



RE: FY2023 EPA Brownfields Assessment Coalition Grant Application

The Northeastern Vermont Development Association and its Coalition Members (Gilman Housing Trust, Inc. [dba RuralEdge], Northern Forest Center and Northeastern Vermont Regional Hospital) are pleased to submit this proposal for FY2023 Brownfields Assessment Grant funding. Below we provide the information requested.

1. Applicant Identification:

Northeastern Vermont Development Association (NVDA)
 36 Eastern Avenue, Suite 1
 St. Johnsbury, VT 05819

2. Funding Requested:

- (a) Assessment Grant Type: Assessment Coalition
- (b) Federal Funds Requested: \$1,000,000

3. Location: The target areas for all coalition members are located within the counties of Caledonia, Essex and Orleans.

- (a) Cities/Towns: City of Newport, Town of Lyndon, Town of St. Johnsbury, Town of Lunenburg, Town of Barton & Town of Concord
- (b) Counties: Caledonia, Essex and Orleans Counties
- (c) State or Reservation: Vermont

4. Target Area and Priority Site Information:

Target Area Name	Census Tract(s)	Addresses of Priority Sites
City of Newport (RuralEdge Target Area)	951400, 951500	1. Four Founders Circle (119 Clermont Terrace, Newport) 2. Newport Center (4116 & 4127 VT Route 105, Newport)
Downtown St. Johnsbury (Northern Forest Center Target Area)	9574	1. 560 Railroad Street (560 Railroad St, St. Johnsbury)
St. Johnsbury Neighborhood Development District (Northeastern Vermont Regional Hospital Target Area)	9575	1. True Temper Factory (575 Concord Ave, St. Johnsbury) 2. Hospital Drive Corridor (Hospital Dr, St. Johnsbury)
Town of Lyndon (NVDA Target Area)	957200, 957300	1. Kennametal Manufacturing (378 Main St, Lyndon) 2. Depot Street Corridor (Depot St, Lyndon)
Small Towns & Rural Areas Throughout NEK (NVDA Target Area)	950500, 951800, 950500	1. Gilman Paper Mill (1 Riverside Ave, Lunenburg) 2. Barton Motor Co. & Gas Station (476 Main St, 46 Porter Lane & 19 Harrison Ave, Barton) 3. Bernie's Market & Gas Station (167 Main St, Concord)

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THE REGIONAL PLANNING AND DEVELOPMENT COMMISSION SERVING THE NORTHEAST KINGDOM:
 CALEDONIA, ESSEX AND ORLEANS COUNTIES
 NVDA is an Equal Opportunity lender, provider and employer

5. Contacts:

(a) Project Director:

Name: David Snedeker, Executive Director
Phone: (802) 748-8303 | Email: dsnedeker@nvda.net
Mailing Address: 36 Eastern Avenue, Suite 1, St. Johnsbury VT 05819

(b) Chief Executive/Highest Ranking Elected Official:

Name: David Snedeker, Executive Director
Phone: (802) 748-8303 | Email: dsnedeker@nvda.net
Mailing Address: 36 Eastern Avenue, Suite 1, St. Johnsbury VT 05819

6. Population: The priority sites are located within the cities/towns identified below.

- Town of St. Johnsbury: 7,162
- Town of Lyndon: 5,491
- City of Newport: 4,244
- Town of Barton: 594
- Town of Lunenburg: 376
- Town of Concord: 201

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	5
The applicant is, or will assist, a federally recognized Indian tribe or U.S. territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
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).	1,2
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	NA
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	NA

NA = Not applicable.

8. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the Vermont Department of Environmental Conservation is attached.

9. Releasing Copies of Applications: Not applicable.

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
(802) 828-1138
sarah.bartlett@vermont.gov

November 14, 2022

Northeastern Vermont Development Association
Attn: David Snedeker
36 Eastern Avenue, Suite 1
St. Johnsbury, VT 05819

Dear Mr. Snedeker:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Northeastern Vermont Development Association (NVDA), along with Gilman Housing Trust, Inc., Northern Forest Center, and Northeastern Vermont Regional Hospital, intends to apply for an EPA Brownfields Assessment Coalition Grant, and if awarded, to utilize the grant funds to conduct assessment activities associated with the characterization of brownfield properties within small towns/villages throughout Caledonia, Essex, and Orleans counties.

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

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

Best of luck in the competition.

Sincerely,



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

CC: Dorrie Paar – USEPA (submitted electronically)



1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Coalition Members, Target Area & Brownfields

1.a.i. Coalition Members: The **Northeastern Vermont Development Association (NVDA)** is a regional planning commission that encompasses 55 municipalities in Caledonia, Essex and Orleans Counties. This area, also known as the Northeast Kingdom (NEK), includes some of the most rural and geographically isolated parts of the state and has a total population of just 63,544 spread out over an area comprising 20% of Vermont. NVDA has formed a Coalition with three non-profit community-based organizations (CBOs) located in the NEK: **RuralEdge** (affordable and senior housing developer), **Northern Forest Center (NFC)** (regional innovation and investment partner) and the **Northeastern Vermont Regional Hospital (NVRH)** (regional medical provider and largest employer). These CBOs were identified as key partners due to their ongoing partnerships with NVDA and our collective goals of improving economic conditions, addressing housing shortages, improving health outcomes and preserving greenspace.

As small, regional organizations funded by government grants and philanthropic sources, the Coalition members have very limited financial resources and do not otherwise have the capacity to apply for an EPA Brownfield Grant or fund and manage site investigation activities on their own. These CBOs rely on NVDA to provide funding assistance and oversee environmental site assessment (ESA) activities. Over the past four years, NVDA has managed two Coalitions that have effectively utilized two \$600K EPA Brownfield Assessment Grants (awarded in fiscal year [FY] 2018 and 2021, respectively) to develop a sustainable Brownfield Revitalization Program (BRP). Under both projects the demand for grant funds was much greater than the amount of funds available and NVDA was unable to fund activities at all of the priority sites. To continue the momentum of NVDA's BRP and achieve the community's collective revitalization goals, the Coalition continues to rely on NVDA to secure an array of EPA and other state/federal grants to fill funding gaps and fuel public-private partnerships.

1.a.ii. Overview of Brownfield Challenges & Description of Target Area: The NEK is one of five USDA Rural Economic Area Partnership (REAP) Zones in the US, identified by rural isolation, lack of local capital, and poverty. One of NVDA's priorities is to assist towns with regional and municipal land use and create sustainable economic growth. The areas we serve are made of tight-knit communities on a picturesque landscape. However, our region lost its original "resource-based" economic foundation, which has led to significant population decline. Since 2015 all three counties within the NEK have seen significant population loss: Caledonia County -4.0%; Essex County -2.3%; and Orleans County -0.7%. We also have one of the highest elder populations (65+ years) in Vermont. As the population contracts and ages, businesses no longer have a sufficient base to support them, struggle to find employees, and inevitably close. These business closures vacate buildings on commercial and industrial sites, some of which have had continual use for 100-200 years. Many of these brownfield sites operated well before any environmental regulations or standard for proper handling and disposal. Awareness of the health effects of hazardous substances and petroleum products was widely not a concern or unknown. This has resulted in abandoned or underutilized brownfields from large industrial facilities to small corner gas stations clustered in our small towns and villages.

The Coalition members have identified separate Target Areas (TAs) within the City of Newport, Town of Lyndon and Town of St. Johnsbury. NVDA's TA also includes the other small towns and villages it serves in the NEK outside of the Coalition member's TAs. These **TAs include five federally designated Opportunity Zones (OZs)** (two in Newport, two in St. Johnsbury and one in Lyndon) and are home to a substantial number of vacant and underutilized industrial and commercial sites with a history of contamination. Using proven strategies that made the previous EPA Grant projects successful, the Coalition will leverage an additional \$1M of EPA funding to continue revitalizing catalyst brownfields and addressing the socioeconomic challenges throughout the NEK. The TAs include:

- **City of Newport (RuralEdge's TA):** Located on **Lake Memphremagog**, Newport serves as an important gateway to Canada. A preliminary inventory identified dozens of brownfields sites in the downtown core. The downtown area includes a block of vacant buildings in the city center that were removed in 2015 for a major redevelopment project. Funding for the project was abruptly halted (due to a private investment scam) after the buildings were removed and the project continues to sit idle. Potential contaminants include volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), and petroleum. Further assessment is needed to give potential developers confidence to invest in this prime location.
- **Downtown St. Johnsbury/Census Tract 9574 (NFC's TA):** The area has over 150 years of industrial history and is bordered by a railroad and the **Passumpsic River**. This area was the focus of a 2018 *Area-Wide Planning (AWP) Study* and 2020 *Main Street Brownfield Planning Study* that identified 24 brownfield sites impacted by metals, VOCs, petroleum products, polychlorinated biphenyls (PCBs), PAHs and per-/poly-fluoroalkyl substances (PFAS). Six properties were assessed under NVDA's past grants and two are undergoing cleanup. Additional assessment and cleanup planning are needed to support reuse for new businesses, housing and recreational amenities.
- **St. Johnsbury Neighborhood Development District/Census Tract 9575 (NVRH's TA):** Situated between **Moose River and Passumpsic River**. Despite past manufacturing and landfilling activities, as well as the presence of gas stations and auto repairs, few ESAs have been completed in this area. Many sites are underutilized and redevelopment is stalled pending completion of site investigations.

- **Town of Lyndon (NVDA's TA):** The Town's downtown core, comprised of Depot Street and Main Street, was once a thriving commercial and industrial center. A combination of confirmed/suspected contamination from past manufacturing, print shops, dry cleaners and gas stations are deterring investors and stalling revitalization.
- **Small Towns & Rural Areas throughout the NEK (NVDA's TA):** Additionally, NVDA serves 52 other small rural municipalities that need support to initiate redevelopment. Priority brownfield sites described in 1.a.iii are located in town and village centers with a high likelihood of redevelopment and importance to the community.

1.a.iii. Description of the Priority Brownfield Sites: With a legacy of over 200 years of resource extraction and goods-producing industries, followed by decades of steady economic decline, there are presently hundreds of brownfield sites throughout the NEK, including: (1) former mills and manufacturing facilities; (2) salvage yards, landfills and unpermitted dump sites; (3) former gas stations and auto-related businesses; (4) former dry cleaners; and (4) other vacant/underutilized properties in town centers and aging neighborhoods. Below we describe our priority sites. These sites were selected due to the likelihood of redevelopment moving forward in the near-term and the housing and economic benefits these projects will provide.

Priority Site Name & Address	Size	Site Description & Environmental Concerns	Contaminants of Concern (COCs)	Funding Needs
City of Newport (RuralEdge Target Area)				
Four Founders Circle^(a) 119 Clermont Terrace, Newport	2 Parcels (8.4 acres)	Former Catholic school, church and convent built in 1955 and mostly vacant for over 25 years. Multiple USTs confirmed onsite. Confirmed soil/groundwater impacts and RBMs.	PAHs, ACM, LBP, PCB	Phase II ESA, ABCA/CAP
Newport Center 4116 & 4127 VT Route 105, Newport	2 Parcels (0.86 acres)	Built in 1890, this deteriorating apartment building likely contains ACM, LBP and PCB in building materials and soil. Suspected USTs.	Petroleum, ACM, LBP, PCB	Phase II ESA, RBM Survey, ABCA/CAP
Downtown St. Johnsbury (NFC Target Area)				
560 Railroad Street^{*(b)} 560 Railroad St, St. Johnsbury	1 Parcel (0.31 acres)	Underutilized mixed-use building (commercial on lower level and vacant residential on upper level). Confirmed soil/groundwater impacts and RBMs. UST present.	PAHs, VOCs, PCBs, ACM, LBP	Supplemental Phase II ESA, ABCA/CAP
Neighborhood Development District (NVRH Target Area)				
True Temper Factory^{*(a)} 575 Concord Ave, St. Johnsbury	1 Parcel (7.68 acres)	Located along Moose River . Former wooden dowel manufacturing facility vacant for over 10 years. Over 70 drums with unknown substances have been dumped onsite. Former onsite rail spur and adjacent railroad that operated from 1900 through the 1980s. Adjacent sites include former gas station/auto repair facility, dry cleaner and salvage yard. Residential properties also border the site.	Creosote, Herbicides, Heavy Metals, PAHs, VOCs, PCBs, Misc. Hazardous Wastes, ACM, LBP	Phase II ESA, RBM Survey, ABCA/CAP, Reuse Plan
Portland Street Corridor* St. Johnsbury	Multiple Parcels	Mixed residential and commercial neighborhood located along the Moose River . Multiple vacant parcels and few ESAs completed in the area. Adjacent property uses include former auto repair, industrial sites, gas stations and dry cleaners.	Petroleum, Metals, Solvents, Hazardous Wastes	Phase I/II ESA, ABCA/CAP, Reuse Plan
Town of Lyndon (NVDA Target Area)				
Depot Street Corridor Lyndon	Multiple Parcels	Former industrial area. Dozens of underutilized mixed-use properties with commercial on the lower level and uninhabitable residential on the upper levels. Many buildings were constructed prior to 1940 and likely contain RBMs.	Petroleum, Solvents, ACM, LBP, PCB	Phase I/II ESA, RBM Survey, ABCA/CAP, AWP
Kennametal Manufacturing 378 Main St, Lyndon	1 Parcel (4.05 acres)	The Town of Lyndon's highest priority site on Main St. Vacant since 2014 and previously used for tool manufacturing. Site has confirmed contaminants and implementation of a previous CAP has failed. The Town and NVDA have received numerous purchase inquiries but negotiations repeatedly stall due to contamination concerns.	Heavy Metals, Acids, Solvents, Misc. Hazardous Wastes, PCBs, ACM, LBP	Supplemental Phase II ESA, ABCA/CAP, Reuse Plan
Other Small Towns & Rural Areas (NVDA Target Area)				
Gilman Paper Mill* 1 Riverside Ave, Lunenburg	3 Parcels (67.0 acres)	Located on the Connecticut River , this longtime paper mill closed in 2002. Several deals to sell the property and repurpose as a wood pellet manufacturer have fallen through due to concerns about environmental contamination.	Solvents, Creosote, VOCs, Metals, Acids, Arsenic, PCBs, ACM, LBP	Phase II ESA, ABCA/CAP
Barton Motor Co. & Gas Station^{*(b)} 476 Main St, 46 Porter Lane & 19 Harrison Ave, Barton	3 Parcels (1.22 acres)	The Village of Barton's highest priority brownfield (adjacent to Barton River) includes a former gas station and auto repair and sales facilities vacant since 2008. Confirmed contaminants include a dissolved petroleum plume migrating towards the Barton River . The former gas station has contributed to a comingled plume on Main Street.	VOCs, PAHs, Heavy Metals, PCBs, ACM, LBP	Supplemental Phase II ESA, ABCA/CAP
Barnie's Market & Gas Station 167 Main St, Concord	1 Parcel (1.60 acres)	Former general store and gas station. Closed for more than two years. Confirmed contaminants from leaking UST. Suspected RBMs due to age of building. Surrounded by residential properties.	PAHs, ACM, PCBs, LBP	Phase I/II ESA, RBM Survey, ABCA/CAP

***Adjacent to body of water.** ^(a) Phase I ESA & RBM Survey funded by FY21 Grant. Phase II ESA recommended based on results of Phase I ESA.
^(b) Phase I and II ESA funded by FY21 Grant. Supplemental assessment activities required to delineate the horizontal and vertical extent of contamination confirmed during the Phase II ESA.
Definitions: ABCA = Analysis of Brownfield Cleanup Alternatives; ACM = Asbestos Containing Material; AWP = Area-Wide Plan; CAP = Corrective Action Plan; ESA = Environmental Site Assessment; LBP = Lead-based Paint; PAH = Polynuclear Aromatic Hydrocarbons; PCB = Polychlorinated Biphenyls; RBM = Regulated Building Material; UST = Underground Storage Tank; VOC = Volatile Organic Compounds

1.b. Revitalization of the Target Areas

1.b.i. Reuse Strategy & Alignment with Revitalization Plans: Selection of the priority sites in the Lyndon, St. Johnsbury, and Newport OZs reflects a general reuse strategy for focusing FY23 funding on projects where extensive planning has been completed to identify priority redevelopment sites. Established goals include providing **affordable multifamily and senior housing** and **generating business opportunities that stabilize the area**. Additionally, the Coalition has conducted studies to support affordable multifamily and senior housing initiatives and achieve the following objectives: maintain and renew affordable housing; increase multifamily and senior housing supply; expand public sector funding; encourage private sector investments with development bonuses and tax credits; and encourage adaptive reuse projects that support preservation of historic buildings. In alignment with these goals and objectives, reuse plans and strategies for each of the **priority brownfields** include:

Priority Site	Reuse Plans/Strategy	Alignment with Revitalization/Land Use Plans
City of Newport (RuralEdge Target Area)		
Four Founders Circle	Adaptive reuse of existing structures for multifamily and senior housing. Convent building will be renovated with apartment units for seniors. School building will be renovated for condominiums. Grassy lot will be redeveloped with single-family homes.	Support housing goals identified in the Town’s 2019 <i>OZ Prospectus</i> . Supports the goals of the City’s 2019 <i>Retirement Community Independent and Assisted Living Market Analysis</i> . Provide senior housing near Newport’s Hospital District to allow elderly population easy access to medical providers/services.
Newport Center	Rehab deteriorating apartment building to reduce exposure to RBMs and provide 14 healthy housing units.	Supports regional efforts to provide address housing shortage and restore aging buildings to provide healthy housing options.
Downtown St. Johnsbury (NFC Target Area)		
560 Railroad St	Adaptive reuse of underutilized building to provide 10 apartments (mid-market workforce rental housing) and two commercial office spaces.	Support housing goals identified in the Town’s 2019 <i>OZ Prospectus</i> . Support goals of the 2020 <i>Brownfield Study</i> to revitalize catalyst sites for multifamily housing.
St. Johnsbury Neighborhood Development District (NVRH Target Area)		
True Temper Factory	Mid-market, multi-family housing development to support medical workforce in Hospital District.	Support regional goals to provide quality housing that will attract and sustain the local workforce. Recent zoning changes have been made to allow for development of senior housing near medical services and workforce housing near the area’s largest employment center. The Town is currently applying for Neighborhood Development Area designation to streamline the permitting process and provide tax credits to developers.
Portland Street Corridor	Retirement community and workforce housing developments.	
Town of Lyndon (NVDA Target Area)		
Depot Street	Rehab structures for mixed-use to address affordable housing shortage. Provide opportunities for small businesses (retail, restaurants, etc.) in the downtown.	Supports Objective #4 of the Town’s 2017 <i>Community Visit</i> : to develop “a master plan for downtown development... as well as build strategies... toward redevelopment of vacant properties.”
Kennametal Manufacturing	Adaptive reuse of vacant manufacturing facility to attract new employer.	Assess catalyst site identified in the Town’s 2019 <i>OZ Prospectus</i> . Supports Action 2.14 of the 2020 <i>Municipal Plan</i> : “Prioritize reuse and cleanup of properties, e.g. the Kennametal site.”
Other Small Towns & Rural Areas (NVDA Target Area)		
Barton Motor Co. & Gas Station	Position multi-parcel site for mixed-use commercial/residential development that provides ~24 residential units and 20K square feet of commercial space.	Support regional goals to address affordable housing shortage and create commercial space for businesses that will provide basic goods/services in underserved areas.
Gilman Paper Mill	Adaptive reuse of vacant manufacturing facility to attract new employers.	Support regional goals to attract a new employer and stabilize the industrial employment base.
Barnie’s Market & Gas Station	Address contamination concerns to position site for new community general store in underserved area.	Support regional goals to improve access to basic goods (groceries) in remote and underserved areas.

1.b.ii. Outcomes & Benefits of Reuse Strategy: The Coalition’s revitalization plans are focused on vacant and underutilized sites and the projects proposed will not cause the displacement of residents or businesses. Redevelopment of the priority sites are anticipated to provide the following benefits:

- **Spur Economic Growth in OZs:** The project will spur economic growth in **five OZs**. NVDA and its project partners are actively marketing OZ opportunities and looking at related funding for reuse. Completing ESAs, RBM Surveys, CAPs and Reuse Plans for sites in the OZs is instrumental to attracting new investment.
- **Provide affordable, senior & multifamily housing:** Affordable housing projects at **Newport Center** (14 units), **560 Railroad Street** (10 units), **Depot Street** (~36 units), **Barton Motors** (24 units) and **True Temper Factory** (# of units TBD), will address the area’s housing shortage and reduce cost burdening. The mixed affordable and senior housing developments at **Four Founders Circle** (120 units) and along **Portland Street** (# of units TBD) will also help address the area’s senior housing shortage for independent and assisted living, as well as create living spaces that accommodate the large disabled population.
- **Create Jobs & Stabilize the Industrial Employment Base:** Returning former industrial sites to productive use, including the **Kennametal Manufacturing** and **Gilman Paper Mill** sites will restore a critical employment base for these small communities. Attracting new employers to these sites has the potential to create over 65 permanent jobs and restore critical tax revenues for the small communities in the NEK that have very limited sources of

income. New employment opportunities will create a positive feedback loop that reduces poverty, cost burdening, and dependence on government programs by providing quality, living-wage jobs.

- **Support Adaptive Reuse & Energy Efficiency Projects in all Target Areas:** Adaptive reuse projects proposed in all the TAs will highlight historic preservation, infill development, and sustainable building design. These measures include new high-efficiency heating systems, replacement of single pane windows and electrical upgrades. NVDA has previously connected developers with federal grants to fund power infrastructure upgrades at old manufacturing facilities with outdated and inefficient infrastructure. Additionally, RuralEdge has successfully incorporated renewable energy such as solar and biomass systems in three of their housing projects, and innovative technologies such as air source heat pumps and hybrid water heater systems in two projects.
- **Greenspace Preservation:** All priority sites are in fully developed areas. With appropriate cleanup and remediation, revitalization of the priority sites directs development away from undeveloped landscapes. The prevention of sprawl and destruction of the natural environment is an integral component of our community's future, which greatly benefits from its natural surroundings and outdoor recreation (the main drivers of tourism in the NEK).

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: As a local unit of government, NVDA is eligible and experienced with leveraging funding from a variety of public and private sources. Many of the funding sources identified below were secured for cleanup/reuse of sites assessed under the past EPA Grants. The Coalition will continue to tap into these funding sources to advance reuse of sites assessed with FY23 EPA Grant funds:

- As described in 1.a.ii, the NEK is one of five USDA REAP Zones in the US due to its rural isolation and lack of local capital. Priority consideration of **USDA Rural Development Grants and other federal programs** is given to REAP Zone applications. These funds can be used to further cleanup and redevelopment of sites.
- **VT Agency of Commerce & Community Development (ACCD)** helps obtain funding for cleanup and redevelopment of brownfields via the Brownfield Revitalization Fund (BRF), which offers grants and loans to municipalities and non-profits. ACCD also offers **tax credits** for brownfield sites. Sites assessed under NVDA's past EPA Grants have received a combined total of nearly \$1.5M of BRF money to fund remediation activities.
- **VT Dept. of Environmental Conservation (VTDEC)** is responsible for administering the state Brownfield Program. VTDEC offers advice on leveraging funds with state programs, such as the Petroleum Cleanup Fund (PCF), which was used to pay for supplemental assessment and cleanup several sites assessed under the past EPA Grants. VTDEC's Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) Program will also be leveraged to provide safeguards to innocent landowners and prospective purchasers of brownfields. Six sites assessed under the FY21 EPA Grant and eight sites assessed under the FY18 EPA Grant were enrolled in BRELLA.
- **VT Community Development Block Grant (CDBG) Fund** provides federal funding for eligible activities through Implementation Grants, Planning Grants, and Scattered Site Grants that assist in brownfield redevelopment.
- NVDA and its Coalition members have ongoing partnerships with the **St. Johnsbury Development Fund** and the **NEK Development Corporation (NEKDC)**. These partnerships provide opportunities to leverage additional funding from private and public sources, including Revolving Loan Funds (RLFs) and redevelopment capital. NVDA partnered with these organizations to advance reuse activities at multiple sites assessed under the past EPA Grants.
- **Tax credits designed to assist with rehabilitation and capital improvements** are available for older and historic buildings located within designated downtowns, village centers and Neighborhood Development Areas (such as the **St. Johnsbury Neighborhood Development District TA**). The **10% State Historic Rehabilitation Tax Credit** applies to the costs for substantially rehabilitating a certified historic building and combines with the **20% Federal Rehabilitation Investment Tax Credit**.
- Developers can take advantage of **incentives** (i.e. tax breaks for capital gains) for projects in the **five OZs**.
- **VT Designated Downtown Tax Credits** provides financial incentives for business development in the designated downtown areas of Newport, St. Johnsbury and Lyndon through public and private investments. These incentives include tax credits, permitting benefits, funds for capital transportation and related capital improvement projects, and priority site consideration by the State Building and General Services when leasing or constructing buildings.
- **Local Tax Stabilization Programs:** The Town of St. Johnsbury and the City of Newport have each adopted a municipal tax stabilization program that can assist new and expanding businesses that are creating new jobs.

1.c.ii. Use of Existing Infrastructure: The proposed projects support infill development activities that minimize urban sprawl and promote adaptive reuse of vacant/underutilized structures. These projects will utilize existing streets, sewer and water infrastructure. All the TAs are among the earliest developed in the NEK and are fully served by paved roads, utilities, culverts and stormwater management features. Nearly all the priority sites identified have existing structures the Coalition wants to preserve and renovate/rehabilitate for reuse. These sites often require the least investment in infrastructure and provide the greatest opportunity to preserve unique architectural character and history. This development strategy also minimizes impacts on our greenspaces. Furthermore, RuralEdge prioritizes adaptive reuse of existing structures for their housing projects. This includes energy retrofits and historic rehab strategies for sites ranging in size from 2 to 40 units. The FY23 EPA Grant will be used for RBM Surveys and abatement

plans in support of sustainable reuse of historic structures (such as the **Depot Street** properties in Lyndon, **560 Railroad St** in St. Johnsbury, and **Four Founders Circle** and **Newport Center** in Newport).

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding: The NEK is comprised of **micro-communities** which have populations <10K each, including the largest cities/towns of Newport (pop. 4,244), Lyndon (pop. 5,491), and St. Johnsbury (pop. 7,162). As communities with small populations, financial resources are limited, and the Coalition is unable to draw on other initial sources of funding without an EPA Grant. As described in Section 1.a.ii., the NEK is one of five REAP Zones in the country, identified because of its rural isolation and lack of local capital. With a small population base, tax revenues used to fund local government and ESA projects are very limited. This is further exacerbated by an aging population, declining incomes, and lower than average workforce participation compared to the State and US. Demographic data provided below demonstrate lower than average tax revenues due to high poverty, below average median household income, and above average unemployment. Together these factors indicate much lower than average discretionary income, which results in less spending, decreasing local business revenues and taxes.

Data Type ^a	Brownfield Target Areas				Northeast Kingdom			Vermont State	United States
	Newport	Lyndon	St. J (CT 9574)	St. J (CT 9575)	Caledonia County	Essex County	Orleans County		
Population	4,244	5,491	3,548	3,614	30,027	6,179	26,843	624,340	326.6M
Senior Population (age 65+ years)	8.8%	14.1%	20.0%	24.7%	20.9%	26.2%	22.8%	19.4%	16.0%
1-yr Unemployment Rate ^b	7.8%	4.4%	4.6%	4.6%	4.4%	5.1%	6.7%	3.5%	4.0%
Median Household Income	\$49,028	\$37,978	\$37,995	\$42,338	\$52,481	\$47,035	\$54,390	\$63,477	\$64,994
Poverty Rate	14.9%	26.5%	15.7%	16.7%	12.1%	14.1%	12.3%	10.8%	12.8%
Senior Poverty Rate (age 65+ years)	19.0%	27.3%	5.4%	0.5%	6.0%	9.1%	12.9%	7.7%	9.3%
Person with Disabilities	29.4%	15.0%	20.4%	17.0%	16.9%	20.3%	16.7%	14.2%	12.7%
Cost Burdened Homes (rent ≥30% income)	56.2%	50.1%	66.1%	44.8%	49.1%	50.8%	51.3%	49.5%	49.1%

Bold indicates distress factors above or below (depending on factor) US averages. **Shaded** indicates distress factors above or below State averages.

The income and tax revenue characteristics described above demonstrate the inability of the Coalition members to allocate funding to brownfields in a meaningful way without EPA Grant funding. Over the last few years, tax revenues have increased very little and regional priorities continue to be funding essential public safety functions such as fire and police. The community's need for funding was further demonstrated by the significant demand for NVDA's past EPA Grants which greatly exceeded the funds available. Several sites nominated for FY21 EPA Grant funding could not be assessed and Supplemental Phase II ESAs and CAPs are needed for seven of the sites where initial Phase II ESAs were completed. NVDA has assisted property owners with applying for EPA Targeted Brownfield Assessments (TBAs) for four sites they could not fund assessments for but only one application was approved due to a lack of available TBA funds in Region 1. FY23 Grant funding is vital to helping the Coalition continue revitalization of the TAs.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: As demonstrated in the table in 2.a.i, the NEK is among the most impoverished areas of Vermont. Levels of distress are further compounded within the TAs of Newport, Lyndon, and St. Johnsbury, resulting in significant welfare impacts to sensitive population groups which include low-income residents of all age groups but most notably seniors.

Aging Population: Vermont has one of the oldest populations in the US, and the TAs have some of the highest concentrations of seniors in the State and EPA Region 1. According to the latest Census, 23% of the NEK's population is over 65 years old. By 2030, however, this age group is estimated to account for nearly 40% of the population in the NEK. Residents in the 55+ age bracket are increasing, while those in the 35-54 age bracket are decreasing, reflecting an erosion of the highest earning age bracket and growing population of those in retirement. The aging population requires more medical attention and is more susceptible to exposure to contaminants.

Poverty: Building off previous statements, as business and industries have closed, those who stay and are under 65 see their good paying job prospects decline because of the rural nature of the TAs and surrounding area. It's not feasible to just commute for another job or for everyday goods and services. The poverty rate in the TAs ranges from 15%-26% and the TAs have a median household income over \$20,000 below the state average.

Housing: Addressing the aging housing stock to provide affordable quality housing for the high number of cost burdened homeowners and renters (housing costs > 30% of income) illustrated in the table above will be a major focus of the project. Low incomes and increasing age of the NEK population inhibit the ability of local citizens to maintain or upgrade a property, thus lowering market values and perpetuating blight. The average year of construction of homes in the NEK is 1971^c (predating the 1978 US ban on the sale of LBP) and many homes in downtown areas were built prior to 1940. These homes are often not equipped to meet the needs of the aging

^a Unless noted otherwise, all data reflects 2015-2019 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).

^b Represents "Not Seasonally Adjusted" Unemployment Rate from the Bureau of Labor Statistics (obtained from www.bls.gov).

^c U.S. Census Bureau, 2015-2019 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).

population, the high rate of people with disabilities (1 in 5 for the TAs), and the workforce the region seeks to attract. Newer construction often occurs outside of towns and villages leaving behind unkempt and decaying downtown areas. This blight acts as a barrier to investment in the community, often steering employers to locate elsewhere.

EPA Grant funding will be used to support affordable multifamily, workforce and senior housing projects in all the TAs. **Four Founders Circle** and **Newport Center** include 134 units of quality, affordable housing. Further, the project site places it near the North Country Hospital and other medical facilities, providing easy access to medical services for the elderly population in Newport. Likewise, **True Temper** and **Portland Street** will provide dozens of affordable multifamily and senior housing units in the **Neighborhood Development District**, thereby improving medical access for the elderly and providing quality workforce housing for the area’s largest employer. Grant funds will be used for RBM Surveys and Abatement Plans that will allow for safe reuse of these structures. Through use of the EPA Grant for assessment and cleanup planning at the priority sites, we hope to start a new chapter with affordable housing in the TAs, new industry, and quality government services to meet the needs of our community.

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

Health data for the NEK is only available at the county-level so information for Caledonia, Essex and Orleans counties is presented in this section. Of the 14 counties in Vermont, Essex, Orleans and Caledonia are currently ranked the least healthy in the state at 14th, 13th and 11th (respectively), indicating a higher-than-normal incidence of disease in the NEK compared to the rest of the state.^f The National Cancer Institute reports Essex and Orleans counties are in the top 5 counties in Vermont with the highest incidence rate for lung and bronchus cancer, reporting over 70 cases/100K. As shown in the table above, the NEK has significantly higher rates of lung and bronchus cancer than state and US averages, with incidence rates in Essex and Orleans counties nearly double the US average. The data also show cancer mortality rates in the NEK are well above VT and US averages and Essex County has the highest cancer mortality rate of all counties in VT.

Data Type	Northeast Kingdom			Vermont State	United States
	Caledonia County	Essex County	Orleans County		
Lung & Bronchus Incidence Rate per 100K ^d	55.3	70.5	72.7	39.9	37.5
Cancer Mortality Rate per 100K ^d	154.5	181.4	161.0	156.2	149.4
Asthma Rate for Adults age 18+ ^e	12%	15%	13%	11%	8%

***Bold** indicates rate exceeds US averages. **Shaded** indicates rate exceeds State averages.*

As stated above, the average age of housing in the NEK is 1971 and makes exposure to RBM highly likely. More acute health impacts, such as cancers, could be attributed to largely unregulated use and/or disposal of VOCs, metals, and PCBs (COCs at **Kennametal** and **Gilman Paper Mill**). These are the sites where our older population spent their working lives and had exposure to hazardous substances and petroleum. Regular exposure to brownfield contaminants such as RBMs (ACM, PCBs and LBP), VOCs, metals and/or petroleum can increase lung cancer rates, liver disorders, neurological system impacts, immune system impacts, and skin disease. Sensitive populations are disproportionately impacted, such as elderly individuals, the large disabled population, and the large low-income population in the TAs since they find themselves in closest proximity to these sites without the financial means to find safe housing or working conditions. Redevelopment of the priority sites will substantially aid in mitigating the cumulative exposure of TA residents to contamination associated with brownfields and other sources of contamination contributing to these high rates of disease.

Further, asthma prevalence in Vermont has been higher than the nationwide rate since 2007 and Vermont recently ranked among states with the highest rates of asthma in the US.^f The counties in the NEK have the highest rate of asthma prevalence in the State when compared to other counties, and **St. Johnsbury** has the highest asthma rate of any municipality in the state. As demonstrated in the table, all three counties have a much higher rate of asthma compared to the US average. Abatement of RBMs in aging structures will reduce potential for asthma resulting from ingestion/inhalation of fine particulates.

(3) Promoting Environmental Justice:

As discussed in 1.a, the TAs were once small manufacturing hubs centered around industry, natural resource extraction, and processing. Now that many of those are gone, along with a significant portion of the population, the elderly population living in poverty are clustered in the TAs. For these individuals, there is little to no ability

Environmental Justice Indicators (EJI) ^g	Percentile in Vermont					
	Target Areas			Northeast Kingdom		
	Newport	St. Johnsbury	Lyndon	Caledonia County	Essex County	Orleans County
Lead Paint Indicator	83	90	70	69	70	62
Haz. Waste Proximity	61	80	69	61	26	62
Superfund Proximity	18	90	91	79	58	33
Low Income Population	74	88	69	68	72	71
Unemployment Rate	67	66	57	56	75	67
Elderly Population	60	68	35	56	77	63

***Bold** indicates distress factors ≥ 50th %tile. **Shaded** indicates distress factors ≥ 70th %tile.*

^d National Cancer Institute. State Cancer Profiles. *Incidence Rate Report for Vermont by County: All Cancer Sites (2015-2019), Age-Adjusted Incidence Rate.*
^e Asthma Data Pages, Vermont Department of Health, Division of Health Surveillance; Published April 2019.
^f Robert Wood Johnson Foundation. County Health Rankings & Roadmaps. *2022 County Health Rankings, Vermont.*
^g Generated using EPA Environmental Justice Screening (EJSCREEN) Tool.

to clean up a site or move to new housing. These sensitive populations are essentially trapped by their economic circumstances, living next door to blighted areas and contaminated sites. EPA’s Environmental Justice tool “EJSCREEN” demonstrates that elderly and low-income people in the TAs are disproportionately impacted by exposure to hazardous substances. The table above compares EJ indices and demographics that encompass Vermont. As demonstrated in the table, sensitive populations within the TAs fall above the 60th percentile for disproportionate burden and exposure to many hazardous substance sources of pollution when compared to other communities in Vermont. These data along with census and health data provided in the previous sections demonstrate that economically impoverished populations and older individuals are disproportionately impacted by brownfields in our community. For small rural towns in the TAs to tackle these issues, it’s crucial we have access to EPA funds for assessment and cleanup activities. Specifically, the grant will be used to identify legacy soil/groundwater contamination associated with brownfields in the TAs, and to identify remedial measures necessary to address those threats at priority sites. This will help to reduce health threats to residents from exposure to contaminants. Grant funds will also be used to complete RBM Surveys to remove LBP, ACMs and PCBs from historic structures in support of adaptive reuse projects.

2.b. Community Engagement

2.b.i. Project Involvement / 2.b.ii. Project Roles: NVDA continues to identify community partners to help guide grant implementation and bring new voices to the table. Each of these partners will be engaged for input on the site selection, cleanup and/or reuse planning process. Many of the partners for NVDA’s past EPA Grants have confirmed their continued involvement on the Brownfield Advisory Committee (BAC) for the FY23 Grant. Below is a summary of project partners and their roles. Additional partners will be recruited throughout the project.

Organization	Contact Name & Info	Organization Purpose & Project Role
RuralEdge	Rebecca Masure, Real Estate Development Director 802-535-3555, beckym@ruraledege.org	Purpose: Affordable housing developer. Role: Coalition member.
Northern Forest Center	Evan Oleson, NEK Program Manager 914.420.3608, eoleson@northernforest.org	Purpose: Natural resource preservation & recreational tourism. Role: Coalition member.
Northeastern Vermont Regional Hospital	Shawn Tester, CEO 802.748.7400, s.test@nvrh.org	Purpose: Regional hospital. Role: Coalition member.
Town of St. Johnsbury	Joe Kasprzak, Assistant Town Manager 802.748.3926, jkasprzak@stjvt.com	Purpose: Local government. Role: Advise on site prioritization and site reuse options and support economic development.
City of Newport	Laura Dolgin, City Manager 802.334.5136, laura.dolgin@newportvermont.org	
Town of Lyndon	Nicole Gratton, Community Development Director, 802.626.1269, planning@lyndonvt.org	
VT DEC	Sarah Bartlett, Brownfields Program Manager 802.249.5641, sarah.bartlett@vermont.gov	Purpose: Protect human health and the environment. Role: Provide technical & funding support.
VT Agency of Commerce & Community Development (ACCD)	Kristie Farnham, Director of Economic Development, 802.398.5268, kristie.farnham@vermont.gov	Purpose: Enhance VT business climate via development of tourism and strengthening Vermont communities. Role: Connect projects to funding for cleanup/redevelopment.
Vermont Dept. of Health	Amy Danielson, Asbestos & Lead Program Manager 802.865.7784, amy.danielson@vermont.gov	Purpose: Protect health & facilitate disease prevention. Role: Support community outreach; advise on health issues. Advise on work plans and abatement plans related to RBMs.
Vermont Dept. of Historic Preservation	Laura Trieschmann, State Historic Preservation Officer 802.828.3222, laura.trieschmann@vermont.gov	Purpose: Preservation of historic resources. Role: Input on historic preservation for adaptive reuse projects.
NEK Development Corporation	Richard Isabelle, 802.334.8100, richard_isabelle@farm-family.com	Purpose: Regional economic development corporation. Role: Attract and retain business, address regional economic challenges.
NEK Collaborative	Jennifer Carlo, Executive Director, 802. 586.0387, jennifer@nekcollaborative.org	Purpose: Improve quality of life via coordinated economic and community development. Role: Address economic challenges. Inform site reuse.
NEK Community Action	Jenna O’Farrell, Executive Director 802.748.6040, jofarrell@nekcavt.org	Purpose: Provide social services that address poverty through education, community collaborations and community action. Role: Outreach to sensitive populations. Inform site reuse.
Northern Community Investment Corporation	Mike Welch, Senior Project Manager 802.748.5101, mwelch@ncic.org	Purpose: Regional economic development corporation. Role: Address regional economic challenges and connect projects to funding sources for cleanup/revitalization.
St. Johnsbury Development Fund	Daniel Kimbell, President, 802.751.4334, dkimbell@passumpsicfnadvisors.com	Purpose: Regional economic development corporation. Role: Enhance local business climate & promote a healthy economy.
Newport Downtown Development Corp.	Rick Ufford-Chase, Director, 845.608.4056, newportdowntowndevelopment@gmail.com	
Evernorth Rural Ventures	Kathy Beyer, Senior VP for Real Estate Development 802.861.3813, kbeyer@evernorthus.org	Purpose: Affordable housing & equity investing/lending. Role: Inform site prioritization and planning efforts to provide diverse, quality and affordable housing in all TAs.
AARP	Kelly Stoddard-Poor, Director of Outreach 802.951.1313, kstoddardpoor@aarp.org	Purpose: Enhance quality of life for elder population. Role: Inform opportunities for brownfield redevelopment projects that will improve livability for senior residents.
Passumpsic Savings Bank	Roena Whitehill, Executive VP/Head of Lending 802.751.4323, rwhitehill@passumpsicbank.com	Purpose: Local financial institution. Role: Connect developers with private lending options.

2.b.iii. Incorporating Community Input: NVDA works with the small towns and villages in the NEK, CBOs, and other stakeholders to form strong partnerships for all our grant projects. Community involvement in planning and implementation ensures the community has a voice in the decisions affecting them and that residents will benefit from the revitalization of brownfields in their neighborhoods. To achieve this, NVDA engages with the community in multiple ways that best fit the needs of each group to feel they are informed, have an opportunity to voice concerns and raise questions, are kept up to date on project activities, and have a say in reuse plans. For the FY21 and FY18 EPA Grants, NVDA held monthly meetings with the Coalition members to share project information, discuss site prioritization and selection strategies, share regional challenges and successes, and discuss revitalization and economic development opportunities. NVDA also holds monthly BAC meetings to update public and private partners on the status of the project, discuss site nominations and solicit input on prioritization/selection, and discuss strategies for addressing funding gaps to move cleanup and redevelopment forward. Due to the broad geographic footprint of the NEK, NVDA has made a practice of hosting monthly BAC meetings via conference calls to ensure engagement from a broad group of stakeholders throughout the tri-county area. This approach will be continued for the FY23 EPA Grant project and in-person meetings will follow local COVID-19 and social distancing guidelines.

NVDA will continue to advertise all engagement opportunities through public notices, email blasts, city council/select board meetings, and public service announcements. This approach will allow stakeholders to provide informed feedback that influences the next phase of work. Additional elements of our engagement plan include:

- **Webpage & Fact Sheets:** NVDA will continue to update its brownfields webpage with fact sheets and informative details about the site nomination, assessment and cleanup process. Fact sheets will be updated to summarize accomplishments of the past EPA Grants and goals for the FY23 Grant.
- **Meetings with Property Owners & Developers:** NVDA and other project partners regularly conduct meetings with property/business owners and developers and will leverage these relationships to solicit interest and participation from potential end users and investors. For the past EPA Grants, meetings with property owners/developers, NVDA, and VTDEC are held before and after assessment activities occur to discuss the process, objectives, reuse plans, findings, next steps, and additional funding sources to support cleanup/reuse activities. Since COVID-19, meetings now occur via video conferencing or conference calls to maintain social distancing while also keeping open lines of communication.
- **Email & Newsletters:** NVDA will include project updates in its newsletter to its stakeholder distribution list. Project partners will also communicate progress via regular meetings and organizational newsletters.
- **Regional Roundtable Events:** Project Director, David Snedeker, is a member of multiple regional roundtable groups with developers, real estate strategists, CBOs, and other community stakeholders. Information regarding the EPA Grant is shared at these monthly/quarterly events.

3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS

3.a. Description of Tasks/Activities & Outputs: The scope of work has been organized into the tasks below.

Task 1 – Project Management, Reporting & Other Eligible Activities
i. Project Implementation: NVDA will oversee consultant activities and manage all aspects of the project in accordance with the terms and conditions established in the Cooperative Agreement (CA) with EPA. At NVDA’s direction, the consultant will assist with compliance reporting (quarterly and final reports, ACRES updates, annual Disadvantaged Business Enterprise [DBE] and Financial Reports, etc.) and other eligible project activities identified in the CA Work Plan. NVDA will facilitate monthly check-in meetings with the consultant and Coalition to ensure the project is progressing as planned. We anticipate up to four personnel from NVDA and the Coalition members will attend two regional and one national brownfields conference.
ii. Identifying Additional Sites: Not applicable to this task.
iii. Anticipated Project Schedule: Activities will be ongoing throughout the 4-year project period.
iv. Task/Activity Lead(s): NVDA with support from the consultant.
v. Output(s): 16 Quarterly Reports; 1 Final Performance Report; 4 DBE Utilization Reports; 4 Federal Financial Reports; prompt ACRES updates; 3 brownfield conferences attended by 4 coalition staff; and monthly meetings.
Task 2 – Community Engagement & Site Inventory/Prioritization
i. Project Implementation: The community engagement program (described in 2.b.iii) includes expanding the existing BAC comprised of Coalition members, local government representatives, CBOs, and business owners. NVDA’s existing project webpage, fact sheets and site nomination form will be updated. As implemented during the past EPA Grants, the BAC will review and prioritize sites nominated for grant funding. A comprehensive inventory of sites will be developed for the Depot Street Corridor (Lyndon). Inventory data, combined with a focused AWP (see Task 4 below), will be leveraged to identify catalyst projects that are most likely to spur reinvestment in this area. The inventory will be linked to NVDA’s geographic information system (GIS) to maximize its long-term value as a planning resource.
ii. Identifying Additional Sites: The Coalition will prioritize grant funds for sites with the greatest near-term community benefit in the TAs. Sites that have a potential purchaser or developer with redevelopment plans that

align with community goals will be prioritized for funding. The Coalition will also accept site nominations from property owners and prospective purchasers. Site nominations will be reviewed and prioritized using criteria that will be agreed upon and ranked by the BAC. Additionally, the consultant will develop a brownfield inventory for the **Depot Street Corridor**. Ranking criteria will be incorporated in the inventory to identify additional catalyst sites.

iii. Anticipated Project Schedule: The project webpage and fact sheets will be updated during the first quarter (1Q). The BAC (which includes the Coalition members) will be convened monthly with the first meeting during 1Q. The inventory for Depot Street will be completed by 3Q.

iv. Task/Activity Lead(s): NVDA will lead outreach to residents of the TAs with support from the Coalition members and project partners (as in-kind services). The consultant will assist with facilitating stakeholder, BAC, and public meetings. The Coalition and BAC will lead site prioritization efforts. The consultant will develop/maintain the inventory for Lyndon as well as a focused inventory list of all sites nominated and approved for grant funding.

v. Output(s): Updated project webpage, fact sheets and site nomination form; ~45 BAC meetings; ~20 other stakeholder meetings; Brownfield inventory for Depot Street; Inventory of all sites nominated/approved.

Task 3 – Phase I/II ESAs, RBM Surveys & Site-Specific Cleanup Plans

i. Project Implementation: NVDA estimates 22-25 sites will be assessed (the final total will depend on the number of sites for which more than one type of activity is performed). NVDA will prepare Eligibility Determination (ED) requests (with support from the consultant as needed) for sites prioritized by the BAC. The consultant will conduct Phase I ESAs for ~18 sites in accordance with the AAI Final Rule and the ASTM E1527-21 and E1527-13 Phase I ESA Process. The consultant will complete Phase II ESAs for ~14 sites and RBM Surveys for ~7 sites. Prior to initiating sampling or other field investigation activities, the consultant will update the existing Master Quality Assurance Project Plan (QAPP) for EPA and VTDEC approval. The consultant will also prepare Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each site selected for a Phase II ESA and/or RBM Survey. The SAPs will be submitted to EPA for approval prior to fieldwork. The consultant will prepare ABCA/CAP Reports for ~10 sites where contamination is confirmed.

ii. Identifying Additional Sites: The process for identifying additional sites is described under Task 2. NVDA will accept site nominations throughout the 4-year project term. Each site nomination will be reviewed and approved by the BAC prior to ED requests being prepared and submitted to EPA.

iii. Anticipated Project Schedule: Year 1: Master QAPP, 6 Phase I ESAs, 5 Phase II ESAs, 3 RBM Surveys; 3 Cleanup Plans | Year 2: 6 Phase I ESAs, 6 Phase II ESAs, 3 RBM Surveys, 3 Cleanup Plans | Year 3: 6 Phase I ESAs, 3 Phase II ESAs, 1 RBM Surveys; 2 Cleanup Plans | Year 4: 2 Cleanup Plans

iv. Task/Activity Lead(s): The consultant will lead technical activities at the direction of NVDA. Site Access will be secured by NVDA. The Access Agreement used for the FY21 Grant will be updated by the NVDA for this project. NVDA will prepare ED requests with support from the consultant as needed.

v. Output(s): 22-25 ED requests; 1 Master QAPP; 18 Phase I ESAs; 14 Phase II ESAs; 7 RBM Surveys; 10 Cleanup Plans

Task 4 – Reuse Planning & AWP

i. Project Implementation: The consultant will develop site reuse plans/redevelopment feasibility studies for ~4 catalyst sites and one AWP for the **Depot Street Corridor** (Lyndon) in support of advancing redevelopment goals and adaptive reuse of catalyst sites. The feasibility studies will assist the Coalition with identifying the highest and best reuse for sites with unique redevelopment challenges.

ii. Identifying Additional Sites: The process for identifying additional sites is described under Task 2. This approach will be used for selecting additional catalyst sites in need of reuse plans.

ii. Anticipated Project Schedule: Year 1: 1 Reuse Plan | Year 2: 2 Reuse Plans, 1 AWP | Year 3: 1 Reuse Plan

iii. Task/Activity Lead(s): The consultant will lead all technical activities at the direction of NVDA.

iv. Output(s): 4 Site Reuse Plans; 1 AWP deliverable

3.b. Cost Estimates: The table below provides a breakdown of estimated costs by task. An average rate of \$175/hour was used for contractual services and \$60/hour was used for NVDA personnel/fringe (\$45/hour for personnel + \$15/hour for fringe) to administer the grant. The Coalition members will contribute their own resources as in-kind services to support the activities described herein. As demonstrated under Task 3, **65% of grant funds (\$652,452 of contractual services) are allocated for Phase I/II ESAs and RBM Surveys.**

Task 1 – Project Management, Reporting & Other Eligible Activities (Total = \$63,900)

Personnel & Fringe Total: \$18,000

- Personnel: \$13,500 (150 hours x \$45/hr x 2 staff)
- Fringe Benefits: \$4,500 (150 hours x \$15/hr x 2 staff)

Travel Total: \$12,600

- National Brownfields Conference: \$4,860 (\$1,620/person x 3 Coalition personnel)
- 2 Regional/State Brownfields Conference: \$7,740 (\$1,290/person x 3 Coalition personnel x 2 events)

Contractual Total: \$31,500	
<ul style="list-style-type: none"> • Monthly check-in meetings: \$10,500 (60 hours x \$175/hr) • Compliance Reporting: \$21,000 (120 hours x \$175/hr) 	
Other Total: \$1,800	
<ul style="list-style-type: none"> • Conference Registration Fees: \$1,800 (\$200/person x 3 conferences x 3 Coalition Member Staff) 	
Task 2 – Community Engagement & Site Inventory/Prioritization (Total = \$46,500)	
Personnel & Fringe Total: \$15,000	
<ul style="list-style-type: none"> • Personnel: \$11,250 (125 hours x \$45/hr x 2 staff) • Fringe Benefits: \$3,750 (125 hours x \$15/hr x 2 staff) 	
Contractual Total: \$31,500	
<ul style="list-style-type: none"> • BAC & Stakeholder Meetings: \$17,500 (50 hours x \$175/hr x 2 staff) • Update Project Fact Sheets, Site Nomination Form & Webpage Content: \$3,500 (20 hours x \$175/hr) • Brownfield Site inventory for Depot Street Corridor: \$10,500 (60 hours x \$175/hr) 	
Task 3 – Phase I/II ESAs & Site Cleanup Plans (Total = \$766,600)	
Personnel & Fringe Total: \$7,500	
<ul style="list-style-type: none"> • Personnel: \$5,625 (125 hours x \$45/hr) • Fringe Benefits: \$1,875 (125 hours x \$15/hr) 	
Contractual Total: \$756,100	
<ul style="list-style-type: none"> • Site Eligibility Requests: \$3,500 (20 hours x \$175/hr) • Update Master QAPP: \$4,100 (1 QAPP x \$4,100/QAPP) • Phase I ESAs: \$99,000 (18 sites x \$5,500/site) • Phase II ESAs: \$490,000 (14 sites x \$35,000/site)^(a) • RBM Surveys: \$59,500 (7 sites x \$8,500/site)^(a) • Cleanup Plans: \$100,000 (10 sites x \$10,000/site) 	
Other Total: \$3,000	
<ul style="list-style-type: none"> • VTDEC BRELLA Enrollment: \$3,000 (6 sites x \$500/site) 	
^(a) Cost includes developing site-specific HASPs and SAPs to supplement the Master QAPP.	
Task 4 – Site Reuse Planning & AWP (Total = \$123,000)	
Personnel & Fringe Total: \$9,000	Contractual Total: \$114,000
<ul style="list-style-type: none"> • Personnel: \$6,750 (150 hours x \$45/hr) • Fringe Benefits: \$2,250 (150 hours x \$15/hr) 	<ul style="list-style-type: none"> • Reuse Plans: \$54,000 (4 sites x \$13,500/site) • AWP: \$60,000 (1 area x \$60,000/area)

A summary of the proposed budget for grant funded activities is provided in the table below. Since grant funds are not requested for equipment or supplies, these budget categories are not included in the table.

Budget Categories	Task 1: Project Mgmt., Reporting & Other Eligible Activities	Task 2: Community Engagement & Site Inventory/Prioritization	Task 3: Phase I/II ESAs & Cleanup Plans	Task 4: Reuse Planning & AWP	Total
Personnel	\$13,500	\$11,250	\$5,625	\$6,750	\$37,125
Fringe Benefits	\$4,500	\$3,750	\$1,875	\$2,250	\$12,375
Travel ^(a)	\$12,600	\$0	\$0	\$0	\$12,600
Contractual	\$31,500	\$31,500	\$756,100	\$114,000	\$933,100
Other	\$1,800 ^(b)	\$0	\$3,000 ^(c)	\$0	\$4,800
Total for Direct Costs	\$63,900	\$46,500	\$766,600	\$123,000	\$1,000,000
Total for Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$63,900	\$46,500	\$766,600	\$123,000	\$1,000,000

^(a) Up to three personnel from NVDA and its coalition members will attend two regional and one national brownfield conferences.

^(b) Costs are for conference registration fees. ^(c) Costs are for enrollment fees for VTDEC's BRELLA Program.

3.c. Measuring Environmental Results: The status and estimated completion dates for outputs will be tracked and reported to EPA via Quarterly Performance Reports and ACRES updates. Between meetings and reports, the following **outputs** will be tracked on a spreadsheet maintained by NVDA and its consultant: (1) # of sites nominated; (2) # of sites prioritized for funding; (3) # of Phase I ESAs; (4) # of Phase II ESAs; (5) # of RBM Surveys; (6) # of ABCAs/CAPs; (7) # of site reuse plans; and (8) # of community meetings. The anticipated **short- and long-term outcomes** identified in Section 1.b.ii (# of jobs, # affordable residential units, # of senior housing units, acres of greenspace created, etc.) will also be tracked and reported to EPA. Additionally, NVDA will continue to update ACRES property profiles beyond the life of the Grant to fully capture long-term outcomes. NVDA will track and evaluate the following outcomes: (1) # of sites cleaned up and # of Certificate of Completion (COC) determinations received from VTDEC; (2) # of sites for which off-site risks are identified; (3) # of sites for which property title transfers are facilitated; (4) # of adaptive reuse projects; (5) # of sites and acres redeveloped; (6) # of acres of parks/greenspace created; (7) private investment and other funding leveraged; (8) # of housing units creating; and (9) # of jobs created. By using the detailed tracking mechanisms described above for the past EPA Grants, NVDA was able to confirm the project was progressing as planned and monitor key performance indicators. We will use the same approach for this project to track progress and ensure the project progresses on schedule and addresses EPA objectives and community goals.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Capacity: NVDA employs 12 staff, including planning, business development, GIS, accounting, and administrative support (descriptions of key staff are provided in 4.a.iii). As demonstrated on the past EPA Grants, NVDA has the capacity to successfully carry out and manage the programmatic, administrative, and financial requirements on behalf of the Coalition. For previous grant projects, NVDA was responsible for overseeing the consultant team, reporting to EPA, financial management, stakeholder engagement, maintaining the list of brownfield site nominations, coordination with the Coalition members for site prioritization, preparation of eligibility requests, and coordinating site access. NVDA will continue to lead these activities for the FY23 Grant.

4.a.ii. Organizational Structure: As the Coalition lead, NVDA will administer the grant and be accountable to EPA for management of the CA and compliance with grant terms and conditions. NVDA will oversee the consultant who will implement technical activities. As established for the past EPA Grants, NVDA will continue using a two-person management team that will oversee all aspects of the project to ensure timely completion of key milestones.

Governance Structure: Immediately following notice of grant award, NVDA will update the existing Memorandum of Agreement (MOA) established for the FY21 Grant to include the new Coalition members. The MOA documents the roles and responsibilities of each Coalition member and specifies that grant funds will be used to conduct assessments at a minimum of two priority sites within the jurisdiction of each member. NVDA will use the same collective governance structure that was established for the past EPA Grant projects. This includes facilitating monthly check-in calls with all Coalition members to ensure each CBO is meaningfully involved in all aspects of the project and to ensure clear internal objectives are established in support of timely and successful expenditure of grant funds. The BAC (see Section 2.b), which also convenes monthly, will also include a representative from each Coalition member as well as other project partners that will continue to guide the site prioritization process.

4.a.iii. Description of Key Staff: Key staff involved in the past EPA Grant projects will continue to serve in the same positions and provide the same level of involvement that has resulted in efficient and successful expenditure of grant funds. Below are brief descriptions of these key staff as well as representatives from each Coalition member.

- ***David Snedeker, Executive Director, NVDA:*** As Director since 2013, David serves on numerous advisory committees and boards throughout the NEK and the State. As NVDA's Planning Manager from 2007 to 2013, David managed activities in Land Use, Transportation, Natural Resource Planning, and Community Development. During his tenure, he has led efforts to secure the federal designation of the Foreign Trade Zone #286 for the NEK - a significant incentive to attract businesses to the region. David has also provided key leadership for the Vermont-Quebec Enterprise Initiative (VQEI), which facilitates the expansion of Quebec companies across the border to foster economic development in Vermont. As Project Director of NVDA's past EPA Grants, David oversaw all phases of the project, meeting established metrics, and completing projects at least one year ahead of schedule.
- ***Irene Nagle, Senior Planner, NVDA:*** Irene has worked in planning and historic preservation for over 20 years. She aids communities throughout NEK on municipal plans, land use regulations, economic development, and grant management. Irene is a member of the St. Johnsbury Economic Restructuring Committee and the Housing Committee. She is also an active board member of the Vermont Community Development Association. In the unlikely event that David becomes unavailable to fulfill his duties as Project Director, Irene will assure project continuity by assuming project and grant management responsibilities. In her role on NVDA's FY21 and FY18 Grants, Irene was responsible for managing project financials, assisting with compliance reporting, coordinating meetings with the Coalition members and the BAC, preparing ED requests, and overseeing administrative tasks.
- ***Rebecca Masure, Director of Real Estate Development, RuralEdge,*** has held multiple positions within RuralEdge since 2008, including Capital Projects Manager (preserving the existing housing portfolio), Finance Manager (managing accounts payable for the property management company and the 44 properties in their portfolio), and Project Manager for Development. She has participated in the completion of 18 real estate development projects including 375 apartment units totaling over \$58M. Her projects have included multi-family rehab, energy retrofits, new construction, and historic rehab redevelopments, with total development costs of \$300K to \$15M. Rebecca has successfully incorporated renewable energy such as solar and biomass systems in three projects, and innovative technologies such as air source heat pumps and hybrid water heater systems in two projects.
- ***Evan Oleson, NEK Program Manager, NFC,*** manages NFC's property investment and community support programs and contributes to other activities throughout the NEK. He is the project manager for NFC's redevelopment of 560 Railroad Street in St. Johnsbury and worked with the NVDA-led Brownfields Assessment Coalition to oversee ESA and RBM survey activities. Evan will be working with local advisors to identify additional sites for redevelopment and overseeing due diligence, including supplemental ESAs and clean-up planning.
- ***Shawn Tester, CEO, NVRH,*** leads the region's robust rural health care facility/system. He sits on the boards of the NEK Collaborative and the VT Association of Hospitals and Health Systems. He is a trustee of Passumpsic Bank and the VT State Colleges System. Shawn is currently forming public-private partnerships with developers, NVDA and the Town of St. Johnsbury to identify and prioritize sites for workforce and senior housing developments.

4.a.iv. Acquiring Additional Resources: As demonstrated on our past EPA Grant projects, NVDA has the resources necessary to effectively implement EPA Grant funding. We have additional planning, business development, and support staff to assist with the project as needed. NVDA also has proactive succession planning should unforeseen events take place. The Board of Directors will lead the recruiting process and provide interim staff resources to support efficient transitions. Succession plans will eliminate project delays and ensure staff who may be reassigned to the project have appropriate qualifications and experience.

Procurement Process: NVDA routinely contracts with consultants and has established equal opportunity procurement procedures for ensuring a fair bidding process. NVDA will leverage this experience for timely contractor procurement and anticipates beginning implementation immediately upon execution of the CA. The qualifications-based procurement process used by NVDA conforms with 2 CFR 200.317 - 200.326. The consultant will support project management and compliance reporting activities and complete all Phase I/II ESAs, RBM Surveys, ABCAs/CAPs, site-specific reuse plans/feasibility studies, and AWP. Additional information regarding our procurement process is included in our response to Threshold Criteria ([Attachment A](#)).

4.b. Past Performance & Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: NVDA previously received 4 EPA Brownfield Grants: (1.) FY2021 Brownfield Assessment Coalition Grant (\$600K); (2.) FY2018 Brownfield Assessment Coalition Grant (\$600K); (3.) FY2007 Community-Wide Assessment (CWA) Grant (\$200K Hazardous Substances); and (4.) FY2006 CWA Grant (\$200K Petroleum). The FY21 and FY18 Grants are described below.

4.b.i.(1) Accomplishments:

(1.) 2021 Assessment Coalition Grant (\$600K): Project accomplishments are summarized below and all outputs and outcomes are accurately reflected in ACRES. Additional ACRES updates will be made as necessary to account for future outcomes and success stories beyond the life of the grant.

- 16 sites (comprised of 20 parcels) nominated for grant funding.
- Completed assessments and/or cleanup plans for 18 sites (totaling 58.5 acres) throughout 9 towns/cities.
- Completed 7 Phase I ESAs, 3 RBM Surveys, 7 Phase II ESAs, 4 Supplemental Phase II ESAs, 2 ABCAs & 5 CAPs.
- Created 19 property profiles in ACRES.
- Enrolled 3 sites in DEC's BRELLA Program.
- Supported 6 adaptive reuse projects.
- Leveraged \$2.53M of public and private funds to date.
- 30 units of affordable housing planned in 2023 and 100 additional units anticipated by 2025.
- 20-30 units of senior housing anticipated in 2023.
- Updated project-specific webpage and fact sheets.
- Hosted 18 Brownfield Advisory Committee meetings.
- Attended 1 regional brownfields conference.
- Completed 4 Quarterly Performance Reports.
- Final Performance Report will be completed in Spring 2023.

(2.) 2018 Assessment Coalition Grant (\$600K): Project accomplishments are summarized below. Following project completion, additional ACRES updates were made to document new outcomes, success stories & leveraged funds.

- 24 sites nominated for grant funding.
- Completed assessments and/or cleanup plans for 18 sites (totaling 58.5 acres) throughout 9 towns/cities.
- Completed 11 Phase I ESAs, 4 RBM Surveys, 8 Phase II ESAs, 5 Supplemental Phase II ESAs, 2 ABCAs, & 1 CAP.
- Created 18 property profiles in ACRES.
- Enrolled 8 sites in DEC's BRELLA Program.
- DEC issued Certificates of Completion for 3 sites.
- Supported 11 adaptive reuse projects.
- Leveraged \$28.7M of public and private funds to date.
- Created 6 jobs to date & 58 more anticipated by 2023.
- 46 units of affordable housing anticipated by Spring 2023.
- Developed project-specific webpage and 5 fact sheets.
- Hosted 16 Brownfield Advisory Committee meetings.
- Attended 1 regional and 1 national brownfields conference.
- Completed 8 Quarterly Performance Reports.
- Final Performance Report submitted January 2021.
- Over 400 in-kind hours from NVDA & its Coalition members.

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

(1.) 2021 Assessment Coalition Grant (\$600K): NVDA has maintained compliance with the workplan, schedule (10/01/21-09/30/24), and EPA terms and conditions and achieved the expected results in just over one year (nearly two years ahead of schedule!). All progress reports and other deliverables were submitted on time and in compliance with EPA standards. Final assessment activities are currently being completed and the Final Performance and Financial Reports will be prepared in Spring 2023, at which time the CA will be formally closed. Property profiles in ACRES continue to be updated within 30 days of completing activities and are updated as needed to reflect current conditions. As of 10/01/22, \$462,688.62 (or 77%) of grant funds have been drawn down (see [Attachment E](#)).

(2.) 2018 Assessment Coalition Grant (\$600K): NVDA has maintained compliance with the workplan, schedule (10/01/18-09/30/21), and EPA terms and conditions and achieved the expected results in just over two years. All progress reports and other deliverables were submitted on time and in compliance with EPA standards. The Final Performance and Financial Reports were submitted in January 2021, at which time the CA was formally closed (8 months ahead of schedule). Property profiles in ACRES were updated within 30 days of completing assessment activities and continue to be updated as needed to reflect current conditions.

ATTACHMENT A

Threshold Criteria Responses

1. APPLICANT ELIGIBILITY:

(a) Applicant Type: Regional Organization

(b) Eligibility: The **Northeastern Vermont Development Association (NVDA)** is the regional planning commission and economic development corporation for the Northeast Kingdom (NEK) which is comprised of Caledonia, Essex, and Orleans Counties. Established in 1950, NVDA is comprised of a Board of Directors, at large members (including Legislators), and a professional staff. Each of the 55 towns and gores of Caledonia, Essex and Orleans Counties may appoint two representatives for the Board. Operating under the authority of The Vermont Planning and Development Act (24 V.S.A., Chapter 117), NVDA serves approximately 63,500 people and over 2,000 square miles of the NEK. As a representative of local government, NVDA is charged with making policy decisions at the regional level and then helping to implement those decisions within each community.

Eligibility documentation for NVDA is provided in Attachment B and includes:

1. Articles of Incorporation
2. Bylaws
3. Governmental Code (24 V.S.A. § 4341) confirming the authority of NVDA as the regional planning commission and economic development commission.

2. NUMBER OF NON-LEAD COALITION MEMBERS AND TARGET AREAS:

NVDA has formed a Coalition with three non-profit, community-based organizations (CBOs) that represent separate areas of the NEK: **Gilman Housing Trust, Inc. (dba RuralEdge)**, **Northern Forest Center (NFC)**, and **Northeastern Vermont Regional Hospital (NVRH)**. (A description of the mission of each organization is provided in Section 1.a.i of the narrative.) These organizations were identified as key partners for the EPA Brownfield Assessment Coalition Grant project because of their ongoing partnerships with NVDA and our collective goals of improving economic conditions, addressing housing shortages, and preserving greenspace through infill development. Each Coalition member represents a different area of the NEK where brownfield revitalization efforts will be focused. The target areas are described below.

- RuralEdge Target Area – City of Newport (CT 951400 & 951500)
- NFC Target Area – Downtown St. Johnsbury (CT 9574)
- NVRH Target Area – St. Johnsbury Neighborhood Development District (CT 9575)
- NVDA Target Area – Town of Lyndon (CT 957200 & 957300)
- NVDA Target Area – Small Towns & Rural Areas Throughout the NEK (CT 950500, 951800 & 950500)

3. ELIGIBILITY OF NON-LEAD COALITION MEMBERS:

RuralEdge, NFC and NVRH are non-profit, community-based organizations (CBOs) with tax-exempt status under section 501(c)(3) of the Internal Revenue Code. Documentation of their 501(c)(3) status from the Internal Revenue Service (IRS) is provided as Attachment C.

4. EXISTING BROWNFIELDS GRANTS TO NON-LEAD MEMBERS:

Neither RuralEdge, NFC nor NVRH have ever been awarded an EPA Brownfield Grant. Therefore, none of these organizations are a recipient of an open Cooperative Agreement (CA) for Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant funding, nor a recipient of a MARC Grant that closed in 2015 or later.

5. COALITION AGREEMENT:

Letters of commitment confirming the membership of RuralEdge, NFC and NVRH in the Coalition are provided as Attachment D. Following grant award, NVDA will update the Memorandum of Agreement (MOA) created for the Fiscal Year 2021 (FY21) EPA Brownfield Assessment Coalition Grant project in accordance with the terms and conditions issued by EPA for the FY23 Grant.

6. COMMUNITY INVOLVEMENT:

NVDA works with the small towns and villages in the NEK, CBOs, and other stakeholders to form strong partnerships for all our grant projects. Community involvement in planning and implementation ensures the community has a voice in the decisions affecting them and that residents will benefit from the revitalization of brownfields in their neighborhoods. To achieve this, NVDA engages with the community in multiple ways that best fit the needs of each group to feel they are informed, have an opportunity to voice concerns and raise questions, are kept up to date on project activities, and have a say in reuse plans. For the FY21 and FY18 EPA Grants, NVDA held monthly meetings with the Coalition members to share project information, discuss site prioritization and selection strategies, share regional challenges and successes, and discuss revitalization and economic development opportunities. NVDA also holds monthly BAC meetings to update public and private partners on the status of the project, discuss site nominations and solicit input on prioritization/selection, and discuss strategies for addressing funding gaps to move cleanup and redevelopment forward. Due to the broad geographic footprint of the NEK, NVDA has made a practice of hosting monthly BAC meetings via conference calls to ensure engagement from a broad group of stakeholders throughout the tri-county area. This approach will be continued for the FY23 EPA Grant project and in-person meetings will follow local COVID-19 and social distancing guidelines.

NVDA will continue to advertise all engagement opportunities through public notices, email blasts, city council/select board meetings, and public service announcements. This approach will allow stakeholders to provide informed feedback that influences the next phase of work. Additional elements of our engagement plan include:

- **Webpage & Fact Sheets:** NVDA will continue to update its brownfields webpage with fact sheets and informative details about the site nomination, assessment and cleanup process. Fact sheets will be updated to summarize accomplishments of the past EPA Grants and goals for the FY23 Grant.
- **Meetings with Property Owners & Developers:** NVDA and other project partners regularly conduct meetings with property/business owners and developers and will leverage these relationships to solicit interest and participation from potential end users and investors. For the past EPA Grants, meetings with property owners/developers, NVDA and VTDEC are held before and after assessment activities occur to discuss the process, objectives, reuse plans, findings, next steps, and additional funding sources to support cleanup/reuse activities. Since COVID-19, meetings now occur via video conferencing or conference calls to maintain social distancing while also keeping open lines of communication.
- **Email & Newsletters:** NVDA will include project updates in its newsletter to its stakeholder distribution list. Project partners will also communicate progress via regular meetings and organizational newsletters.
- **Regional Roundtable Events:** Project Director, David Snedeker, is a member of multiple regional roundtable groups with developers, real estate strategists, CBOs, and other community stakeholders. Information regarding the EPA Grant is shared at these monthly/quarterly events.

7. EXPENDITURE OF EXISTING GRANT FUNDS:

As detailed in Section 4.b.i of the narrative, **as of October 1, 2022, NVDA has drawn down \$462,688.62 (or 77%)** of our \$600,000 FY21 Grant. Documentation of our asap.gov Account Settlement Report is provided as Attachment E and shows a total remaining balance of \$137,311.38 (demonstrating a total drawdown of \$462,688.62). Remaining funds are being used to complete a Phase I Environmental Site Assessment (ESA) for two sites, Phase II ESAs for four sites, prepare Quarterly Progress Reports, complete ACRES updates, and prepare a Final Performance Report and Final Financial Report. Formal project closeout will occur in Spring 2023 (approximately 18 months ahead of schedule).

8. CONTRACTORS AND NAMED SUBRECIPIENTS:

(a) Contractors: Prior to submitting this grant application, NVDA completed a qualifications-based procurement process to select a consultant team to provide comprehensive services (grant writing and implementation assistance). The procurement process was completed in accordance the *Best Practice Guide for Procuring Services Under EPA Assistance Agreements*. The Request for Qualifications (RFQ) was published September 9, 2022 and advertised via the *Caledonian Record* and *Orleans County Record* (local newspapers) and NVDA's website (www.nvda.net). The RFQ was also emailed directly to eight qualified contractors listed on the Vermont Department of Environmental Conservation's website. Proposals were due to NVDA by October 7, 2022 (providing a response period of 30 days). Three firms responded to the RFQ and all three proposals received were reviewed and scored by NVDA's selection committee, which includes NVDA staff and members of the Board.

(b) Subrecipients: No subrecipients are named in this proposal.