



Town of Stafford
Connecticut
Office of Selectmen
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R01-24-A-006

Sal P. Titus
Kurt Vail
Richard F. Hartenstein Jr.
Board of Selectmen

Narrative Information Sheet
EPA FY2024 Brownfields Community-Wide Assessment Grant Application
Town of Stafford, Connecticut

1. Applicant Information

Stafford, Town of
1 Main Street
Stafford, CT 06076

2. Funding Requested

- a. Grant Type: Community-Wide Assessment
- b. Federal Funds Requested: \$500,000.00

3. Location

- a. Stafford
- b. Tolland
- c. Connecticut

4. Target Area and Priority Site Information

- **Target areas discussed in the Narrative:**
The Target Areas for this grant are the Stafford's Downtown and the northeast part of the town known as Staffordville.
- **Census Tract Numbers:**
Downtown Target Area: census tract census tract 09013890100, and Staffordville Target Area: census tract 09013890201.
- **Address of the priority sites proposed in the Narrative:**
 - a. 91 West Street, Stafford, CT 06076
 - b. 25 West Street, Stafford, CT 06076
 - c. 108 Hydeville Road, Stafford, CT 06076

5. Contacts

- a. **Project Director:**
Name: Amber E. Wakley, Director of Grants & Community Development, Town of Stafford
Phone: (860) 851-8102, Email: amberw@staffordct.org
Mailing Address: 1 Main Street, Stafford, CT 06076

b. Chief Executive/Highest Ranking Elected Official

Name: Salverio P. Titus, First Selectman, Town of Stafford
Phone: (860) 684-1777, Email: firstselectman@staffordct.org
Mailing Address: 1 Main Street, Stafford, CT 06076

6. Population

a. 11,472 (Source: 2020 Decennial Census)

7. Other Factors

Other Factors	Yes/No	Page #
Community population is 10,000 or less.	No	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	No	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	1, 2
The proposed site(s) is in a federally designated flood plain.	Yes	1
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes	3, 4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Yes	3, 4
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	Yes	3
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).	Yes	8, 9
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.	No	n/a

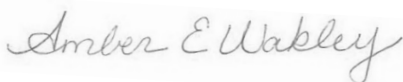
8. Letter from the State or Tribal Environmental Authority

See attached letter from Meena Mortazavi of the Connecticut Department of Energy and Environmental Protection (DEEP) (CT DEEP).

9. Releasing Copies of Applications

n/a

Respectfully submitted,



Amber Wakley
Director of Grants & Community Development
Town of Stafford



November 10, 2023

Amber Wakley
Director of Grants & Community Development
Town of Stafford
1 Main Street
Stafford, CT 06076

Re: State Acknowledgement Letter for EPA's Community-wide Assessment Grant for FY 24

Dear Ms. Wakley:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Stafford intends to apply to the US Environmental Protection Agency (EPA) for a Community-wide Assessment Grant for Federal Fiscal Year 2024. DEEP understands that the Town of Stafford plans to use the grant funding to conduct assessments at various properties contaminated with hazardous substances and/or petroleum within the Town.

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. 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. Brownfield Challenges and Description of Target Area – Incorporated as an agricultural community in 1719, Stafford, Connecticut, transitioned from fields to factories when the Industrial Revolution reached town in the mid-1800s. First iron forges and gristmills, then **sizeable factories were built and flourished along Stafford’s many waterways**, establishing the Town as one of the largest industrial communities for synthetic fibers, woolens, leather, metals, and other products. After WWII, the textile industry shifted, a dramatic change with far-reaching consequences. **Many industries shuttered, eliminating local jobs and leaving behind a landscape of contaminated, abandoned, dilapidated, and underutilized properties, with a long shadow of significant economic hardship.** There are over 50 known hazardous release sites identified by the CT Department of Energy and Environmental Protection (DEEP) in the Town of Stafford, including former mills, drycleaners, vacant commercial properties, former greenhouses, and manufacturing facilities. Many of these sites are impacted with volatile organic compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), metals (lead, etc.), petroleum, and/or hazardous building materials (HBM), such as asbestos, lead-based paint (LBP) and polychlorinated biphenyls (PCBs). These brownfields have resulted in decreased property values, increased crime, blight, and neglect, diminished local business investment, lack of jobs and housing options and lost tax base. Brownfields have also contributed to the economic disparities and increased public health and safety concerns which are disproportionately shouldered by sensitive and underserved communities in the area. Today, residents are forced to cope with the lasting environmental, economic, welfare and health impacts associated with brownfield. Plagued by these challenges, the Town is in **desperate need of assistance by EPA** to help address the negative impacts that these sites have continued to bear upon the Town for years.

Two (2) Target Areas have been identified; geographic clusters prioritized for their prime sustainable redevelopment locations, potential risk to residential populations, and environmental/blight concerns. These Target Areas include Downtown and Staffordville, the northeast part of the town. **Downtown** [(census tract 09013890100), BG 2 & 3] is a **State of Connecticut designated Environmental Justice (EJ) Community** and Stafford’s most densely populated neighborhood (approx. 39.75% of total households). While the Target Area is the heart of Stafford, the presence of several underutilized buildings is an impediment to the economy and revitalization of the area. **Staffordville** (census tract 09013890201) is >4-miles from the downtown and is a rural village center distinguished by State Route 19, active industrial facilities, Staffordville Reservoir, residential homes and critical infrastructure facilities. Both Target Areas contain neglected sites and are in a flood plain (zone B: areas between limits of 100-year flood and 500-year flood) while a high number of dams are also present in the area. Approximately 57 dams are located in the Town of Stafford, with 8 designated as a high hazard (category C) and 6 as significant high hazard (category B) by CTDEEP. Several of these dams are located near brownfield sites in the Target Areas and pose a significant hazard of spreading contamination in the event of flooding. The detriment and negative impacts to the economy, societal welfare, and overall health and quality of life in the Target Areas are directly connected to the existence of brownfield sites.

1.a.ii. Description of the Priority Brownfield Site(s) – A 2020 Brownfields site inventory conducted as part of the Town’s previous assessment grant identified over a dozen priority brownfields sites in the Target Areas that total over 65-acres of land with potential health and safety concerns to sensitive populations, including but not limited to, former manufacturing (textile, machinery, metal, etc.) and commercial facilities (dry cleaners, gas stations, etc.), a former fentanyl lab, and residential properties impacted by HBM. **The three (3) top Priority Sites for this grant are described in more detail below:**

Avery Park (91 West Street), a 15.26-acre Priority Site in the Downtown Target Area is owned by the Stafford Housing Authority (*a distinctly separate entity from the Town of Stafford*) and comprised of 24 residential buildings that provide **110 affordable housing units for seniors, veterans, and individuals with disabilities**. Built in 1960, the site is contaminated with asbestos, LBP, mold, and other unknown

hazardous substances, which has caused 60-units to be decommissioned and unavailable for use. Degradation of these units further narrows affordable housing options for Stafford's low-income and sensitive populations in the EJ and accessible downtown area, which is highly sought-after for those without transportation options. There is over a 3-year waiting list for applicants seeking units at Avery Park. It is a blighted eyesore in a highly visible residential area <0.6 miles to Downtown and near Stafford Motor Speedway which attracts over 120,000 spectators/visitors each year. Grant activities will include Phase I/II Environmental Sites Assessments (ESAs)/HBM surveys and Cleanup/Reuse Planning necessary for the expansion and redevelopment of affordable housing so critical to underserved populations in Town.

Foxville Mill (25 West Street), a 9.35-acre Priority Site in the Downtown Target Area, is a privately-owned industrial mill complex comprised of ~8 adjoining buildings (131,000-sq. ft.) that border the Middle River. The site is located in a commercial/residential neighborhood <1/2 mile from Avery Park. The earliest portion of the facility was constructed in 1837 as a worsted woolen mill. The addition of a weave shed, dye house, and power plant in 1907 dramatically increased the site's footprint. Fabrics and military textiles were produced by its 500-600+ employees until the company fell into decline during the 1940s and eventually shuttered in 1981, eliminating employment for generations of workers. Since then, the Site has been underutilized and only partially occupied by a variety of light manufacturing and commercial entities. The Site is prime for redevelopment, but contends a long industrial history with known and perceived HBM including LBP and PCBs and other potential environmental concerns. Most recently, a portion of the mill has fallen into disrepair, resulting in partial collapse and potential release of HBM contamination to the environment, surrounding properties, and adjacent residential neighborhood. Grant activities would include Phase I/II Environmental Site Assessments and Cleanup/Reuse Planning activities to position the Site for mixed-use redevelopment to expand commercial tax base, employment, and housing opportunities in the Target Area. The assessment would also be used to determine whether contamination on the site presents a potential risk to groundwater quality, which is a critical outcome since residents and businesses in the Target Area rely on private wells for their drinking water supplies.

The Hydeville Mill (108 Hydeville Road) is a 2.99-acre parcel of land in the Staffordville Target Area made up of 8 vacant and adjoining industrial mill buildings (86,300sq ft). Developed as the Phoenix Woolen Mill in 1860, it continued operation as a woolen mill until 1976, using the brook that runs through the property for its operations. In years following, the site was used for various manufacturing operations (metals, insulation foam, ceramics, etc.). Currently, the former mill is subject to frequent acts of vandalism, trespassing and other illicit activities, and is in a state of significant disrepair and is structurally unsound. The Site owner passed away in 2011 leaving extensive tax liens on the property. The Town petitioned the probate court to create an estate and appoint an executor who could grant the Town access to the property to conduct due diligence and environmental assessment activities prior to tax title taking. Funded through the Town's FY19 Brownfield Assessment Grant, a Phase I ESA was completed in 2021, revealing over 30 Areas of Concern (AOCs) and associated Recognized Environmental Conditions (RECs). A limited Phase II ESA identified asbestos, LBP, and petroleum constituents, PAHs and metals above applicable standards. Additional funds are needed to complete needed assessment and cleanup/reuse planning activities. There are many potential end uses, but interested developers are deterred by the unknown environmental liabilities and financial risks which are prohibiting the sale and redevelopment of this property. Completing assessments to characterize the environmental conditions and estimated remedial costs will remove the stigma and redevelopment barriers by addressing unknowns and creating a more shovel-ready site. Following assessment and cleanup planning activities, the Town will publish an RFP to attract developers that will put forth sustainable remediation and redevelopment scenarios. Cleaning up and bringing these Priority Sites back to beneficial reuse is vital to the Town's revitalization, would increase neighboring property values and the town's tax base, reduce current threats to human health and the environment, protect the Target Areas drinking water and bring economic benefits to residents such as job opportunities for Stafford's unemployed population, and improved quality of life.

2.a.iii. Identifying Additional Sites – The Town will update its current inventory of potential

brownfields. The same criteria the Town used to select the initial Priority Sites for assessment and cleanup/reuse planning activities will be used to complete the inventory, prioritize, and select additional sites for inclusion in the program if grant funds remain after addressing the target area(s)/priority sites, or if access or eligibility issues arise. Prioritization and selection criteria will include feedback and input from the community, potential impact/benefits to underserved communities, perceived and/or actual environmental concerns and health risks, community needs, redevelopment potential, tax title takings, alignment with the Town's master plans and EPA Brownfields eligibility and access.

1b. Revitalization of the Target Areas

1.b.i Reuse Strategy and Alignment with Revitalization Plans – Stafford's Brownfield Initiative directly correlates with the Town's **2022 Plan of Conservation and Development**, a comprehensive vision for Stafford's economic, natural, and social future, with established objectives to: Redevelop and revitalize regional centers and areas with existing or currently planned physical infrastructure; Expand housing and employment opportunities, especially in EJ areas; Conserve and restore the natural environment, cultural and historical resources, and traditional rural lands and; Protect and ensure the resiliency of environmental assets critical to public health and safety. The plan also calls for the Town to support and improve the economic vitality of the town through promoting creative land-use practices. **Our Priority Sites seek to reuse existing properties to encourage sustainable development that meet the needs of the community, while preserving the existing natural resources.** Redeveloping **Avery Park** will expand Downtown's affordable and sustainable housing choices for low and moderate-income households and sensitive populations including seniors, veterans, and individuals with disabilities, and advanced environmental justice objectives. The **Foxville Mill and Hydeville Mill** sites are zoned Industrial/ Commercial, mixed-use redevelopment concepts include light manufacturing, commercial, residential, retail, and recreation spaces. These developments eliminate blight and environmental risks while preserving site histories, incorporating energy efficiency/sustainability, and expanding quality job opportunities in walking distance of residential/EJ areas.

1.b.ii Outcomes and Benefits of Reuse Strategy – The funds from this grant will help to transform currently blighted Target Areas within the Town into clean spaces and thriving community assets. Through site assessments, we will be able to identify and quantify the contaminants that exist within Target Areas, evaluate risks, plan, and then remediate and redevelop with additional leveraged funding. **These activities will act as a catalyst for the area's revitalization and lead to a sustainable development of Stafford. The Town will encourage site specific redevelopment plans to incorporate energy efficiency and green infrastructure practices such as solar panels for renewable energy generation, green roofs, low impact development (LID) and green stormwater management options, such as infiltration planters.** The Target Areas were once the center of the town's economy and remediating/reusing these sites will revive lost the local economy, reduce environmental risks, assist struggling residents through new local employment opportunities, attract new businesses, generate new tax revenues, and expand safe and affordable housing stock. Places that have been abandoned and underutilized for years will transform into places to live, work and play and provide support for the people of Stafford and disadvantaged areas in need of growth.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse –The Assessment grant from EPA will unlock the availability of leveraged funds from other local, state, and federal programs. The town will leverage a **Tax Increment Financing program**. To complete the tasks necessary for additional assessment, cleanup and/or reuse, the Town will leverage all it can through developers, private investment, and supplemental grants: **Connecticut Dept. of Economic Community and Development (CT DECD), Office of Brownfield Remediation and Development (OBRD) grants and loans (assessment & cleanup), historical tax credits (redevelopment), Dept. of Housing and Urban Development, Connecticut's Community Development Block Grant (CDBG) Program, and the EPA Region 1 Targeted Brownfields**

Assessment (TBA) program and cleanup grants. Finally, additional funding from the **CT Green Bank** could be used for green infrastructure and renewable energy projects during the redevelopment process. The Town will seek to develop an Energy Savings Performance Contracting (ESPC) with CT Green Bank as well as make use of their C-Pace economic development tool to retain business and lower energy costs further allowing them to save money for implementing redevelopment plans. EPA funding will close funding gaps and help position Sites for cleanup. Proposed reuses will spur economic development activity in Target Areas, and further unlock public/private funding potentials. Redevelopment in the Target Areas will serve as a catalyst to revitalize many of the other potential brownfield in town. With some brownfields being located on the river which runs through the town, further revitalization could provide opportunities for climate resiliency through designs that include flood protection/mitigation measures and by making use of existing dams for low-impact, renewable hydroelectric energy or other renewable energy.

1.c.ii. Use of Existing Infrastructure – All Priority Sites are connected to existing roadways, electric, high speed internet, storm water, municipal water, and sewer, and have the capacity to handle expansion associated with the proposed redevelopment as well as future additional growth. This grant will help facilitate the reuse of the existing infrastructure and align with directives in the Town’s Plan of Conservation and Development to redevelop and revitalize commercial centers and areas of mixed land uses with existing or planned physical infrastructure. The surrounding areas of the Target Sites include paved parking lots, sidewalks, and accessible roads with streetlights.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i The Community’s Need for Funding – Stafford’s small (pop: >12k), rural character lends to its beauty, but limits its capacity and resources to fund brownfields assessment activities. This is reflected in the **valuation of taxable property, which is only 63% of the State Average**, and the **municipal debt per capita, which is 94% of the state average** (ctdata.org). **Our population has decreased by 5% since 2010, further reducing the tax base and town revenue** (2023 Equity Profile). Stafford has an average mill rate of 34.95, which means that the real estate tax revenue is moderate and barely sufficient to cover the municipal budget for essential services and critical infrastructure projects. Most recently, volatile cost-of-living necessities, such as food and energy, have skyrocketed immediately impacting vulnerable residents with less discretionary income. 28% of Stafford’s households are cost-burdened, spending at least 30% of their total income on housing costs (2023 Equity Profile); taxes on residential properties cannot be raised. Stafford particularly struggles with pockets of **poverty in the Downtown Target Area where BG 2 & 3 are respectively 34% and 41.2% of the population is below 200% the federal poverty level (CT EJScreen), compared to 6% average across the town, and 10% average across the state.** Overall, the Town of Stafford must focus limited resources to provide basic services and critical infrastructure projects (road reconstruction, bridge replacement/repairs, public facility repairs), bond payments, and debt services. The Town is not financially capable of assessing the brownfield sites without grant assistance from the EPA. Community investment through assessment and cleanup of brownfields through this grant is crucial to support economic growth, revitalization, and maintain the character of the region.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations – Target Areas of this grant have high numbers of sensitive populations according to EJSCREEN: Downtown (8901 BG 2 & 3) has low income (77th % in state, 63 nationally) and children under 5 (82nd nationally) and veteran population (14.9%, which is double the national and triple the state average, respectively according to ACS 2021). These groups, living in the more densely populated Downtown Target Area, are disproportionately impacted by blight and contamination associated with the presence of brownfields. In the Staffordville Target Area (Census Tract 8904), children under 5 are the 76th % nationally and over 64 at 73rd %. These populations are particularly vulnerable to health conditions associated with contamination, as well as blight-related issues. Vandalism and crime are often related to dilapidated properties and Stafford has a higher crime rate compared to

surrounding Tolland County; **robbery rate is more than double (16.8 vs. 7.3 per 100,000 in the county) and assault rates ~50% higher** (311 compared to 224 per 100K). **Mental health conditions such as depression were reported at 15% compared to 9% average in the state (2015-2018), and the pandemic has only exacerbated these conditions and the need for support from social and town services.** Requested funds will remove blight in the Target Areas and the risks associated with contaminant exposure risks. The creation of residential and recreational resources, as well as jobs, will help revitalize the neighborhood and provide significant support to these sensitive populations and improve their wellbeing.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions – Although a rural community away from urban centers, Stafford ranks specifically high in populations with adverse health conditions in comparison to national and state averages. According to the CT Department of Public Health (PDH), **Stafford’s census tracts had one of the highest asthma-hospitalizations rates in Tolland County** (DPH Asthma Surveillance Program). 15.9% of children in the Stafford School District have asthma, which can be compared to 13.9% in the state (Connecticut Data Collaborative) and 6.4% in the nation (Centers for Disease Control and Prevention). **49% of households in Stafford are living in structures built before 1960, compared to the Connecticut average of 42%** (Census Bureau ACS 2019). Therefore, a higher percentage of people in Stafford are at risk of being exposed to lead paint and other HBM. In 2016, 5.4% of screened children had lead blood levels exceeding 5 µg/L and an additional 1.6% exceeding 10 µg/L. **The lead paint indicator in Stafford is at 81st national percentile (EJScreen).** Stafford’s population also has a high blood pressure rate of 28-31%, among the highest rates in Tolland County. In addition, Stafford residents report a higher incidence of smoking (19%) than the average in Connecticut (14%) (2021 Equity Profile). These health problems are amplified by the presence of numerous brownfields in the community that increase exposure to hazardous materials and associated effects such as VOCs (liver, kidney, nervous system; birth defects; **cancer**); metals (immune, cardiovascular, **developmental, neurological, reproductive**, respiratory, kidney; **cancer**); petroleum (nervous system, immune, liver, kidney, respiratory; **cancer**), PAHs (liver; **cancer**) and high prenatal exposure to PAHs is associated with **cognitive dysfunction, childhood asthma and other birth defects; and HBM including asbestos (lung scarring, mesothelioma and lung cancer).** **The increased disease rates exhibited by the residents of these areas are strong indicators of negative health impacts associated with the environmental quality and the presence of contamination, among other factors.**

(3) Environmental Justice

(a) Identification of EJ issues: In addition to its high prevalence of low income and aging population, **the Downtown Target Area is also a state-designated EJ Community (#8901), as 41.2% of the population in this area lives below 200% of the Federal Poverty Line** and are suffering from **Food Apartheid** with limited transportation access. Beyond brownfields, sensitive populations face disproportionate environmental burdens; according to EJSCREEN, several EJ indices exceed the national average, including Ozone (76th percentile), Traffic Proximity (53rd percentile), Pb paint (85th percentile, Hazardous Waste Proximity (89th percentile and Underground Storage Tanks (77th percentile). The same area **has several EJ indices exceeding the 50th percentile in the state and region (PM 2.5, Ozone, Diesel PM, Air Toxics, RMP proximity), in addition to the lead paint indicator that is at the 81st percentile nationally and the Wastewater Discharge Indicator at the 70th percentile nationally.** The combination of poverty with critical service gaps and exposure to high environmental burdens poses significant environmental justice issues for sensitive populations in the downtown area. A high percentage of disengaged youth, a growing crisis, is also a considerable problem for the town. 11.3% of female and 27.5% of male young people are disengaged compared to the state averages of 4.5% and 5.5%, respectively. In the Downtown Target Area, higher levels of unemployment (7% compared to 2.4% in state) correlate to the need for financial assistance, where an additional 10% of people receive income assistance. **(b) Advancing Environmental Justice** - Assessing and restoring the brownfields in Stafford will advance environmental justice both directly by removing hazardous building materials and contamination and limiting exposure, and indirectly by removing blight, creating affordable housing opportunities for sensitive populations (senior housing),

and generating of employment opportunities in the currently blighted industrial properties. The reuse strategies will minimize displacement of residents, as the proposed includes maintaining and improving affordable housing for sensitive and disadvantage communities, improving opportunities for the recreation of young children that is critical to families, and creating jobs that allow the local workforce with limited transportation access to be engaged in the community. This combination of reuse strategies is designed to give back to the community and help the town incorporate resources for sensitive populations, including affordable housing and community spaces. The funding from the grant will seek to level out this disparity by making the living environment more equitable while expanding access to meaningful services, housing, employment, and educational opportunities in underserved communities. The project is not expected to cause displacement of residents/businesses; strategies and/or policies will be implemented to minimize the displacement of residents and/or businesses if needed, such as community benefit agreements, small business preservation programs, inclusionary zoning, community land trusts, tax abatement and/or financial programs. The Town and its partners will continue to engage the community in the brownfields reuse process and will have discussions with the community about how to minimize displacement through the assessment and cleanup/reuse process.

2.b. Community Engagement

2.b.i. Project Involvement / 2.b.ii. Project Roles –Selected for the roles played in our community, a broad group of entities/stakeholders serve as active supportive partners to the Town and Brownfields Advisory Committee (BAC) to ensure an inclusive process, and that all citizens are actively engaged, informed, and involved. Each partner is direct link to underserved populations in Target Areas, and/or civic/business community. These liaisons will assist in site selection/ prioritization, community engagement activities, invite participation, input solicitation, and feedback collection. Our essential partners and their role in the project are summarized in the table below. The Town/BAC will continue to identify additional community stakeholders/partners throughout the project life.

NPO = nonprofit organization

Partner Name	Specific Role in Project
Stafford Housing Authority: Ann Marie Perrone, Executive Director, aperrone@staffordha.com , (860) 684-4973	Community Liaison to Avery Park/Priority Site residents. Partner to support the assessment and cleanup/reuse planning, outreach/education, leverage public/private resources, BAC advisor.
Safe Net Food Cupboard: Andrea Lorenzetti, Volunteer Coordinator, info@safenetministries.com , (860) 851-9987	<i>NPO providing food, utility & shelter asst. to underserved community(ies).</i> Community Liason to sensitive populations in target areas: outreach/education partner, site identification, information distribution, cleanup/reuse planning. BAC advisor.
Rotary Club of Stafford: Ernest Neafsey, President, staffordrotary@gmail.com , (860) 287-3141	<i>NPO promoting economic and civic vitality, serves as business and community liaison:</i> input in site selection, cleanup/reuse planning activities. Youth engagement and regional coordination.
Stafford Historical Society: Rebecca Kraussmann, Vice President staffordhistorical@gmail.com , (860) 684-7978	<i>NPO, assist w/ historical preservation.</i> BAC member. Involved in site selection, cleanup & reuse planning, site history advisor.
Stafford Senior/Community Center: Grace Parrow, Director of Elderly Outreach & Municipal Agent on Aging, gparrow@staffordct.org , (860) 684-3906	Public meeting host, outreach/education partner to senior population, assist with community involvement and solicitation of feedback and input, etc.

2.b.iii. Incorporating Community Input - The Town’s Brownfields Initiative has been created to emphasize Stafford’s goals of returning underutilized properties back to productive reuse, as well as protecting human and environmental health, spurring job growth, and creating affordable home opportunities. The Brownfields Initiative **website** explorestaffordct.com is as a digital information repository where residents can read official documents, learn about program goals, current progress, visions for brownfield sites, and access other pertinent project information. The website also provides opportunities to engage and solicit feedback/input from the community. By participating in efforts such as **surveys** and joining in on **hybrid public presentations**, the residents and stakeholders are given a chance to learn about local development plans, give their feedback, and discuss the subject with leaders of the

town. Members may also sign up for **social media** and/or **email** updates on grant related brownfield activities, which contain a summary of completed and planned site activities, as well as any news on future community meetings. For members who do not have access to the internet, transportation, are occupied in the workforce or with children, the town may deliver **fliers** to these residents, including the senior population, with information on contacting the town hall if they have questions or concerns. **Public meetings** and/or **planning/visioning sessions with in-person and virtual options** will be held to solicit input on the projected reuse of Priority Site to inform plans for development; these sessions will be recorded and available for later viewing to accommodate all populations. In addition, an **Information Repository** at Town Hall, located in the Target Area, will serve as the location for hard copies of all program-related documents for review by the public. This is a living document and will be updated or revised as necessary. The Town/BAC will review input/feedback at quarterly meetings (or more as needed), draft responses, and create a formal procedure to schedule to dissemination of content through Project Partners, technologies, and public building repositories. BAC meeting agendas minutes, summaries, and presentation copies/recordings are available at staffordct.org. The Town also hosts many popular annual community events where there will also be opportunities to meet the residents where they are and gather feedback and input in a casual and inviting atmosphere. Input will be a key element to prioritize sites, understand community challenges/concerns, guide reuse planning, and serve as a mechanism to maintain an engagement and informed community at all stages. Feedback will be carefully considered and incorporated into the decision-making processes throughout the program.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

i. Project Implementation / ii. Anticipated Project Schedule / iii. Task/Activity Lead / iv. Outputs:

TASK #1 - COOPERATIVE AGREEMENT (C.A.) OVERSIGHT
<p>i. EPA-funded tasks/activities: Management/execution of oversight tasks: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Closeout); Procurement & management of Qualified Environmental Professional (QEP) in accordance with local, state & federal requirements; maintain financial records & complete drawdowns; maintain project files & information repository; project coordination with stakeholders; Site Eligibility Determination Forms; compliance with Section 106 Historic Preservation Act, as applicable; execute access agreements with private property owners; quarterly Brownfields Advisory Committee (BAC) meetings ensure program remains on schedule/budget. Travel & attend Regional/National Brownfields Conferences. Non-EPA grant resources: Town provided in-kind services.</p>
<p>ii. Anticipated Project Schedule: Town will competitively procure QEP by 12/31/24. Kick off program January 2025. Quarterly Reports submitted within 30 days after the end of each reporting period. Annual FFR and M/W/DBE reports submitted by October 30 of each grant year. ACRES updated when assessments are started/completed, new information becomes available and major milestones. Quarterly Steering Committee meetings. Final Closeout reports will be submitted within 90 days after the end of the cooperative agreement.</p>
<p>iii. Task/Activity Lead(s): The Town will lead this task in coordination with and assistance from the QEP, who will provide technical and programmatic assistance, including eligibility forms, QRs, ACRES, etc.</p>
<p>iv. Output(s): EPA Reporting (ACRES, 4 annual FFR & M/W/DBE reports, 16 QRs, Closeout Report, etc.), RFP for QEP, procure QEP, grant drawdown requests, eligibility determination forms, executed access agreements, 16 Steering Committee Meetings, general C.A. oversight and attend Brownfields Conferences.</p>
TASK #2 - COMMUNITY ENGAGEMENT
<p>i. EPA-funded tasks/activities: Stafford will lead community engagement efforts, with a focus on community input into the Assessment and Cleanup/Reuse Planning for Priority Sites. Outreach materials, surveys and program updates will be prepared and posted on the Town’s website and social media. Town will create promotional materials to publicize meetings and ensure the Target Area residents are fully engaged, as well as the broader community & stakeholders. Non-EPA grant resources: Town will provide in-kind services of staff time.</p>
<p>ii. Anticipated Project Schedule: Expected to commence Spring 2025 and occur through 6/30/28. Town anticipates completing a minimum of three (3) public meetings (Brownfields 101 / pre-assessment ~ Spring 2025; Post-Phase II assessments to discuss results and solicit feedback from the community regarding potential redevelopment/reuse scenarios ~ Winter 2026/Spring 2027; and Pre Grant-Closure ~ Spring 2028). In addition, area wide planning specific community outreach, including one (1) public meeting to present results of the analysis and draft reuse concept plans & cleanup plans</p>

will also be conducted, as well as supporting engagement and materials ~ Spring 2027.
iii. Task/Activity Lead(s): Town will lead community engagement activities. QEP will provide technical support, expertise, and other assistance as needed.
iv. Output(s): Outreach materials, surveys, flyers, website and social media updates, public notices, public meeting presentation materials, email blasts, handouts, etc. and coordination with project partners and stakeholders. Documentation of a total of four (4) public meetings (3 ‘general’ plus 1 AWP) community input/feedback, and Town responses.
TASK #3 - PHASE I & PHASE II ASSESSMENTS
i. EPA-funded tasks/activities: Town and QEP will update the Town’s existing brownfields inventory. The Town will seek public input and feedback through a public survey and meeting. The prioritization and selection criteria are anticipated to include feedback and input from the community, perceived and/or actual environmental concerns and health risks, community needs, redevelopment potential, potential impact/benefits to underserved communities, tax title takings, EPA Brownfields eligibility and access. Phase I Environmental Site Assessments (ESAs) will be completed in accordance with most current ASTM Standard Practice for Environmental Site Assessments: E 1527-21 approved by EPA and EPA’s “All Appropriate Inquiry”. Site- specific Quality Assurance Project Plans (QAPPs) will be prepared and approved by EPA prior to Phase II activities. Phase II ESAs/HBM surveys will be completed to confirm/dismiss presence of impacts at sites in accordance with ASTM’s most current standard. QEP will conduct Phase II ESAs/HMB surveys, help Town enroll sites into the state’s voluntary cleanup program (if appropriate) and prepare report(s) for regulatory compliance. Because AWP activities are also planned as part of grant activities, the Town only anticipates completing Phase I/ II ESAs at three (3) priority sites. Non-EPA grant resources: Town will provide in kind services in form of staff time. Although not anticipated, Town can apply for supplemental assessment activities/funding from CT DECD, CTDEEP and/or EPA TBA program if needed.
ii. Anticipated Project Schedule: Commence Spring 2025. Assessment activities will be conducted to maximize efficiencies and available resources, when feasible. Phase I/ II expected to continue through approximately 6/30/27.
iii. Task/Activity Lead: Town will lead the brownfields inventory update and prioritization process. QEP will provide inventory technical support and will conduct QAPPs/Phase I & II ESAs/HBM survey. Town will review reports for accuracy/completeness. Town with help from QEP, will enroll sites into the CT VCP, if applicable.
iv. Output(s): Update inventory. Three (3) QAPPs/Phase I & II ESAs/HBM survey. Enroll sites in VCP, if needed.
TASK #4 – CLEANUP/REUSE & AREA WIDE PLANNING
i. EPA-funded tasks: The Town will work with QEP to develop an <i>Area Wide Plan (AWP)</i> for the Staffordville Target Area. The AWP will build on previous planning efforts and outline a strategy targeted towards Brownfields conceptual reuse and redevelopment scenarios. This plan will seek to reinvigorate and spark reinvestment in the Target Area by mitigating local environmental conditions at Brownfields. Through realistic strategies and market-driven initiatives, it will aim to assess, clean up and return key priority Brownfields sites to productive use. Analysis & Prioritization – Focusing on the Staffordville Target Area, existing conditions will be evaluated including environmental constraints and resiliency related concerns (flooding, etc.) and a redevelopment study and financial feasibility analysis will be conducted to evaluate potential reuse options. This will foster an understanding of the relationship and potential of brownfields sites identified and the larger vision of revitalization for the Target Area. Based on the redevelopment study results, brownfield site analysis, and feedback from the community, the Town will prioritize sites for cleanup, redevelopment, and reuse. Site Specific Reuse Plans / ABCAs – Develop site reuse plans / ABCAs for selected brownfield sites based on the analysis conducted and community feedback received. The draft concept plans will be revised based upon community feedback. Final AWP Report – A report will be generated summarizing the activities conducted. The report will include an implementation and action plan with suggested potential partners, roles, policy adjustments, and potential funding sources. The report will also include a summary of the public outreach and engagement process and how it informed the plan/vision and reuse scenarios. Non-EPA grant resources: The Town will provide in-kind services in the form of staff time, if needed.
ii. Anticipated Project Schedule: Commence Spring 2025. AWP specific public engagement / meeting anticipated 2027. Final AWP Report anticipated Winter’27. Town is confident all tasks can be completed in 4 years.
iii. Task/Activity Lead(s): QEP leads Area Wide Plan/Reuse Plans/ABCAs. Town will lead AWP specific public engagement efforts with help from QEP. Town will review reports for accuracy and completeness.
iv. Output(s): One (1) AWP including up to three (3) site specific Reuse Plans and/or ABCAs/cleanup plans.

3.b. Cost Estimates - Stafford is requesting \$500,000. Costs have been estimated based upon past grant experience and estimates from QEPs. *The Town is requesting no fringe or equipment costs:* **Task 1: Personnel** = \$3,500 (70hrs x \$50/hr); **Travel** = Regional and National Brownfield Conferences – 2 attendees (travel,

lodging, per diem @ \$2,000/pp average x3 conferences) = \$12,000; Contractual = QRs (16 @ \$200ea. = \$3,200) + ACRES (~2 hrs/quarter x16qtrs @ \$150/hr = \$4,800) + general Programmatic Oversight Assistance (~4hrs/mo. x48mo. x\$125/hour = \$24,000) + annual & closeout report assistance (~2 hrs/yrx4yrs@~\$125/hr = \$1,000)=\$33,000. **Task 2: Personnel** = \$3,500 (70hrs x \$50/hr); Supplies: \$1,000 (printing/production of outreach materials/etc). Contractual = prepare presentation materials & attend 4 meetings (\$2,500 ea. = \$10,000) + community survey, general public engagement activities and generate additional outreach materials (\$125 x40hrs = \$5,000). **Task 3: Contractual** = [Inventory @ \$5,000 + 3 Phase I ESAs @ \$22,500 (ave. \$7,500 ea.) + 3 QAPPs @ \$13,500 (~\$4,500 ea.) + 3 Phase II ESAs @ \$218,500 (2 @ ave. of \$80,750 + Hydeville Supplemental Assessment at \$57,000)] = \$259,500. **Task 4: Contractual** = One AWP (\$150,000) + up to three (3) ABCAs/Reuse Plans (~ \$7,500 ea. = \$22,500) = \$172,500.

Budget Categories		Project Tasks				Total
		Task 1: C.A. Oversight	Task 2: Community Engagement	Task 3: Phase I & II ESAs	Task 4: Cleanup / Reuse & AWP	
Direct Costs	Personnel	\$3,500	\$3,500			\$7,000
	Travel	\$12,000				\$12,000
	Supplies		\$1,000			\$1,000
	Contractual	\$33,000	\$15,000	\$259,500	\$172,500	\$480,000
Total Budget		\$48,500	\$19,500	\$259,500	\$172,500	\$500,000

3.c. Measuring and Evaluating Environmental Progress and Results – Staff will implement an EPA-approved detailed work plan to establish clear milestones, monitor progress and track success in achieving outputs, outcomes, and project results. To ensure that the project is on schedule and budget, status updates will be incorporated into the Town’s current reporting structure. The Town will track, measure, and report project performance through its quarterly reports, ACRES database, and website. Quarterly reports and internal project management tools will be used to ensure funds are expended appropriately in a timely and efficient manner within 4 years, including the tracking of DBE expenditures. Towards the end of the project, outcomes will include the number of acres assessed, reports generated, engagement activities conducted, amount of funding leveraged, and estimation of population affected by the minimization of hazardous substances and petroleum contamination exposure. This process has been followed by the Town of Stafford in the past for other grants and has been both successful and effective. If the project is not on schedule, the issue will be documented in the quarterly report corrective actions implemented.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i Organizational Capacity / 4.a.ii. Organizational Structure / 4.a.iii. Description of Key Staff –

Stafford has diverse, comprehensive professional staff and officials with expertise and a proven ability to effectively work together to manage grant funds and collaborative programming. The Town utilizes an interdepartmental approach to administer projects of this type and scope, leveraging its unique combination of in-house finance, development, environmental, capital project, and legal expertise. The Town will co-manage the EPA Cleanup Grant through: The Director of Grants and Community Development, **Amber Wakley**, will serve as the **Project Manager** and have direct oversight of the program. She has a proven ability to effectively manage and administer state and federal grant programs, including the FY22 EPA Brownfields Cleanup Grant and FY19 EPA Brownfields Assessment Grant. Amber maintains and tracks grant requests and reporting and is responsible for helping develop the Town’s economic development and community engagement activities. Additionally, she maintains strong relationships with residents, town boards and commissions, and property owners. Building Official, **Glenn T. Setzler**, offers extensive professional and practical expertise. Glenn has worked in mid-sized architectural firms for over 20 years, has an in-depth understanding of state building and fire codes, excellent project management skills, and experience with all phases of construction. Accomplishments include the Dutch Point Redevelopment project in Hartford valued at approximately \$73M. The Town’s

Interim Finance Director, **Lynn Nenni**, is responsible for accounting practices to ensure compliance, and that funds are expended and drawn down in a timely and efficient manner. She has a working knowledge of reporting and financial procedures for state and federal grant processes. In the event of turnover, the First Selectman (CFO) will assign the most qualified staff to manage the grant. **4.a.iv. Acquiring Additional Resources** – Stafford is committing resources and personnel, augmenting in-house capabilities with additional expertise solicited through RFP, to the extent required by the procurement provisions of the regulations at 2 CFR Part 200. Stafford will contract an experienced Brownfields QEP to assist with assessment activities, community outreach, and EPA reporting. All Town recruitment/hiring is publicly bid and advertised in compliance with local, state, and federal laws, and with direct text/email bid/employment alerts to local subscribers. Town Ordinance 11-5: Bidding/Purchasing Policy establishes procedure for local, competitive, and equitable procurement of any additional technical, legal, or other support that may be needed. The Town also maintains an active partnership with the Brownfields Municipal Assistance Program through the University of Connecticut, which can provide guidance on technical matters, and will seek advice from EPA Region 1 and Connecticut Office of Brownfield Remediation and Development to promote strong labor practices and local hiring/procurement, to link members of the community to potential employment opportunities in brownfields assessment, cleanup, or redevelopment related to the proposed project in a meaningful and equitable way.

4.b. Past Performance and Accomplishments

4.b.i Currently Has or Previously Received an EPA Brownfields Grant - (1) Accomplishments: Stafford received a ***\$650,000 FY22 Cleanup Grant and \$300,000 FY19 Community-Wide Assessment Grant*** and are currently administering and closing the grants, *Period of Performance: 7/1/2022 – 9/30/2025 and 10/1/2019 - 9/30/2023, respectively.* Cleanup Funds are allowing HBM abatement/cleanup at the Witt School. Outputs to date: EPA kickoff meeting, prepared Community Relations Plan (CRP) and Draft ABCA, 1 public meeting, and implemented 30-day public comment period. Assessment and preliminary remedial /reuse planning activities were completed as part of the Town’s FY19 Assessment Grant. Funds have also allowed the Town to develop a prioritized inventory of brownfields sites; establish a brownfield steering committee; identify and quantify contaminants at sites so that they can eventually be remediated and redeveloped. Outputs to date include Community surveys for the identification, prioritization, and selection of priority sites as well as reuse needs and desires of the community, 4 Phase I ESAs, 1 HBM Assessment, 2 Phase II ESA, 1 ABCA, 2 QAPPs, Cleanup & Reuse Planning Activities for the Witt School, 3 public meetings, digital and outreach materials, and BAC meetings. Programs are on schedule. There have been no compliance issues with the terms and conditions of the grant agreement. ACRES and MBE/WBE reporting is up to date. **(2) Compliance with Grant Requirements:** Town follows all grant requirements and obligations including, QRs ACRES, MBE/WBE, annual financial reports, etc., which have all been prepared and submitted on time. ***FY 22 Cleanup Grant*** cooperative agreement was executed on 8/26/2022, and the Town issued/closed RFP to hire a QEP/LEP (Dec 2022), prepared an RFP to hire a QEP/LEP (Nov. 2022), executed QEP contract (June 2023), and renewing/recruiting appointments for the 9-member Brownfields Advisory Board. Project is on budget and schedule in accordance with work plan. Remaining cleanup funds (\$642,641.25) and will be expended in accordance with the work plan and period of performance as defined in 2 CFR § 200.1. Overall, the ***FY19 Assessment Grant*** was completed on budget and schedule following an initial delay due to COVID-19 pandemic, which included the inability to conduct regulatory file reviews at CTDEEP, etc. Delays and corrective measures were noted in ACRES reporting. Remaining assessment funds (\$471.46) chiefly reflect unused Travel costs, subsequent of a vacated staff position previously budgeted for attendance at Brownfields Conferences. Funds were expended in accordance with the period of performance as defined in 2 CFR § 200.1. All grant activities were completed before 9/30/23. The Town has a record of the success and results achieved with the current Brownfields grants and additional funds are crucial for sustaining and expanding these positive outcomes.

Threshold Criteria for Assessment Grants

**Town of Stafford, Connecticut
FY2024 EPA Brownfields Community-Wide Assessment Grant Proposal**

III.B. Threshold Criteria for Assessment Grants

1. Applicant eligibility

The Town of Stafford is a General Purpose Unit of Local Government municipality eligible entity for a EPA Brownfields Assessment Grant.

2. Community Involvement

The Town has successfully implemented a concentrated outreach and engagement program since 2019, which has served as the cornerstone for the FY19 Community-Wide Assessment Grant and FY22 Cleanup Grant proposals and EPA cooperative agreements. The Town is committed to this active engagement program and understands it is a vital part of the Stafford Brownfields Initiative, which created to emphasize Stafford's goals of returning underutilized properties back to productive reuse, as well as protecting human and environmental health, spurring job growth, and creating affordable home opportunities.

The Brownfields Initiative website *explorestaffordct.com* is as a digital information repository where residents can read official documents, learn about program goals, current progress, visions for brownfield sites, and access other pertinent project information. The website also provides opportunities to engage and solicit feedback/input from the community. By participating in efforts such as surveys and joining in on hybrid public presentations, the residents and stakeholders are given a chance to learn about local development plans, give their feedback, and discuss the subject with leaders of the town. Members may also sign up for social media and/or email updates on grant related brownfield activities, which contain a summary of completed and planned site activities, as well as any news on future community meetings. For members who do not have access to the Internet, transportation, are occupied in the workforce or with children, the town may deliver fliers to these residents, including the senior population, with information on contacting the town hall if they have questions or concerns. Public meetings and/or planning/visioning sessions with in-person and virtual options will be held to solicit input on the projected reuse of Priority Site to inform plans for development; these sessions will be recorded and available for later viewing to accommodate all populations. In addition, an Information Repository at Town Hall, located in the Target Area, will serve as the location for hard copies of all program-related documents for review by the public. This is a living document and will be updated or revised as necessary. The Town also hosts many popular annual community events where there will also be opportunities to meet the residents where they are and gather feedback and input in a casual and inviting atmosphere. Input will be a key element to prioritize sites, understand community challenges/concerns, guide reuse planning, and serve as a mechanism to maintain an engagement and informed community at all stages. The Town will also work with project partners to ensure an inclusive process, and that all citizens are actively engaged, informed, and involved. Feedback will be carefully considered and incorporated into the decision-making processes throughout the program.

3. Contractors and Named Subrecipients

The Town of Stafford received a FY2019 \$300,000 U.S. EPA Brownfield Assessment Grant. At least 70% of the funding was drawn down for the Assessment cooperative agreement, payment was received from the EPA, and drawn down funds were disbursed prior to October 1, 2023. A copy of the Town's Payment Transaction Confirmation (ASAPGov Confirmation, dated November 13, 2023) has been attached to this document.

4. Contractors and Named Subrecipients

N/A as Contractors/Subrecipients have not been procured/named.