R01-19-A-042

WINDHAM
REGIONAL
COMMISSION

January 30, 2019

Frank Gardner
EPA New England - Region 1
5 Post Office Square, Suite 100
Mail Code - OSRR07-3
Boston, MA 02109-3912

Dear Mr. Gardner:

The Windham Regional Commission is very pleased to submit this application for $300,000 in EPA Brownfields funds to continue our community-wide hazardous substances assessment program.

Since 2000 the Windham Region Brownfields Reuse Initiative (WRBRI), a program of the Windham Regional Commission, has been instrumental in the redevelopment of properties that have been abandoned or underused due to real or perceived contamination. Due to the continued demand to redevelop brownfield sites in the region, we are applying for $300,000 in hazardous substance assessment funds to be used community-wide. Funds will be used primarily for site assessments and cleanup planning; however, public education and outreach, and the ongoing development and implementation of a strategy for redevelopment of brownfield properties will also be a significant part of the project. Please see the following Narrative Information.

Narrative Information Sheet

1) **Applicant Identification:** Windham Regional Commission
139 Main Street, Suite 505
Brattleboro, VT 05301
DUNS: 014928931

2) **Funding Requested:**
   i. **Assessment Grant Type:** Community-wide
   ii. **Federal Funds Requested:** $300,000
   iii. **Contamination:** Hazardous Substances

3) **Location:** The assessment grants will continue to target the 27 southeastern Vermont towns compromising the Windham Regional Commission (WRC). The WRC serves the 23 towns in Windham County; the neighboring towns of Readsboro, Searsburg, and Winhall in Bennington County; and Weston in Windsor County.

4) This proposal is for community-wide assessments. Property name and address does not apply.

5) **Contacts:**

Project Director
Susan Westa, Senior Planner
Windham Regional Commission
139 Main Street, Suite 505
Brattleboro, VT 05301
Phone: 802-257-4547
Fax: 802-254-6383
Email: swesta@windhamregional.org

Chief Executive
Christopher Campany, Executive Director
Windham Regional Commission
139 Main Street, Suite 505
Brattleboro, VT 05301
Phone: 802-257-4547
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6) **Population:** 46,720 according to the 2010 U.S. Census for the Windham Regional Commission service area

7) **Other Factors Checklist**

Other Factors	**Page #**
Community population is 10,000 or less.	1
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them)	1
The priority site(s) is in a federally designated flood plain.	1
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy ; or any energy efficiency improvement projects.	2

8) **Letter From State Environmental Authority.** Attached is a letter from Patricia Coppolino, Brownfields Response Program, Department of Environmental Conservation, Vermont Agency of Natural Resources

If you have any questions about the proposal or the WRBRI program please contact Susan Westa, WRBRI Program Manager (802-257-4547 x108). We hope for and look forward to an opportunity to continue this important work.

Sincerely,

L. Christopher Campany
Executive Director

cc: Joe Ferrari, U.S. Environmental Protection Agency, Region 1

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
(802) 249-5822
Patricia.coppolino@vermont.gov

AGENCY OF NATURAL RESOURCES

January 14, 2019

Windham Regional Commission
Attn: Ms. Marion Major
139 Main Street, Suite 505
Brattleboro, VT 05301

Dear Ms. Major,

This letter will serve as acknowledgement that the Vermont Department of Environmental Conservation is aware that the Windham Regional Commission is intending to apply for Hazardous FY19 federal brownfield grant funds and to use the grant funds, if awarded, to conduct general site assessment activities.

The Vermont Department of Environmental Conservation is appreciative of your intent to support brownfield redevelopment in Vermont. Please know that the Vermont Department of Environmental Conservation is here to support your organization with brownfield redevelopment in the Windham Region of Vermont.

Good luck in the competition.

Sincerely,

Patricia Coppolino, Environmental Program Manager
Sites Management Section
Waste Management and Prevention Division

Narrative

1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields

i. Background Description of Target Area

Southeastern Vermont is recognized as a bucolic vacation destination. However, the region's rural economic stagnation, abandoned or underutilized former industrial sites, and ongoing recovery from devastating flooding by Tropical Storm Irene results in limited opportunities for the people that live here. Complicating matters, in 2014 the Vermont Yankee Nuclear Power Station (VY), which accounted for approximately 1 percent of employment but 5 percent of income for Windham County, permanently ceased operations.

The Windham Region is comprised of 27 towns in a 920 sq. mile area in Windham, Bennington and Windsor Counties. The Windham Regional Commission (WRC) is composed of town-appointed commissioners. The total population of the region is 46,720. Only one town, Brattleboro, has a population over 10,000. Brownfields are found in or near historic compact settlements, downtowns and village centers, which are our primary target areas. These centers have served as the region's social, economic and cultural centers since the early 1800's. These settlements are designated by state, regional and local policy as the places where growth is to be directed to prevent sprawl, to promote walkable communities, and to reduce transportation-related emissions, but blighted sites curtail redevelopment

The villages and downtowns in our region grew around industry that used water power, leaving us with **contaminated industrial and commercial sites along rivers and streams in the hearts of villages and downtowns**. This precludes redevelopment where it is otherwise well-suited, depriving communities of jobs, services, revenue and in many cases, anchor social and commercial institutions. The challenge is further exacerbated by the proximity of many of these properties to rivers and streams and related catastrophic bank erosion. Brownfields can complicate flood hazard mitigation actions. Of the region's 21 state designated village centers and 3 designated downtowns, all but three villages are located adjacent to a body of water. 14 designated village centers and 3 designated downtowns are at least partially located within federally designated flood plains.

ii. Description of the Priority Brownfield Site(s)

WRC's downtowns and villages are priority sites for the Windham Regional Brownfields Reuse Initiative (WRBRI). **It is within these communities that we will target most of our assessment work.**

Brattleboro, Bellows Falls and Wilmington, the region's designated downtowns, are the major commercial/industrial centers in the region that developed around water power. Brattleboro had a range of manufacturing industries including printing presses, organ production, and textiles. Bellows Falls, well known for having been a leading paper manufacturing center at the turn of the 20th century, also had machine shops and rail yards. Wilmington was host to mills on the north branch of the Deerfield River.

Village centers throughout the WRC region hosted a wide range of industries, albeit on a smaller scale, from lumber mills to marble works and paper mills. Small businesses such as automotive repair shops and dry cleaners have left contamination that inhibits further development. Many of these former buildings/sites have been left vacant or underutilized. These sites pose potential public health threats, and severely limit economic development due to increased redevelopment

costs. State, regional and town development policy directs growth to existing compact settlements, where basic infrastructure is already in place. Renovating and repurposing of brownfield sites is key to community reinvestment and revitalization.

Within the Bellows Falls officially designated downtown district is an area known as "The Island." The Island has served as an important regional industrial center historically and today. A Phase II ESA for an Island site reported lead, arsenic, PAHS, petroleum and VOCs. Other contaminants are expected to be found nearby. As a result, Bellows Falls has struggled to attract economic development interest in the Island. However, Vermont's Brownfields Economic Revitalization Alliance (BERA) is now focusing on this area, providing expertise from multiple state agencies. The BERA team is looking towards WRC's Brownfields program to fund ESAs and cleanup planning for the remaining Island site.

Brattleboro's recent Town Plan update directs redevelopment opportunities to areas where growth will minimize infrastructure expansion, revitalize the area and help manage the cost of services to residents. Brattleboro's own brownfield program is focusing on the Whetstone Brook area that was devastated by Tropical Storm Irene. They are looking to WRC's brownfields program to provide assistance outside of the Whetstone Brook area, such as redevelopment of industrial and commercial sites along Putney Road, and the rail and industrial corridor along the Connecticut River.

Additionally, state and regional policy prioritize brownfield sites for net metered solar installations. Solar developers are actively looking for these sites. The WRBRI has supported a solar installation on a brownfield site in the Town of Grafton in the village of Cambridgeport. WRBRI will continue to emphasize the value of brownfields sites for solar installations.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

State, regional and municipal policies make compact settlement and mixed-use development a priority. We have experience with this. Algiers Village, one of the region's designated village centers, created and implemented a plan that integrated commercial and residential redevelopment with emphasis on walkability and green space. This entailed renovating a historic building into seven units of affordable housing, rehabilitating and revitalizing a historic general store, removing an abandoned warehouse, cleaning up petroleum and hazardous contamination on the site, and constructing two new residential buildings (17 units of affordable housing), parking, sidewalks and a bus stop. This project, which received a Phoenix Award in 2014, demonstrates what is possible with brownfields program support. We want to replicate this success in all of our villages. When growth comes, it is to be directed to the region's villages.

In 2013, the Village of Bellows Falls developed the *Island Growth and Rehabilitation Plan* which identified high level revitalization options for the area. Redevelopment plans include revitalization of the historic mill buildings, bicycle and pedestrian-friendly streetscaping, and placemaking elements featuring interpretive walkways showcasing the natural history of the Island and Abenaki petroglyphs. The Island plan was the first step towards revitalization. Building upon previous brownfield reports and site assessments, the strategy for revitalization implementation has begun to take shape, however there is still much work to do.

ii. Outcomes and Benefits of Redevelopment Strategy

Brownfield assessments will lead to redevelopment action, thereby raising neighboring property

values and tax revenue, creating new commercial, housing and civic opportunities on sites with an industrial past, and creating jobs and homes. Potential economic benefit is among site selection criteria. We anticipate that a significant number of new jobs will be created through cleanup that results from this grant, as well as construction jobs related to site redevelopment. Revitalization of village centers and downtowns enables formerly blighted property to again contribute to the local economy by fostering new businesses, the arts, affordable and accessible housing, and green infrastructure for floodwater attenuation and greenspace as now redeveloped WRBRI sites have. By focusing development in existing centers, we will preclude sprawl.

The Bellows Falls Island sites are being developed for a new 60,000 +/- s.f. facility for industrial use and office space, including high-tech industry jobs with salaries well above the area median wage. These are the type of well-paying jobs that the region needs. Redevelopment of this industrial area will also benefit downtown shops and restaurants, all of which are within walking distance.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

WRBRI has established partnerships and working relationships with each of the following funding sources. We work closely with these partners to obtain assistance and leverage funds through state and federal programs such as *VT Brownfields Technical Assistance, VT Brownfields Revolving Loan Fund, VT Petroleum Cleanup Fund, VT Community Development Block (CDBG), EPA Target Assessment, EPA Cleanup grants, and USDA Rural Development.* We will continue to assist the redevelopment of sites with obtaining funding and/or technical assistance through *Vermont and Federal Tax Credits (New Market, Historic, Affordable Housing, etc.), CDBG, Windham County Economic Development Program, VT Economic Development Authority, USDA Rural Development, National Park Service Rivers & Trails Program, VT Community Loan Fund, and VT Community Foundation.*

ii. Use of Existing Infrastructure

The WRBRI prioritizes the use of existing infrastructure and revitalizing blighted property when remediation allows. The settlement pattern of the village centers and downtowns of the region are compact and walkable, and most often situated along streams or rivers. These funds will be target the reuse of existing and historic structures and sites within the designated downtowns and village centers.

The Island, within the designated downtown of Bellows Falls Village, is supplied by the Bellows Falls Village Water System. This is a unique amenity not available to the vast majority of Vermont towns.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The Windham Region is rural. The largest towns, Brattleboro and Rockingham, have populations of 12,046 and 5,282 respectively. Over half of our towns have fewer than 1,000 residents and lack the fiscal capacity to fund assessment activities. The cost per person of delivering basic infrastructure and services, such as roads, education, and electricity, is high. WRC has no taxation authority, and receives most of its funding through grants and a performance-based contract with

the state. WRC has limited control over how it uses the majority of its funding and does not have funding to pay for brownfield assessments. Income data indicates that significant percentages of our targeted communities' residents fall below county, state, and national median income levels. Southern Vermont has the lowest average earnings per job at approximately $48,000[1] compared to the state of Vermont and four other New England states. Decline of industry has changed the character and economies of these historic employment centers. The expansion of census tracts eligible for participation in the federal New Market Tax Credit[2] (NMTC) program and the increase of Community Development Block Grant (CDBG) Low Moderate Income (LMI) area wide benefit communities is another indicator of economic deterioration in the region. The number of NMTC-eligible census tracts grew from 1 in 2000 to 5 at present. The number of CDBG LMI areas grew from 2 census areas before 2014 to the current 13 areas in the WRC region. Job growth in the Southern Vermont is projected to occur at a slower rate than the surrounding areas, expanding 1% from 2017 to 2023[3]. The closure of Vermont Yankee exacerbates conditions of economic stagnation.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Brownfield sites are health concerns. The most prevalent contaminants found in our Region[4] include solvents, petroleum products, PAHs, PCBs, arsenic, lead, metals, VOCs, and asbestos, all of which are potential threats to public health. We estimate that 96 hazardous and 41 petroleum brownfields are found in our target communities. These brownfield sites are located directly within or adjacent to densely developed low to moderate income areas that support a range of commercial, industrial, cultural and residential uses. A Phase II ESA for a Bellows Falls Island site reported lead, arsenic, PAHS, petroleum, and VOCs[5]. We expect these and other contaminants will be found throughout the area given historic land uses.

For example, in Brattleboro and Bellows Falls the location of residences, childcare centers, nursing homes, schools, hospital/health centers, homeless shelters, and affordable housing developments has been examined by WRC in relation to existing and completed brownfield sites. Each of these **sensitive populations** can be found within a quarter mile of brownfield sites. Prior to entering WRC's program, part of a former manufacturing site was developed as an Early Head Start program. Testing revealed high levels of arsenic in the playground soils before cleanup.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Lead levels in perimeter soils at pre-1950 Vermont homes commonly tested at two to nearly four times EPA cleanup levels for play areas.[6] Approximately 70% of Brattleboro's and 81% of Bellows Falls' housing units were built before 1950.[7] The VT Department of Health indicates that Bellows Falls had the highest percentage of elevated blood levels for lead of all children tested in Vermont between 1997 and 2005 (15%)[8], and a 2008 report indicates that Windham County has worse than statewide levels of elevated juvenile blood lead concentrations and lower than average

[1] Southeastern Vermont Comprehensive Economic Development Strategy (CEDS): Economic Profile, DRAFT, June 2018.
[2] Tracts qualify for the program if: (1) the poverty rate for such tract is at least 20%, or (2) in tracts not located within a Metropolitan Area, the median family income does not exceed 80% of statewide median family income.
[3] Southeastern Vermont Comprehensive Economic Development Strategy (CEDS): Economic Profile, DRAFT, June 2018.
[4] Based on previous Phase II work throughout the Region
[5] Robertson Paper Mill
[6] Vermont Office of the Attorney General and Department of Health. "Get the Lead out of Vermont." 2007.
[7] 2009-2013 American Community Survey 5-Year Estimates, DP04 Selected Housing Characteristics
[8] VT Department of Health "Landlord Compliance Focus of Lead Poisoning Prevention Week." 2006.

levels of first trimester pregnancy prenatal care. [9]

The prevalence of **asthma** in Vermont has historically been among the highest in the nation. In 2012 the prevalence of current asthma in VT adults was 11% and greater than the U.S. asthma prevalence (9%). Vermonters 35-44 years old, those with a high school education or less, those earning $15,000-$24,999 per year, and women had increased prevalence of asthma compared to U.S. averages for these groups.[10]

(3) Economically impoverished/Disproportionately Impacted Populations

Our targeted areas have high poverty, low median incomes, crime, and health issues (lead and asthma). Due to their industrial history they have been **disproportionately** impacted by having large numbers of brownfields sites in historically densely developed areas that are increasingly at risk for flooding. All brownfields sites in Brattleboro and Bellows Falls are located in areas where 42% and 51% of households respectively made less than $35,000[11], in an area where the low income threshold for 1 or more persons was greater than $40,250[12]. Brownfields occupy prime commercial sites, shifting the tax burden disproportionately on homeowners. Tax rates in the Region, especially in our target communities, are some of the highest in Vermont.[13] Blighted sites contribute to crime making these **communities less desirable for redevelopment**.

b. Community Engagement

i. Community Involvement

WRC will continue to engage with a broad constituent and stakeholder base, provide updated project information, facilitate public dialogue, and provide opportunities for public participation and local organizations regarding site selection for assessments, cleanup, and reuse. WRC partners include:

Partner Name	Point of Contact	Role/Commitment
Brattleboro Area Chamber of Commerce	Kate O'Connor, 802-254-4565 Kate@BrattleboroChamber.org	Outreach – Distribute brochures • Link to WRBRI website
Brattleboro Development Credit Corporation	Adam Grinold, 802-257-7731 Ext. 224 agrinold@brattleborodevelopment.com	Advisor, Outreach & Dvlpr. • Steering Com. - ident. sites • Finance & legal advice
Connecticut River Conservancy	Andrew Fisk, 413-772-2020 ext. 208 afisk@ctriver.org	Advisor & Outreach • Natural resource issues
Preservation Trust of Vermont	Paul Bruhn, 802-343-0595 paul@ptvermont.org	Advisor - Historic preservation & reuse tech. assistance
Rockingham Arts and Museum Project	Robert McBride, 802-463-3252 ramp@sover.net	Advisor & Outreach • Ident. sites & tech. assistance
Southeastern Vermont Community Action	Steve Geller, 802-722-4575 sgeller@sevca.org	Advisor & Outreach • Ident. sites • Redevelopment assistance

[9] VT Department of Health "Health Status Report 2008." 2008. Vermont Department of Health.

[10] Vermont Department of Health, "*Data Brief -Asthma in Vermont and United States Reducing the Burden of Asthma" 2015*.

[11] 2013-2017 American Community Survey 5-Year Estimates, the average household size in Brattleboro was 2.04 and the average household size in Bellows Falls was 2.24

[12] Defined by HUD as those below 80% of median income (from HUD Income Limits Documentation System, FY 2018).

[13] VT Department of Taxes - FY 15 Vermont Tax Rates by Town (tax.vermont.gov/content/tax-rates-county-2015)

Vermont Land Trust	Joan Weir, 802-343-0595 JWeir@vlt.org	Advisor & Outreach • Ident. sites & tech. assistance
Windham & Windsor Housing Trust	Elizabeth Bridgewater, 802-246-2109 ebridgewater@homemattershere.org	Affordable Housing Dvlpr. • Steering Com. – ident. sites

ii. Incorporating Community Input

WRC will reach out to the community in multiple ways including the following:

***Steering Committee*:** The WRBRI Steering Committee oversees the program and meets bi-monthly. Membership includes WRC members and staff, a realtor, an engineer, a planner, town officials from the targeted communities, affordable housing advocates and other interested citizens. The Committee is responsible for evaluating sites for acceptance into the program and for overseeing assessment and cleanup planning activities.

Public Meetings: WRBRI holds general public meetings to present assessment findings, address community concerns, and solicit feedback on site reuse. Meetings are publicized through a variety of methods including press releases, social media, notices displayed in local stores, libraries, community bulletin boards, local television programs, phone calls, and direct mailings to community groups. Four weeks are allotted for public comment. WRC also meets with the immediate neighbors to a site and any interested neighborhood organizations at times that are most convenient for the public.

***Transactional Workshops**:* WRBRI conducts a workshop for professionals involved in brownfields transactions such as attorneys, developers, bankers, realtors, and engineers. They are targeted through direct mailings, ads, and articles. WRC's "Bagels and Brownfields" workshop discusses legal, regulatory, technical, and financial issues.

Informational Resources: Public ability to contact program staff directly is WRBRI's most important informational resource. The WRBRI program brochure is distributed to stakeholders via public outlets, and the WRBRI page on the WRC website is regularly updated. WRC tells the story of our brownfields program in the WRC newsletter.

***Record Documentation & Repositories**:* WRC is subject to Vermont's Open Meeting Law. All WRBRI Steering Committee minutes are public record and available within 5 days of the meeting. All community participation activities are documented, including public input and suggestions.

***Interpretive Services**:* Translation services and services for the hearing impaired are obtained as needed to facilitate participation.

3. TASK DESCRIPTION, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

The following task descriptions apply to WRC's proposed hazardous substances assessment program including the development of an area-wide plan.

Task 1 - Cooperative Agreement Oversight: WRBRI is a program of WRC which will manage all financial, reporting and auditing tasks. These include management of the EPA/WRC cooperative agreement, overall project coordination, and reporting and managing any related environmental professionals agreements. The WRBRI Steering Committee (led by WRC staff) will develop requests for proposals, advertise, evaluate, rank and hire qualified environmental professionals as grant subconsultants. WRC will update ACRES and conduct quarterly reporting. As part of the

overall project coordination, WRBRI staff will also attend EPA sponsored trainings.

Many Task 1 items will be ongoing throughout the 3-year period. The first milestone will be development of the cooperative agreement. Pre-qualified subconsultants are on board until 2022 when the Steering Committee will begin the pre-qualifying process. Quarterly reporting and other activities will occur on a regular basis as required.

Task 2 – Citizen Engagement: The WRBRI program will continue extensive education and outreach. WRC staff will lead and work with community-based organizations, attending municipal and neighborhood meetings, presenting information on project progress and collecting citizen feedback. WRC staff will disseminate the WRBRI brochure and other user-friendly financial, technical and educational materials that outline brownfield redevelopment issues. We make effective use of our website and social media (Facebook). This task also includes the continuation of the WRBRI Steering Committee, WRC-led work with prospective purchasers/developers of brownfield sites, and outreach and coordination with site neighbors. All WRC meetings are open to the public and meeting minutes are published on the WRC website.

Many Task 2 activities will occur throughout the 3-year grant period. WRC will disseminate program related information early on. As assessments get underway, milestones will include public meetings and neighborhood outreach. Steering Committee meetings take place bimonthly.

Task 3 – Site Assessments Activities: The environmental professionals will lead and conduct Phase I and II site assessments. WRBRI plans to coordinate the development of 5 Phase I hazardous substances assessments and 5 Phase II hazardous substances assessments. The number of sites carried out may change depending on site characteristics and cost. The Phase II estimates include the preparation of the Quality Assurance Project Plans (QAPP) that will be approved by EPA.

WRC staff will lead work with both owners and prospective purchasers to coordinate site access and share results of site assessments. Staff will review all sub-consultant work, coordinate EPA and VT Department of Environmental Conservation (VTDEC) review of reports and work plans, and communicate with property owners and prospective purchasers.

Task 3 activities will be ongoing throughout the 3-year period. As sites are selected, environmental professional hired will take the lead on Phase 1 and Phase 2 assessments. WRC staff will take the lead on project coordination and communication with all parties.

Task 4 – Site Reuse and Cleanup Planning: The WRBRI pre-qualified environmental professionals will lead remediation planning on up to 5 hazardous sites, depending on site characteristics. WRBRI staff will be responsible for reviewing remediation plans, coordinating reviews of the reports with EPA and VTDEC, and communicating with property owners and prospective purchasers. WRC will also lead the development of an area-wide plan for a yet to be determined community (WRC will solicit proposals from our designated villages and downtowns). WRC staff will work closely with the environmental professionals, the community and the area property owners to develop a comprehensive area-wide plan. WRC will lead community engagement efforts, incorporating neighborhood concerns, and coordinating and reviewing plan progress.

Remediation and site reuse planning will take place upon completion of Phase II assessment work. Development of an area-wide plan will begin immediately upon receipt of the grant, by soliciting project proposals from communities. All work will be completed within 3 years.

b. Cost Estimates and Outputs

i. Cost Estimates

	Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Site Assessments Activities	Task 4 Site Reuse and Clean Up Planning	TOTAL
Personnel	$11,460	$9,967	$7,472	$5,016	$33,915
Fringe Benefits	$4,296	$3,585	$2,853	$1,850	$12,584
Travel	$1,000	$0	$0	$0	$1,000
Equipment	$0	$0	$0	$0	$0
Supplies	$0	$0	$0	$0	$0
Contractual	$0	$0	$195,000	$57,500	$252,500
Other	$0	$0	$0	$0	$0
Total	$16,756	$13,552	$205,325	$64,366	$300,000

Task 1: Staff personnel/fringe costs are estimated at $11,460/$4,296. Travel cost is estimated to include travel for one person to a national conference at $1000 and other EPA trainings.

Task 2: Staff personnel/fringe costs are estimated at $9,967/$3,585.

Task 3: 5 Phase I hazardous substances assessments at up to $4,000 each[14] for a total of $20,000; and 5 Phase II hazardous substances assessments at $35,000 each[15] for a total of $175,000. The number of sites carried out may change depending on site characteristics and cost. The Phase II estimates include the preparation of a Quality Assurance Project Plan (QAPP) that will be approved by EPA.

Personnel and fringe costs (estimated at $7,472/$2853) associated with this task are for WRC staff to work with both owners and prospective purchasers to coordinate site access and to communicate results of site assessment. Costs also cover staff review of all sub-consultant work, coordination of EPA and VT DEC review of reports and work plans, and communicating with property owners and prospective purchasers.

Task 4: 5 Corrective Action Plans at a cost averaging $8,500 per site[16] for a total of $42,500. WRC staff will be responsible for reviewing remediation plans, coordinating reviews of the reports with EPA and VT DEC, and communicating with property owners and prospective purchasers. The development of an area-wide plan is also included in this budget with $15,000 for consulting services. The area-wide planning funds will be matched by other funds in conjunction with the community selected. Personnel/fringe costs are estimated at $5016/$1850.

ii. Outputs

Task 1 - Output
EPA/WRC Cooperative Agreement
Pre-qualified environmental professionals procured as needed

[14] Cost is based on average costs of previous Phase I assessments. Cost may be less or more depending on size of site.

[15] It has been WRC's experience that the cost of the Phase II assessment depends on size and former use and has varied from $28,500 to $ 38,500 for an initial Phase II investigation.

[16] Average Corrective Action Plan costs.

Determination of site eligibility by EPA Region 1
Attendance at national brownfields conference and other EPA brownfields trainings
EPA Acres database updated
Quarterly reports (12), MBE/WBE reports, final report & other required EPA reports
Task 2 - Output
Steering Committee meetings, bimonthly (18)
Brownfields brochure and links to website disseminated
Brownfields Transaction Workshop
WRC newsletter articles on brownfields – nine published
WRBRI program presented to nine organizations in the region
Partner community-based organizations - hold 2 meetings each
Presentation of assessment findings and gathering of public comments, as needed
Meetings to discuss site remediation, timeline, and site reuse – 5 as needed
Task 3 - Output
Five Phase I hazardous substances assessments
Five Phase II hazardous substances assessments
Five coordination meetings
Task 4 - Output
Remediation plans for up to five sites
Five coordination meetings
Area-wide plan, including community & neighborhood planning meetings

c. Measuring Environmental Results

The WRBRI program manager tracks the progress of the program by reporting developments on the ACRES website and producing quarterly reports for the EPA. In addition, the WRBRI Steering Committee meets on a bimonthly basis. The program manager maintains an updated spreadsheet on the status of each site. In the meetings, staff reports to the Committee on any developments and findings from assessments. The Committee receives a full debrief of contaminants identified on the sites and next steps towards remediation if recommended. Since the Committee serves as the decision making entity of the program, WRC emphasizes the importance of keeping the committee current with developments and outcomes of the program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFOMANCE

a. Programmatic Capability

i. Organizational Structure

Susan Westa, WRC Senior Planner and Community Development lead with over 30 years of community and environmental planning experience, will serve as the Brownfields Program Manager. Ms. Westa will manage WRC staff and the work of environmental professionals. She will have oversight of the assessment funds and programmatic requirements and will serve as liaison between communities, State officials and the EPA. WRC has been in continuous operation for over 50 years. The Finance Director has been with the Commission for more than 20 years. In the event employee turnover should occur, one of the other senior planning staff, including the Executive Director, would assume the leadership position.

WRBRI will continue to procure environmental professionals to assist with site assessment and cleanup planning tasks. WRC has self-certified its procurement procedures for personnel services

and equipment in compliance with applicable federal regulation (pursuant to 49 CFR 18.36(g)3). Procurement procedures and policies have been developed in accordance with state and federal statutes and regulations. The WRC will continue to use this competitive solicitation process.

ii. Acquiring Additional Resources

WRBRI will continue to contribute in-kind staff time, overhead, and supplies necessary to complete administrative activities and indirect costs not covered under the brownfields grants[17]. WRC received an FY 2011 EPA Brownfields Clean-up Revolving Loan Fund (RLF) grant and projects that have been assessed with WRBRI Assessment grant funds are given priority for cleanup loans and/or grants **(over $1.5 mill. distributed).** The Program Manager also oversees WRC's Community Development Program, which is funded by additional state and local funds[18] and approximately **$5,000 a year** goes to the integration of the WRBRI with other WRC programs.

b. Past Performance and Accomplishments

i. Accomplishments

Since its inception in 2000, the WRBRI has assisted with 56 sites, 91% of which have been redeveloped or are in the planning or implementation phase of redevelopment. Recent highlights of our program include assessment through remediation for **55 units of affordable housing**, a **new public transit bus facility,** and **parking for a local farmer's market**. The following grants for petroleum and hazardous substance brownfields assessments have been successfully closed out with no funds remaining at the time of closure:

- Cooperative agreement 2B-96109501- $200,000 (ARRA funds – hazardous)
- Cooperative agreement 2B-96109601- $200,000 (ARRA funds – petroleum)
- Cooperative agreement BF-96151401- $400,000 (petroleum and hazardous)
- Cooperative agreement BF-96179001-$400,000 (petroleum and hazardous)

WRC is managing an EPA Brownfields RLF (BF 96151501) and an FY 16 EPA assessment grant for hazardous and petroleum substances (BF-00A00215). At the time of this application, approximately $7,013.10 hazardous substances funds remain available. Approximately $86,859 of petroleum funds remain with $3,718 obligated, resulting in just $83,141 available. The remaining hazardous funds will be expended before June 2019.

ii. Compliance with Grant Requirements

WRC has a record of compliance with all quarterly reports, MBE/WBE reporting and financial status reports. Property profiles are up-to-date in the ACRES database. Satisfactory progress has been made in achieving results detailed in the work plan and no modifications have been required. For the current grant, the WRBRI has procured environmental professionals, continued community outreach, updated its website, assisted with reuse planning and spoken with numerous prospective purchasers. Grant information is reported quarterly and entered into the ACRES database. Due to extenuating circumstances, one quarterly report has fallen behind in submission, but the delay was communicated to and coordinated with U.S. EPA Region 1 personnel. All final ESAs, QAPPs and CAPs are sent to the Project Officer at EPA Region 1.

[17] Under our FY16 grants, **WRC contributed $15,000 in administrative overhead costs** not covered by the current grant, and we anticipate contributing that amount or higher for this grant.

[18] This funding comes to the WRC through Vermont Property Transfer Tax and municipal per capita assessments.

Attachment A: Threshold Criteria

THRESHOLD CRITERIA

1. APPLICANT ELIGIBILITY. Windham Regional Commission (WRC) is a Vermont Regional Planning Commission and is eligible to apply as a regional council or group of general purpose units of local government.

2. COMMUNITY INVOLVEMENT. The purpose of our community involvement plan is to engage a broad constituent and stakeholder base provide updated project information to facilitate public dialogue, and provide opportunities for public participation. Community outreach efforts detailed in the application show how the Windham Region Brownfields Reuse Initiative (WRBRI) will continue to involve affected residents, businesses, municipal officials and local organizations in decision-making process regarding site selection for assessments, cleanup, and reuse. Community involvement will include, but not limited to WRBRI Steering Committee, neighborhood outreach, community meetings, informational resources (website, newsletter, brochure, etc.), transactional workshops, record documentation and repositories, interpretive services and working with community partners.

3. EXPENDITURE OF ASSESSMENT GRANT FUNDS. WRC's previous Assessment Grants were drawn down by 73% as of December 27, 2018. See the attached financial record.

Attachment B: Letters from the State

Attachment C: Applicant Eligibility

The Vermont Statutes Online

Title 24 : Municipal And County Government

Chapter 117 : Municipal And Regional Planning And Development

Subchapter 003 : Regional Planning Commissions

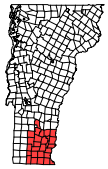
§ 4341. Creation of regional planning commissions

(a) A regional planning commission may be created at any time by the act of the voters or the legislative body of each of a number of contiguous municipalities, upon the written approval of the Agency of Commerce and Community Development. Approval of a designated region shall be based on whether the municipalities involved constitute a logical geographic and a coherent socioeconomic planning area. All municipalities within a designated region shall be considered members of the regional planning commission. For the purpose of a regional planning commission's carrying out its duties and functions under State law, such a designated region shall be considered a political subdivision of the State.

(b) Two or more existing regional planning commissions may be merged to form a single commission by act of the legislative bodies in a majority of the municipalities in each of the merging regions.

(c) A municipality may move from one regional planning commission to another regional planning commission on terms and conditions approved by the Secretary of Commerce and Community Development. (Added 1967, No. 334 (Adj. Sess.), § 1, eff. March 23, 1968; amended 1971, No. 257 (Adj. Sess.), § 1, eff. April 11, 1972; 1981, No. 132 (Adj. Sess.), § 4; 1987, No. 200 (Adj. Sess.), § 19, eff. July 1, 1989; 1995, No. 190 (Adj. Sess.), § 1(a); 2009, No. 146 (Adj. Sess.), § G5, eff. June 1, 2010; 2009, No. 156 (Adj. Sess.), § F.11, eff. June 3, 2010; 2013, No. 36, § 3.)

The Windham Region



TN

GIS
Vermont Geographic Information System
WINDHAM REGIONAL COMMISSION
139 Main St • Suite 505 • Brattleboro, VT 05301
(802) 257-4547 www.windhamregional.org

2 0 2 4 6 8
Miles

c:\WRmaps\Base_8x11_b&w_simple.mxd

Note: This map should be used for general reference and planning purposes only.

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Windham Regional Commission

* b. Employer/Taxpayer Identification Number (EIN/TIN): 03-0220628

* c. Organizational DUNS: 0149289310000

d. Address:

* Street1: 139 Main Street
Street2: Suite 505
* City: Brattleboro
County/Parish:
* State: VT: Vermont
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 05301-3040

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Susan
Middle Name: Patricia
* Last Name: Westa
Suffix:

Title: Senior Planner

Organizational Affiliation:

* Telephone Number: 802-257-4547 x108
Fax Number: 802-254-6383

* Email: swesta@windhamregional.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

E: Regional Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Windham Region Brownfields Reuse Initiative FY19

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: VT (1)
* b. Program/Project: VT (1)

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2019
* b. End Date: 09/30/2022

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ____.

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms.
* First Name: Susan
Middle Name: Patricia
* Last Name: Westa
Suffix:

* Title: Senior Planner

* Telephone Number: 802-257-4547 x108
Fax Number: 802-254-6383

* Email: swesta@windhamregional.org

* Signature of Authorized Representative: Susan Westa
* Date Signed: 01/30/2019