December 1, 2021

Frank Gardner, Brownfields Coordinator
5 Post Office Square
Suite 100, Mail code: OSRR7-2
Boston, MA 02109-3912
Gardner.Frank@epa.gov

Re: Community-Wide Assessment Grant Narrative Information Sheet

Dear Mr. Gardner,

The Northwest Regional Planning Commission is pleased to submit an application for an EPA Brownfields Assessment Grant. One of twelve Regional Commissions created by the Vermont Legislature, NRPC serves 23 municipalities in Franklin and Grand Isle Counties. Our application requests $350,000 for brownfields assessment.

Per the Proposal Guidelines, this transmittal letter includes the following information:

1) Applicant Identification:
   Northwest Regional Planning Commission
   75 Fairfield Street
   St. Albans, VT 05478

2) Funding Requested:
   a) Assessment Grant Type: Community-Wide
   b) Funding Requested: $350,000

3) Location:
   a) City/Municipality: Alburgh Town, Alburgh Village, Bakersfield, Berkshire, Enosburg Falls, Enosburgh Town, Fairfax, Fairfield, Fletcher, Franklin, Georgia, Grand Isle, Highgate, Isle La Motte, Montgomery, North Hero, Richford, St. Albans City, St. Albans Town, Sheldon, South Hero, Swanton Town, and Swanton Village.
   b) County: Franklin and Grand Isle Counties
c) **State:** Vermont

### 4) Target Area and Priority Site/Property Information:

a) **Targeted Areas:** Richford Village Census Designated Place (CDP) and St. Albans City Census Tract 107.

b) **Priority Sites:**
   1) 21-25 Stebbins Street, St. Albans City, VT 05478
   2) 24 Maple Street, St. Albans City, VT 05478
   3) Missisquoi Park parcel, no address, in between Main Street and Missisquoi River

### 5) Contacts:

a) **Project Director:** Greta Brunswick, Senior Planner, Northwest Regional Planning Commission, 75 Fairfield Street, St. Albans, VT 05478, Phone: 802-524-5958, Fax: 802-527-2948, Email: gbrunswick@nrpcvt.com

b) **Executive Director:** Catherine Dimitruk, Northwest Regional Planning Commission, 75 Fairfield Street, St. Albans, VT 05478, Phone: 802-524-5958, Fax: 802-527-2948, Email: cdimitruk@nrpcvt.com.

### 6) Population:

a) St. Albans City population: 6,804
b) St. Albans City Census Tract 107 population: 3,334
c) Richford Town population: 2,723
d) Richford CDP population: 1,639

### 7) Other Factors Checklist:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>NA</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td>NA</td>
</tr>
<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>2</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>NA</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.</td>
<td>NA</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>NA</td>
</tr>
</tbody>
</table>
8) Letter from the State: Attached.

9) Releasing Copies of Applications: Not applicable

If you have any questions about our application, please feel free to call me at 802-524-5958.

Sincerely,

Catherine Dimitruk
Executive Director
Northwest Regional Planning Commission
Attn: Ms. Greta Brunswick
75 Fairfield Street
St. Albans, VT 05478

Dear Ms. Brunswick,

This letter will serve as acknowledgment that the Vermont Department of Environmental Conservation (DEC) has received notice that the Northwest Regional Planning Commission (NWRPC) intends to apply for an EPA Brownfield Assessment Grant and to use the grant funds, if awarded, to conduct general site assessment activities associated with the characterization of brownfield properties within the NWRPC region of Vermont.

The State of Vermont is very appreciative of your programmatic successes and of your intent to apply for additional grant funding, as NWRPC’s local involvement in the Brownfield Program continues to assist us in the assessment of properties in Vermont. The objectives of the assessments are appropriate and consistent and continue to progress the objectives of the Vermont Brownfields Program.

As you progress in your efforts with brownfield assessments, the Vermont DEC looks forward to working collaboratively with the NWRPC and to assist potential developers to enter into the Vermont Brownfield Environmental Liability Limitation Program, through which additional cleanup funding is available.

Good luck in the competition.

Sincerely,

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

October 15, 2020
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1a. Target Area and Brownfields

(i) Background and Description of Target Area. Franklin and Grand Isle Counties consist of 23 rural municipalities in northwestern Vermont (population 57,239) bordered by New York, Canada, Lake Champlain and the Green Mountains. Our target areas include St. Albans (population 6,804) located in the Lake Champlain Valley and the smaller population center of Richford (population 2,723) located in the foothills of the Green Mountains and on the Canadian border. NRPC will focus assessment activities specifically in the most economically challenged areas of these communities – the Qualified Census Tract 107 in St. Albans City (population 3,334) and in Richford Village CDP (population 1,639).

The economies of both target communities historically centered on agriculture and forest products, which thrived because of the region’s location as a major corridor for commercial traffic from New England to Canada. The railroad years were prosperous. St. Albans hosted the Central Vermont Railway headquarters with facilities expanding across 51 acres within Census Tract 107 and more than 200 trains a day passing through at its peak. Richford became the center of a retail/trading area and a major customs port of entry, the only Chinese port of entry in New England.

Local economies have adjusted since the shift away from rail in the early 20th century, but we have not regained the same level of prosperity. City and village centers are experiencing population stagnation, unemployment, and high poverty rates, while surrounding greenfield communities and, in the case of Richford, less remote communities have doubled their population and experience higher median incomes. The remnants of former industries and rail related business create blight, public health risk and increased redevelopment costs that complicate and challenge economic development in our target communities.

(ii) Description of Target Brownfields Sites. The target areas of St. Albans City and Richford have concentrations of brownfields that vary in type, size and scale. They include former manufacturing plants, railroad sites, former dry cleaners, old gas stations, auto service uses and historic buildings that have fallen into disrepair from the impacts of adjacent brownfields sites. They damage our community’s health and well-being and represent loss of good family jobs, economic prosperity, and community pride. Further, brownfields threaten the quality of our natural ecosystem and public health with contamination in groundwater, the Missisquoi River and surficial soils.

21-25 Stebbins Street, St. Albans City. This priority brownfields site combines three separate underused and blighted parcels, immediately adjacent in St. Albans City’s qualified Census Tract 207. The site was identified as a catalytic redevelopment opportunity in the 2017 Brownfields Targeted Area Wide Plan funded by our program. The blighted condition, liability and cost associated with redevelopment are causing stagnation in neighborhood property values and without cleanup and redevelopment it will continue to hinder revitalization efforts in the area.

Redevelopment at this site is complicated due to its industrial and auto-service oriented history, which may have contaminated the soil, groundwater and/or building materials with petroleum and other hazardous substances. A carwash formerly located at 25 Stebbins Street burned down in 2006 and only a slab remains today on this corner lot. The other two parcels were most recently used for auto-related uses and now are partially used for warehousing.
Given the long industrial history of the area, the presence of coal and other urban fills in the subsurface soils is also anticipated.

**24 Maple Street, St. Albans.** This property consists of 20 units of rental housing in 3 multi-unit buildings constructed in 1971 in Census Tract 107 of St. Albans City. The units are 90% occupied with tenants with rental assistance to alleviate significant cost burden. The residents of the housing complex are disproportionately vulnerable to unquantified environmental risks that remain from a historic manufactured gas plant. Additionally, impacts to the adjacent impaired waterway of Stevens Brook remain unknown.

The manufactured gas plant operated from approximately 1870 to 1950, after which it remained unused until the housing complex was constructed in 1970. In 1982, a coal tar-like substance believed to have been associated with wastes produced during the manufacturing process of coal gas was encountered. Contaminated soil was removed by EPA in 2006, 2007 and 2012; however, the site has not been fully characterized. Funding is available to complete a vapor and indoor air assessment in 2022, but additional funding is needed for the full scope of the phase 2 investigation and subsequent cleanup planning.

**Missisquoi Park, Richford.** Nestled between the Wild and Scenic Missisquoi River and Richford Village’s Main Street lies an undeveloped and misleadingly pristine looking 9-acre property with an industrial and railroad history. Hidden in the shrubs and riparian habitat, remnants of historic foundations remain from wood product manufacturing dating back to the 19th century and historical maps show the rail spurs that formerly webbed across the property. The perceived contamination issues at this site are further compounded by its location in the FEMA 100-year flood plan and wetland. The liability and cost that could come with taking on the anticipated cleanup of the Missisquoi Park site is threatening the success of adjacent economic development efforts. These factors highlight the need to characterize and manage the risk of any soil or groundwater contamination that may exist there.

### 1b. Revitalization of the Target Area (10 points)

(i) **Reuse Strategy and Alignment with Revitalization Plans.** St. Albans City takes an active role in pursuing redevelopment of brownfields in the downtown, capitalizing on a combination of private investment and public funds, such as their Tax Increment Finance District to leverage public improvements and NRPC’s brownfields funds. Their efforts are guided by a strong community supported and inclusive planning program. NRPC’s brownfield program funded the June 2017 St. Albans City Brownfields Targeted Area Wide Plan with 21-25 Stebbins Street identified as one of the catalyst properties. The City is pursuing proposals for office space or multi-unit housing for both of these priority brownfields sites based on the land use, market and reuse strategies provided in the area wide plan. NRPC is supporting the City’s marketing efforts and they are counting on NRPC brownfields assessment funds to alleviate pre-development costs, which are impeding redevelopment.

Richford’s Missisquoi Park was included in the 2013 Richford Area Wide Brownfield Redevelopment Plan along with several other catalytic sites, funded by the NRPC brownfield program. As a Northern Forest Canoe Trail Town, this riverfront land is seen as an opportunity to enhance recreation opportunities, promote economic development, and improve stormwater management in the village. However, the redevelopment of this and other sites in the Village Center have been stagnated. Brownfields funds are critical to support the efforts of a newly hired Economic Development Coordinator to implement the vision for Missisquoi Park,
which includes remediating any contamination and providing opportunities for ecosystem
interpretation and restoration, including green stormwater management (2018-2019 Richford
Stormwater Master Plan). This will serve as a catalyst for additional private and public
investment in the Village Center.

(ii) Outcomes and Benefits of Reuse Strategy (5 points). The brownfields redevelopment
strategy in St. Albans City will address environmental inequalities experienced by low-income
families living on historically industrial properties, significantly improve property values,
promote walkability, and contribute to the vibrancy of the neighborhoods in Census Tract 107.
New and improved multi-unit rental housing projects at priority sites will add high quality,
affordable units to a tight housing market (median days on market for condo units just 90 days
in 2020) and an old rental housing stock (over 65% built before 1950). New office space will add
workers near Main Street, increasing demand for downtown housing, retail and services. The
tax increment from this private investment will be leveraged by public investment in
placemaking improvements, such as street trees, attractive lighting, public art, and
neighborhood pocket parks supported by the City’s Tax Increment Finance District.

Further up the watershed, the redevelopment strategy for Missisquoi Park and other
brownfield sites in the remote and disadvantaged community of Richford is to build the town’s
strengths as an outdoor recreation hub. Removing the stigma of contamination and integrating
the Missisquoi Park parcel with the adjacent recreation projects will have an immense impact
on the revitalization efforts in Richford and catalyze new private investment. Canadians passing
through, canoeists on the Northers Forest Trail and recreationists on the Missisquoi Valley Rail
Trail will be enticed to stop for lunch at a café, have a picnic beside the river while learning
about the local ecosystem, or visit an eclectic shop. Local business revenue will increase and
new business opportunities will become possible as a result of this project. There is also
opportunity to combine remediation and park development with alternative stormwater
treatment solutions and ecosystem restoration.

1c. Strategy for Leveraging Resources (15 points)

(i) Resources Needed for Site Reuse. NRPC has demonstrated capacity to leverage
brownfields funds to achieve greater impact for communities and partners. In Richford, this
grant will fund Brownfields Assessments and a Resource Roadmap to further the rehabilitation
of the Missisquoi Park parcel implementing the 2018 vision/concept plan. NRPC is well
equipped to assist in accessing brownfields cleanup funding, whether from our EPA funded
Brownfield Cleanup RLF or another Cleanup RLF. We will also assist the Town of Richford
access project implementation funds for the Missisquoi Park. We are eligible for and have
proven success with grants from the VT Community Development Program, VT Municipal
Planning Grant Program, Northern Border Regional Commission Infrastructure Grant Program
and VT Ecosystem Restoration Grants.

For both 21-25 Stebbins and 24 Maple Street funds from this grant will provide critical
information to the City of St. Albans and potential developers on the cost and scale of cleanup.
NRPC’s Brownfields Cleanup RLF will be a valuable funding source for any required cleanup. For
Class A Office space at 21-25 Stebbins Street, brownfields assessment funds would be leveraged
by significant private investment and public improvements through the Tax Increment Finance
District. A multi-unit housing development would also leverage affordable housing tax credits.
Brownfields assessment and cleanup funds at 24 Maple will be leveraged by 1 million in of
improvements and code corrections to existing housing units occupied by working families in Census Tract 107.

(ii) Use of Existing Infrastructure. Both St. Albans City and Richford are serviced by existing water and sewer, natural gas lines, electric utility lines and high-speed internet. The proposed redevelopments will make use of this existing infrastructure. Any public infrastructure improvements will focus on making the streetscape more pedestrian accessible, adding greenspace and in the case of Richford, improving stormwater treatment on the Missisquoi Park site with additional opportunities to collect and filter stormwater.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2a. Community Need (20 points)

(i) The Community’s Need for Funding. Richford and St. Albans are both small municipalities at under 3,000 and under 7,000 respectively, and which also experience high poverty rates well above state, county and national rates (2019 American Community Survey for Richford Village and St. Albans City Census Tract 107). Richford Village area has a small tax base (2/5th of the average grand list value statewide, VT Dept. of Taxes 2020) and limited local staff, relying heavily on regional planning commissions and public funding. Due to these factors, brownfields funds and assistance from NRPC are essential to further the cleanup and redevelopment of the Missisquoi Park and other brownfields sites in Richford. In historic downtowns like St. Albans City, private investment takes significant public partnership and public funding. Brownfields funds are a critical piece of the puzzle that make redevelopments work in small downtowns. Without this funding, St. Albans would be challenged in attracting developers to the priority brownfields sites of 21-25 Stebbins Street and 24 Maple Street.

(ii) Threats to Sensitive Populations. St. Albans City Census Tract 107 and Richford Village have high rates of poverty and sensitive populations resulting from disinvestment in areas concentrated with brownfields and historic industry. Over 15% of all households and 50% of households with children under 5 in this Census tract are living below the poverty level (2019 ACS 5-year estimate). Both target communities have higher rates of single parent households (over ½ of households in Richford Village and 1/3 in Census Tract 107, compared to 23% state wide, ACS 2019 estimates). Census Tract 107 also has more people of color than other parts of the city and a greater percentage than the county (19% in Census Tract 107 compared to 7% in the balance of the City and 6% countywide according to EPA’s EJ Tool).

The direct health impact of specific brownfields on our target communities is not known, but certain health statistics can be linked to the types of contaminants found at sites in our communities. Unfortunately, these statistics are tracked on a statewide or county level. Our region has concerning levels of respiratory conditions that may be attributable to environmental and occupational exposures at brownfields sites like the 21-25 Stebbins Street and the 24 Maple site, including asthma and COPD (chronic obstructive pulmonary disease). 17% of the adult population in our county was diagnosed with lung diseases in 2016 (VT Department of Health 3/4/50 report, 2019). According to the same study, the cancer death rate is also higher for the county that the state as a whole. Lead poisoning is also a health concern in our region, which is attributable to lead based paint found on older buildings. In Richford, over 90% and in St. Albans City over 75% of housing was built before 1980 and therefore may present a lead-based paint hazard (Healthy Vermonters 2020).
This data shows that our target areas experience environmental justice challenges. Census Tract 107 in St. Albans City is known as the area “across the tracks” where historic railroad yards and other industries proliferated. Median income in Tract 107 is 30% less than Tract 108 making up the balance of the City according to 2019 ACS data and as noted above has a higher BIPOC population. It is documented that the residents residing in Tract 107 live in proximity to more hazardous sites in the state’s database (over 60% located in Tract 107). This is exemplified by the fact that contamination from a coal gasification plant remains uncharacterized and may continue to plague the sensitive populations in the area.

Meanwhile, Richford is the most rural, isolated community in the region with documented income gaps and generational poverty and as a result access to fewer resources, services and education (only 5% of the population has a bachelor degree or higher with just under 30% having less than a high school education, ACS 2019 estimates). The remnants of former industries and rail related business create blight, public health risk and increased redevelopment costs that complicate and challenge economic development efforts in our target communities. Brownfields funds are needed to increase equity of resources, services and opportunity for all populations in our region.

2b. Community Engagement (15 points)

(i),(ii) Project Involvement and Project Roles. NRPC has a long history of collaboration with community-based organizations and groups and actively pursues new partnerships. A selection of important partners that will help in the cleanup and redevelopment of our priority sites include the following:

<table>
<thead>
<tr>
<th>Partner</th>
<th>Point of Contact</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of St. Albans</td>
<td>Chip Sawyer, Director of Planning and Development</td>
<td>St. Albans City is an active partner in brownfields redevelopment in the City, a program target area. Mr. Sawyer serves on the NRPC Brownfields Steering Committee.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:c.sawyer@stalbansvt.com">c.sawyer@stalbansvt.com</a>, 802-524-1500*259</td>
<td></td>
</tr>
<tr>
<td>Champlain Housing Trust</td>
<td>Amy Demetrowitz, Director of Real Estate Development</td>
<td>Coordination and planning related to a multi-family housing development at one of the program’s priority sites, such as 115 Federal Street.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:amy.demetrowitz@champlainhousingtrust.org">amy.demetrowitz@champlainhousingtrust.org</a>, 802-861-7307</td>
<td></td>
</tr>
<tr>
<td>Town of Richford</td>
<td>Levi Irish, Economic Development Coordinator</td>
<td>Facilitating communication with the adjacent property owners and other stakeholders for the Missisquoi Park property and other brownfields in Richford.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:dgregoire@notchvt.org">dgregoire@notchvt.org</a>, 802-255-5563</td>
<td></td>
</tr>
<tr>
<td>Northern Forest Canoe Trail</td>
<td>Noah Pollock, Stewardship Director</td>
<td>Coordinating planning and events with the cleanup of Missisquoi Park, which is adjacent to a NFCT canoe portage.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:noah@northernforestcanoetrail.org">noah@northernforestcanoetrail.org</a>, (802) 540-0319</td>
<td></td>
</tr>
</tbody>
</table>

(iii) Incorporating Community Input. NRPC will continue to implement a strong community engagement program to ensure our targeted communities are involved in brownfields redevelopment. Our Brownfields Steering Committee forms a connected and inclusive
foundation to our program, with each representative serving as a liaison to their interest group or organization.

We have adapted to the challenges that the COVID 19 pandemic has posed for engagement and understand that there are barriers for many stakeholders to participate in the planning process due to pandemic related impacts. For example, we have adapted to a hybrid steering committee meeting format with accessible, remote access including translation and closed captioning services available. We have also adapted community meetings to offer remote access and participation and ensure that any physical meeting space will comply with the current CDC guidelines. We couple this with a strong online presence and follow up with direct mail and phone calls when needed.

We work together with our municipal and community partners to define and implement appropriate site-specific community engagement for priority sites. In Richford, we will work closely with the Town and the Richford Economic Advancement Corporations to communicate directly with those most impacted by brownfields sites in the community. In St. Albans, we will communicate progress on our priority sites to interested neighborhood residents and seek input from key organizations such as the downtown development non-profit, St. Albans for the Future, the Rotary Club and the Chamber of Commerce. Our goal is to ensure that those affected by brownfields are involved in reuse planning and cleanup decisions.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Description of Tasks/Activities and Outputs (25 Points)

<table>
<thead>
<tr>
<th>Task 1: Cooperative Agreement Oversight and Program Management.</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: NRPC will ensure requirements of the Cooperative Agreement are implemented, managed properly, and completed in a timely manner to meet the goals and objectives of this program. This task will involve: Quarterly reporting and ACRES reporting; Leading the program’s Steering Committee; Maintaining and growing the region’s brownfields site inventory, especially in our targeted areas; Complying with the program’s site selection process to ensure compatibility with the program’s goals and priorities; Competitively procuring and managing services from qualified environmental professionals (QEPs); Site specific activities including assisting with enrollment of our priority sites in the Vermont Brownfields Reuse and Environmental Limited Liability Act (BRELLA); Coordinating site eligibility determinations and Section 106 compliance for our priority sites; Travel to community meetings, site visits and conferences; Attendance at professional development and networking conferences and events; and Necessary supplies, including postage, copies and a laptop computer.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: This task will be completed on a monthly basis and will be complete by the end of the period of performance.</td>
</tr>
<tr>
<td>iii. Task Lead: Greta Brunswick, NRPC Senior Planner and Brownfield Program Manager</td>
</tr>
<tr>
<td>iv. Outputs: EPA Cooperative Agreement; 3 site nomination and EPA eligibility forms; 6 scopes of work or requests for proposals for ESAs or other reports; 3 site access and owner participation agreements; brownfield site inventory; 36 progress and financial reports and reimbursement requests; ACRES updates.</td>
</tr>
</tbody>
</table>
### Task 2: Community Outreach and Engagement

i. **Project Implementation:** NRPC is strategically positioned to provide technical assistance to the region's municipalities, non-profits, landowners and developers on brownfields redevelopment. This includes our expertise on the CERCLA Brownfields Law, liability concerns, BRELLA, funding opportunities and grant writing and how to implement public/private partnerships. NRPC will offer site specific assistance to our priority brownfields sites to further redevelopment, such as coordination and communication with property owners and adjacent landowners on environmental assessment results, cleanup responsibilities, public meetings, community relations plans and opportunities for funding. We will assist with communications on priority brownfield sites in accordance with our Voluntary Notice Policy, which guides us to notify potentially affected persons and appropriate public officials about identified health and environmental hazards that may pose a risk to human health or the environment; and to encourage public participation in the program. Finally, we will conduct regular program marketing through our newsletter, website, social media, press releases and presentations/meetings with partner organizations and stakeholders.

ii. **Anticipated Project Schedule:** This task will be completed on a quarterly basis from October 1, 2023 to September 30, 2026. The project task will be completed on time.

iii. **Task Lead:** Greta Brunswick, NRPC Senior Planner and Brownfield Program Manager

iv. **Outputs:** 16 Steering Committee meeting summaries; quarterly press releases and/or newspaper articles and newsletter articles; quarterly updates to our program website; 1 update to our program brochure; 1 program highlights brochure; and 3 sets of property specific engagement materials.

### Task 3: Site Specific Assessments

i. **Project Implementation:** The majority of this funding will be used by NRPC to hire competitively procured QEPs to complete Phase 1 Environmental Site Assessments (ESAs) in accordance with ASTM E1527-13 standards and complying with All Appropriate Inquiry, Phase 2 ESAs, Quality Assurance Project Plans (QAPPs) and Section 106 Compliance Reports on our priority brownfields sites of 21-25 Stebbins Street and 24 Maple Street in St. Albans City, the Missisquoi Park parcel in Richford and other brownfields sites in these targeted areas. The Program Manager will work closely with the EPA Project Officer and the VT Department of Environmental Conservation (DEC) Site Manager to ensure ESAs and QAPPs are completed properly and in accordance with the 2019 VT Investigation and Remediation of Contaminated Properties Rule (IRCP).

ii. **Anticipated Project Schedule:** This task will include 1 phase 1 ESA and 1 phase 2 ESA in year 1; 1 Phase 1 ESA, 1 Phase 2 ESA and 2 Supplemental Phase 2 ESAs in year 2 and 1 Phase 2 ESA in year 3.

iii. **Task Lead:** Greta Brunswick, NRPC Senior Planner and Brownfield Program Manager

iv. **Outputs:** 2 Phase 1 ESAs for identified priority sites. 3 Phase 2 ESAs and 2 Supplemental Phase 2 ESAs for our priority sites, including 4 QAPPs and VT DEC-approved workplans. NRPC will also ensure compliance with the Section 106 National Historic Preservation Act and if necessary, some costs may be diverted to Section 106 compliance. The majority of funds will be used for phase 2 assessments.
Task 4: Reuse and Cleanup Planning

i. Project Implementation: NRPC will use funding to hire competitively procured QEPs to complete reuse and cleanup planning, which is critical on the complicated brownfields in our target areas. NRPC will fund a Resource Roadmap for the Missisquoi Park or other identified site in need in Richford; Evaluation of Corrective Action Alternatives (ECAA)/Analysis of Brownfield Cleanup Alternatives (ABCA) for all priority sites and Corrective Action Plans for all priority sites. If necessary, we may fund additional reuse planning such as an Evaluation of Market Viability for one of the St. Albans City priority sites.

ii. Anticipated Project Schedule: This task will include 1 ECAA/CAP per year and a resource roadmap during year 2.

iii. Task Lead: Greta Brunswick, NRPC Senior Planner and Brownfield Program Manager

iv. Outputs: 3 ECAAs and/or CAPs and a Resource Roadmap for our identified priority sites. Depending on costs, we may fund additional reuse planning such as an Evaluation of Market Viability for priority sites if needed.

3b. Cost Estimates (20 points)

<table>
<thead>
<tr>
<th>Budget Category</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
<th>Task 4</th>
<th>Total</th>
</tr>
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<td>Direct Costs</td>
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<td>Personnel¹</td>
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<td>$3,060</td>
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<td>Contractual⁵</td>
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<td>Other</td>
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<td>Total Direct Costs</td>
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<td>$38,000</td>
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<td>Indirect Costs</td>
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<td>$17,500</td>
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<tr>
<td>Total Costs</td>
<td>$37,590</td>
<td>$9,910</td>
<td>$264,500</td>
<td>$38,000</td>
<td>$350,000</td>
</tr>
</tbody>
</table>

Task 1: Cooperative Agreement Oversight and Program Management.

Personnel and Fringe. 80% of personnel and fringe hrs to Task 1. Average rate of $34/hr for 360 hrs = $12,240 in wages. Average rate of $9/hr for 450 hrs = $4,050 in fringe.

Travel. Staff attendance at 1 national brownfields conference ($1,800 for flight, hotel and expenses), travel to statewide and regional trainings and meetings ($350 based on average of 600 miles at 0.58/mile), in-region travel related to outreach, site inventory, and assessment activities ($150 based on average of 268 miles over 3 years at 0.56/mile).

Supplies. Fees for entry into BRELLA ($500 each for 2 sites) and a total of $1000 to be used towards the purchase of computer equipment.

Contractual. A competitively procured attorney to review program and outreach documents.

Indirect: The FY21 Indirect Cost Rate calculation for NRPC starting 7/1/2021 is 99.65%, calculated as a percentage of personnel and fringe. The proposed budget caps this at 5% of the grant request for a total of $14,000.

Task 2: Community Engagement and Outreach.
Personnel and Fringe. 20% of personnel and fringe hrs dedicated to Task 2. Average rate of $34/hr for 90 hrs = $3,060 in wages. Average rate of $9/hr for 90 hrs = $810 in fringe.

Travel. Travel to statewide and regional trainings and meetings ($350 based on average of 625 miles at 0.56/mile), in-region travel related to outreach, site inventory, and assessment activities ($150 based on average of 268 miles over 3 years at 0.56/mile).

Supplies. Copying/printing of program brochure, reports, and other documents ($1000), postage ($500) and newspaper advertisements and meeting support materials ($500).

Indirect: The FY21 Indirect Cost Rate calculation for NRPC starting July 1, 2021 will be 99.65%, calculated as a percentage of personnel and fringe. The proposed budget caps this amount at 5% of the grant request for a total of $3,500 budgeted for Task 2.

Task 3: Site Specific Assessments.

Contractual: We estimate 2 Phase 1 ESAs at $2,500 each and 4 Phase 2 ESAs at $30 - $60,000 each for a total of $264,500.

Task 4: Cleanup and Reuse Planning.

Contractual: We estimate 3 Hazardous Materials ECCA and/or CAPs at $10,000 each, a Resource Roadmap and/or additional reuse planning assistance for priority sites for $10,000 for a total Hazardous Materials cost of $40,000.

3c. Measuring Environmental Results (5 Points)

NRPC will continue to implement our established process for achieving quality, State and EPA approved outputs within our 3-year period of performance, including ESAs, ECCA/ABCA and CAPs, and tracking program outcomes, such as acres cleaned up, leveraged investment and jobs created. The Program Manager works closely with the EPA Project Officer and State Brownfields Site Managers to maintain communication and ensure compliance. We record and track progress in ACRES, with our own maps and databases and document progress in our quarterly reporting. We use the new quarterly reporting feature within ACRES, which streamlines ACRES with our own tracking and reporting systems. We make every effort to anticipate challenges and delays in project timelines. We convene strategic stakeholders and professionals to bring about resolution and move projects forward.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4a. Programmatic Capability (15 points)

NRPC has a seamless grants management program with a systematic approach to tracking, reporting and achieving outputs and outcomes. We have qualified and experienced staff, a demonstrated track record, established relationships and program Steering Committee and priority brownfield sites ready to go all of which will ensure expenditure of these funds within the 3-year period of performance. Key members of the program team will include:

Catherine Dimitruk, NRPC Executive Director: Ms. Dimitruk has over 20 years of experience as Executive Director and has successfully managed all NRPC’s previous brownfields grants. Ms. Dimitruk will assume program oversight responsibilities.

Greta Brunswick, NRPC Brownfields Program Manager/Lead: Ms. Brunswick will be the lead for all aspects of program management. She has 15 years of experience in community development, land use and environmental planning and has managed the Brownfields Program for nine years, including our Brownfields Cleanup Revolving Loan Fund since its inception in
2010. Ms. Brunswick has a B.S. in Community Development and Applied Economics. She has attended three national brownfields conferences, attends regional brownfields conferences and coordinates regularly with the Vermont Brownfields Program and Vermont Department of Health.

Amy Adams, NRPC Office Administrator. Ms. Adams has provided financial reporting and management with the program since its inception in 2003 and will continue in this role.

NRPC is knowledgeable and experienced in federal procurement guidelines 2 CFR § 200.320 and will engage in an open, fair and competitive procurement process to pre-qualify approximately four QEPs to complete the contractual site-specific work required under this grant, including ESAs and ECAA/ABCA and CAPs. Additionally, we will competitively procure contracts for other contractual work including Evaluations of Market Viability, Resources Road Maps, Section 106 Compliance Reports and an experienced legal team to provide expert legal guidance as needed.

4b. Past Performance and Accomplishments (15 points)

NRPC has successfully completed 7 brownfields assessment grants. Currently, we have an open FY19 Assessment grant for $300,000 and have expended 78% of grant funds as of October 1, 2021. The grant award date is July 1, 2019 and the period of performance ends on September 30, 2022. We have funded assessment activities on 9 sites totaling 200,000 dollars and anticipate expending at least 75% of the grant on phase 1 and 2 assessments. We have succeeded in achieving our program goals as expected and on schedule, including completing all ACRES and quarterly reporting. All of our funds are obligated and we will complete and closeout this grant before September 2022.

In 2018, NRPC successfully closed out an FY15 Brownfields Assessment grant for $200,000. Due to an assessment activity costing less than we contracted for near the end of our period of performance, there was a balance of $4,148.69 in funds for the 2015 grant. With the 2015 grant we completed assessment activities at 8 sites including a Targeted Area Wide Brownfields Plan for the Stebbins, Market, Catherine Street neighborhood in St. Albans City for just under $50,000. In addition, we funded a total of 5 Phase 1 ESAs, 5 Phase 2/Supplemental Phase 2 ESAs and 2 CAPs with this grant, including the assessment and cleanup plan for one of the catalyst sites identified in this area wide plan, 14 Stebbins Street. 87% of the grant funded site-specific activities including 55% for phase 1 and 2 assessments.

NRPC received an FY11 $1,000,000 grant to capitalize a cleanup RLF. We have received supplemental awards in 2015, 2019, 2020 and 2021 bringing our award total to $1,975,000 and our cost share obligation to $395,000. There is a balance of $706,542 as of October 21, 2021, not including our cost-share obligation. This grant’s period of performance started on October 1, 2010 and ends on September 30, 2023. In 2015, we received a successful advanced monitoring desk audit with no recommendations or issues found. To date we have disbursed 4 cleanup loans and 7 cleanup sub-grants resulting in economic development and public health benefits in the communities we serve.
1. Applicant Eligibility

The Northwest Regional Planning Commission is one of twelve Regional Planning Commissions enabled by the Vermont Legislature (please find enclosed an excerpt from Vermont Statute to this effect). Vermont Regional Planning Commissions consist of representatives from member local governments and are considered a regional council of government (COG). Our mission is:

- To assist local municipalities, through education, technical assistance, grants and funding; and to aid municipalities in their planning efforts as authorized by Vermont planning laws.
- To serve as a center for information and as a resource to support the region and its municipalities’ interests, growth patterns and common goals.
- To provide a forum for the discussion of issues which are regional in nature and/or unique to our area of the state, and to serve as a mediator to resolve conflicts as appropriate. Common sense and a spirit of compromise must be allowed to enter the discussion so that the impacts of development may be mitigated.
- To conduct regional planning programs.

2. Community Involvement

NRPC will continue to implement a strong community engagement program to ensure our targeted communities are involved in brownfields redevelopment. Our Brownfields Steering Committee forms a connected and inclusive foundation to our program, with each representative serving as a liaison to their interest group or organization.

We have adapted to the challenges that the COVID 19 pandemic has posed for engagement and understand that there are barriers for many stakeholders to participate in the planning process due to pandemic related impacts. For example, we have adapted to a hybrid steering committee meeting format with accessible, remote access including translation and closed captioning services available. We have also adapted community meetings to offer remote access and participation and ensure that any physical meeting space will comply with the current CDC guidelines. We couple this with a strong online presence and follow up with direct mail and phone calls when needed.

We work together with our municipal and community partners to define and implement appropriate site-specific community engagement for priority sites. In Richford, we will work closely with the Town and the Richford Economic Advancement Corporations to communicate directly with those most impacted by brownfields sites in the community. In St. Albans, we will communicate progress on our priority sites to interested neighborhood residents and seek input from key organizations such as the downtown development non-profit, St. Albans for the Future, the Rotary Club and the Chamber of Commerce. Our goal is to ensure that those affected by brownfields are involved in reuse planning and cleanup decisions.
3. **Named Contractor or Subcontractor**

NRPC is not naming any contractor or subrecipient that will conduct work proposed in this application. NRPC will only contract with contractors that have been competitively procured according to NRPC Procurement Policies and CFR 200.

4. **Expenditure of Assessment Grant Funds**

Please reference the attached report from ASAP which confirms that NRPC has drawn down X% of our 2019 Assessment grant as of October 1, 2021.