



## **1. Applicant Identification**

ROI-24-A-001

Naugatuck Valley Council of Governments  
49 Leavenworth Street, 3rd Floor  
Waterbury, CT 06702

## **2. Funding Requested**

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$500,000

**3. Location** The target communities are within the cities of Waterbury, Ansonia, and Derby. The 25 municipalities eligible for assessment funding through the Regional Brownfields Partnership (an affiliation of municipalities and community organizations) include: Ansonia, Beacon Falls, Berlin, Bristol, Burlington, Cheshire, Derby, Middlebury, Naugatuck, Newtown, Plainville, Plymouth, Prospect, Redding, Seymour, Shelton, Southbury, Southington, Thomaston, Torrington, Waterbury, Watertown, Winchester, Wolcott, and Woodbury

**4. Property Information for Site-Specific Applications** The three target areas discussed in the narrative are 106-165 Olson Drive, Ansonia (09009125300); 36 Pleasant Street, Ansonia (09009125400); 2 Factory Street, Derby (0900120200); 1200 South Main Street, Waterbury (09009351900 with site across the street from 0900351400); and 40 Bristol Street, Waterbury (0900351900).

## **5. Contacts**

### **a. Project Director**

Ricardo Rodriguez, Brownfield Program Coordinator, Phone 203.757.0535; Fax 203-465-6067; [Rrodriguez@nvcogct.gov](mailto:Rrodriguez@nvcogct.gov); Naugatuck Valley Council of Governments, 49 Leavenworth St. 3<sup>rd</sup> Floor, Waterbury, CT 06702

### **b. Chief Executive/Highest Ranking Elected Official**

Rick Dunne, Executive Director, Phone 203.757.0535; Fax 203-465-6067; [Rdunne@nvcogct.gov](mailto:Rdunne@nvcogct.gov); Naugatuck Valley Council of Governments, 49 Leavenworth St. 3<sup>rd</sup> Floor, Waterbury, CT 06702

## **6. Population**

According to the 2020 Census:

- Waterbury Population: 114,403
- Ansonia Population: 18,918
- Derby Population: 12,325



**7. Other Factors Checklist**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority brownfield site(s) is impacted by mine-scarred land.	N/A
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).	Yes, for all priority sites. Please see Pages 1 and 2
The priority site(s) is in a federally designated flood plain.	YES, Please see page 1 and 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Yes, Page 3
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.	N/A
The target area(s) is located within a community in which coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

**8. Letter from the State or Tribal Environmental Authority:**

Please see attached letter from the State of Connecticut Department of Energy and Environmental Protection –**Attachment (FORMAT)**



November 2, 2023

Mr. Rick Dunne  
Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, 3<sup>rd</sup> Floor  
Waterbury, CT 06702

Re: State Acknowledgement Letter for EPA Brownfields Community-wide Assessment Grant for FY24

Dear Mr. Dunne:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Naugatuck Valley Council of Governments intends to apply to the US Environmental Protection Agency (EPA) for a Community-wide Brownfields Assessment Grant for Federal Fiscal Year 2024. DEEP understands that the Naugatuck Valley Council of Governments plans to use the grant funding to conduct assessments at various properties contaminated with hazardous substances and/or petroleum in the communities served by your organization.

If EPA awards grant funds, DEEP or EPA must determine the eligibility of each site before any site- specific assessment activity is undertaken using petroleum assessment grant funds.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available [here](#) on DEEP's website.

If you have any questions about this letter, please contact me at (860) 424-3256 or by e-mail at [meena.mortazavi@ct.gov](mailto:meena.mortazavi@ct.gov). Good luck with your application.

Sincerely,

Meena Mortazavi  
Environmental Analyst

c: Ms. Katy Deng, EPA (via e- mail)



## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **1 a. Target Area and Brownfields**

1 a.i. Overview of Brownfield Challenges and Description of Target Area: The Naugatuck Valley Council of Governments (NVCOG) provides brownfield services to 25 municipalities through the Regional Brownfields Partnership of West Central Connecticut (RBP). Members make up nearly one-third of the state's distressed municipalities as determined by the Connecticut Department of Economic and Community Development (DECD) in 2023. Over 685,000 people reside in west-central Connecticut which is populated by cities and small towns disproportionately burdened by brownfields scattered among hills, along rivers, and in valleys with steep topography that limits redevelopment. Many of the brownfields are located between rivers and neighborhoods, restricting the community's' access to riverfront green space.

The region is best known for its once thriving Brass manufacturing history that produced large quantities of buttons and bullets during the first two World Wars. When the manufacturing industries deteriorated, the factories that produced these goods were either abandoned or went out of business leaving behind hundreds of contaminated properties throughout the region. There are five superfund sites and more than 300 hundred vacant or abandoned parcels.

Although there is substantial need throughout the region, our target areas will be focus on three distressed municipalities within the RBP's service area. All target areas have been identified as priority due to their proximity to the EJ Communities, high potential for commercial or residential redevelopment, and the degree to which brownfields impede public access to the river. The first target areas area is a) census tract 3519 within the south end of Waterbury, ½ mile radius from census tract 3505, 3515, 3514, and 3517. According to the CEJST Screening Tool, these 5 census tracts host a combined 16,794 individuals living within the south end of Waterbury, with most of them seeking employment within 3519. This area (3519) is highly industrialized and hosts a large quantity of brownfields, b) The second target area is Downtown Ansonia, specifically census tract 1253 (4,759 residents) and 1254 (3,493 residents). Tract 1254 is an EJ community and is located less than 250 feet directly across the river from tract 1253. Our third, and final priority area is c) the downtown of Derby, specifically, to the South end of Main Street Derby (census tracts 1202, 6,248 residents) where the city will soon complete a variety of state-funded transportation, commercial, and housing projects (census tract 1202 an EJ Community with 6,248 residents). The brownfields within these target areas do not produce tax revenue, are a blight on their communities, impede investment, and, and represent risks to human health and the environment. Funding through this award will provide the needed data to determine viable redevelopment options, attract developers and investors (commercial, industrial, residential), improve human health, and restore the environment. The Naugatuck Valley and its residents have been held captive by the current state of these brownfields for far too long and are determined to start the process of overcoming the challenges left behind by the Valley's robust manufacturing past.

**1.a.ii. Description of Priority Brownfield Site(s):** Due to the high number of brownfield sites within the target areas, we are highlighting five priority sites with the highest potential of being redeveloped. According to the EPA Screening Tool, the two Waterbury target sites are located between two EJ Communities, with the Naugatuck River separating them. At 40 Bristol Street, which borders an opportunity zone, environmental site assessments (ESAs) indicated asbestos, polycyclic aromatic hydrocarbons (PAHs), metals, and other hazardous contaminants throughout four deteriorating buildings. The 6.6-acre parcel once served as a manufacturing site for cable and chains. Additional testing is required to close data gaps and develop a remedial action plan (RAP). It is a priority for assessment because there is a proposed reuse for mixed-use development with solar features adjacent to the river. At 1200 South Main Street, within an opportunity zone, is contaminated with heavy metals, VOCs, and PAHs on the former gas station/ manufacturing site. The city intends to close out the data gaps and prepare a RAP allowing for mixed-use redevelopment on the 4.01-acre vacant parcel. This site is partially located within the FEMA 100-year flood plain and wholly within the 500-year plain. The city is also working to extend its



multi-purpose greenway trail to connect the Waterbury sites to other area municipalities.

The second priority area has two target sites in the city of Ansonia: 36 Pleasant Street, is an underutilized metals casting manufacturing site in an EJ Community. An ESA indicated metals and PAH contamination on site. Further investigation is needed to determine the extent of the contamination before the site can be returned to productive industrial use, allowing a potential buyer to expand and create an anticipated 6-10 jobs within a community seeking to expand its workforce. At the second target area, the city has demolished all buildings on the former Olson Drive manufacturing site, and an ESA has indicated the presence of PAHs, asbestos, and other contaminants. Further investigation is needed to close data gaps and determine the extent of the contamination on the vacant parcel. The site is a priority because the city has secured a private developer to construct a multi-million-dollar sports complex for the community less than 250 ft from EJ Community census tract 1254 and opportunity zone. The site is within the 500-year flood plain. The third priority location is within the 20-acre planned Derby Main Street South project area in an EJ/ distressed community at 2 Factory Street, Derby. The site currently houses a scrapyards that is relocating to another site. The city is acquiring the property in accordance with its Main Street South Master Plan and plans to redevelop it to provide much needed residential and commercial space. Environmental testing is needed to determine the degree and extent of contaminants, believed to include PAHs, ETPH, metals, and solvents.

**1.a.iii. Identifying Additional Sites:** The Naugatuck Valley Council of Governments has managed a brownfield program for over twenty years. In that time, staff have built and continue to cultivate relationships with local and state officials, community groups, and non-profits, which allow us to maintain a robust inventory of potential projects and their funding needs. Currently, more than ten sites require assessment dollars.

As a responsible steward of federal brownfield funding, NVCOG shares EPA's mission to advance environmental justice initiatives by prioritizing project sites in historically underserved and disadvantaged communities. Most of NVCOG's completed and ongoing projects are in census tracts identified by the Climate and Economic Justice Screening Tool (CEJST) as EJ Communities or by the Connecticut DECD as disadvantaged.

NVCOG evaluates potential sites for health, economic, and quality-of-life outcomes enabled by data from the EJ Screening Tool and other publicly available data sources. We also consider the environmental implications of not remediating a particular site, given its proximity to particularly vulnerable populations or waterways. Finally, NVCOG carefully considers how effectively a site can leverage assessment funding for future revitalization.

## **1 b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans: Reuse Strategy:** The three priority areas have benefitted from comprehensive planning, economic analysis that maximizes the use of current infrastructure, community preferences and preferred developer intent. All three cities belong to the Regional Brownfield Partnership hosted by the NVCOG, which provides brownfield grant writing, project management, and funding assessment and Revolving Loan Fund awards to members. **Plan alignment:** Connecticut requires that all Plans of Conservation and Development (POCD) be updated every ten years. In Target area 1: the City of Waterbury's Plan of Conservation and Development 2015-2025 has the goal of remediating brownfields to support economic revitalization. Specifically, policy 18-4 states that Waterbury will "Prioritize Brownfield Remediation funds for the South end properties and other contaminated sites along the Naugatuck River Greenway." This includes the 1200 South Main Street and 40 Bristol Street sites where the city is proposing to develop S. Main Street as mixed-use commercial/light industrial and 40 Bristol Street as mixed-use/residential. The Naugatuck River Greenway trail will pass long both parcels allowing residents of the south end to connect with the river once again. Policy 48-1, in the Economic and Workforce development section recognizes the need to continue the brownfield remediation program. The Waterbury Development Corporation is the City's economic and community development agency. The most recent Brownfields Reinvestment Program (BRP) strategy outlines core approaches that include revitalizing brownfields that are adjacent to residential neighborhoods to



“promote opportunities for technology and green businesses and reinforcing industrial corridor sectors by repurposing property for new operations for more efficient and ‘green’ land use and to strength the industrial base of the City.” The BRP also recognizes that brownfield redevelopment creates construction jobs and long-term employment opportunities for Waterbury residents. The city is targeting sites that have the highest revitalization benefits.

Target area 2: Ansonia’s POCD was updated in 2019 and contains a special section on brownfields identifying multiple sites in the small city. Redevelopment of these sites is a priority in the effort to resurrect the tax base instead of ignoring the blighted, unused 8.56-acre Olson Drive and 0.5-acre 36 Pleasant Street target sites. The city has gone through the RFP process for the Olson Drive site and has secured an interested developer for a community sports complex. Soil and groundwater data is needed to develop remedial costs that are needed to package financing for the proposed reuse. At 36 Pleasant Street, data collected will assist in securing a prospective light-industrial company in moving into the EJ Community. The firm has stated that it will need to hire an estimated 6-10 new employees to meet their demand for services. In Target area 3: Derby’s POCD, updated in 2016, contains a section on Commercial and Industrial Redevelopment that specifically mentions adaptive reuse of brownfields into mixed-use buildings. Redeveloping these sites is a priority for the municipality to assure healthy communities throughout the city. The Derby Main Street South project is part of this plan. By securing environmental data, Derby will be able to include this parcel in their upcoming RFP/RFQ for developers, allowing the stakeholder to gain knowledge of the level of remediation needed and thus securing redevelopment outcomes for the entire area. Redevelopment has been proposed as mixed-use commercial and mixed-income residential in need of modern housing units.

**1.b.ii. Outcomes and Benefits of Reuse Strategy:** Securing EPA’s assessment funding will advance these projects to the remediation and redevelopment phase, transforming these blighted, underserved areas into livable spaces that benefit the entire region. Developers want pad sites for residential, industrial, and commercial reuse. Anticipated jobs across the projects total 75, and all accessible by public transportation. The grant will facilitate the multi-purpose greenway trail that will cross through the south end of Waterbury, along the Olsen Drive site, and the Derby Main Street South sites. At 40 Bristol and 1200 South Main Street, Waterbury the city will be able to transfer the properties to developers allowing the sites to once again be placed on the municipal tax grand list lessening the burden on the residents. The neighboring parcels, although not brownfields, are significantly underutilized, will gain value allowing interested parties to create amenities and services, increasing volume of individuals anticipated to reenter this area. Infrastructure for stormwater management will be updated on both sites to help redirect rainwater into the Naugatuck River. The Derby Main Street South parcels, proposed to be redeveloped into mixed-use will see similar outcomes with focus on green features within the residential units. Solar panels on the roofs of these buildings as well as a storm water management system is proposed. The construction of the sport-complex will provide the neighborhoods of census tracts 1253 and 1254 with soccer and playing fields as well as provide jobs for sporting events. The sports-complex is proposed to have green features such as solar panels and water conserving measures for the watering of the grass on the fields. 36 Pleasant Street, Ansonia the data collected will assist in bringing back an underutilized manufacturing site and creating 6-10 jobs.

Not only will this grant support and spur the development of assessment information critical to the request for State remediation funds, but it will also assist with best practices, determining climate adaptation, generate taxes for the municipalities, and assure on-site pollutants are not carried downstream to Long Island Sound. All the projects will use the Connecticut Commercial Property Assessed Clean Energy (CPACE) program for roof top solar arrays. The Licensed Environmental Professionals (LEPs) will prepare information on the suitability for geothermal energy once the assessments are underway by adding blow counts to the drilling protocol.

### 1.c. Strategy for Leveraging Resources



1.c.i **Resources Needed for Site Reuse:** Waterbury has bonded to secure funds for brownfield redevelopment. Staff is discussing strategies to combine local tax abatement, state tax credit, and tax increment financing. Waterbury currently has a pending cleanup application with the Connecticut Department of Economic and Community Development (DECD). At the Ansonia Opportunity Zone projects, staff is in discussion with two experienced developers to use a similar approach. The assessment grant would create leverage to apply for additional State development funds. Olson Drive already has a firm commitment from the developer and municipal approval to construct the sports complex. In the Derby Main Street South priority area, the city has secured a \$5 million-dollar DECD state grant for remediation and/or construction.

NVCOG will continue to assist eligible projects in securing state and federal funding, engage with liability relief programs, and will assist in creating bankable deals in each of the target sites. Applications to the Connecticut Green Bank to support green energy options are also being drafted. NVCOG and the municipalities plan on using the necessary assessment data to create an economic driver within the priority areas.

1.c.ii **Use of Existing Infrastructure:** All the sites have existing water/sewer/electric/gas utilities as is high speed internet. There is existing access to Interstate 84 and Route 8, which are major transportation networks for freight and commuters. Rail stations are walkable for all three sites and there is planned investment in track, signal, and new train cars. Buses run regularly throughout the Corridor and have stops at all 3 sites. Sewer treatment facilities have been upgraded. The multi-purpose Greenway trail is being designed and/or constructed near all the priority sites. No additional infrastructure is needed for the revitalization plan in any of the priority sites.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

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

2.a.i. **The Communities Need for Funding:** Since 2013, all three priority sites have been listed within the State of CT's top 10 distressed municipalities list (8-Ansonia, 9-Waterbury, and 10-Derby). As distressed municipalities, Ansonia, Derby, and Waterbury disproportionately rely on state and federal funding sources, which are inherently volatile and subject to changing appropriations. According to the Connecticut Office of Policy and Management, external revenue accounts for 36.0 % of Ansonia's budget, 38.9% of Derby's, and 33.9% of Waterbury's. These communities cannot accommodate a substantial drop in state and federal funding without levying unsustainable tax burdens on economically disadvantaged communities. Therefore, assessment dollars that facilitate eventual remediation are crucial to building the resilience of local grand lists. The poverty rates of both Ansonia (12.2%) and Derby (13.1%) exceed the state average of 9.8%. This trend is also reflected in annual median household income. Ansonia's median household income is \$61,846 - 26% below the Connecticut median and 17.1% below the federal median. Derby's median household income is slightly higher, at \$64,494, but is still 22.8% below the state median and 13.5% below the federal median. The 2018-2019 Community Needs Assessment by Greater Waterbury Health Partnership indicates that there are 38,000 residents living with incomes less than the federal poverty level of \$51,500 for a family of four. Waterbury is less financially secure than the region. 65% of Waterbury Households are Asset Limited, Income Constrained, and Employed. The high density of the brownfields combined with low incomes in Waterbury strain the tax base and make paying for cleanup and subsequent reuse of properties difficult. Low-income minority residential neighborhoods surround all the priority sites. This grant will provide much needed funding towards the assessment and ultimate redevelopment of sites in these communities.

### **2.a.ii. Threats to Sensitive Populations:**

1. **Health or Welfare of Sensitive Populations:** The residents of the South end of Waterbury are some of the most impacted by the regions historical manufacturing past. Within a ½ mile ring centered at the 1200 South Main Street parcel, which includes 40 Bristol Street, there is population of 5,761. 53% of this population is identified as low-income, with 77% being people of color, with more than half being Hispanic or Latino. 26% of



the population has less than a high school education with 21% being limited in English households and 14% with disabilities. 25% of the population are children 1 to 18 and 8% over the age of 65. This area is above the 90<sup>th</sup> percentile for low-income with 51% of households living on less than \$26,000 a year (ALICE Data). This Brownfield Corridor has a history of community disinvestment and decay. Homeownership rates are very low with 87% of homes being renter occupied. Over 150 abandoned parcels are vacant in 2 block groups surrounding the site. Vacancy attracts rogue dumping despite energetic efforts by the City's Blight Force. There is almost no new building in the area. Per 100,000 people, Waterbury had 38% more incidents of property crime compared to the national average. In target area 2, a ½ mile ring centered at 36 Pleasant Street (disadvantaged census tract 1254), which also includes Olson Drive, demonstrates a population of 5,805 living within the target areas. CEJST states that individuals living within census tract 1254 are at the 72<sup>nd</sup> percentile with people in households where income is less than or equal to twice the federal poverty level. EJ Screening Tool states that 59% of the individuals living within the ½ mile radius of 36 Pleasant St are people of color, 20% less than a high school education, 13% limited English households, 24% children from 1 to 18 years of age and 18% older than 65. Census tract 1254 has an unemployment rate of 51%. Within target area 3 disadvantaged census tract 1202: 2 Factory Street, Derby is within the 95<sup>th</sup> percentile for unemployment, 75<sup>th</sup> percentile in low-income, and 95<sup>th</sup> percentile for housing cost. Like Ansonia, children under age 5 and people over age 65 also exceed the national average. Housing is part of the proposed redevelopment within the project area. This grant will support the redevelopment of all three Corridors and provide jobs, reduce sources of contamination, and remove blight. All the communities within the target areas suffer disproportionately from welfare issues, including a reliance on social welfare programs, and lack of access to healthcare.

**2. Greater than Normal Incidence of Disease or Adverse Health Conditions:** According the EJ Screen Tool, the 1/2 mile ring centered at 1200 South Main Street, Waterbury, which encompasses 40 Bristol St, has particularly poor air quality compared to the national average. Exposure to Particulate Matter PM2 is in the 90<sup>th</sup> percentile, with Diesel Particulate Matter at 90<sup>th</sup>- percentile, Air Toxic Releases to air in the 90<sup>th</sup>-percentile, and Ozone in the 83<sup>rd</sup> percentile. Nearby contamination may contribute to the target area's 91<sup>st</sup> percentile ranking for asthma rates. Statistics indicative of the impact on health show that visits to the emergency rooms by children with asthma averaged 61.3 per 10,000 people in the state but were 197.3 in Waterbury, according to the Waterbury Regional Health study. The rate of Hispanic infant deaths was 10.4 per 1,000 compared to 7.1 statewide. Black and Hispanic populations make-up over 77% of the population in the Waterbury South end. The median age of the housing stock in Waterbury is 1957 – one of the oldest in the region according to the Connecticut Economic Resource Center. Due to aging housing stock, this tract also falls in the 95<sup>th</sup> percentile for the Lead Paint Indicator. 25% of the population are children, lead is known to affect brain development. In census tract 1254 in Ansonia, particulate matter is at the 92<sup>nd</sup> percentile, Ozone 89<sup>th</sup> percentile, and Diesel Particulate Matter is at 77<sup>th</sup> percentile with local asthma rates at 94<sup>th</sup> percentile. Similarly, Ansonia's older housing and high number of brownfields result in the target area ranking lead paint indicators in the 85<sup>th</sup> percentile. Target area 3 at census tract 1202: 2 Factory Street, Derby is within the 91<sup>st</sup> percentile for asthma with Particulate Matter at 91<sup>st</sup> percentile, Ozone at 88<sup>th</sup> percentile, and RMP Facility Proximity at 88<sup>th</sup> percentile. The Naugatuck Valley has a significantly higher rate of invasive cancers when compared to cities with populations over 100,000 in the state. Assessing sources of contamination may contribute to decreased risk of asthma and cancer rates over time. Residents living within these priority areas are at elevated risk to come across contaminants found within the water, air, and subsurface, likely associated with the prevalence of brownfields. Assessing and identifying the problem areas will help municipalities continue with their POCD plans, eliminate the risks and minimizing the possibility of harm to the residents.

**3. Environmental Justice:** According the EJ Screen Tool analysis of the 1/2-mile ring centered at 1200 South Main Street, Waterbury, which encompasses 40 Bristol St, 10 out of 13 Environmental Indicators exceed national averages. The south end of Waterbury mainly consists of low-income individuals of color with speaking English





as a second language. Poor health indicators include exposure to particulate matter PM2 at the 90th percentile, Diesel Particulate Matter at the 90th- percentile, air toxic releases to air at the 90th-percentile, and Ozone at the 83rd percentile Wastewater Discharge is at the 95th percentile with proximity to superfund sites within the 98th percentile. An aging housing stock within this area also falls in the 95th percentile for the Lead Paint Indicator. In census tract 1254 in Ansonia, particulate matter is at the 92nd percentile, Ozone 89th percentile, with lead paint rates at 85th percentile and proximity to wastewater discharge facilities within the 96th percentile. In target area 3 census tract 1202, the residents face issues like exceeding national average on 8 out of the 13 Environmental Indicators; with Particulate Matter at 91st percentile, Ozone at 88th percentile, RMP Facility Proximity at 88th percentile, underground storage tanks at 86th percentile and 92nd percentile in wastewater discharge. Collectively these residents face an excessive environmental burden.

(Other Factors to consider below: **South end of Waterbury (< ¼ radius of sites 40 Bristol and 1200 S Main St):** compared to USA Percentile EJ Screening Tool – 94th in Traffic Proximity, 94th for hazardous waste proximity, **CEJEST - Disadvantage Percentiles** are as follows: 98th in Energy burden, 97th in Housing cost burden, 96th in Linguistic Isolation, 96th in Unemployment, 96th in Poverty, and 97th in Low median income; **36 Pleasant Street, Ansonia: CEJEST–** 98th in energy burden, 96th low-income, 95th – higher education non enrollment, 96th traffic proximity, 97th housing burden.) **Olson Drive, Ansonia:** 97th in lead, 90th in asthma, and 90th energy cost; **2 Factory Street, Derby:** 75th in low-income, 93rd- energy burden, 91st- housing cost, 90th – Traffic proximity, 95th - Unemployment, and 18% with less than a high school education.)

**b. Advancing Environmental Justice:** Identifying the problem is step one in advancing environmental justice.

The RBP Region has an overabundance of environmental burdens, making the individuals in these communities more vulnerable to contaminants within these brownfield areas. EPA funding will assist in providing these communities with much needed resources to fully delineate the sites and address the environmental concern associated with them. Resulting in the mitigation of pollutants, amplifying the environmental, minimizing human health risks, and increasing the welfare of the communities and those that reside within. All projects proposed have proposed green energy features that will assist in minimizing the disadvantaged census tract’s carbon footprint.

**2.b.i. and 2.b.ii COMMUNITY ENGAGEMENT: NVCOG’s 5 Key PARTNERS:**

Partner Name	Point of Contact	Specific role in project
NEST	Kevin Taylor, Executive Director <a href="mailto:Kevin@nestct.org">Kevin@nestct.org</a> 203-753-1896	NEST will assist in defining the Community needs, provide housing data and prospective developers.
Hispanic Coalition	Victor Lopez, Executive Director <a href="mailto:vlopez@hispaniccoalition.org">vlopez@hispaniccoalition.org</a> 203-754-6172	Hispanic Coalition will be sharing the community’s input on site selection and redevelopment outcomes as well as provide locations for community meetings.
Greater Waterbury Health Partnership (GWHP)	Angie Matthis, Executive Director <a href="mailto:amatthis@staywellhealth.org">amatthis@staywellhealth.org</a> 203-756-8021 ext 3993	GWHP will define community needs, provide data, assist in site selection, and ensure public safety
Waterbury Development Corporation (WDC)	Thomas Hyde, Interim Director <a href="mailto:thyde@nvrconline.org">thyde@nvrconline.org</a> 203-346-2607 ext. 7277	WDC will provide assistance in identifying priority sites, host public meetings, and will serve as the main connect with the City of



		Waterbury.
Connecticut Brownfield Land Bank, Inc.	Rick Dunne, President <a href="mailto:rdunne@nvcogct.gov">rdunne@nvcogct.gov</a> 203-753-0535	Site selection: Capacity of liability relief by acquire parcels while environmental work takes place. Reuse: prospective developer links

**2.b.iii. Incorporating Community Input:**

**Local community:** NVCOG staff will continue to communicate project progress to the local community through the Regional Brownfield Partnership (RBP), a diverse membership of municipalities, community organizations, and business groups from across the region. Each time a project is selected, the target community will host a kickoff meeting and progress meetings to solicit input from the local community. Input will be reported to the project managers and municipal officials where comments will be considered with end use. **Project partners:** The Connecticut Brownfield Land Bank, Inc, a statutorily established, 501(c)(3) non-stock/non-profit - can provide temporary ownership of the brownfield(s) as environmental activities are taking place in means of providing another level of liability relief to municipalities. The Regional Brownfield Partnership can host meetings, share technical expertise, and serve as a liaison to the municipality and interested parties not immediately in the neighborhood. The local Development Corporation manages brownfield projects on behalf of the City and can provide technical and financial resources. Residents in Waterbury Corridor will be encouraged to participate through the Hispanic Coalition and Greater Waterbury Health Partnership. Within the Ansonia and Derby priority area(s) non-profits such as Team Inc. and Valley Foundation aid in connecting with the community. These organizations are highly involved in community needs assessment and services and have direct access to the residents in the target area. The Hispanic Coalition will also help to link residents to job openings on the Corridor projects through their Working Cities grant. **Residents/groups in (close proximity) to target area:** The River-Baldwin Recreation Center is in the middle of the Waterbury Brownfield Corridor where NVCOG has participated in previous community meetings. Access will be arranged through the Hispanic Coalition. Community members are also familiar with several church and social club sites in the Corridor that are all walkable or on bus lines for ease of access. Our team will inform residents of meetings by flyers, outreach to our partners and using social media including Facebook and Twitter and NVCOG’s website. We will create a dedicated page on NVCOG’s website for each project with updates and FAQs. Everyone will be invited to the RBP meetings and open houses in convenient public locations near the neighborhoods. We will hold 3 meetings in the early phase of each cleanup project prior to the start of site work. The first will be to explain the proposed project with timelines and contact information, the second to discuss the technical questions with QEP and health professional staff available and the third to address any unanswered questions. Later meetings will be held as needed in response to partner and community concerns. Meetings will be advertised in English and Spanish. Sign language interpretation and translation services will be available as well.

**3. TASKS DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

3.a. Description of Tasks and Activities:

<b>TASK 1 Cooperative Agreement Oversight</b>
<b>Project Implementation:</b> For both the priority and non-priority sites, included under “Personnel,” staff will prepare and review eligibility determinations for hazardous materials and petroleum applications and prepare the required reporting for EPA. This task also includes travel expenses for at least two representatives to attend the national Brownfields conferences. Staff will track all reports developed and will measure progress by reporting outcome



quarterly. No other resources are needed to carry out this task.
<b>Anticipated Project Schedule:</b> Starting upon award and throughout the grant. Months 1-36; this includes procurement process; 3-year project management; quarterly reporting on ACRES
<b>Task/Activity Lead(s):</b> NVCOG; Brownfield Program Coordinator - Ricardo Rodriguez lead; supported by Steven Perry, Environmental Planner
<b>Output(s):</b> QEP procurement; conference attendance; internal/community meetings; Quarterly Reports, Eligibility Determinations, ACRES updates
<b>TASK 2 Task/Activity: Community Engagement</b>
<b>Project Implementation:</b> For the priority site for hazardous materials and petroleum applications, NVCOG staff will work with Greater Waterbury Health Partnership, the Hispanic Coalition, and the three municipalities to arrange public meetings, share information and solicit input from the community. Our collaborators will confirm or select additional sites according to previously established priorities including developer interest, tax delinquency, and known or suspected health risk, harmony with smart growth, green remediation, and sustainable development. Staff and the technical professionals will meet with stakeholders in each community where an assessment will occur for an estimated six meetings. In this task, there is an allowance for travel costs for staff to monitor site conditions and attend outreach meetings.
<b>Anticipated Project Schedule:</b> Upon execution of the Cooperative Agreement. Initial Stake holder meetings, annual public meeting, constant website and email updates.
<b>Task/Activity Lead(s):</b> NVCOG; Brownfield Program Coordinator - Ricardo Rodriguez lead; supported by Steven Perry, Environmental Planner and Desira Blanchard Community Engagement Coordinator
<b>Output(s):</b> Minutes from 10 meetings; website and social media updates; list of community concerns and questions answered
<b>TASK 3 Phase 1 &amp; Phase II Assessments</b>
<b>Project Implementation:</b> The priority site and non-priority sites have suspected hazardous substances and identified petroleum impacts. Connecticut has a privatized system under which QEPs/LEPs may conduct assessments and cleanups. The LEPs will prepare Phase I, Phase II and Phase III Environmental Assessments to determine the nature and extent of these contaminants. NVCOG staff will manage LEPs to ensure timely delivery of reports. No other grant resources are needed to carry out this task.
<b>Anticipated Project Schedule:</b> All projects are ready to start upon award. Months 1-18 months (Phase I in priority sites: months 3-9 months, Phase II/III in priority sites: months 6-18, HBMA 9-18). If funding permits = Phase I in non-priority sites 3-6, Phase II 9-12.
<b>Task/Activity Lead(s):</b> NVCOG; Ricardo Rodriguez, Brownfield Program Coordinator
<b>Output(s): Priority:</b> 5 Phase I reports; 2 Phase II reports; 5 Phase III; 2 HBMA <b>If funding permits: Non-priority:</b> 2 Phase I reports; 2 Phase II reports, 1 Phase III or Remedial Action Plan
<b>TASK 4: Cleanup Planning and Area-wide Planning/Reuse Planning</b>
<b>Project Implementation:</b> The results of the Phase II reports will be reviewed and discussed with the stakeholders for each site. The effect of the assessments on proposed reuse plans and human health will also be discussed with the CT Department of Public Health and the local health district representative as well as with the prospective developers. Staff will produce a summary sheet containing all relevant information and post it on the NVCOG website and Facebook page. No other grant resources are needed to carry out this task. A minimum of 5 RAPs are anticipated.
<b>Anticipated Project Schedule:</b> Months 18-36; RAPs: Site Reuse Assessment: 18-36
<b>Task/Activity Lead(s):</b> NVCOG; Ricardo Rodriguez, Brownfield Program Coordinator
<b>Output(s):</b> 3 Reuse Plans, 5 RAPs, CT DPH comments, website, Facebook updates



**3.b. Cost Estimates:**

NVCOG		Project Tasks (\$)				
Budget Categories		Task Cooperative Agreement oversight	Task Community Engagement	Task Assessments	Task cleanup, reuse planning	TOTAL
DIRECT COSTS	Personnel	\$7,000	\$4,000	\$9,000	\$5,000	\$25,000
	Fringe	\$1,300	\$700	\$1,600	\$900	\$4,500
	Travel	\$0	\$2,000	\$3,000	\$1,000	\$6,000
	Equipment					
	Supplies	\$100	\$2,500	\$1,400	\$500	\$4,500
	Contractual		\$3,000	\$292,000	\$140,000	\$435,000
	Other					
Total Direct Costs		\$8,400	\$12,200	\$307,000	\$147,400	\$475,000
Indirect Costs		\$7,000	\$4,000	\$9,000	\$5,000	\$25,000
Total Budget		\$15,400	\$16,200	\$316,000	\$152,400	\$500,000

**Task 1 – CA Oversight:** Grant management and required reporting is under “Personnel” that reflect previous experience. (Estimated 308 hours x \$50 = \$15,400) **Task 2 – Community Engagement:** \$16,200 split for travel for 2 representatives to attend the National Brownfields conference. Travel costs: 2 people to 1 conference; estimated airfare/lodging/per diem = \$2,000; set aside for local travel to sites, community meetings is 400 miles @ \$0.65 per mile = \$260; \$2,500 for supplies (Flyers and advertisements); \$150/ meeting for a total of 10 in-person meetings = \$12,200 (includes LEP). **Task 3: - Site Assessments:** \$3,500 x 5 Phase I = \$17,500, \$40,000 x 2 Phase II = \$80,000, \$40,000 x 5 Phase III = \$200,000 and \$9,250 x 2 HBMA = \$18,500 totaling \$316,000. **Task 4 – Reuse Planning:** \$30,000 x 5 RAPS = \$150,000. (Phase III ESAs and RAPS may be combined to provide cost savings) Personnel Costs reflect experience on past projects. Remaining funding will be allocated to non-priority sites mentioned above.

**3.c. Measuring Environmental Results**

Upon notification of award, staff will confer with the Project Officer, inform municipalities and stakeholders, and set up kickoff meetings near the target areas. Because of the Connecticut privatized system, Licensed Environmental Professionals can conduct assessment and cleanup work without direct state oversight. NVCOG will issue an RFQ/RPF for Licensed Environmental Professionals and the RBP Committee and municipal appointees select a firm to place on the short list, allowing them to bid on assessment projects. During the 1st year, the target area will be the initial focus. Municipalities will be encouraged to continue discussing potential projects with NVCOG staff as funds are expended. Project set-up, including initial review of initial requests and site access agreements will be completed within two months. Eligibility Determinations will be submitted for additional sites. We expect most selected assessment projects will be completed within a 9-month time frame. The NVCOG will track our progress by entering data into ACRES, submitting quarterly reports, and using Project software. Every two weeks, staff will report project progress to the stakeholder. The QEP will be required to enter the approved scope of work for project into Project software or similar program to allow staff to track milestones, control invoices, reports to the community and requirements of the State programs. Even after assessment work is complete, staff will track non-federal leverage, jobs created, and redevelopment outcomes in ACRES.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a. Programmatic Capability**



**4 a.i, a.ii, a.iii. Organizational Capacity, Organizational Structure and Description of Key Staff:** NVCOG serves 25 communities through the RBP and conducts regular outreach to all members, chambers of commerce, and community groups who bring applications forward. Staff reviews applications with relevant municipal staff to determine if the application is supported and submits to EPA for an Eligibility Determination (ED) approval. Staff issues an RFP to the QEPs, who submits bid-proposals for review by the RBP Executive Committee, which selects the preferred proposal. Contracts include the scope of work, milestones and percent of completion that are overseen by NVCOG staff. NVCOG’s team is led Executive Director Rick Dunne, who has 20+ years managing brownfield assessments and cleanups, supported by: Ricardo Rodriguez, M.S, Environmental Science (5+ years of brownfield oversight); Steven Perry, B.A, Biology; and Michael Szpryngel, Finance Director who has processed SF 424 details, invoices, and quarterly budgets. The project manager will be Ricardo Rodriguez with support from Steven Perry.

**4.a.iv. Acquiring Additional Resources:** Connecticut established a privatized, voluntary assessment and remediation program through which technical work is performed and verified by LEPs (the equivalent of QEPs). To acquire additional expertise, NVCOG will issue an RFQ/RFP for QEP firms to support the assessment projects. NVCOG has and will continue to work closely with CT DEEP staff and the EPA Project Manager. Additional resources will continue to be sought from our community partners, and, private, state, and federal programs that have provided support brownfield projects. NVCOG will continue its partnership with Northwest Regional Workforce Investment Board, a job training provider that prepares individuals, many living within disadvantaged communities, to work on remediation jobs. Upon completion, trainees relate to local contractors that often submit bids on environmental projects within the region.

**4.b. Past Performance and Accomplishments**

**4.b.i. Currently Has or Previously Received an EPA Brownfield Grant:**

1. Accomplishments

Grant	Amount	Output/Outcomes	Number of Site Assessed	Output/Outcomes reflected in ACRES
EPA FY2020 RLF	\$1.82 million	5 Grants, 2 Loans	7 Cleanups underway	Yes
EPA FY2021 Assessment	\$300,000 (Haz/Pet)	3 Phase I, 4 Phase II, 1 HBMA	5 Assessed	Yes
EPA FY2022 RLF	\$6.9 million	9 Grants, 2 Loans	11 Cleanups underway	Yes

**2.Compliance with Grant Requirements:** NVCOG will continue to fully comply with all the requirements under the grants, (terms and conditions) mentioned above. All quarterly reports have been completed on time to ACRES. This includes proper LEP and contractor procurements as well as financial tracking. Although the 2020 Assessment grant is open, staff are working on closing the grant out within the next quarter.



**To:** Ms. Katy Deng, Project Manager, United States Environmental Protection Agency

**From:** Rick Dunne, Executive Director, Naugatuck Valley Council of Governments

**Date:** November 2, 2023

**Subject:** EPA FY24 Community-Wide Assessment Application: III.B.1 – Eligibility

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### Threshold Criteria

**1. Applicant Eligibility:** The Naugatuck Valley Council of Governments (NVCOG) is a Regional Council established under governmental authority or group of General-Purpose Units of Local Government established under Federal, state, or local law (e.g., councils of governments) to function as a single legal entity with authority to enter into binding agreements with the Federal Government. As such, NVCOG is eligible to apply as a “political subdivision of the state” and “general purpose unit of local government” for the purpose of the EPA Brownfields program, pursuant to Connecticut Gen. Stat. 84-24j and B-31a. This attachment serves as certification of the Naugatuck Valley Council of Government’s (NVCOG) compliance with section III.B.1 – Applicant Eligibility – of Funding Opportunity Number EPA-OLEM-OBLR-23-12. Enabling statutes are available for your review at the following:

- [https://www.cga.ct.gov/current/pub/chap\\_295.htm#sec\\_16a-4c](https://www.cga.ct.gov/current/pub/chap_295.htm#sec_16a-4c)
- [https://www.cga.ct.gov/current/pub/chap\\_050.htm#sec\\_4-124i](https://www.cga.ct.gov/current/pub/chap_050.htm#sec_4-124i)

**2. Description of Community Involvement:** NVCOG staff will continue to communicate project progress to the local community through the Regional Brownfield Partnership (RBP) a diverse membership of municipalities, community organizations, and business groups from across the region. Each time a project is selected, the target community will host a kickoff meeting and progress meetings to solicit input from the local community. Input will be reported to the project managers and municipal officials. If applicable, incorporated into the design plans.

Project partners will set up regular meetings in person at least once a month to review and communicate project progress. In the early stages of a cleanup project, meetings will be held more frequently, and project partners have bimonthly meetings and/or conference calls/ virtual meetings. Partner websites will be updated after these meetings. All meetings will support bilingual populations with other languages being available upon request. Our team will also involve residents in the planning and implementation of brownfields assessment activities by employing the use of social media including



Facebook and Twitter and NVCOG's website. We will create a dedicated page on NVCOG's website for each project where staff will provide updates and information on how to solicit input. Through the website we will also inform the community about attending Regional Brownfield's Partnership (RBP) meetings.

We will plan to update our social media accounts weekly, so project information is up to date. We also plan to set up open houses in convenient public locations near the neighborhoods. Residents in Waterbury will be encouraged to participate through the Hispanic Coalition and Greater Waterbury Health Partnership. These organizations are highly involved in community needs assessment and services and have direct access to the residents in the target area. We will hold 3 initial meetings in the early phase of each assessment project prior to the start of site work. The meetings will be set up to solicit input from the community about what they would like to see in their neighborhood and communicate the cleanup process, timelines and how results will be communicated. Questions raised at the meetings will be compiled into a FAQ sheet that will be posted on the website. We will provide a sign in sheet at each meeting to collect email addresses so Staff can send monthly emails to keep interested residents informed about the project. Meetings will be advertised in Spanish. Sign language interpretation and translation services will be available.

- 3. Expenditure of Assessment Grant Fund:** Assessment funds have been drawn down for at least 70% as of September 30<sup>th</sup>, 2023. Please see **Attachment B** for a copy of the financial record.
- 4. Statement of Applicant's 501(c)(4) Status:** As a general purpose unit of local government, 501(c)(4) status does not apply to the Naugatuck Valley Council of Governments.
- 5. Contractors and Named Subrecipients:** The Naugatuck Valley Council of Governments has not selected or procured contractors, nor named subrecipients.