Narrative Information Sheet

1. Applicant Identification

Two Rivers-Ottauquechee Regional Commission
128 King Farm Road
Woodstock, Vermont 05091

2. Funding Requested

a. Assessment Grant Type: Community-wide
b. Federal Funds Requested
   i. $300,000
   ii. N/A

3. Location

Two Rivers-Ottauquechee Region, Vermont

<table>
<thead>
<tr>
<th>County</th>
<th>Towns</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orange County</td>
<td>Bradford, Braintree, Brookfield, Chelsea, Corinth, Fairlee,</td>
</tr>
<tr>
<td></td>
<td>Newbury, Randolph, Strafford, Thetford, Topsham, Tunbridge,</td>
</tr>
<tr>
<td></td>
<td>Vershire, West Fairlee</td>
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<tr>
<td>Windsor County</td>
<td>Barnard, Bethel, Bridgewater, Hartford, Hartland, Norwich,</td>
</tr>
<tr>
<td></td>
<td>Plymouth, Pomfret, Rochester, Royalton, Sharon, Stockbridge,</td>
</tr>
<tr>
<td></td>
<td>Woodstock</td>
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<tr>
<td>Addison County</td>
<td>Granville, Hancock</td>
</tr>
<tr>
<td>Rutland County</td>
<td>Pittsfield</td>
</tr>
</tbody>
</table>

4. Target Area and Priority Site/Property Information

Target Area: Town of Hartford
Priority Sites: Pine Street block (7 Pine St, 75 Pine St, 43 Pine St, Lot 123), White River Junction, VT 05001

Target Area: Town of Randolph
Priority Sites:
- 17 Weston Street, Randolph, VT 05060 (former Gelatine factory)
- 2 Pearl Street, Randolph, VT 05060 (former Branchwood factory)

Target Area: Town of Royalton
Priority Sites:
- 89 Pleasant Street, South Royalton, VT 05068 (former Windsor County Feeds grain mill)
- 5894 VT-14, South Royalton, VT 05068 (former Eaton’s Sugar House)
5. Contacts

a. **Project Director:**
   Kevin W. Geiger, AICP  
   802-457-3188  
   kgeiger@trorc.org  
   128 King Farm Road  
   Woodstock, VT 05091

b. **Chief Executive/Highest Ranking Elected Official:**
   Peter G. Gregory, AICP  
   802-457-3188  
   pgregory@trorc.org  
   128 King Farm Road  
   Woodstock, VT 05091

6. Population\(^1\)

a. **Community Wide Population**
   Two Rivers-Ottauquechee Region, Vermont: 53,387

b. **Target Area Populations**
   Hartford: 10,686  
   Randolph: 4,774  
   Royalton: 2,750

7. **Other Factors Checklist**

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<th>Other Factors</th>
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<tr>
<td>Community population is 10,000 or less.</td>
<td>4</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
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<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
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<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially 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).</td>
<td>N/A</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>3</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td>N/A</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
<td>N/A</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>N/A</td>
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\(^1\) 2020 Decennial Census Data
8. **Letter from the State or Tribal Environmental Authority**
   
   See Attached Letter

9. **Releasing Copies of Applications**
   
   Not applicable: Application does not have confidential, privileged, or sensitive information.
Letter from State Environmental Agency
November 17, 2021

Two Rivers-Ottauquechee Regional Commission  
Attn: Sarah Wraight  
128 King Farm Road  
Woodstock, VT 05091

Dear Ms. Wraight:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Two Rivers-Ottauquechee Regional Commission (TROC) intends to apply for an EPA Brownfields Assessment Grant, and if awarded, to utilize the grant funds to conduct assessment activities associated with the characterization of brownfield properties within the TROC region of Vermont.

The State of Vermont is very appreciative of TROC's past and continued programmatic successes and of your intent to apply for additional grant funding, as your local involvement in the Vermont Brownfields Program continues to be an asset in the assessment and redevelopment of properties in your region. Assessment work conducted with TROC oversight has been appropriate, consistent, and helps to progress the overall objectives of the Vermont Brownfields Program.

VT DEC looks forward to continued collaboration with TROC as you progress with your efforts in brownfields assessments. We will continue to work with TROC to assist potential developers with enrollment into the Vermont Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program, through which additional cleanup funding is available.

Best of luck in the competition.

Sincerely,

Sarah Palmer Bartlett  
Brownfields Program Coordinator  
Sites Management Section/Waste Management & Prevention Division

CC:
Narrative / Ranking Criteria
1. Project Area Description and Plans for Revitalization

1.a. Target Area and Brownfields
1.a. (i) Background and Description of Target Area

The Two Rivers-Ottawuechee Regional Commission (TRORC) is a regional planning commission, created by the state and akin to a county planning department or council of governments in other states. Most of TRORC’s 30 member towns are located in Windsor and Orange Counties. Brownfields are found throughout our region, though many have not yet been added to the state’s contaminated sites list. Most of the brownfields that have been identified and assessed in our region have legacy contamination from underground petroleum storage tanks and/or light industrial uses (auto repair shops, dry cleaners, manufacturing, etc.). Common pollutants include volatile organic compounds (VOCs), heavy metals, polyaromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs), and dioxins and furans.

Legacy contamination threatens human and environmental health. With much of the region’s historical development along rivers and in floodplains, brownfields can have significant water quality impacts. Their economic impacts are just as damaging. Liability concerns and the high cost of assessment and cleanup are hindering revitalization of many vacant or underutilized brownfield properties, thereby draining economic vitality from our villages and downtowns. In a region where development is severely constrained by hilly topography and the growing flood risk from climate change, the sustainability of our communities is dependent upon fully utilizing our limited supply of developable sites. Housing was a critical need even before the pandemic; as of 2019, over 1/3 of households in Windsor and Orange Counties paid more than 30% of their income on housing.1 The need for additional affordable units has now escalated to a crisis.

We have 3 target areas where we will focus most of our assessment work under this grant: Hartford, Randolph, and Royalton. Hartford and Randolph are the region’s largest economic hubs and Royalton hosts a private university, but neither Randolph nor Royalton have had population growth over the past decade.2 Hartford (Windsor County) is our largest town (population: 10,686). Its densest development area, White River Junction, has the best potential for infill redevelopment in the region and is slowly revitalizing. The area has blocks of marginal or defunct commercial space. Randolph (Orange County) is our second-largest town (population: 4,774). There is strong redevelopment potential in its central business district and nearby commercial districts. In Royalton (Windsor County, population: 2,750), most brownfields are in the VT-14 and VT-107 corridors. South Royalton village is the Town’s largest settlement and holds the most potential for redevelopment. Brownfields are significantly hampering revitalization efforts in all of these target communities.

1.a. (ii) Description of the Priority Brownfield Site(s)

Hartford has 49 known sites on the state’s registry, Randolph has 44, and Royalton has 20. Like elsewhere in the region, these are diverse collections of small sites contaminated by underground fuel tanks and/or light industrial uses. TRORC maintains a prioritized inventory of

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1 2015-2019 American Community Survey 5-Year Estimates
2 2020 Decennial Census
state-listed and unlisted sites throughout the region, and that inventory will inform future site selection within our 3 target areas. This section describes 8 priority sites that illustrate the importance of addressing brownfields in each of TRORC’s target communities.

In Hartford, the Pine Street block hosts a collection of mostly commercial properties, several with known or suspected contamination. The block has tremendous potential for civic, commercial, and housing infill; much of its land area is currently monopolized by parking lots and low-density development. It is centrally located on US-4 (the busiest road in central Vermont), proximate to local and state government offices, a school, and a plethora of businesses. Ongoing assessment work at the former Bergeron Site (7 Pine St) has documented tetrachloroethene (PCE) in soil vapor as well as groundwater contamination from PCE, petroleum VOCs, and metals. Potential vapor intrusion into the abutting residential property is under investigation. The site was once a filling station and dry cleaner, and it is currently a used car dealership. In the northeastern corner of the Pine Street block is a vacant lot formerly occupied by the Socony Oil depot. Past assessment work found petroleum contamination of groundwater and soil, with impacts to the neighboring (downgradient) parcel currently occupied by an auto parts store (75 Pine St). Further south is a bus garage (43 Pine St) that was formerly a filling station but has not yet been assessed.

In Royalton, the Windsor County Feeds site hosts a grain mill building that now lies derelict and vacant. The property lies within the South Royalton village center, outside of the floodplain, and is a prime site for housing or commercial infill. It was assessed for petroleum contamination of groundwater following removal of underground storage tanks in 1991, but the low contamination levels did not warrant further investigation. More comprehensive assessment is needed to evaluate potential hazardous materials contamination. Further west in town lies the former site of Eaton’s Sugar House, a restaurant and store destroyed by fire in 2019. It is a prime commercial location lying outside the floodplain and benefitting from the confluence of 2 state highways and I-89. Assessment is needed to evaluate potential contamination from commercial operations and the fire, and ultimately prepare the site for reuse.

In Randolph, the former Branchwood Factory site and the former Gelatine Factory are located downtown, outside of the floodplain. Despite their excellent potential for infill redevelopment, both sites are plagued by concerns about potential contamination. The Branchwood site was formerly a wood products manufacturing facility that burned in 1999. The site has been vacant ever since. A recent Phase II study found PAH and dioxin/furan contamination of shallow soils site-wide, and further assessment will be required. The Gelatine Factory site hosted various manufacturing activities from the late 1800s until the 1970s. There is currently one large building on the property, used as apartments. Given the site's history, there could be potential impacts to sensitive receptors from hazardous materials contamination, but no prior assessment work has been reported for the site or abutting residential properties.

These are a small selection of the brownfields in our region that are threatening human and environmental health and monopolizing land sorely needed for redevelopment. Without assessment support, towns and private landowners are often financially unable to revitalize these underutilized properties. Community requests for assistance have exceeded the hazardous materials funding available through TRORC’s current EPA Brownfields Assessment Grant.

1.b. Revitalization of the Target Area
1.b. (i) Reuse Strategy and Alignment with Revitalization Plans

The Pine Street block in Hartford, which includes the Bergeron site and several other brownfields, was the focus of an area-wide planning effort funded by TRORC’s FY 2015 EPA Brownfields Assessment Grant. Informed by community feedback, the plan proposed small-scale infill along Maple Street, improving the streetscapes for pedestrians and cyclists, creating a central public plaza, and constructing larger buildings (including high-density housing) in the northeastern quadrant. The proposal is also consistent with the vision outlined for the block in Hartford’s Town Plan, namely high-density, mixed use, and infill development.

Although formal redevelopment strategies have not yet been developed for priority sites in Randolph and Royalton, planning work is underway. With support from TRORC’s FY 2019 EPA Brownfields Assessment Grant, Randolph is starting an area-wide study of 17 underutilized parcels in the downtown (including Branchwood and the Gelatine Factory). Informed by community dialogue, market analyses, and an environmental conditions survey, the plan will present potential reuse scenarios for the study area as well as conceptual designs for Branchwood. Both the Branchwood and Gelatine Factory sites are in the central business district where the Town Plan calls for dense, mixed-use, infill development. Preliminary conversations about Branchwood’s redevelopment have focused on housing.

Royalton is about to embark on a master planning project for the village of South Royalton. The current Town Plan envisions the village as mixed use with high-density multi-family residential development. Redevelopment of prime parcels like the Windsor County Feeds and Eaton’s Sugar House sites will be critical to the town’s broader revitalization efforts.

1.b. (ii) Outcomes and Benefits of Reuse Strategy

All the priority sites identified in this application are prime infill spots; their redevelopment will both benefit from and enhance the surrounding uses. Rehabilitating blighted properties will create opportunities for affordable housing and commercial developments that are sorely needed in downtowns and village centers. Infill growth brings in more jobs and tax revenue without expensive extensions of utilities and roads. It’s also a critical component of sustainable rural development; infill improves quality of life in our historic settlements and helps to retain and attract residents while preserving the natural resources upon which our forestry, agriculture, and tourist industries depend. Economic development has long proven a challenge for the region as a whole, which meets the federal criteria for economic distress and is part of an Economic Development District. More than 1/3 of Windsor County and Orange County households are housing cost burdened or severely burdened. Randolph and Royalton are in particular need of assistance, as indicated by their Qualified Opportunity Zones designations. Past brownfields assessments have led to redevelopment projects worth over $12 million. We estimate that this grant, if funded, will result in over $1 million of privately funded new property value, dozens of direct job gains, new affordable housing units, and even more indirect benefit.

Additionally, brownfield redevelopment can create green space for recreation and natural stormwater treatment. Depending on site characteristics, energy projects can also be good options for brownfields reuse. Solar energy generation on former brownfields is statutorily preferred and incentivized in Vermont, and TRORC can help to facilitate those projects.

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3 2015-2019 American Community Survey 5-Year Estimates
1.c. Strategy for Leveraging Resources
1.c. (i) Resources Needed for Site Reuse

In its previous brownfields work, TRORC has successfully leveraged additional monies from many sources. As needed, we will support landowners and municipalities in applying for supplemental assessment funding from the state’s Petroleum Cleanup Fund and Brownfield Response Program. TRORC and its community partners are also committed to assisting the long-term rehabilitation of priority sites, beyond the purview of this Assessment Grant. Together we will support eligible parties in seeking cleanup funding through the aforementioned state funds, the Vermont Brownfields Revitalization Fund, Vermont Community Development Program, USEPA Cleanup Grants, and regional revolving loan funds. To support site reuse, we can help landowners access funding through Royalton’s Betterment Fund, Hartford’s Revolving Loan Fund, or state tax credits for rehabilitating sites in downtown and village areas.

1.c. (ii) Use of Existing Infrastructure

TRORC prioritizes assessment activities for brownfield properties that: are located in areas planned and zoned for denser development, have underutilized infrastructure capacity, are served by municipal water and sewer, and/or are accessible by major roads. Many properties fit these criteria within our target communities. All but 1 of our priority sites (Eaton’s Sugar House) have municipal water and sewer. Eaton’s is located in a hamlet at a confluence of highways.

2: COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need
2.a. (i) The Community’s Need for Funding

Financing brownfield assessment and redevelopment is challenging in a region faced with slow economic growth, an overabundance of low-wage jobs, and an extremely limited and expensive housing market. The region meets the federal criteria for economic distress and is part of an Economic Development District. Randolph and Royalton are Opportunity Zones.

The only method for towns to raise funds in Vermont is through property taxes, voted upon by all residents annually. Taxes are already high (Vermont is ranked 4th nationally for total state and local tax burden), and any vote to raise them further is usually defeated. Tax bases are further limited by small populations. Our region’s largest town (Hartford) has 10,686 residents, and our second-largest town (Randolph) has 4,774. Royalton’s population is 2,750. Without grant assistance, taking on the financial burden of a brownfield is infeasible for towns and most businesses. From our prior brownfields work, we know this grant would catalyze investment in redevelopment projects that are critical to the economic and environmental health of our towns.

2.a. (ii) Threats to Sensitive Populations
2.a. (ii) (1) Health or Welfare of Sensitive Populations

Our rural region’s sensitive populations tend to be spatially dispersed. Compared to their respective counties, our 3 target areas have larger concentrations of racial and ethnic minorities. Over 1/3 of households in Windsor and Orange counties pay more than 30% of their income on

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5 2020 Decennial Census
6 2020 Decennial Census
housing. In all 3 target communities, at least 1/3 of school children were eligible for free or reduced lunch in the 2020-2021 school year. Randolph’s unemployment rate was higher than the county’s in 2019 and 2020. Senior citizens are overrepresented in Windsor and Orange counties compared to the state as a whole. Our region lacks reliable health and welfare data for these subpopulations, but we know that the type of housing located in blighted areas is more likely to be rental units, so lower-income residents may be at greater risk of exposure to common brownfield contaminants (e.g., VOCs, heavy metals, PAHs, dioxins and furans). This grant will fund evaluation of contaminant levels and planning for corrective actions to reduce public health risks. TRORC and our partners are committed to equitable redevelopment, and we work to support site reuse projects that create affordable housing and well-paying jobs.

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

From the most recent available data (county-level), we know that between 2012 and 2016, Windsor County was the only Vermont county with leukemia incidence higher than the statewide rate. Compared to the state, Windsor County also had elevated rates of hypospadias birth defects (2012-2016) and melanoma of the skin (2011-2015). EJSCREEN’s 2014 NATA (air toxics) cancer risk index ranks most of Royalton and the northern part of White River Junction (including the Pine Street block) in the 80-90th percentile compared to the state. In 2016, testing of children aged 36 months to 5 years showed a much higher incidence of elevated blood lead levels in Windsor County (16.3% of children tested) compared to the state as the whole (6.1% of children tested). As part of our brownfields assessment work, we will evaluate contaminant-related threats to human health and identify mitigation strategies.

2.a. (ii) (3) Promoting Environmental Justice

Low-income members of our communities have fewer resources with which to access quality housing or high-paying career paths, or meet other critical needs. These systemic inequities are layered with racism that creates an unwelcoming environment in many of our aging, rural, and predominately white communities. The pandemic has intensified pressures on stressed households and sped up gentrification in our region. Redevelopment has a role to play in tackling social inequities by expanding marginalized community members’ access to resources and networks. Our target areas for this grant have higher concentrations of racial and ethnic minorities and low-income households. We will also be prioritizing assessment for prospective reuse projects that will create affordable housing and well-paying local jobs.

2.b. Community Engagement

2.b. (i and ii) Project Involvement & Project Roles

Our identified community partners are Green Mountain Economic Development Corporation (GMEDC) and Randolph Area Community Development Corporation (RACDC). GMEDC is headquartered in Hartford, and serves the same region as TRORC. With their deep understanding

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7 2015-2019 American Community Survey 5-Year Estimates
10 2015-2019 American Community Survey 5-Year Estimates
11 Vermont Department of Health Environmental Public Health Tracking Data Explorer
12 ibid.
of each community’s needs, strengths, and weaknesses, they will help TRORC select sites for assessment that will have a positive economic impact for communities. They will also help businesses access cleanup and redevelopment funding assistance. RACDC has nearly 30 years of experience supporting affordable housing development and other downtown and village revitalization efforts. They have helped shape the area-wide planning work currently underway for downtown Randolph. RACDC will continue helping identify Randolph sites for assessment, and support redevelopment through landowner counseling and/or direct project management.

<table>
<thead>
<tr>
<th>Name of Organization</th>
<th>Point of Contact</th>
<th>Assistance to be provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>GMEDC</td>
<td>Erika Hoffman-Kiess: (802) 295-3710, <a href="mailto:erika@gmedc.com">erika@gmedc.com</a></td>
<td>Site selection; advice/support for site redevelopment</td>
</tr>
<tr>
<td>RACDC</td>
<td>Julie Iffland: (802) 728-4305, <a href="mailto:julie@racdc.com">julie@racdc.com</a></td>
<td>Site selection; site redevelopment support, especially housing</td>
</tr>
</tbody>
</table>

2.b. (iii) Incorporating Community Input
Throughout this project, we will engage key stakeholders and interested residents in our target areas and in the region at large, focusing on the following local audiences:

- **TRORC Board of Directors**: TRORC’s Board is comprised of appointed representatives from each of our 30 towns. Annually during a regular Board meeting, TRORC staff will apprise Board members of assessment funding availability and solicit site suggestions.

- **Local Officials**: We will leverage our already close relationships with local officials through one-on-one conversations/correspondence and advertised public meetings. Early in the grant period, we will solicit site suggestions and interest in area-wide planning. For town-owned properties undergoing assessment, we’ll be in frequent communication to ensure that assessment activities support the Town vision for future site uses.

- **Site Owners/Redevelopers**: As needed, TRORC staff will have confidential calls or meetings with each site’s owner, prospective purchasers, and their attorneys to discuss the pros and cons of conducting an assessment and respond to any concerns.

- **Regional Chambers of Commerce, environmental groups, abutters, and general public**: From past experience, we expect these entities can offer assistance in site identification, share site information not available in the public record, and generate momentum for cleanup and redevelopment of a brownfield property. TRORC will reach out at least 4 times per year via newsletter articles, press releases and newspaper ads, website updates, lawn signs, discussions at Selectboard or other public meetings, and/or direct communications as appropriate.

- **TRORC Brownfields Advisory Committee**: TRORC recruits volunteers with diverse perspectives from our region to help review and prioritize potential sites. The group will meet as needed to evaluate new site options proposed over the course of the project. During public meetings, accommodations will be made for limited English proficiency and hearing and visual impairments as needed. When the pandemic restricts in-person meetings, we will use hybrid or online meeting formats, with follow-up email updates as needed.

3: TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs
### Task: Cooperative Agreement Oversight

<table>
<thead>
<tr>
<th>Task</th>
<th>Description</th>
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<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong></td>
<td>This task covers procurement of Qualified Environmental Professionals (QEPs) for contractual work, quarterly and final financial and progress reporting to USEPA, ACRES reporting, and any additional needed coordination with USEPA and Vermont Department of Environmental Conservation (VTDEC).</td>
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<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong></td>
<td>Throughout the 3-year period. Procurement: Quarter 1.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong></td>
<td>TRORC</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong></td>
<td>QEP selections; Quarterly progress reports; ACRES reporting; final report</td>
</tr>
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### Task: Sites Inventory and Area-wide Planning

<table>
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<tr>
<th>Task</th>
<th>Description</th>
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<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong></td>
<td>This task involves inventorying (identifying and prioritizing) sites. We will expand our existing inventory through research and consultation with our partners and other key stakeholders (see 2.b, above). Research efforts will focus mainly on our 3 target communities, but if we learn of sites elsewhere in our region, we’ll also include them. Our expanded inventory will inform the creation of 2 area-wide plans that outline constraints, opportunities, and strategies for future redevelopment. Area-wide plans will focus on target areas if stakeholder interest allows, or we can pivot to other towns as needed.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong></td>
<td>Inventory updates by Quarter 2; 1st area-wide plan by Quarter 8, 2nd area-wide plan by Quarter 12</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong></td>
<td>TRORC will lead inventory work. Due to their expertise with environmental reviews and conceptual design work, QEPs will lead area-wide planning work (with guidance from TRORC and its partners).</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong></td>
<td>Updates to existing sites inventory, 2 area-wide plans</td>
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### Task: Phase I and II Assessments & Corrective Action Plan (CAP)

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<tr>
<th>Task</th>
<th>Description</th>
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<tr>
<td>i. <strong>Project Implementation:</strong></td>
<td>In this task, we will prepare: Phase I assessments; Phase II assessments (which include work plans and Quality Assurance Project Plans) and any necessary follow-up investigations; and CAPs (which include Analysis of Brownfields Cleanup Alternatives and the preferred remedy). We will also help enroll eligible sites in the state’s voluntary assessment and cleanup program, which is the best path to liability protections and cleanup funding assistance. Deliverables under this task will focus on our target communities and, as needed, other towns in our region. Many potential sites have already been identified and prioritized by TRORC, and more will be found through the inventory process and area-wide planning in this project (see above). As community interest and collaboration permit, assessment activities will target priority sites, such as but not limited to those described in 1.a.(ii) above.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Project Schedule:</strong></td>
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<tr>
<td><strong>Quarters 1-4:</strong></td>
<td>3 Phase Is (including 1 Hartford priority site and 1 Randolph priority site), 1 Phase II, 2 state program enrollments</td>
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<tr>
<td><strong>Quarters 5-8:</strong></td>
<td>4 Phase Is, 2 Phase IIs, 2 CAPs, 3 state program enrollments</td>
</tr>
<tr>
<td><strong>Quarters 9-12:</strong></td>
<td>3 Phase Is (including 1 Royalton priority site), 1 Phase II, 2 CAPs, 1 state program enrollment</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong></td>
<td>QEPs will lead assessment and CAP work because of their technical expertise. TRORC will review QEPs’ deliverables, coordinate review by EPA and VTDEC, and coordinate communications with interested site parties.</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong></td>
<td>5 hazardous substance and 5 petroleum Phase I assessments; 2 hazardous substance and 2 petroleum Phase II assessments; 2 hazardous substance and 2 petroleum CAPs; enrollment of 6 sites in state’s brownfields program</td>
</tr>
</tbody>
</table>
**Task: Community Outreach and Engagement**

i. Project Implementation: This task includes community engagement activities through regional media (our website, newsletter, and local newspapers); meetings or correspondence with partners and key interest groups (see 2.b, above) to identify and prioritize sites; coordination with site parties and local officials to facilitate assessment processes and area-wide planning; and staff participation in the National Brownfields Conference.

ii. Anticipated Project Schedule: In quarters 1-2, we will advertise the program and solicit site suggestions from partners, the advisory committee, and other stakeholder groups. Media outreach will take place quarterly thereafter. We will consult with the TRORC Board annually and other stakeholders on an as-needed basis throughout the grant period.

iii. Task/Activity Lead: TRORC

iv. Outputs: Minimum of 14 meetings, up to 10 newspaper ads, fliers/handouts, digital messages

### 3.b. Cost Estimates

The cost estimates below are rounded to the nearest dollar. $245,415 (81.8% of awarded funds, including indirect costs) will support Phase I, Phase II, and site-specific cleanup planning work.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks ($)</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Cooperative Agreement</td>
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</tr>
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<td>Oversight</td>
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<td>Personnel</td>
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<td>Fringe Benefits</td>
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<td>Travel</td>
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<td>Supplies</td>
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**COST EXPLANATIONS:**

TRORC’s cost estimates are based on over 20 years of brownfields assessment experience. Please note these abbreviations: Hazardous Substances (HS), Petroleum (P), hour/s (hr/s)

Indirect costs: Some indirect administrative costs are included in each task, totaling $15,000 (5% of awarded funds). TRORC’s actual indirect costs for this project would be $29,768.59. The difference ($14,768.59) will be contributed by TRORC as in-kind.

Cooperative Agreement Oversight:

- **Personnel:** Director $46.15/hr * 25 hrs = $1,154; Staff $30.06/hr * 70 hrs = $2,104
- **Fringe:** Director $33.14/hr * 25 hrs = $829; Staff $16.84/hr * 70 hrs = $1,179

Sites Inventory and Area-wide Planning:

- **Personnel:** Director $46.15/hr * 45 hrs = $2,077; Staff $30.06/hr * 100 hrs = $3,006
- **Fringe:** Director $33.14/hr * 45 hrs = $1,491; Staff $16.84/hr * 100 hrs = $1,684
Travel: 8 regional trips * average 60 miles/trip * $0.56/ mi = $269
Contractual: 2 area-wide plans at $14,000 each: $28,000
Phase I, II, and CAP:
Personnel: Director $46.15/hr * 34 hrs = $1,569; Staff $30.06/hr * 141 hrs = $4,238
Fringe: Director $33.14/hr * 34 hrs = $1,127; Staff $16.84/hr * 141 hrs = $2,374
Travel: 10 regional trips * average 60 miles/trip * $0.56/ mi = $336
Supplies: Fees for enrolling 6 sites in state's brownfields program, at $500 /site = $3,000
Contractual: 5 HS Phase Is at $3,100 each + 2 HS Phase IIs at $42,000 each + 2 HS CAPs at $14,000 each + 5 P Phase Is at $2,600 each + 2 P Phase IIs at $32,000 each + 2 P CAPs at $8,000 each = $220,500 total contractual
Community Outreach and Engagement:
Personnel: Director $46.15/hr * 40 hrs = $1,846; Staff $30.06/hr * 90 hrs = $2,705
Fringe: Director $33.14/hr * 40 hrs = $1,326; Staff $16.84/hr * 90 hrs = $1,516
Travel: 10 regional trips * average 60 miles/trip * $0.56/ mi = $336; Conference travel for 1 staff person, estimate $62 roundtrip bus trip to airport + $400 airfare + ($96 lodging rate * 4 nights) + ($59 per diem * 3 days) + ($44.25 per diem* 2 days) + $200 registration = $1,312
Supplies: (10 newspaper ads * $100/ad) + (367 printed pages * $0.06 each) = $1,022

3.c. Measuring Environmental Results
TRORC will use an internal database to track the progress of every Phase I, Phase II, CAP, and area-wide plan on a continuous basis. TRORC’s Finance Manager will track project costs with monthly updates and draft invoices for staff to review. During monthly check-ins we will compare our progress to our work plan schedule to ensure that we are fulfilling all grants deliverables in a timely manner. The data we collect on numbers of project outputs and associated contractual costs will be reported quarterly through ACRES. TRORC also remains committed to tracking outcomes. We will report brownfield redevelopment successes in ACRES and showcase redevelopment efforts through our website and regional newsletter.

4: PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability
4.a. (i-iii) Organizational Capacity, Organizational Structure, Description of Key Staff
TRORC staff have the expertise and experience to successfully manage this grant. The Project Director, Kevin Geiger, has 30 years of experience in planning and economic development, and has been on our brownfields team since 2000. The Executive Director, Peter Gregory, has managed TRORC for 24 years, and has successfully overseen millions of dollars in grants. Kevin and Peter are conversant in federal procurement, and are well-qualified to select and manage quality contractors. Sarah Wraight has 8 years of experience in environmental outreach related to contaminated sites, and has been on our brownfields team since 2018.

Sarah and Kevin supervise contractors closely to ensure their work is thorough and timely. Our staff have the technical knowledge and experience to read assessment reports and ensure they are clear, correct, and up to standard. In terms of financial management, all work performed at TRORC is assigned a cost code. Our Finance Manager, Lori Kay, continuously
tracks all project costs and bills, and maintains copies of all related project documents. The Executive Director reviews and approves all expenses and timesheets.

4.a. (iv) Acquiring Additional Resources

TRORC has extensive experience contracting with Qualified Environmental Professionals to assess brownfields. We plan to use a request for qualifications approach to select 3 contractors; this gives us flexibility, ability to compare costs, and capacity to assess multiple sites simultaneously. During the qualifications process, we require prospective contractors to name their project team and provide examples showing that their team has experience with similar projects. We confer with the staff at EPA and VTDEC prior to the final selection.

4.b. Past Performance and Accomplishments

4.b. (i) Currently Has or Previously Received an EPA Brownfields Grant

4.b. (i) (1) Accomplishments

Under TRORC’s current EPA Brownfields Assessment Grant (Agreement BF 00A00420), we have so far completed 4 Phase I assessments, 4 Phase II assessments, 1 Supplemental Site Investigation (SSI), 2 CAPs (including 1 Community Relations Plan), and 1 Evaluation of Corrective Action Alternatives (ECAA). Two Phase IIs, 1 SSI, and 1 area-wide plan are in progress. In total, 12 petroleum and/or hazardous substances sites have been addressed (through assessment, leveraged cleanup, or leveraged redevelopment). TRORC has leveraged $19,620 for assessment, $394,404 for cleanup, and $2,388,057 for redevelopment. All outputs and outcomes have been reported in ACRES.

In 2019, we closed out assessment grant agreement BF00A00110, which addressed 20 sites and produced 2 area-wide plans, 11 Phase Is, 3 Phase IIs, 5 SSIs, 3 CAPs, and 1 ECAA. We leveraged $26,837 in assessment funding. This grant also resulted in 2 property transfers, 3 flood buyouts, creation of 1 park, and 1 dam removal. In 2013, TRORC closed out another assessment grant (Agreement 96132201) that addressed 6 sites and produced 1 Phase I, 4 Phase IIs, and 1 SSI. TRORC leveraged $24,764 for assessment, $959,265 for redevelopment, and 38 redevelopment jobs. Outputs and outcomes have been reported in ACRES for all past grants.

4.b. (i) (2) Compliance with Grant Requirements

Under our current grant (7/1/19-9/30/22), TRORC has completed 10 of the 15 assessment deliverables in our workplan, plus we have completed or are currently working on 1 ECAA, 2 SSIs, and 2 Phase IIs. With USEPA’s approval, we modified our workplan to reduce the number of area-wide plans to 1 (there wasn’t sufficient community energy to take on the 3 we originally planned), and that deliverable is currently in progress. To date we have spent or are contracted to spend 53% of our award on QEP work on Phase Is, Phase IIs, and SSIs. We expect to expend all remaining grant funds by our closing date. TRORC’s previous grant (BF00A00110) schedule was extended with USEPA approval in order to finish some assessments that began later than expected. The grant was closed out on time and we completed 14 of the 16 assessments in our workplan. There was $23 left unspent (the sum of de minimis balances in each of our tasks that were not captured in our final invoice). TRORC’s 2010-2013 grant closed out on time and produced 5 of the 16 assessments in our work plan, plus 1 SSI. There were $752 unspent; a Phase I was not completed and it was too late to find another site.

For all of our grants, all quarterly and ACRES reporting have been submitted on time. We report on progress toward expected results in our quarterly reports.
Community-Wide Assessment Grant Application

List of Threshold Criteria Attachments

A. Documentation of Applicant Eligibility
B. Description of Community Involvement
C. Statement on Named Contractors/Subrecipients
D. Documentation of Expenditure of Existing Grant Funds
Attachment A
Threshold Criteria: Applicant Eligibility

Applicant Type:
General Purpose Unit
of Local Government
(Regional Planning Commission)
January 5, 2001

Mr. Peter Gregory
Two Rivers – Ottauquechee Regional Commission
The King Farm
Woodstock, VT 05091

Re: Confirmation of political Subdivision Status

Dear Peter,

This letter is to confirm that the Two Rivers – Ottauquechee Regional Commission is a political subdivision under Vermont Law.

The legal authority for the creation and operation of the Two Rivers – Ottauquechee Regional Commission is found in 24 V.S.A Chapter 117. In particular, 24 V.S.A § 4341 provides that 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.

If you have any further questions, please contact me at (802) 828-2175.

Sincerely,

William A. Dalton
Deputy Secretary of State
Attachment B
Threshold Criteria: Community Involvement
Threshold Criteria: Community Involvement

Two Rivers-Ottawquechee Regional Commission (TRORC) has identified two key community partners, Green Mountain Economic Development Corporation (GMEDC) and Randolph Area Community Development Corporation (RACDC). They will assist this project by helping TRORC select sites for assessment that have strong potential for commercial and housing redevelopment, and they will help to facilitate post-assessment redevelopment efforts.

Throughout this project, we will engage key stakeholders and interested residents in our target areas and in the region at large. Our outreach strategy will focus on the following audiences:

- **TRORC Board of Directors**: TRORC’s Board is comprised of appointed representatives from each of our 30 towns. Annually during a regular Board meeting, TRORC staff will apprise Board members of assessment funding availability and solicit site suggestions.

- **Local Officials**: We will leverage our already close relationships with local officials through one-on-one conversations/correspondence and advertised public meetings. Early in the grant period, we will solicit site suggestions and interest in area-wide planning. For town-owned properties undergoing assessment, we’ll be in frequent communication to ensure that assessment activities support the Town vision for future site uses.

- **Site Owners/Redevelopers**: As needed, TRORC staff will have confidential calls or meetings with each site’s owner, prospective purchasers, and their attorneys to discuss the pros and cons of conducting an assessment and respond to any concerns.

- **USEPA and Vermont Department of Environmental Conservation (VTDEC)**: We will maintain close communication with USEPA and VTDEC throughout our project. Both agencies will provide guidance on site eligibility, assessment work plans and deliverables, cleanup planning, and leveraging assistance beyond our grant. As needed, VTDEC will refer sites to TRORC’s program for financial assistance and vice versa.

- **Regional Chambers of Commerce, environmental groups, abutters, and general public**: From past experience, we expect these entities can offer assistance in site identification, share site information not available in the public record, and generate momentum for the cleanup and restoration of a brownfields property. TRORC will reach out at least 4 times per year via newsletter articles, press releases and newspaper ads, website updates, lawn signs, discussions at Selectboard or other public meetings, and/or direct communications as appropriate.

- **TRORC Brownfields Advisory Committee**: TRORC recruits volunteers with diverse perspectives from our region to help review and prioritize potential sites. The group will meet as needed to evaluate new site options proposed over the course of the project.

During meetings, accommodations will be made for limited English proficiency and hearing and visual impairments as needed. When the pandemic restricts in-person meetings, we will use hybrid or online meeting formats, with follow-up email updates as needed.
Attachment C
Threshold Criteria: Named Contractors and Subrecipients

This threshold criterion is not applicable to our application. TRORC has not named any contractors or subrecipients in this application. Should this grant be awarded to TRORC, TRORC will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500. No subawards will be made.
## Custom Transaction Detail Report

**Two Rivers-Ottauquechee Regional Commission**

**July 1, 2019 through November 17, 2021**

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**Total Drawdown Amount as of 10/1/21**: 212,098.42

**Total Award**: 300,000.00

**71%**