

## Narrative Information Sheet

R01-19-A-041

### 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
- c. Contamination: \$170,000 hazardous substances and \$130,000 petroleum

### 3. Location

Two Rivers-Ottauquechee Region, Vermont

| County         | Towns  |
|----------------|--|
| Orange County  | Bradford, Braintree, Brookfield, Chelsea, Corinth, Fairlee, Newbury, Randolph, Strafford, Thetford, Topsham, Tunbridge, Vershire, West Fairlee |
| Windsor County | Barnard, Bethel, Bridgewater, Hartford, Hartland, Norwich, Plymouth, Pomfret, Rochester, Royalton, Sharon, Stockbridge, Woodstock              |
| Addison County | Granville, Hancock   |
| Rutland County | Pittsfield   |

- a) Target Areas: Randolph, Hartford, Bradford
- b) Counties of the Target Areas: Orange County and Windsor County
- c) State: Vermont

### 4. Property Information for Site-Specific Proposals: N/A

### 5. Contacts

- a. Project Director  
Kevin W. Geiger, AICP  
802-457-3188 ext. 124  
[kgeiger@trorc.org](mailto:kgeiger@trorc.org)  
128 King Farm Road  
Woodstock, VT 05091
- b. Chief Executive/Highest Ranking Elected Official  
Peter G. Gregory, AICP  
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[pgregory@trorc.org](mailto:pgregory@trorc.org)  
128 King Farm Road  
Woodstock, VT 05091

Gerald Fredrickson, Chair ~ Peter G. Gregory, AICP, Executive Director  
128 King Farm Rd. Woodstock, VT 05091 ~ 802-457-3188 ~ [trorc.org](http://trorc.org)

Barnard ~ Bethel ~ Bradford ~ Braintree ~ Bridgewater ~ Brookfield ~ Chelsea ~ Corinth ~ Fairlee ~ Granville ~ Hancock ~ Hartford  
Hartland ~ Newbury ~ Norwich ~ Pittsfield ~ Plymouth ~ Pomfret ~ Randolph ~ Rochester ~ Royalton ~ Sharon ~ Stockbridge ~ Strafford  
Thetford ~ Topsham ~ Tunbridge ~ Vershire ~ West Fairlee ~ Woodstock

6. Population

a. Community Wide Population <sup>1</sup>

Two Rivers-Ottawquechee Region, Vermont: 55,996

b. Target Area Populations<sup>2</sup>

Bradford: 2,729

Randolph: 4,715

Hartford: 9,680

7. Other Factors Checklist

| <b>Other Factors</b>   | <b>Page #</b> |
|--|---------------|
| Community population is 10,000 or less   | <b>4</b>      |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory   | <b>N/A</b>    |
| The priority brownfield site(s) is impacted by mine-scarred land   | <b>N/A</b>    |
| 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). | <b>N/A</b>    |
| The priority site(s) is in a federally designated flood plain.   | <b>1</b>      |
| The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.  | <b>3</b>      |
| 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.  | <b>N/A</b>    |

8. Letter from the State or Tribal Environmental Authority

See Attached Letter

<sup>1</sup> 2010 America Census Data

<sup>2</sup> 2013-2017 American Community Survey 5-Year Estimates

## Letter from State Environmental Agency



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*AGENCY OF NATURAL RESOURCES*

**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

January 10, 2019

Two Rivers-Ottauquechee Regional Commission  
Attn: Mr. Kevin Geiger  
128 King Farm Road  
Woodstock, VT 05091

Dear Mr. Geiger,

This letter will serve as acknowledgement that the Vermont Department of Environmental Conservation is aware that the Two Rivers-Ottauquechee Regional Commission is intending to apply for Hazardous and Petroleum 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 Two Rivers-Ottauquechee Region of Vermont.

Good luck in the competition.

Sincerely,

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



## Narrative/ Ranking Criteria

## ***TRORC 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-Ottawaquechee Regional Commission (TRORC) is a regional planning commission, a statutory creation of the state, most akin to a county planning department or council of governments in other states. TRORC has 30 member towns, most of which are in Orange and Windsor Counties. Previous brownfield inventorying and assessment efforts have shown that every town in our region has small brownfields sites, many of which have not yet been added to the state's hazardous sites list. Residents have been exposed to elevated levels of arsenic, chlorinated solvents, heavy metals, and polyaromatic hydrocarbons (PAHs) in surface soils. Old underground fuel storage tanks are a prevalent petroleum concern, and untreated floor drains are common, especially in vehicle repair shops. Many brownfield sites are located near rivers and in downtowns and village centers; they create potential water quality issues and sap economic vitality from core areas. Brownfields depress property values, burden municipal services, and leave prime development sites vacant or underutilized.

Due to the region's relatively hilly topography, recent flood damages, increasing flood risk due to climate change, and strained local budgets, it is difficult to build on the hills, dangerous to locate in floodplains, and almost impossible to install new sewer or water service lines. All developable sites need to be used to their full potential, especially if they already have public infrastructure and are on safe ground. Combine these land use and financial constraints with common concerns about redeveloping hazardous sites and a regional shortage of over 5,000 affordable housing units, and the result is a region hindered by the presence of its brownfields.

We plan to mainly focus this grant on hazardous substances and petroleum sites in three towns: **Hartford, Randolph, and Bradford**. **Hartford** (Windsor County) is our largest town and has 26 known sites on the state's registry. Its downtown has blocks of marginal or defunct commercial space. This area has the best potential for infill redevelopment in the region, and has seen some revitalization in recent years. **Randolph** (Orange County) has 13 state-listed sites. There is strong redevelopment potential in its central business district and the adjacent industrial zone. Hartford and Randolph are the region's largest economic hubs. **Bradford** (Orange County) has 8 state-listed sites. Projects here would focus on the commercial area south of the village center, including the underutilized industrial park, which has known contamination issues.

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

In previous brownfield inventorying efforts, TRORC completed a regional prioritization of state-listed and unlisted sites. This prioritized inventory will inform future site selection for assessment. This section describes 3 sites that illustrate the importance of addressing brownfields in each of TRORC's target communities.

In **Hartford**, the Bergeron site is state-listed and located within the focus area for an ongoing, area-wide Brownfields Planning and Redevelopment Vision project. It also lies within the 500-year flood zone (a moderate flood hazard area) as delineated by the Federal Emergency Management Agency. Site investigations indicate that groundwater is contaminated with chlorinated solvent (possibly released by historical dry cleaning operations off-site) and various pollutant metals at concentrations exceeding the state's enforcement standards. Petroleum-related compounds have also been found in groundwater, probably the legacy of the site's former use as

an automotive service station. The property is currently a used car dealership. With a prime location on US-4 (the busiest road in central Vermont) across from the Town Hall, in an area that has had recent successes reclaiming brownfields, this site has tremendous redevelopment potential for multi-story civic and commercial uses at greater density.

In **Randolph**, the Branchwood site is a former factory that was destroyed in a fire. With the exception of a single smokestack, the buildings have been cleared and the site now lies empty and unused. Hazardous materials contamination is suspected, but the site is not state-listed and has not yet been evaluated. Located on flat land, out of the floodplain, in Randolph's Central Business District with public sewer and water, it is a prime site for redevelopment.

In **Bradford**, the Auto Body and Auction House site sits at the US-5/VT-25 junction. It is state-listed. The property has seen many uses over the years, including farm equipment sales, an automobile dealership, a gasoline service station, and the current auto repair shop and auction house. Underground storage tanks and some petroleum-contaminated soils were removed from the site in 1992. A Phase II investigation in 2013 reported a variety of contaminants in excess of state enforcement standards, mostly in groundwater: arsenic, barium, cadmium, chromium, lead, and trimethylbenzene. The state has determined that the site has sensitive receptors threatened by the contamination. The Auto Body and Auction House site was identified through a regional inventorying effort as an excellent candidate for redevelopment. It is situated at a major intersection, is already served by municipal sewer and water, and is out of the floodplain.

These are just a few of the brownfields in our region that have been identified as priority sites for redevelopment due to their prime locations. Brownfields impose significant burdens on our region. Our target communities and other towns in the region are reluctant to acquire potential brownfields by tax sale, as they fear taking on environmental liability. Several brownfields properties in the region are in arrears on taxes. Bradford's industrial park has trouble getting tenants due to a previous spill. Both Hartford and Randolph have key downtown properties that are underutilized due to uncertainty over contamination severity and cleanup liability. Brownfield properties ultimately equate to loss of potential jobs and development. Assessment support is a critical step toward realizing these sites' full potential. 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) Redevelopment Strategy and Alignment with Revitalization Plans**

The Maple Street block in Hartford, which includes the Bergeron site, is the focus of a small area-wide planning effort funded by our current EPA Brownfields Assessment Grant. Informed by community outreach and archival research on historical land uses and potential contamination, the project team is preparing a Redevelopment Vision and Plan that will integrate existing and potential future uses, review strategies for brownfields site cleanup and reuse, and provide a list of likely resources and leveraging opportunities to help implement brownfields assessment, remediation, and revitalization. This work will create a solid foundation for future environmental site assessments. As one of the state's Regional Planning Commissions, TRORC is well-positioned to help the team craft a redevelopment plan that aligns with regional plans and Hartford's Town Plan. The team has already produced a set of zoning revision recommendations to help increase development density, pull business fronts toward the street, and streamline permitting processes within the Maple Street block. These zoning changes will advance the

vision outlined for the Maple Street block in Hartford's Town Plan, namely high-density, mixed use, and infill development (as part of the future Downtown area).

While formal redevelopment strategies have not yet been developed for priority sites in Randolph and Bradford, TRORC will work closely with the Towns to prepare for redevelopment that is consistent with their respective future land use plans and development goals and policies. The Branchwood site lies in an area where the Town of Randolph is promoting dense, mixed-use, infill development. The Bradford Auto Body and Auction House is located in a district where the Town hopes to concentrate larger commercial uses. The Town is considering reusing the site as a fitness center, a need identified in the Town's economic development plan.

#### **1.b. (ii) Outcomes and Benefits of Redevelopment Strategy**

By assessing contaminated sites and ushering them toward cleanup and ultimately reuse, this grant will advance our target communities' goals of stimulating diverse and concentrated development, which in turn benefits community health, reduces traffic, increases economic vitality, and preserves quality of life. Rehabilitating blighted properties will create opportunities for affordable housing and commercial developments that are sorely needed in downtown areas. Downtown redevelopment in turn brings in new jobs and tax revenues, without expensive extensions of sewer or water. Green space for recreation and natural stormwater treatment is another excellent reuse option in keeping with local and regional plans. Green spaces raise the values of surrounding properties that were once depressed by an abutting blighted site. Finally, energy projects can be good options for brownfields reuse, depending on site characteristics. Solar energy generation on former brownfield properties is statutorily preferred and incentivized in Vermont, and TRORC can help to facilitate those projects.

Although it is difficult to estimate the economic impact of our potential projects, we know that past brownfields assessments have led to redevelopment projects worth over \$10 million. We estimate that this grant, if funded, will result in over one million dollars of privately funded new property value, dozens of direct job gains, and even more indirect benefit.

### **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 Vermont Department of Environmental Conservation Brownfield Response Program and the Vermont Community Development Program. TRORC is also committed to assisting the long-term rehabilitation of priority sites, beyond the purview of this Assessment Grant. We will support eligible parties in seeking cleanup funding through the aforementioned state funds, the Vermont Brownfields Revitalization Fund, the Vermont Petroleum Cleanup Fund, and EPA Brownfields Cleanup Grants. All of our target communities also have access to regional revolving loan funds. To support site reuse, we can help landowners access state tax credits for rehabilitating sites in downtown and village areas. Additionally, our community partner organizations have committed to working with us on redevelopment, and they bring capacity for financing and business planning technical assistance.

#### **1.c (ii) Use of Existing Infrastructure**

TRORC prioritizes assessment activities for brownfield properties that: are located in areas planned and zoned for more intensive development, have underutilized infrastructure capacity, are served by municipal water and sewer, and are accessible by major roads that have

excess capacity. There are numerous properties that fit these criteria within our target communities, including the example priority sites described in 1.a.(ii), above.

## **2: COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

#### **2.a. (i) The Community's Need for Funding**

TRORC's member towns are situated in a low-density region with slow economic growth, municipal budgets strained by aging infrastructure and recurrent flood disasters, an overabundance of low-wage and low-skill jobs, an out-migration of young adults, declining numbers of commercial sites in downtown areas, and a shortage of affordable housing. Our region meets federal criteria for economic distress, and is a designated Economic Development District.

The challenge of financing brownfield redevelopment in the region is significant. The only method for towns to raise funds in Vermont is through property taxes, voted upon by all residents annually. Compared to the state as a whole, median property values are depressed across much of the region, especially in our target communities of Bradford and Randolph.<sup>1</sup> Taxes are already high (Vermont is ranked 11th in the nation in terms of total state and local tax burden<sup>2</sup>), and any vote to raise them further is usually defeated. Tax bases are further limited by small populations. Hartford (our region's largest town) has 9,680 residents; its population has declined 7.7% since 2000. Bradford's current population is 2,729, and Randolph's is 4,715.<sup>3</sup>

#### **2.a. (ii) Threats to Sensitive Populations**

##### **2.a. (ii) (1) Health or Welfare of Sensitive Populations**

This grant will allow the presence of contaminants on sites to be confirmed, their level and extent measured, and, ultimately, the public health and environmental risks posed by them to be greatly reduced or eliminated entirely. Based on previous brownfields assessments in our region and our preliminary understanding of our priority sites, we expect to find chlorinated solvents, pollutant metals, asbestos, and various petroleum-related compounds. Some of our sites pose immediate public health and environmental risks. All brownfields create uncertainty about the future safety of those who live, work or play in those areas.

Our region's sensitive populations tend not to be spatially concentrated. However, senior citizens are overrepresented in Windsor County compared to the state as a whole.<sup>4</sup> Also, a large proportion of the region's limited rental properties are in Hartford and Randolph. In addition to reducing exposure to pollution, downtown redevelopment in our target communities could help create much-needed housing for seniors and low-income families, with reduced transportation expenses by virtue of proximity to jobs, services, and transit. (Transportation costs in our target areas are 23-24% of median annual household income, well over the 15% threshold that's considered affordable.<sup>5</sup>) Revitalizing downtowns will also benefit sensitive populations by reducing blight, creating jobs, expanding our local tax bases and the social services they fund, and supporting active transportation choices that improve community health. TRORC and our partners are experienced in and committed to equitable redevelopment.

##### **2.a. (ii) (2) Greater than Normal Incidence of Disease and Adverse Health Conditions**

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<sup>1</sup> 2013-2017 American Community Survey 5-Year Estimates

<sup>2</sup> The Tax Foundation, 2012, [https://files.taxfoundation.org/legacy/docs/State-Local\\_Tax\\_Burden\\_FY2012.pdf](https://files.taxfoundation.org/legacy/docs/State-Local_Tax_Burden_FY2012.pdf)

<sup>3</sup> 2013-2017 American Community Survey 5-Year Estimates

<sup>4</sup> 2013-2017 American Community Survey 5-Year Estimates

<sup>5</sup> Center for Neighborhood Technology, H+T Index, 2017

In Vermont, health data are usually only available for counties, not towns, and brownfield health impact data have not been aggregated for general public use. From the available data, we know that between 2011 and 2015, breast cancer, melanoma, and leukemia incidence rates in Windsor County were higher than the statewide rates. 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 a 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) Economically Impoverished / Disproportionately Impacted Populations**

The story of our region's economic decline is written in underused and vacant properties in each of our target communities. The job market is skewed toward low-wage and low-skill employment, and the demand for affordable housing units outstrips supply by about 5,000 units. Of our three target communities, Bradford and Randolph are facing the greatest economic burdens. They have unemployment rates higher than the statewide rate,<sup>6</sup> and the percentage of school children in those towns who receive free or reduced lunch (50.9% in Bradford, 46.6% in Randolph) is also higher than the state percentage.<sup>7</sup> Randolph lies within a federally designated (Internal Revenue Service) Opportunity Zone. Assessing brownfields in our target communities will pave the way for future redevelopment of those blighted properties, which in turn will help to create jobs for residents, expand local tax bases and the social services they fund, and create healthy and affordable homes in central locations with access to amenities and lower transportation costs.

## **2.b. Community Engagement**

### **2.b. (i) Community Involvement**

Our two identified community partners are Green Mountain Economic Development Corporation (GMEDC) and Twin Pines Housing Trust. **GMEDC's** office is located in our project's largest target community (Hartford), and serves the same 30 towns as TRORC. With their strength in business development, GMEDC's staff has been and will be assisting TRORC with site selection for assessment and redevelopment planning. They bring the ability to create a successful business plan, secure financing, and market new businesses. GMEDC understands each community's needs and economic strengths and weaknesses, and is therefore well positioned to ensure that TRORC selects sites for assessment that will have a positive economic impact for community residents. **Twin Pines Housing Trust** is our largest regional non-profit housing partner. They operate several housing developments and are currently working with us to build housing at a brownfield site that was assessed under our current grant. They can help evaluate sites for residential redevelopment, even sites that will be at market rate.

| <b>Partner Name</b>      | <b>Point of contact (name, email &amp; phone)</b>  | <b>Specific role in the project</b>             |
|--------------------------|--|---|
| GMEDC                    | Robert Haynes, <a href="mailto:rhaynes@gmedc.com">rhaynes@gmedc.com</a> , 802.295.3710                   | Site selection & business development expertise |
| Twin Pines Housing Trust | Andrew Winter, <a href="mailto:andrew.winter@tphtrust.org">andrew.winter@tphtrust.org</a> , 802.291.7000 | Site selection & housing development expertise  |

### **2.b. (ii) Incorporating Community Input**

<sup>6</sup> US Bureau of Labor Statistics, 2017 Local Area Unemployment Statistics (Annual Data)

<sup>7</sup> Vermont Agency of Education Child Nutrition Programs Annual Statistical Report, School Year 2017-2018, <https://education.vermont.gov/sites/aoe/files/documents/edu-nutrition-2018-free-reduced-eligibility-report.pdf>

TRORC has and will involve the targeted communities and others in our region, on a number of fronts. This project is supported by our Board of Directors, appointed by our member communities. We have placed a notice on our web site of our intent to apply for these funds. Our outreach strategy focuses on four critical audiences:

- **Local Officials:** We will involve local officials through conversations, correspondence, newsletter articles, website notices, public meetings, and TRORC's monthly board meetings.
- **Site Owners/Redevelopers:** TRORC staff will have confidential discussions 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, and state agencies:** From past experience, we expect these entities can offer critical assistance in site identification. We update USEPA and the state Department of Environmental Conservation (VTDEC) on our progress, and both advise on judging site scope and leveraging assistance beyond our grant.
- **Abutters and the community at large:** Abutters and other interested community members can provide critical information about a site that cannot otherwise be found in the public record, and can generate momentum for the clean-up and restoration of a brownfield property. Redevelopment success relies on considering diverse community input. TRORC will begin outreach to these stakeholders as early as possible in the assessment process.

As evidenced above, we view involvement *as* communication. TRORC will meet and correspond with many parties who will be directly involved in assessment activities. To solicit input from a wider audience that is not as intimately involved in the project, we will use press releases to our local newspapers as well as updates at Selectboard meetings, which are open and also usually covered by the local press. In developing area-wide plans, we will engage local residents through public meetings. Accommodations will be made for limited English proficiency and hearing and visual impairments as needed.

### **3: TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

#### **3.a. Description of Tasks and Activities**

- *Task: Cooperative Agreement Oversight:* This task covers the procurement of Qualified Environmental Professionals (QEPs) and other contractors under the grant, preparation and submission of quarterly and final financial and progress reports to EPA, ACRES reporting, and any additional needed coordination with EPA and VTDEC. TRORC will execute these activities throughout the 3-year project period.
- *Task: Sites Inventory and Area-wide Planning:* This task involves inventorying (identifying and prioritizing) sites. Inventory work relies upon property research, consultation with our community partners regarding redevelopment potential, and discussions with key stakeholders (see 2.b.(ii), above) to recruit participation in our program. Lead by TRORC, these efforts will build upon our previous inventory work and focus on our 3 target communities. Our expanded inventory will support the development of area-wide plans that outline constraints, opportunities, and strategies for future redevelopment. Contractors will lead planning efforts, and TRORC and its community partners will provide guidance and support. Three small area-wide plans are anticipated, primarily focused on hazardous materials sites.
- *Task: Phase I and II Assessments and Corrective Action Plans (CAPs):* Under this task, QEPs will lead work on: 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). Phase I investigations will identify “Recognized Environmental Conditions” and determine the need for subsequent testing in Phase II assessments, which will actually quantify and delineate any contamination. A Phase II is followed by the development of a CAP. TRORC will review QEPs’ deliverables, and will also facilitate review by key stakeholders such as EPA, VTDEC, the site owner, and the respective town officials. TRORC may use some funds under this task to enroll eligible sites in the state’s voluntary assessment and cleanup program, which allows applicants to get greater reassurance from the state regarding future liability. Based on our experience with previous assessment grants, we anticipate conducting: 9 Phase I investigations (4 hazardous substances sites, 5 petroleum sites); 4 Phase II investigations (2 hazardous substances sites, 2 petroleum sites); and 2 CAPs (1 hazardous substances site, 1 petroleum site). 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 high priority sites, such as but not limited to the example sites described in 1.a.(ii) above.

- **Task: Community Outreach and Engagement:** This task includes stakeholder engagement activities through media (our website, newsletter, and local newspapers), in-person meetings with key stakeholders (see 2.b.(ii), above), and the general public. These activities will take place throughout the 3-year project period, in all communities where Phase I, Phase II, CAP, or area-wide planning work will take place. TRORC will be the lead for this task. Contractors will assist with some public outreach services for area-wide planning. We estimate there will be up to 49 meetings, with scheduling dependent upon stakeholders’ and contractors’ needs and availability.

**Note: TRORC will contribute most of this project’s indirect administrative costs as in-kind.**

**Anticipated Schedule:** *Excludes regular/ongoing reporting and community outreach activities. Please note abbreviations: Hazardous Substances funding (HS), Petroleum funding (P)*

| Quarter | Deliverables Completed                                       | Quarter | Deliverables Completed                            |
|---------|--|---------|---|
| 1       | Sites Inventory (P+HS)                                       | 7       | 1 Randolph priority site Phase I (HS)             |
| 2       | 2 Phase Is (P)   | 8       | 1 Phase I (P)                                     |
| 3       | 1 Area-wide plan (HS); 1 Hartford priority site Phase I (HS) | 9       | 1 Phase II (HS)                                   |
| 4       | 1 Area-wide plan (HS); 1 Phase I (HS)                        | 10      | 1 Phase II (HS); 1 Bradford priority site CAP (P) |
| 5       | 1 Area-wide plan (P); 1 Phase I (HS)                         | 11      | 1 Phase II (P); 1 CAP (HS)                        |
| 6       | 2 Phase Is (P); 1 Phase II (P)                               | 12      | Final Report (P+HS)                               |

### **3.b. Cost Estimates and Outputs**

We are applying for both hazardous and petroleum funding. Local petroleum sites tend to be more common, smaller, and simpler than hazardous sites, so we anticipate assessing more petroleum sites at a lower per-site cost. \$200,688 (66.9% of awarded funds, including indirect costs) will support Phase I and Phase II assessment work. Cost estimates in the table below are rounded to the nearest whole dollar.

|                      | Budget Categories  | Project Tasks                   |  |                      |                                   | Total     |
|----------------------|--------------------|---------------------------------|--|----------------------|-----------------------------------|-----------|
|                      |                    | Cooperative Agreement Oversight | Sites Inventory and Area-wide Planning | Phase I, II, and CAP | Community Outreach and Engagement |           |
| Hazardous Substances | Personnel          | \$976                           | \$3,891                                | \$6,440              | \$3,909                           | \$15,216  |
|                      | Fringe Benefits    | \$800                           | \$2,454                                | \$4,203              | \$2,395                           | \$9,852   |
|                      | Travel             | \$0                             | \$196                                  | \$294                | \$818                             | \$1,308   |
|                      | Equipment          | \$0                             | \$0                                    | \$0                  | \$0                               | \$0       |
|                      | Supplies           | \$0                             | \$0                                    | \$0                  | \$724                             | \$724     |
|                      | Contractual        | \$0                             | \$20,000                               | \$110,400            | \$4,000                           | \$134,400 |
|                      | Total Direct Costs | \$1,776                         | \$26,541                               | \$121,337            | \$11,846                          | \$161,500 |
|                      | Indirect Costs     | \$93                            | \$1,397                                | \$6,386              | \$623                             | \$8,500   |
|                      | Subtotals          | \$1,869                         | \$27,938                               | \$127,723            | \$12,470                          | \$170,000 |
| Petroleum            | Personnel          | \$1,093                         | \$2,702                                | \$6,136              | \$4,057                           | \$13,988  |
|                      | Fringe Benefits    | \$896                           | \$1,728                                | \$4,018              | \$2,452                           | \$9,094   |
|                      | Travel             | \$0                             | \$131                                  | \$327                | \$2,098                           | \$2,556   |
|                      | Equipment          | \$0                             | \$0                                    | \$0                  | \$0                               | \$0       |
|                      | Supplies           | \$0                             | \$0                                    | \$0                  | \$863                             | \$863     |
|                      | Contractual        | \$0                             | \$10,000                               | \$85,000             | \$2,000                           | \$97,000  |
|                      | Total Direct Costs | \$1,989                         | \$14,561                               | \$95,481             | \$11,469                          | \$123,500 |
|                      | Indirect Costs     | \$105                           | \$766                                  | \$5,025              | \$604                             | \$6,500   |
|                      | Subtotals          | \$2,094                         | \$15,327                               | \$100,506            | \$12,073                          | \$130,000 |
| Total Budget         |                    | \$3,963                         | \$43,265                               | \$228,229            | \$24,543                          | \$300,000 |

#### **COST EXPLANATIONS:**

*TRORC's cost estimates are based on nearly 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 \$46,940.59. The difference (\$31,940.59) will be contributed by TRORC as in-kind.

#### Cooperative Agreement Oversight:

- *Personnel:* Director \$39.05/hr \* 25 HS hrs = \$976; Director \$39.05/hr \* 28 P hrs = \$1,093

- *Fringe:* Director \$31.99/hr \* 25 HS hrs = \$800; Director \$31.99/hr \* 28 P hrs = \$896

#### Sites Inventory and Area-wide Planning:

- *Personnel:* (Director \$39.05/hr \* 45 HS hrs) + (Staff \$26.67/hr \* 80 HS hrs) = \$3,891; (Director \$39.05/hr \* 33 P hrs) + (Staff \$26.67/hr \* 53 P hrs) = \$2,702

- *Fringe:* (Director \$31.99/hr \* 45 HS hrs) + (Staff \$12.68/hr \* 80 HS hrs) = \$2,454; (Director \$31.99/hr \* 33 P hrs) + (Staff \$12.68/hr \* 53 P hrs) = \$1,728

- *Travel:* 10 regional trips \* average 60 miles/trip \* \$0.545/ mi = \$327 total

- *Contractual:* 3 plans at \$10,000/plan = \$30,000 total

#### Phase I, II, and CAP:

- *Personnel:* (Director \$39.05/hr \* 85 HS hrs) + (Staff \$26.67/hr \* 117 HS hrs) = \$6,440; (Director \$39.05/hr \* 82 P hrs) + (Staff \$26.67/hr \* 110 P hrs) = \$6,136

- *Fringe:* (Director \$31.99/hr \* 85 HS hrs) + (Staff \$12.68/hr \* 117 HS hrs) = \$4,203; (Director \$31.99/hr \* 82 P hrs) + (Staff \$12.68/hr \* 110 P hrs) = \$4,018

- *Travel*: 19 regional trips \* average 60 miles/trip \* \$0.545/ mi = \$621 total
- *Contractual*: 4 HS Phase Is at \$3,100 each + 2 HS Phase II at \$42,000 each + 1 HS CAP at \$14,000 each + 5 P Phase Is at \$2,600 each + 2 P Phase IIs at \$32,000 each + 1 P CAP at \$8,000 each = \$195,400 total contractual

**Community Outreach and Engagement:**

- *Personnel*: (Director \$39.05/hr \* 40 HS hrs) + (Staff \$26.67/hr \* 88 HS hrs) = \$3,909; (Director \$39.05/hr \* 39 P hrs) + (Staff \$26.67/hr \* 95 P hrs) = \$4,057
- *Fringe*: (Director \$31.99/hr \* 40 HS hrs) + (Staff \$12.68/hr \* 88 HS hrs) = \$2,395; (Director \$31.99/hr \* 39 P hrs) + (Staff \$12.68/hr \* 95 P hrs) = \$2,452
- *Travel*: 49 regional trips \* average 60 miles/trip \* \$0.545/ mi = \$1,602; Conference travel for 1 staff person, estimate \$62 roundtrip bus trip to airport + \$400 airfare + (\$94 lodging rate \* 4 nights) + (\$55 per diem \* 5 days) + \$200 registration = \$1313
- *Supplies*: (11 newspaper ads \* \$100/ad) + (31 lawn signs \* \$15 each) + (370 printed pages \* \$0.06 each) = \$1,587
- *Contractual*: Outreach services for 2 HS area plans \* \$2,000 each = \$4,000; Outreach services for 1 P area plan \* \$2,000 each = \$2,000

**OUTPUTS:**

*Cooperative Agreement Oversight*: Quarterly progress reports; ACRES reporting; final report

*Sites Inventory and Area-wide Planning*: Updates to existing petroleum and hazardous substances sites inventory; 3 area-wide plans

*Phase I, II, and CAP*: 4 hazardous substance and 5 petroleum Phase I assessments; 2 hazardous substance and 2 petroleum Phase II assessments; 1 hazardous substance and 1 petroleum CAP; sites enrollment in state's brownfields program, as needed

*Community Outreach and Engagement*: Up to 49 meetings with stakeholders, including 6 public meetings for area-wide planning; newspaper ads for public meetings; 31 lawn signs for brownfield properties; printed handouts; participation in national brownfields conference

**3.c. Measuring Environmental Results**

TRORC's Finance Manager will track costs on a project basis, with monthly updates and draft billings for staff to review. These monthly check-ins will reference the anticipated schedule outlined in 3.a. (above) to ensure that we are meeting the grant's deliverables in a timely manner. Measuring project outputs, such as the number of Phase I or Phase II assessments, is straightforward. We will track and report progress to EPA quarterly, and we will input data into the brownfields tracking database ACRES as outputs are achieved. TRORC is also committed to tracking outcomes. We have consistently reported brownfield redevelopment successes in ACRES, and we will continue this practice. We will also showcase the progress of redevelopment efforts on our website in order to heighten community awareness of the exciting possibilities for brownfield clean-up and redevelopment in our region.

**4: PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a. Programmatic Capability**

**4.a. (i) Organizational Structure**

TRORC staff have the expertise and experience to successfully manage this grant. We will have three key staff assigned to this project. The Project Director, Kevin Geiger, has 25 years of experience in planning and economic development. Kevin has been part of our brownfields team since 2000. The Executive Director, Peter Gregory, has managed TRORC for 22 years, and has successfully overseen several millions of dollars in grants. Kevin and Peter are

conversant in federal procurement, and are well-qualified to select quality contractors. Sarah Wraight has a Masters in Land Use and Environmental Planning, and 5 years of professional experience in environmental outreach and advocacy related to contaminated sites.

We supervise all contractors closely to ensure that their work is thorough and timely. Our staff has the technical knowledge to read laboratory reports and testing diagrams, the editing capacity to ensure that documents are clear and correct, and the brownfields experience to ensure these reports are up to standard. Our staff also visit each site to ensure that all work has been properly executed. In terms of financial management, all work performed at TRORC is assigned a cost code. Our Finance Manager, Dee Gish, continuously tracks all project costs and bills, and maintains a separate contract binder with copies of all related documents. The Executive Director reviews and approves all expenses and timesheets.

#### **4.a. (ii) Acquiring Additional Resources**

TRORC has extensive experience contracting with Qualified Environmental Professionals to assess brownfields. We plan to use a request for qualifications approach; this gives us flexibility, ability to compare costs, and fast-track capacity, as we can task different sites to different firms at the same time. During the qualifications process, we require prospective contractors to name their project team and provide examples with that team and its 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 BF00A00110), we have completed 7 Phase I assessments, 1 Phase II assessment, 1 CAP, and 3 supplemental environmental investigations. Three Phase II assessments, 1 Phase I assessment, and 1 CAP are in progress. In total, 13 petroleum and/or hazardous substances sites have been addressed (through assessment and/or leveraged redevelopment). TRORC has leveraged \$12,000 in assessment funding. One property (0.14 acres) has been remediated and is ready for reuse.

In 2013, TRORC closed out another assessment grant (Agreement 96132201) that addressed 6 sites and produced 1 Phase I assessment, 4 Phase II assessments, and 1 supplemental environmental investigation. TRORC leveraged \$24,764 in assessment funds, \$959,265 in redevelopment funds, and 38 redevelopment jobs. In 2011, TRORC completed work on an assessment grant (Agreement 97184101) that addressed 8 petroleum properties and produced 6 Phase I assessments, 2 Phase II assessments, and 1 supplemental investigation. TRORC leveraged \$ 10,917,200 in redevelopment funds and 112 redevelopment jobs. All outputs and outcomes from current and prior grants have been entered into ACRES.

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

TRORC's current grant (10/01/15-09/30/18) was extended in order to complete some assessments that began later than expected, due to the need for relationship-building with landowners. TRORC has completed 9 of the 16 assessments in our workplan, plus 3 supplemental investigations. Five more deliverables are in progress, and we expect to expend the remaining funds by the new closing date (9/30/19). TRORC's 2010-2013 grant closed out on time and produced 5 of the 16 assessments in our work plan, plus 1 supplemental investigation. There were \$752 unspent; a Phase I was not completed and it was too late to find another site. TRORC's 2007-2010 grant was extended to 6/30/11, which allowed us to complete all but 1 of the assessments in our workplan, plus 1 supplemental investigation. All funds were expended. We have completed quarterly and ACRES reporting on time for all of our assessment grants.

Community-Wide Hazardous Substances and Petroleum Assessment Grant  
Proposal

List of Threshold Criteria Attachments

- A. Documentation of Applicant Eligibility
- B. Description of Community Involvement
- C. Documentation of Available Balance on Current Assessment Grant

Attachment A  
Documentation of Applicant Eligibility

Redstone Building  
26 Terrace Street  
Drawer 09  
Montpelier, VT 05609-1101

Tel: (802) 828-2363

<http://www.sec.state.vt.us>



State of Vermont  
Office of the Secretary State

Deborah L. Markowitz  
Secretary of State

William A. Dalton  
Deputy Secretary

Jessica G. Porter  
Director, Professional Regulation

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,

A handwritten signature in dark ink, appearing to read "W.A. Dalton", written over a horizontal line.

William A. Dalton  
Deputy Secretary of State

Attachment B  
Description of Community Involvement

## Threshold Criteria: Community Involvement

Two Rivers-Ottawaquechee Regional Commission (TRORC) began community engagement during the preparation of this grant proposal. This project is supported by our Board of Directors, who are each appointed by our member communities. We placed a notice on our web site of our intent to apply for these funds. We also communicated with two key community partners, Green Mountain Economic Development Corporation (GMEDC) and Twin Pines Housing Trust. They will assist this project by helping TRORC select sites for assessment that have strong potential for commercial and housing redevelopment.

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 four audiences:

- **Local Officials:** As we begin, we will leverage our already close relationships with local officials through one-on-one conversations, public meetings, e-mail, physical mailings, newsletter articles, and by updating our website. We know our local leaders personally. We will also keep the municipal representatives to our Board of Commissioners (there is one per town) updated at our monthly board meetings.
- **Site Owners/Redevelopers:** TRORC staff will have confidential discussions 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, and state agencies:** From past experience, we expect these entities can offer critical assistance in site identification. We update USEPA and the state Department of Environmental Conservation (VTDEC) on our progress, and both advise on judging site scope and leveraging assistance beyond our grant.
- **Abutters and the community at large:** Abutters and other interested community members can provide critical information about a site that cannot otherwise be found in the public record, and can generate momentum for the clean-up and restoration of a brownfields property. Redevelopment success relies on considering diverse community input. TRORC will begin outreach to these stakeholders as early as possible in the assessment process.

As evidenced above, we view involvement as communication. TRORC will meet and correspond with many parties who will be directly involved in assessment activities. To solicit input from a wider audience that is not as intimately involved in the project, we will use press releases to our local newspapers as well as updates at SelectBoard meetings, which are open and also usually covered by the local press. In developing area-wide plans, we will engage local residents through public meetings. Accommodations will be made for limited English proficiency and hearing and visual impairments as needed.

Attachment C  
Documentation of Available Balance  
on Current Assessment Grant

Please see Attachment for ASAP Cash Management Report

Account Balance: \$104,512.15  
Authorizations (Awarded Funds): \$400,000  
Drawn down:  $\$400,000 - \$104,512.15 = \$295,487.85$   
 $\$295,487.85 / \$400,000 \times 100 = 73.87\%$  Drawn down

# Automated Standard Application for Payments

## CASH MANAGEMENT REPORT

### Average Day Analysis By ALC / Recipient ID / Acct Report

ALC/Region : 68128933/  
 Recipient ID : 5005088  
 Account ID : BF00A00110  
 CFDA :

Short Name : LVFMC  
 Short Name : TRORC

Transaction Date From : 06/01/2015

Through : 01/18/2019

| ALC/Region          | Recipient ID | Account ID | CFDA   | Group ID | Beginning Balance | Authorizations | Payments & Adjustments (PY/RP/BE) | Account Balance | Avg Days |
|---------------------|--------------|------------|--------|----------|-------------------|----------------|-----------------------------------|-----------------|----------|
| 38128933/           | 5005088      | BF00A00110 | 66.816 | 10306    | \$0.00            | \$400,000.00   | -\$295,487.85                     | \$104,512.15    | 66.50    |
| Totals :            |              |            |        |          | \$0.00            | \$400,000.00   | -\$295,487.85                     | \$104,512.15    |          |
| ALC/Region Totals : |              |            |        |          | \$0.00            | \$400,000.00   | -\$295,487.85                     | \$104,512.15    |          |

## Narrative Information Sheet

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

01/29/2019

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:

Two Rivers-Ottawaquechee Regional Commission

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

03-0224910

\* c. Organizational DUNS:

8265112060000

d. Address:

\* Street1:

128 King Farm Rd

Street2:

\* City:

Woodstock

County/Parish:

\* State:

VT: Vermont

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

05091-1052

e. Organizational Unit:

Department Name:

Division Name:

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

Prefix:

Mr.

\* First Name:

Kevin

Middle Name:

\* Last Name:

Geiger

Suffix:

Title:

Senior Planner

Organizational Affiliation:

TRORC

\* Telephone Number:

802-457-3188

Fax Number:

802-457-4728

\* Email:

kgeiger@trorc.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:

TRORC FY 2019 Brownfields Community-Wide Assessment Grant

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-01

\* b. Program/Project VT-01

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:  \* First Name: Peter

Middle Name:

\* Last Name: Gregory

Suffix:

\* Title: Executive Director

\* Telephone Number: 802-457-3188 Fax Number: 802-457-4728

\* Email: pgregory@trorc.org

\* Signature of Authorized Representative: Peter G Gregory \* Date Signed: 01/29/2019