testing work to be performed as part of this project. As part of the consultant selection process, prospective consultants will be requested to provide evidence of their qualifications with respect to maintaining the highest levels of quality assurance in order to meet the QAPP requirement.

#### **b.ii. Leveraging.**

Since 1999, the RPC has contributed hundreds of hours of in-kind staff time, and numerous dollars of its own budget for overhead and supplies necessary to complete administrative activities and indirect costs not covered under the SWCBRP. In addition, the six Brownfields Steering Committee members and the ten Commissioners who make up the Board, have

volunteered countless hours to ensure the program's continued success. Such commitments will continue and reinforce efforts to pursue and apply for other state and federal grant funding for remediation and redevelopment activities.

The SWCBRP is well known and respected throughout the state. The RPC has had an excellent track record of identifying and accessing all available sources of funds for brownfields assessment. Of the over \$1.2 million spent on site assessment work to date, over half was from sources other than EPA assessment grant funds such as the State's Petroleum Cleanup Fund (PCF). We will continue to work closely to identify sites that may be able to access PCF funding. In the past, four sites have benefited from PCF funds for assessment and cleanup activities. In the past year, two sites have benefited from PCF funding including the J & L site.

In 2009, Vermont enacted the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA), in order to enhance brownfields reuse efforts across the state. While developers pay no fee to enter BRELLA, there is a \$5,500 fee for owners. This is often a huge deterrent to innocent land owners who want to enter BRELLA but cannot afford it. By using assessment funds, the non-profit owner, who currently owns the PVDC site (formerly Fellows Gear Shaper), enrolled in BRELLA, and was then eligible for over \$355,000 in additional state brownfields cleanup funds. This funding then leveraged \$350,000 in Community Development Block Grant (CDBG) funds, and more than \$500,000 in local and federal tax credits for the developer.

Completion of the Windsor Waypoint Welcome Center would not have been possible without past EPA assessment funds and a subgrant from the SWCBRP RLF. The project also received over \$600,000 in Transportation Enhancement and Scenic Byways funds.-The Town of Windsor provided over \$40,000 in local matching funds, as well as, private funding by the former owner.

While assessment funds are crucial for the initial investigation of a brownfields site, cleanup money is imperative for redevelopment. Besides the State, the RPC is the only other organization in Vermont that has an EPA funded RLF available for loans and subgrants. Recently, the RPC secured \$590,000 in supplemental RLF funding under the American Recovery and Reinvestment Act to address hazardous and petroleum cleanup activities at sites in and outside the region. In addition, the RPC will continue to work with member towns to access funds from the Vermont Community Development Program (VCDP), Rural Development, the Vermont Housing Conservation Board, the Downtown Board (for designated downtowns, which include the downtowns of Windsor and Springfield), and all other available grant programs.

The State of Vermont also has funds dedicated to brownfields redevelopment in a Brownfields Revitalization Fund, as well as a revolving loan fund managed by the ACCD. Last spring, the ACCD announced its decision to subgrant over \$400,000 to the PVDC and J&L sites. J&L previously received a VCDP planning grant, and its non-profit owners, SRDC, used its own funds to remove several PCB-containing transformers last fall.

### c. Programmatic Capability

#### i) Currently or Has Ever Received an EPA Brownfields Grant

Funds Expenditure: The RPC staff has managed EPA Brownfields assessment grants since 1999 and a revolving loan fund for cleanup since 2002. All funds were expended for the hazardous assessment grants awarded in 2004 and 2006, as well as the petroleum assessment grant awarded

in 2007. Funds remaining in the RLF consist of almost \$25,000 in personnel funds to oversee a \$47,000 subgrant and a \$519,000 loan. The 2008 assessment grant (\$200,000 for hazardous; \$200,000 for petroleum) has \$74,496 remaining for hazardous assessment, and approximately \$178,000 remaining for petroleum assessment. According to discussions with the DEC, the remaining hazardous assessment funds will be encumbered by the spring of 2010 for two sites that are currently in the program.

Compliance with grant requirements: The RPC has consistently submitted timely quarterly progress reports including both mandatory and voluntary reporting measures. For example, since being awarded an RLF grant in 2002, twenty-six (26) quarterly progress reports have been submitted to EPA on time and within budget. RPC staff has and continues to attend on-line ACRES training sessions as well as inputting pertinent information into the system as it becomes available. All pre and post-award grant requirements were fulfilled as well as establishing a number of administrative protocols to ensure that the SWCBRP runs efficiently and effectively. The RPC also keeps its regional EPA Project Officer apprised of all major issues which have the potential of needing EPA guidance.

The RPC has successfully closed a number of grants including: a 1999 Pilot assessment grant and supplemental grant in the fall of 2003; a \$200,000 assessment grant received in 2004 for petroleum and hazardous substances in the fall of 2006; a \$200,000 assessment grant received in 2006 for hazardous substance in the fall of 2008; and has submitted the paperwork to close out a \$100,000 petroleum assessment grant received in 2007.

Accomplishments: Brownfields assessment funds have been the catalyst of many redevelopment and revitalization activities in the region. Five properties that have been through the assessment program have been redeveloped, five are in the process of being cleaned up and redeveloped (with two more anticipated for 2010), and the assessment reports from most of the others have been used for planning the next steps towards CAPS and/or marketing the sites to developers. The EPA brownfields assessment grants have helped to leverage over \$1,000,000 in assessment and cleanup funds from the state and private property owners. Although funds spent on construction of sites that needed no remediation was not accounted for, it is likely that they are well over \$1,000,000 for three properties that have already been redeveloped. Some highlights of the program are as follows:

- PVDC Site – Springfield: Initial assessment work paved the way for the present developers to take notice of this ‘diamond in the rough’. A CAP has been approved and remediation efforts are continuing at the site with plans for a medical office and other commercial and light industrial uses to be completed in 2010. The developers are hoping to resurrect the former hydroelectric power plant to provide energy for the buildings. The redevelopment of this six acre site not only means the end to a sore site in the Designated Downtown District of Springfield, but also numerous job opportunities for its residents.
- J&L 1 – Springfield: Petroleum assessment funds used to assess an 85,000 gallon underground concrete vault which contained over 11,000 gallons of fuel oil. Its close proximity (less than 300 feet) to the Black River was a major concern to the State and residents. Working closely with the State as well as leveraging funds from the PCF, the tank was successfully closed and no longer poses a threat to the river.
- Burnham Site – Windsor: A former industrial dump, this site remained unsold due to the property’s listing on the state’s active Hazardous Waste Sites list. A site assessment showed no issues of concern, and the property was immediately sold and converted to office space where an accounting firm currently employs 12 people.

- Proctorsville Village Housing Project - Cavendish: Assessment funds used for site assessments and a CAP on an abandoned woolen mill. The town subsequently received a subgrant through the SWCBRP's RLF for cleanup activities prompting a regional non-profit affordable housing developer, Rockingham Area Community Land Trust (RACLT), to partner with Housing Vermont, a nonprofit syndication and development company that creates permanently affordable rental housing for Vermonters. A total of 20 affordable housing units for low and moderate income households were completed in 2008 (\$750,000 redevelopment project). In addition, by incorporating sustainable practices, the project received Efficiency Vermont's 2009 Best of the Best Single Family Housing Award.
- Former Windsor High School - Windsor: An automotive shop in the basement was a potential concern, however, a Phase II site assessment showed no issues of concern and the property was redeveloped into municipal offices and garages for fire and rescue squad.
- Windsor Waypoint Welcome Center - Windsor: While at first many had their doubts about the success of the project, the RPC's support never faltered. Together with the assistance of the State, EPA and local officials, the Welcome Center finally opened its doors in May 2009 to the residents of Windsor and also became the home of the Windsor/Mt. Ascutney Region Chamber of Commerce. Since then, the community has embraced the Welcome Center and has also been using the space to host many functions including meetings for local businesses, art exhibits, and community events such as the recent "Great Gatsby Night". It is important to note that not only does the site no longer pose a health risk to nearby residents, businesses or the groundwater, but it also serves as a great testament to the redevelopment of brownfields.
- Jewell Brook Mill - Ludlow: Assessment funds allowed an interested developer to see what environmental conditions were present. Subsequently, it purchased the much blighted property and plans to construct 24 housing units within the next year.

Management System: The assessment and cleanup of brownfields sites is a critical element of the overall redevelopment of the struggling former industrial towns in the region. The RPC is committed to ensuring that the SWCBRP remains viable and successful. As such, it created the BC position as well as a Steering Committee. In 2004, Bylaws were adopted and revised in 2008 to govern the Steering Committee and its activities. The SWCBRP's primary goal is to clean up, revitalize and return to productive use brownfields located in the region, as well as improving the quality of life in the low to moderate income neighborhoods that surround such sites.

The BC is the liaison between the owner/developer of a property and the federal/state agencies charged with implementing environmental assessment and cleanup standards. The initial BC ran the program from 1999 to December 2007. The subsequent BC ran the program until August 2009 and had over 20 years of experience with brownfields, and held a B.S. in Biology as well as a masters in urban and regional planning with an environmental emphasis. The present BC was extensively trained by the former one, and has more than fifteen years of planning experience with an emphasis on natural resources and land use. In addition, the former BC is a consultant for the SWCRPC, and remains involved with the SWCBRP.

The RPC's Executive Director is heavily involved with the SWCBRP, and has held his position for over 20 years. He attends all Steering Committee and Board meetings, is a valued member of the subcommittee that reviews and selects QEPs, and reviews all EPA quarterly progress reports. In addition, he and the BC work closely with the Financial Administrator in developing realistic and attainable budgets for all EPA grants. Besides being active with the SWCBRP, he is also on the Legislative Committee of the Vermont Association of Planning and Development Agencies, and active on the Vermont Scenery Preservation Council and Connecticut River Byway Council

Steering Committee. The Executive Director is widely known throughout the state and is well respected in the community. This has made him a valuable asset when leveraging funding and mediating ‘political’ conflicts on projects when they arise.

With respect to additional expertise and resources to assist the SWCBRP, the RPC is fortunate to have established solid working relationships over the past ten years with legal counsel, QEPs, and employees from the DEC and DOH. In addition, over the years, the BCs from the other ten regional planning commissions have formed a brownfields network in which issues and problems can be flushed out and resolved. With respect to the selection of QEPs, once a grant is awarded, a detailed RFP is posted using the Vermont Department of Economic and Development’s Business to Business Bid System. A subcommittee is then formed consisting of the BC, Executive Director and three members of the Steering Committee in order to develop a short list. This short list is then recommended to the Board for its approval. When a QEP is needed for assessment work, an RFP will go out to the short list and bids are reviewed in the same manner as stated previously.

In addition to managing several EPA grants as described above, the RPC is well versed in the administration of federal funds. Within our office, staff manages funds from the Vermont Community Development Program (CDBG funds), non-brownfields related EPA grants, Federal Highways (enhancement and scenic byways grants), the Federal Emergency Management Agency, and the Economic Development Administration.

Adverse Audit Findings. The RPC has always responded to any inquiries received by the grants office in a timely and expeditious fashion. The RPC has only received two violations letters from the grants office which upon prompt investigations turned out to be internal errors by the grants office and were subsequently resolved. No adverse findings have been found in recent general audits, and the RPC in FY 09 had a single audit in accordance with OMB Circular A-133. The draft audit has been received and there were no findings associated with the audit. The RPC has not been required to comply with any “high risk” terms and conditions under OMB Circular A-102.

### 3. Community Engagement and Partnerships

Affected Communities. RPC will continue efforts to reach out to the communities in which brownfields sites are located to solicit input and to update them concerning site assessment work under this grant. The first level of involvement with the larger community starts with the Steering Committee, which as previously stated, is comprised of local officials from the Board (each representing one of the ten towns), two at-large local representatives and one representative from the SRDC (Note: Steering Committee Bylaws state that any member with a financial interest in a site may not vote). For sites that are critical to community revitalization, the RPC has held public meetings at selectboard meetings in which the town is located to provide project updates and to inform the public. These meetings are generally filmed for local access television stations, and provide a good forum for reaching a broad spectrum of the public.

For sites that are adjacent to residential areas, RPC staff has gone door to door to inform residents of brownfields work and to invite them to come to public meetings. Since the RPC is the nonregulatory entity in brownfields redevelopment work, residents and property owners will often call the BC before calling the state if they have questions and concerns about site assessment work. The RPC’s website has a section dedicated to brownfields work in the region, and also develops public literature with details of specific site assessments.

Since there are many brownfields sites in Windsor next to dense former worker housing, this is a particularly important area for outreach and community involvement. In the past we have worked with the Windsor Resource Center (a coalition of human service organizations that work in Windsor and surrounding communities) as well as the Windsor Improvement Corporation (WIC), to assist with outreach activities.

The RPC continually provides updates on the SWCBRP in quarterly newsletters that are distributed to a mailing list of over 300 individuals and organizations in and around the region. The BC also provides monthly updates at Steering Committee and Board meetings, and attends selectboard and planning commission meetings in member towns as needed. When a site reaches the remediation plan stage, the RPC will continue to use local newspapers, posters and email lists to invite the community to public meetings to present alternatives for remediation and receive comments. The RPC is very careful about choosing QEPs that are well versed in public meetings so that discussions are understandable, informative and valuable.

Besides posting the required site informational signs, the RPC will provide neighboring property owners with updates on the progress of assessment and cleanup. Such updates will also be posted on the brownfields webpage. English is the primary language for residents of neighborhoods surrounding brownfields sites in the region. All communications will be in English unless there is a need for translation services.

Local/state/health agencies. As an agency that serves our member towns, we have worked closely with local officials and organizations in each of the towns where brownfields sites have been identified and assessed. We also continue to work closely with officials from the DEC at every stage of the site assessment process. Specifically, our brownfields sites are assigned a Project Manager from the DEC's Brownfields Program.

This Project Manager works together with the BC to provide technical assistance, and to ensure that all work plans and site assessment reports are in accordance with standards based on risk factors or background levels of contaminants approved by the Vermont Department of Health (DOH). The Project Manager also approves final documents and assists with issuing Certificates of Completion or Site Management Activity Completed letters. When possible, the Program Manager is notified of possible redevelopment plans so that they can be simultaneously reviewed with work plans. In addition, where federal input is required, the Project Manager, BC and QEP confer with the EPA Project Officer to coordinate efforts and make sure all remediation work complies with EPA standards, i.e. QAPPs. In addition, RPC has worked with the state on six Vermont Targeted Brownfields Assessment grants, including two in the past year.

The RPC also continues to strengthen its relationship with the DOH to communicate risk to communities directly affected by contamination, especially with asbestos surveys/work plans to ensure compliance with state standards. The RPC has also worked closely with the Department of Economic Development, the State Historic Preservation Office, and the Agency of Transportation. Such established relationships made a great difference in working out remediation plans concerning asbestos abatement and sensitive historical preservation issues at the PVDC site last winter.

At the local level, we have worked with planning commissions to develop zoning regulations that will allow for adaptive reuse of historic structures. Staff regularly attends meetings of WIC and SRDC, nonprofit entities that are overseeing revitalization plans for the former Goodyear

plant in Windsor and the J&L site in Springfield. Staff also attends monthly meetings of the Eastern Central Vermont Comprehensive Economic Development Strategy (CEDS) Steering Committee regarding economic development issues and projects in Windsor County. Lastly, the RPC continues to send mailings, newsletters and make personal visits to local realtors, banks, and chambers of commerce in our effort to educate the community about the SWCBRP.

Key Community-based organizations. The following community-based organizations have agreed to partner with the RPC in the ongoing work of the SWCBRP. Many of these groups have been involved with the SWCBRP since its inception, and the connection that they provide to property owners, residents and local boards has been invaluable (*see Attachment C for Letters of Support*).

<b>Organization</b>	<b>Brief Description &amp; Role of Organization</b>
Springfield Regional Development Corporation Bob Flint, Exec. Dir. (802-885-3061)	The main economic development arm of the region. A representative from SRDC has actively served on the Steering Committee since its inception in 1999, and has been a driving force in the redevelopment of the PVDC and J&L sites.
Windsor Improvement Corp. Harold Pyke, Pres. (802) 674-6711	A nonprofit organization made up of local officials and business owners in the town of Windsor. This group is focused on redevelopment of Windsor.
Rockingham Area Community Land Trust Bruce Whitney, Acting Exec. Dir. (802)885-3220	The main provider of affordable housing in southern Windsor County and northern Windham County. It has worked closely with the RPC to identify brownfields sites with potential for development of affordable housing.
Ludlow Armory Committee Frank Heald, Town Manager (802) 228-2841	Thirteen member committee appointed by Selectboard to study, review and come up with proposals for the possible future use of the Ludlow Armory facility which is presently undergoing ESAs.
Springfield Chamber of Commerce Patricia Chafee, Exec. V.P. (802) 855-2779	The Chamber works to promote Springfield's business economy, and encourages business and industrial investment, broadening the tax base and providing employment. The Chamber represents the community's pride and self image, and has a vested interest in seeing the town's brownfields properties reclaimed and revitalized.
Windsor/Mt. Ascutney Region Chamber of Commerce Nate Larson, Chair (802) 674-5910	The Chamber works to promote the Windsor/Mt. Ascutney business economies, and encourages business and industrial investment, broadening the tax base and providing employment. The Chamber represents the community's pride and self image, and has a vested interest in seeing the brownfields properties along the riverfront and in downtown Windsor be reclaimed and revitalized.
East Central Vermont Comprehensive Economic Development Strategy Steering Committee (CEDS) John Lawe, Chair	A CEDS is a plan that is required by the U.S. Department of Commerce; Economic Development Administration to be eligible for its planning and construction funds. The RPC and SRDC are active Steering Committee members. The CEDS Steering Committee's mission is to support businesses that capitalize on the Area's assets for the benefit of the Windsor County residents. It considers the economic development potentials and constraints while also leveraging the area's opportunities and strengths. They provide support to the SWCBRP when possible, and held its annual meeting this past spring at the Windsor Waypoint Welcome Center. This was the first public event for the former brownfields site and was widely received by the public.

#### 4. Project Benefits

##### a. Welfare and/or Public Health

In all of the communities in the RPC region, and particularly in Windsor and Springfield, redevelopment of brownfields properties will improve the quality of life for those who live near the sites, as well as for the communities as a whole. As is already being shown through the redevelopment of the PVDC site into medical office facility and other mixed uses in Springfield, blighted areas in the region are being turned into public spaces, businesses and healthy residential areas. What was once a blighted structure that posed significant health and environmental risks, the Windsor Waypoint Welcome Center now proudly displays its historical character to visitors of the Windsor/Mt. Ascutney Region Chamber of Commerce. The former contaminated concrete machine tool pads have been transformed into a beautiful landscaped courtyard in the heart of downtown Windsor. This project was the first critical link that ties a revitalized downtown with a former industrial area. Additional funds from this assessment grant would allow the RPC to continue working with Windsor in reclaiming the industrial area for infill development of housing and additional mixed use, commercial and recreational spaces.

The SWCBRP has and will continue to identify and reduce threats to human health and the environment in a variety of ways within the communities it serves. When the program first began ten years ago, few questioned whether contaminants were left on former industrial properties, yet many questioned why these properties remained vacant or underused. The SWCBRP identifies brownfields sites for assessment, determines whether the possibility of contamination exists on the properties (through Phase I assessment), identifies and characterizes contamination (Phase II), and makes plans for remediating contamination and eliminating risk to human health and the environment. In addition to the work it has done in the past, it has added impact to human health or the environment as a criteria for choosing sites for assessment for these grant funds. The following points illustrate how the redevelopment of sites assessed under this program will continue to reduce risk to public health and the environment:

- Most of the brownfields sites we have addressed to date, and many that have requested site assessment through future funding, have not been on the state's active hazardous sites list. Contamination may have been perceived, but was not known, therefore risk to human health and the environment were not known. Through environmental site assessments on these properties, contamination is identified and characterized, and plans for cleanup are based on sensitive receptors.
- With the brownfields assessment funds, we will continue to work closely with the DEC and QEPs to identify potential sites, conduct soil and groundwater testing to determine if there are threats to human health or the environment. In cases where a release is affecting a neighboring property (or coming from an upgradient property), DEC officials will issue a letter to the responsible property owner. Although some cases end up in a legal battle, many property owners have continued with site assessment outside the SWCBRP as requested by the state.
- Sites in the SWCBRP and other EPA-funded brownfields programs throughout the state are subject to a holistic review of past uses and work plans for site assessment, while most sites that go through the DEC program only focus on releases that come up in a site assessment process. The holistic approach looks at all possible factors that may have caused contamination, and therefore may be a risk for current and future users of the property.

- A variety of end uses have been proposed for different brownfields properties in the region, depending on the level of contamination. For example, 18 Central Street is a site located in the heart of downtown Windsor. The zoning for this area allows for mixed use, including residential development. As contamination in this property is not severe, remediating to residential standards is feasible. Other sites such as J&L in Springfield have a greater number of concerns, some of which will be remediated through engineering controls such as a concrete cap, or institutional controls. Springfield has maintained industrial zoning in this district, and an institutional control will be registered with the state, and will run with the property so as to prevent risk to future owners and developers.

In addition to threats from contaminants, many large former industrial properties present dangerous attractions to local youth and vandals. Redeveloping these large vacant properties in the villages and downtowns will improve the properties themselves, surrounding properties, the quality of life in the neighborhood in which they're located, and the whole community.

Lastly, funds from this grant will help to assist sites that need further testing prior to receiving a State approved CAP. Once a CAP is approved then a site can apply for cleanup funding through a variety of sources including the RCP's RLF. The three acre Ludlow Armory Site (Armory) in Ludlow is a perfect example of a site that will need further testing prior to receiving a CAP.

Vacant for several years, the Armory was used as a Vermont Army National Guard facility since the late 1940s and is adjacent to the Black River High and Middle School. Assessment funds used for a Phase I recently discovered environmental conditions (one being lead) which need further expensive testing. Lead is a significant health risk to children. Assessment funds received from this grant will assist this project in order to develop a CAP on the site.

Ludlow's residents are committed to revitalizing this property. In the summer of 2009, the Ludlow Armory Committee was appointed by the Ludlow Selectboard to explore the future possibilities of the Armory. The thirteen member committee comprises members of the Select Board, Village Trustees, School Board, Recreation Committee and general public. Their mission is to study, review and come up with proposals for possible future uses such as school functions, municipal recreation facilities and general community uses, including, but not limited to, a cafeteria for the schools (presently in the auditorium), an annual antique show, summer camp facilities, and a WWII museum using memorabilia from a resident veteran. The redevelopment is estimated at \$1.3 million, and the town is in the process of getting a bridge loan for the purchase of the property (\$337,500). By assisting in the redevelopment of this site, the SWCBRP will not only remove a health threat, but will also provide a facility that benefits the school and community.

#### b. Economic Benefits and/or Greenspace

While the region sits close to major economic generators in the Upper Valley, the major employers that once made Windsor and Springfield thrive have left these communities and the region with dilapidated buildings, struggling populations, and blighted areas. By revitalizing these areas and incorporating natural resources as an asset, the towns in the region hope to attract new business and industry that will provide good-paying jobs, and create better places to live, work and play for the region's residents. The economic benefits of redeveloped brownfields properties will include increased jobs, increased tax revenue for towns, revitalized downtowns, and encouraging smart growth development. Currently most of these sites are either vacant or

underused as low-cost storage space for small manufacturing or commercial activities.

A few years ago, Windsor created a Master Plan for the area of land adjacent to the Connecticut River which contains over 40 acres of brownfields sites that includes two very large properties (Cone Blanchard and Goodyear). Due to the economic downturn, the much anticipated Rails to Riverfront project which envisioned creating a mix of industrial, commercial, residential, and recreational development was put on hold. However, there is still interest from developers and out of state businesses that see the potential in these properties. For example, Seldon Technologies, who specializes in the manufacturing of nanotechnology filtration products, recently relocated its laboratories in one of the former abandoned industrial buildings in this area. They employ over 40 people and do over \$3,000,000 in annual sales.

Windsor and the RPC would like to continue to assess and clean up these properties so that they are ready for new businesses to move in, creating jobs and bringing the value of these properties back to being major contributors to the local economy. Much of the vacant land in the area could be developed into high-density residential and commercial development that was not formerly on the grand list.

This mixed-use neighborhood would provide much-needed workforce housing in an infill area rather than taking up more undeveloped greenspace on the outskirts of town. Increasing density in the downtown will also contribute to the success of existing downtown businesses. The Master Plan also includes streetscape improvements and pedestrian walkways connecting the area with surrounding neighborhoods. Presently, there are discussions with a developer to construct twenty units of affordable housing on three brownfields sites located in this area.

In addition to looking at environmental impacts of new industry, the Regional Strategic Economic Development and Community Development Plan (developed over an 18 month period and finalized in February 2003) emphasized the need for economic diversity, focusing on key industry sectors that have proven strong and long-lasting through difficult economic times, and the need for strengthening existing businesses that have been loyal to their communities. Although some in Windsor and Springfield reminisce about the “good old days” of a one company town, they understand the reality of a changing economy and the need to attract businesses that will remain solvent and are good stewards of the natural environment.

Most of the properties in the North Springfield Industrial Park are full. The Town of Springfield and SRDC continue to work towards bringing brownfields properties to a point where new business and industry can start with a clean slate, or at least with the knowledge and approximate cost of what will be involved in cleanup. By redeveloping these properties rather than pointing companies to undeveloped land, Springfield would see a return in tax revenue without the added expense of extending water and sewer out to “greenfield” sites. With active employment returning to the downtowns, other smaller retail and office space will be in greater demand and improve the vitality of the downtowns.

Several nonprofits are working toward redevelopment of brownfields properties in the region. Nonprofit development corporations such as SRDC (regional) and the Connecticut River Development Corporation (CRDC) and Precision Valley Development Corporation (local) own three of the largest properties currently in the brownfields program. SRDC purchased the J&L #1 property at bankruptcy auction in order to manage environmental issues and redevelopment (including the recent removal of PCB-containing transformers and assessment/closure of a UST).

CRDC and Precision Valley Development Corporation (PVDC) formed when large manufacturing firms relocated and “sold” their properties to these nonprofits for \$1 (Goodyear to CRDC and Fellows Gear Shaper to PVDC – hence the name, PVDC site). For the past eight years, PVDC has kept the former Fellows Gear Shaper buildings on life support believing that one day a developer would come and breathe life back into this historical and prominent structure. Without this nonprofit involvement, these properties would likely remain abandoned, vacant eyesores in the community.

The SWCBRP has worked closely for many years with the RACLT, a regional nonprofit developer of affordable housing. While the Proctorsville housing project was a great brownfields success story, it continues to work with the SWCBRP to identify additional sites that have potential for affordable housing units. Two such potential sites are in Chester, a town that is eager to work with the SWCBRP to revitalize properties that presently are not contributing to its tax base. Currently, RACLT is working with a consultant to create a redevelopment plan for 20 affordable housing units on a brownfields property and adjacent parcels in downtown Windsor. The project will most likely need additional hazardous assessment funds. With the proposed funds, the RPC will continue to work with RACLT, towns and other nonprofit developers to assess and determine the feasibility of using these sites for housing and greenspace throughout the region.

#### c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

The SWCBRP is a key component in an overall strategy of smart growth in the region. The assessment program, in conjunction with the SWCBRP RLF helps to “level the playing field” between contaminated brownfields properties and undeveloped land that sits outside of the downtown and village centers. Reusing these sites recycles land that has already been disturbed while preserving existing natural resources.

All of the brownfields sites proposed for assessment under this grant are on existing infrastructure, including roads, water, and sewer. Most sites are also located in “designated downtowns,” areas that have been approved by the State to receive incentives for revitalization due to their nature as the centers of activity of a community. The Regional Plan and local town plans also promote revitalization of existing historic structures (many brownfields properties) and focusing economic development efforts in existing village centers and downtowns.

SRDC and the local development corporations are aware that the region can no longer rely on one industry for a healthy economy, but must instead diversify their efforts to recruit new businesses and strengthen those existing businesses that have weathered the stormy economy. The Southern Windsor County Economic Development Strategy recommends a multi-faceted approach that looks to successful industry sectors in the wider region and focuses mainly on businesses that export goods and services for the greatest benefit to the community.

The local economic development representatives that have been sitting on the Steering Committee are responsible for recruiting new businesses and industry to the communities in the region and assisting interested buyers in finding state and federal funds to develop new facilities or revitalize old ones. These representatives are acutely aware of brownfields issues. While assisting prospective businesses with state and federal grant applications, SRDC is able to make recommendations for how these businesses can better meet the state and local goals of bringing clean industry and high-paying jobs and eliminating negative impacts on the environment.

Both Springfield and Windsor recognize the need for housing, and have allowed for adaptive reuse of historic properties as spaces for housing and commercial activities. By using the SWCBRP, site assessments are thorough and based on residential standards where housing is allowed in local zoning and where remediation will not be cost-prohibitive. By allowing for both commercial and residential development in these spaces, we hope to re-invigorate the downtown areas and create vibrant communities.

Windsor's Master Plan for the river front area includes plans for a mixed-use riverfront park and boat access, and makes good use of street trees to define and beautify connections throughout the project area. Ultimately, it would like to create a riverwalk along the Connecticut River, crossing two brownfields properties. Windsor continues its efforts to acquire property in this area so that these public spaces can be developed.

Primarily funded with transportation enhancement funds, the Toonerville Trail is a widely used multi-use recreational path in Springfield, which originates at the Connecticut River and runs north and parallel to the Black River. Unfortunately, it abruptly ends just south of the J&L #1 site. Recently, Springfield received another transportation grant to develop plans which would continue this path behind J&L and connect it to the EdgarMay Recreational and Health Center (EdgarMay Center) that opened in 2006. The EdgarMay Center is a non-profit community organization committed to promoting healthy lifestyles for children and adults throughout Southern Vermont and New Hampshire. The facility offers aquatic, cardiovascular, and strength-training exercise in a welcoming, fun, and educational environment.

The EdgarMay Center is another example of a brownfields revitalization project in which a former foundry was converted into the area's much used and appreciated recreational space (its 6-lane lap pool is heated using 69 solar panels and has saved thousands of dollars in propane costs). It even sponsors its own version of the Biggest Loser program which aims to help individuals and teams lose weight in a fun and exciting way. This nine week program provides participants with four classes with a registered dietician, four last chance workouts with the EdgarMay personal trainers, and prizes for participation along the way.

Using hazardous assessment funds received in 2008, the RPC is working with the DEC and Southern Vermont Recreation Foundation to complete Phase II site assessment work and develop a remediation plan. This work will not only cleanup the site and protect the adjacent Black River, but will also allow for the expansion of the present recreational facility which will feature a 73 KwH photovoltaic system consisting of 440 panels on the roof of the foundry building. The EdgarMay Center will also partner with Green Revolution, an industry leader in capturing the energy created by cardiovascular fitness equipment, to reduce the buildings electricity needs. A biomass heating system is also being considered to heat the more than 50,000 sq. ft facility more efficiently. Lastly, this expansion project will also create 15 full time jobs. This will include program staff, maintenance staff, additional fitness staff, a registered dietitian, a program director, camp staff, and an associate director. It is estimated that membership will increase by 30% or roughly 700 members.

The PVDC site is a prime example of the benefits from infrastructure reuse as it will be utilizing the buildings' unique green-energy component of an existing 100KW hydro-electric generating station which is slated to provide a source of energy with zero carbon emissions. In addition, the adaptive reuse of such a historic and once iconic manufacturing facility, not only preserves a

piece of the town's history but will also send a message to the community that the great buildings of Springfield's past are now its future.

Lastly, the redevelopment of the Windsor Waypoint Welcome Center combined adaptive re-use of the former, historical manufacturing facility with energy efficient materials such as double-pane windows and doors, low-VOC paints, siding made from recyclable materials and low flow toilets. The landscaping, while adding to the aesthetics of the property, utilizes low maintenance, draught resistant plants to save water while still serving its purpose of an institutional control.

The RPC has been developing educational materials for developers and model ordinances for towns to encourage or require low impact development standards for reducing stormwater runoff and encouraging infiltration. The J&L site was selected to participate in an EPA grant for stormwater demonstration projects in the Connecticut River watershed.

SRDC and RACLT have both committed to recycling building materials wherever possible to reduce costs and reduce the environmental impact when former buildings are demolished. The RPC has been working with PVDC and its developers to research grants for green building design for the renovated sections of the former Fellows Gear Shaper buildings. Under an agreement with the State Historic Preservation Office, the developers have agreed to preserve and restore the buildings fronting the Black River as they are prime examples of the architecture used during the great machine tool industry. In addition, SRDC previously worked for over three years with the preservation office in order to renovate one section of the large manufacturing building as it is the last remaining example of a sawtooth roof in Vermont.

#### d. Tracking and Measuring Progress

RPC will track the progress toward the outputs and outcomes planned for this assessment grant through the ACRES program as well as through an in-house database of sites. We understand that this is an important way to link results of the grant funding to EPA's strategic plan and to demonstrate to Congress the tangible results of the brownfields grant program. As with previously funded EPA brownfields grants, a project tracking program will be put into place at the RPC in order to keep a record of specific outputs and outcomes from the EPA assessment grant program. These results will be entered into ACRES and sent to EPA as an attachment to the quarterly reports. Results will also be posted in RPC newsletters and on the brownfields page of the RPC website where they can be viewed by the public.

**Outputs** under this assessment grant will include: Number and acreage of properties assessed, and the number of Phase I, and II environmental site assessments and corrective action plans completed. This proposal estimates that up to six site assessments and at least one remediation plan will be developed through this grant. Although the length of time it takes to complete site assessment work on larger sites may delay the measurement of outcomes for this grant, the RPC can continue to report successes with sites that have already been assessed and are on the verge of being cleaned up and redeveloped.

**Outcomes** for this grant and the SWCBRP in general include: number of jobs created, housing units developed, funds leveraged for redevelopment, acres redeveloped or turned into greenspace. The specific outputs and outcomes will be included in the project work plan once the proposal has been selected for an award.