



# CITY OF BROCKTON

## DEPARTMENT OF PLANNING AND ECONOMIC DEVELOPMENT

Planning Board

Historical Commission

Conservation Commission

Robert F. Sullivan  
Mayor

R01-24-A-009

Robert May, CEcD  
Director

### Narrative Information Sheet

1. Applicant Identification: City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301.
2. Funding Requested:
  - a. Assessment Grant Type: Community-Wide
  - b. Federal Funds Requested: \$500,000
3. Location: Brockton, Plymouth County, Massachusetts
4. Target Area and Priority Site/Property Information
  - Downtown: Census Tract 25023510900
  - Trout Brook Redevelopment District: 25023511000
  - Addresses of Priority Sites
    - Brockton Freight Yard: Eliot St.-Parcel ID 163-192R
    - Brockton Iron & Steel: 45 Freight Street
    - 102 Pleasant Street, 108 Pleasant Street, 76 Warren Ave., 63 Legion Parkway, 111 Legion Parkway
    - 20 and 21 Terminal Place
5. Contacts:
  - a. Project Director: Rob May, Director of Planning and Economic Development. Telephone: (508) 580-7113. Email address: [rmay@cobma.us](mailto:rmay@cobma.us). Mailing Address: City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301.
  - b. Chief Executive/Highest Ranking Elected Official: Mr. Robert F. Sullivan. Telephone: (508) 580-7123. Email address: [MayorSullivan@cobma.us](mailto:MayorSullivan@cobma.us). Mailing Address: City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301
6. Population: 105,643
7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1

The priority site(s) is in a federally designated flood plain.	<b>1</b>
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	<b>4</b>
The reuse of the priority site(s) will incorporate energy efficient measures.	<b>4</b>
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	<b>3, 7</b>
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.	<b>9</b>
The target area is located within a community in which a coal-fired plant has recently closed (2012 or later) or is closing	

8. Letter from the State Environmental Authority: (Attached)
9. Releasing Copies of Application: Not Applicable



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Maura T. Healey  
Governor

Kimberley Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

November 3, 2023

*Via Email*

Rob May  
Director of Planning and Economic Development  
City of Brockton  
45 School Street  
Brockton, MA 02301

**RE: STATE LETTER OF ACKNOWLEDGMENT**  
***City of Brockton***  
***Brownfields Community-Wide Assessment Grant***

Dear Mr. May:

I am writing to support the application submitted by the City of Brockton under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. We understand that the City is planning to undertake several assessment projects to promote redevelopment across the community with a focus in the Trout Brook Redevelopment District and the Trojano parcels. EPA funding will facilitate Brownfields redevelopment by providing resources to assess properties, conduct cleanup planning and redevelopment planning at properties where actual and perceived contamination exist that inhibit potential future development within the City's target areas.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available resources and incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to support the City of Brockton to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.  
Sincerely,

David Foss, CPG, LSP

Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Dorrie Paar, US EPA  
Tracey Costa, Verdantas  
Angela Gallagher, MassDEP Southeast Regional Office  
Kathryn Carvalho, MassDEP Southeast Regional Office

## **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

Brockton is a proud, hard-working, diverse, and struggling AALANA<sup>1</sup> majority city located in Plymouth County and is the largest city in Southeastern Massachusetts and the 7<sup>th</sup> largest city in the state, with just under 106,000 residents<sup>2</sup>, located 25 miles south of Boston. During the 19<sup>th</sup> and 20<sup>th</sup> centuries, Brockton was coined the “Shoe City,” leaving behind significant contamination, job loss, crime and **environmental justice (EJ)** concerns as a consequence of manufacturing over the last 50 years. The 61-acre **Downtown**<sup>3</sup>, representing the core economic and social values of Brockton, has historically served as an industrial center with over 50 shoe and textile factories, set on the banks of the Salisbury Plain River, that once powering factory manufacturing. The densely-populated Downtown is a mix of closed storefronts, dilapidated low-income multifamily and subsidized housing, schools, churches, abandoned buildings, vacant and overgrown lots and Brownfields sites. Adjacent to the Downtown is the 61-acre **Trout Brook Redevelopment District**<sup>4</sup> (TBRD), a 30-plus acre inactive rail yard along with active disheveled scrap metal yards and historic coal yards nestled among commercial and residential properties. Trout Brook is a Historically Developed Urban Stream Corridor and a **FEMA Special Flood Hazard Area**, flowing within TBRD from north to south. The urban stream drains through residential and commercial neighborhoods in the central urban core of the City, and eventually to the Salisbury Plain River, where the Salisbury Brook and Trout Brook converge. These water bodies were harnessed for industrial use with a land development pattern that resulted in worker housing constructed adjacent to industry. The high-density neighborhoods lining the banks of our river systems in the target areas are prone to flooding and the environmental degradation from our industrial past. As part of an historic urban development, Trout Brook was channelized and partially culverted through the rail yard to allow for construction of the rail lines, but routinely floods adjacent neighborhoods and buildings, threatening to spread contaminants. The MBTA<sup>5</sup> commuter rail travels from north to south between the Downtown and TBRD and serves as a sustainable transportation lifeline to residents and workers with 3 commuter stops in the city. Brockton has been listed as **the 11<sup>th</sup> most dangerous city in the state**<sup>6</sup>, with gang warfare, drive-by shootings, and drug overdoses, prevalent in the Downtown. Both neighborhoods are defined as state-designated **EJ communities**. **Underserved populations** include people of color and immigrants that experience high incidence of disease, poverty, low education rates, language barriers, homelessness, low life expectancy, high employment, food insecurity and contaminant exposure. Assessment of the target area aligns with the City’s objectives to mitigate contaminant threats to our underserved and EJ populations, create jobs, connect residents to resources and fast-track brownfields sites for cleanup and developer investment.

#### 1.a.ii. Description of the Priority Brownfields Sites

The City has established the following **Brownfields priority sites** which will include the developer acquisition and reinvestment of close to 50 parcels to accomplish our **Downtown Revitalization** and **Trout Brook Revitalization Plans**. Historic maps<sup>7</sup>, recent Phase I ESAs, and the state waste site cleanup database<sup>8</sup> were utilized to evaluate former usage and suspect/known contamination.

**Trout Brook Redevelopment District** encompasses *Brockton Freight Yard* (31 ac.) which operated as a coal and freight yard for over 100 years since the 1800s and bisected by Trout Brook and a FEMA flood zone. A

<sup>1</sup> African-American, Latino American, Asian, and Native American

<sup>2</sup> US Census. 2020.

<sup>3</sup> Census Tract 25023510900, Brockton, Plymouth County, Massachusetts

<sup>4</sup> Census Tract 25023511000, Brockton, Plymouth County, Massachusetts

<sup>5</sup> Massachusetts Bay Transit Authority (MBTA)

<sup>6</sup> FBI Data 2022.

<sup>7</sup> Sanborn Fire Insurance Maps

<sup>8</sup> Massachusetts Department of Environmental Protection (MassDEP) Waste Site and Reportable Releases database

**Downtown and Trout Brook Redevelopment District Target Areas**

release<sup>9</sup> of PCBs, VOCs, petroleum hydrocarbons and metals was reported to MassDEP in 2007 and assigned Release Tracking Number (RTN 4-20771). Although building demolition and remediation/removal actions were conducted, an Activity and Use Limitation (AUL)<sup>10</sup> was implemented, due to contaminated soils that were not remediated and left behind. Additional assessment is needed to fill data gaps, including soil, groundwater and river sediment impacts and suspect contamination associated with potential buried building debris. The abutting **Brockton Iron & Steel** (3 ac.) has operated as a scrap metal facility since the 1950s, along with a portion of the property formerly used as a bulk petroleum storage facility. A release of VOCs, PCBs, petroleum and metals was reported to MassDEP in 2010 and assigned RTN 4-22881. Limited remediation was conducted and there are suspect contaminant sources, including drum storage, ASTs/USTs<sup>11</sup>, historic bulk oil storage, VOC releases and buried scrap metal. The extent of contaminant impacts has not been delineated.

**Warren Ave./Main St./Pleasant St./Legion Pkwy Enterprise Block:** Five (5) sites in the Downtown with historic commercial use and active gasoline and service stations in the Downtown ranging from 0.25- to 1-acre in size, including shuttered businesses, underutilized commercial space and empty lots within an area historically used for shoe and boot manufacturing with suspect VOC, metals and petroleum impacts.

**Trojano Parcels:** The 1.35-acre triangular-shaped Site was used as warehouse and vehicle servicing, constructed circa 1988. There is a potential of impacts associated usage, storage and potential release of oil and/or hazardous materials.

1.a.iii. Identifying Additional Sites: The City has a list of additional sites in the target areas that are primed for redevelopment and require assessment and will work with the Assessor and Brockton Redevelopment Authority (BRA) on identifying tax delinquent properties and property transfers. We will prioritize grant funds for sites with the greatest near-term community benefit in the target area. The City will also accept candidate site nominations from existing/prospective property owners. Sites that have a potential purchaser or developer with redevelopment plans that align with community goals will be prioritized for funding. Our project partners will provide input on eligible sites that may be candidates for reuse, along with input from the community on EJ challenges in underserved areas. We will interface with MassDEP on identifying sites, along with interested developers and stakeholders on developable sites. As our planning initiatives evolve over the 4-year grant cycle, we will continue to work closely with our partners on new development/reuse opportunities and track the occupation and use of underperforming properties.

**1.b. Revitalization of the Target Area** 1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The City's **Downtown Action Strategy** aims to: increase residential density; re-establish vibrancy; improve public safety; create a Downtown Brockton Higher Education Collaborative; encourage entertainment venues and cultural organizations to locate Downtown; promote diversity of the community; actively target new small business entrepreneurs; improve connectivity between the Downtown and rest of the city and upgrade infrastructure. New development includes restoration of several historic buildings for retail, commercial and market rate and affordable housing uses. The 15-year revitalization is anticipated to bring more than \$80.3M in private investment to several long underutilized and vacant sites in the target area, create up to 450 jobs, and generate up to \$62.2M in District Improvement Financing (DIF) funds over next 30 years. Construction of 631 new housing units (including brownfields sites) permitted under the City's 40R Smart Growth Zoning District<sup>12</sup>, adopted in 2007, will yield \$1.9M in 40R Density Bonus payments. The City launched this planning effort as the first stage of the **Brockton**

<sup>9</sup> Once a release or threatened release of oil or hazardous material is reported to MassDEP, a regulatory clock starts, and Preliminary Response Actions must occur. Within 1 year, the site must either be cleaned up, or it must be classified as either Tier I or Tier II, and undergo a comprehensive assessment and cleanup program.

<sup>10</sup> An AUL is a legal document that identifies site conditions that are the basis for maintaining a condition of No Significant Risk at a property where contamination remains after cleanup.

<sup>11</sup> Above-ground storage tanks and underground storage tanks

<sup>12</sup> The state's Smart Growth Zoning Overlay District Act, Chapter 149 of the Acts of 2004, codified as M.G.L. chapter 40R (the Act), encourages communities to create dense residential or mixed-use smart growth zoning districts, including a high percentage of affordable housing units, to be located near transit stations, in areas of concentrated development such as existing city and town centers, and in other highly suitable locations.

**Downtown and Trout Brook Redevelopment District Target Areas**

**Gateway Transformative Development Initiative (TDI)**, which is a partnership with the City, Brockton 21<sup>st</sup> Century Corporation (B21)<sup>13</sup>, and Trinity Financial, the firm redeveloping **Enterprise Block**, a vibrant, mixed-use development in the Downtown. MassDevelopment<sup>14</sup> selected Brockton as a TDI<sup>15</sup> District in 2014. The Enterprise Block redevelopment (2015/23) included the construction of 216 affordable- and market-rate apartments; rehabilitation of a historic building for office use; 42 artist live-work units, affordable to artists earning up to 60% of the Area Median Income (AMI), creating 120 jobs to date and \$500K in incremental tax revenue. Phase I of the target area revitalization identified 61 parcels for redevelopment. MassHousing<sup>16</sup> closed on \$19M in affordable and workforce housing financing to Trinity for this development. A new 415-space public parking garage was constructed in 2019, allowing the City to consolidate several surface parking lots to make them available for redevelopment as part of four new parcels. Brockton's *121 Main Street* is a new 48-unit housing project and former brownfields site (completed in 2021) designed for low income families-30 units were held for households earning less than 60% of AMI and 18 units were held for households earning less than 110% of AMI, and occupied on the ground floor by Brockton Beer Company, the state's 1<sup>st</sup> minority-owned brewpub. Phase II of the City's revitalization (underway) targets eight properties and Phase III addresses an additional five properties, which will incorporate brownfields sites in the Downtown for market rate and affordable housing. The Downtown Transit-Oriented District (TOD) sits within walking distance of one of the three commuter rail stations in the City. As outlined in the 2020 **Downtown/Trout Brook Development Plan**, the City has prioritized the TRBD as a mixed use village-type community (residential/retail/commercial flex and office) development with public recreational use, connecting to the adjacent commuter rail, linking transit- and pedestrian-oriented (TOD/POD) development and recreational access to Trout Brook. The **TBRD** is valued at \$13.4M and will be the City's largest redevelopment in history and encompasses 2 brownfields sites over 30 acres in size. The target area encompasses 2 of the 4 target area tracts designated as a federal **Opportunity-Zones**<sup>17</sup>, to drive tax-advantaged investment. Assessment of the brownfields sites is crucial to assess environmental impacts that may be impacting receptors; is the stepping stone for cleanup; and to understand challenges that may be encountered during construction and redevelopment.

1.b.ii. Outcomes and Benefits of Reuse Strategy

The **Downtown Action Strategy** was developed to promote a "Livable Downtown". In addition to increasing tax revenue, redevelopment outcomes and benefits include: job creation, with ground-level retail facilities at new developments; increased residential density and affordable housing; reinvestment of vacant, abandoned buildings in the target area; green space to promote recreational opportunities; improved aesthetics and well-being; new small business opportunities; improved public safety with foot/bike patrols and improved lighting; launch of a Clean, Green, and Safe Ambassadors program<sup>18</sup>; upgrades to streetscape and resilient infrastructure to address climate change; increased community diversity by attracting entertainment and cultural organizations and ethnic restaurants, boutiques, and food stores to create new Downtown destinations<sup>19</sup>; Increased exercise/health benefits by connecting pedestrians and cyclists with commuter rail and bus terminal and access to fresh food by expanding

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<sup>13</sup> B21 was established in 1993 to serve as the quasi-public economic development organization "to enhance the position, image, and perception of Brockton as a desirable place to live and work by encouraging financial investment, business development, job creation and retention through economic development.

<sup>14</sup> MassDevelopment is the state's economic development and finance agency and its **Transformative Development Initiative (TDI)** is a place-based development program for Gateway Cities designed to enhance local public-private engagement and community identity; stimulate an improved quality of life for local residents; and spur increased investment and economic activity.

<sup>15</sup> The TDI partnership consists of a team of residents, property and business owners, representatives of institutions, and other stakeholders

<sup>16</sup> MassHousing is an independent, quasi-public agency created in 1966 and charged with providing financing for affordable housing in Massachusetts. The Agency raises capital by selling bonds and lends the proceeds to low- and moderate-income homebuyers and homeowners, and to developers who build or preserve affordable and/or mixed-income rental housing.

<sup>17</sup> The U.S Treasury designated Brockton as an Opportunity Zone in May 2018

<sup>18</sup> Ambassadors will create additional "eyes on the streets;" discourage inappropriate behavior; remove litter; and maintain planters and hanging flower baskets. This program offers an effective and relatively affordable way to improve dramatically the perception of Downtown safety.

<sup>19</sup> In May 2018, MassDevelopment and the civic crowdfunding platform Patronicity launched a new Commonwealth Places campaign with the City of Brockton and Student Ambassadors Bonded Under Recreation & Achievement (SABURA) to transform an underused Downtown vacant lot into a vibrant and lively space filled with music, events, food and festivities year-long

### **Downtown and Trout Brook Redevelopment District Target Areas**

the Brockton Farmer's Market and walkable access to markets, including Vicente's Supermarket, located on the northern edge of the target area; restoration of historic buildings to reduce exposure to building materials contaminant impacts, improve aesthetics, and celebrate the City's valuable historic character; and access to renewable energy by connecting to the Brockton Brightfield solar array<sup>20</sup>. Increased DIF funds will grow the city's developer incentives. The **TBRD** will include multifamily development within easy walking distance of commuter rail and bus services, providing access to health care, education and higher paying jobs. As redevelopment moves forward, it is anticipated that new development will provide opportunities for businesses that would be displaced as a result of implementation of this URP. The City and BRA will make every effort to work with displaced businesses to accommodate their relocation within redevelopment. The demand for goods and services in the TRBD will also help support further revitalization of the businesses in the Downtown. Active ground floor uses, such as a café or small convenience stores could support the needs of both residents and commuters. Along the commuter rail, commercial flex will add additional space for businesses and jobs to support the overall economy of the City and downtown by providing demand for food, goods, and services. Trout Brook becomes a significant asset to this area. Removing invasive plants will help restore the function of the brook. The west of Trout Brook, this plan identifies flood storage areas to help mitigate existing and anticipated flood conditions. The east side of the Brook would become a shared pathway for pedestrians and bicyclists. This pathway would connect Puffer Playground to the north of the rail yard site and Snow Park to the south of the site, which will be a significant amenity for several neighborhoods in the area.

#### **1.c. Strategy for Leveraging Resources**

1.c.i. Resources Needed for Site Reuse: In addition to DIF funding, additional developer incentives and tools successfully used by the City include: **Tax Increment Financing (TIF)**<sup>21</sup>; **Housing Development Incentive Program**; **Chapter 40R Smart Growth Zoning, Historic Rehabilitation Tax Credits**; **New Market Tax Credits**; and the City's **Urban Revitalization Plan & Urban Renewal Authority** for redevelopment. As a **Massachusetts Gateway City**, Brockton has several options to leverage funding to support cleanup and redevelopment of Brownfields sites after assessment. In FY21, Brockton received a \$250K MassDevelopment Brownfields Cleanup Grant for the Corcoran Building Cleanup in south of the Downtown and is eligible to apply for up to \$250K for supplemental Assessment funding per site and \$750K for Cleanup funding per site. The City received an FY21 \$150K Site Readiness Grant for the TBRD development, a FY23 \$150K EPA SNEP<sup>22</sup> watershed grant to address restoration of Trout Brook and a FY23 \$30K state Site Readiness grant to develop an RFQ/RFP to identify a private entity to partner with for the acquisition and redevelopment of the rail yard. We can continue to draw from our state-funded **MassWorks Streetscape Improvements and Infrastructure Grant Program**, which leveraged over \$8M in local funds for traffic flow improvements since 2015. Annually, the City is apportioned \$2M in **MassDOT Chapter 90 transportation funding**, which can be applied to infrastructure improvements in the target areas. The City is an entitlement community under the Community Development Block Grant (CDBG) Program and received just over \$1.3M for this past program year from the US Department of Housing and Urban Development. CDBG Funds could be an important supplemental resource for targeted infrastructure, public service, or housing improvements for sites within the target area. The City plans to contribute \$450K in HUD HOME funds to the revitalization. We will also utilize District Improvement Financing (DIF) funding for public infrastructure and cleanup activities. We can tap into the Health Dept's FY'22 Mass. Dept of Public Health grant (\$1M) to assist in public health concerns. As a state **Green Community** (over \$500K to date), we are eligible for funding to apply to renewable energy and energy efficiency projects. MassHousing has provided over \$91.M in overall financing for development in the target area. Other financing sources included a total of

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<sup>20</sup> The 425-kilowatt solar array is owned by the City and is a **Brownfields to Brightfields** success, located within the target area.

<sup>21</sup> District Improvement Financing (DIF) and Tax Increment Financing (TIF) are economic tools that promote redevelopment by use of public/private partnerships. TIF offers tax breaks to developers, while DIF channels tax dollars into targeted redevelopment districts.

<sup>22</sup> Southeast New England

**Downtown and Trout Brook Redevelopment District Target Areas**

\$30.6M in state and federal tax credit equity, approximately \$3.5M in direct support from DHCD<sup>23</sup>, and approximately \$3.5M from the Affordable Housing Trust Fund, which MassHousing manages of behalf of DHCD.

1.c.ii. Use of Existing Infrastructure: The target area is connected to public water, separate sewer and stormwater utilities, along with electric, natural gas, and communications (i.e., cable, high-speed internet, fiber optics). OpenCape, the high-speed fiber-optic network for Southeastern Massachusetts, runs directly through the target area. The majority of the utilities in the target area are located underground, providing security and reducing outages during storm events. New development is anticipated to utilize and improve existing infrastructure, along with upgrading stormwater discharges by implementing low impact development (LID). New buildings may also be designed with solar panels and/or connect to the Brockton Brightfield solar array. Enhancements of Downtown infrastructure will improve walkable connections to existing amenities, including Vicente’s Supermarket and link to new activity to existing assets. The City proposes a hybrid approach at Trout Brook that combines nature-based with engineered improvements to reduce flooding, improve stormwater management, and restore water quality/ecosystem health-The proposed restored riparian corridor and stormwater management area along Trout Brook, incorporating green infrastructure and nature-based solutions for improved resiliency.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**2. a. Community Need:** 2.a.i. The Community’s Need for Funding: The City is a state-designated **Economic Target Area (ETA)** and an **Economically Distressed Area (EDA)**, due to job loss and business closures, and a state-designated “**Gateway City**”, which offered good jobs and “gateway” to the American Dream, but now suffers from the loss of manufacturing jobs over several decades. Since 2017, 270 teachers have suffered 2 layoffs, due to a \$16M state-funded budget gap, resulting in classroom overcrowding and learning deficits-Between 80-90<sup>th</sup> percentile have less than a high school education<sup>24</sup>. *Increased tax revenue will help with teacher hires to provide a seamless and supportive environment for high school completion; English for non-native speakers; educational certification; credentialing; targeted workforce-skills training.* The target area has lost over 4,000 jobs in the last 20 years and suffered heavily as a result of COVID. The per capita income in the target area is \$16,258<sup>25</sup> (Downtown) and \$24,453<sup>26</sup> (Trout Brook), compared to state (\$48,617) and national (\$37,638) incomes. *Redevelopment of Brownfields sites will result in new jobs and workforce training and the POD and TOD will link residents to transportation and jobs.* Renter-occupied housing is 89% in the target area<sup>27</sup>, exceeding the state (39%) and national (31%) rates, low rates of owner-occupied housing (4 % in Downtown) at with limited options for home ownership.. *Development of new affordable housing will provide opportunities for home ownership.*

2.a.ii. Threats to Sensitive Populations **(1) Health or Welfare of Sensitive Populations:** The target area is hampered by over 75% of the 628 state-listed contaminated sites in the City, including over 50 Brownfields sites in the target area that contribute to blight, disease, and devastating morale. The target areas include a history prevalent in boot & shoe factories, rail yards, coal yards and industrial use, intermingled with schools, churches, and commercial and low-income housing. There is a likelihood that *flooding from Salisbury Plain River and Trout Brook can cause the spread of contaminants.* Wastewater discharges and lead paint exceed the 90<sup>th</sup> percentile<sup>28</sup>, exacerbating contaminant exposure. Furthermore, demolished historic buildings are likely to have been buried in place (prevalent in Brockton) as fill material, with the potential of asbestos, PCBs, lead paint, coal ash, wood ash and polycyclic aromatic hydrocarbon (PAH) contamination. Brockton is one of eight cities in the state classified by the U.S. Dept. of Agriculture (USDA) as a **food desert**<sup>29</sup>, which *will be improved by access to fresh food.* We are one of 11 state communities with teen birth rates that exceeded the state average<sup>30</sup>, reflecting a burden on young

<sup>23</sup> Massachusetts Department of Housing and Community Development

<sup>24</sup> EPA EJScreen

<sup>25</sup> Census Tract 25023510900, Brockton, Plymouth County, Massachusetts

<sup>26</sup> Census Tract 25023511000, Brockton, Plymouth County, Massachusetts

<sup>27</sup> Ibid

<sup>28</sup> EPA EJScreen

<sup>29</sup> IBID

<sup>30</sup> Massachusetts State Health Assessment



**Downtown and Trout Brook Redevelopment District Target Areas**

mothers and their babies-The state designated Brockton as 1 of 3 cities that does not provide adequate pre-natal care of teens, which is closely tied to high infant mortality<sup>31</sup>. The underinsured community relies heavily on the Brockton Neighborhood Health Center a HHS Community Health Center in the Downtown, created to combat the state’s designation as a “Medically Underserved Area”<sup>32</sup>. Low life expectancy is up to the 97<sup>th</sup> percentile<sup>33</sup>. The elderly and children under 5 in the target area exceed the 90<sup>th</sup> percentile<sup>34</sup>. Sensitive populations reside in close proximity to Brownfields sites. *The Brownfields program is anticipated to facilitate community outreach in the target area by identifying and connecting families and individuals in need with community health resources, including education and access to care. New affordable housing will replace aging, crowded, unhealthy residential buildings.* **(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Incidents of breast, cervix/uteri, kidney & renal pelvis, pancreas cancers and melanoma in the community exceed state rates<sup>35</sup> and may be linked to heavy metals, chlorinated solvents, PCBs and petroleum compounds at Brownfields sites in the target area. We are the 3<sup>rd</sup> highest community in the state with the most incidents of childhood lead poisoning (likely from lead paint in old housing stock) and highest asthma prevalence<sup>36</sup>, which may be associated with VOC exposure. Elderly suffering includes total tooth loss close to 25% (exceeding 15% in state)<sup>37</sup>, likely attributed to lack of fluoridation in City water<sup>38</sup>. We have higher rates of adult obesity, arthritis, high blood pressure, chronic obstructive pulmonary disease, incidence of high blood pressure, stroke, and lack of insurance than state rates<sup>39</sup>, linked to lack of exercise and access to healthy food. *Assessment of Brownfields sites will identify contaminants of concern and include risk characterizations to assess potential risk to human health. These data will be shared with our community health partners. Assessed Brownfields sites will be cleaned up, mitigating contaminant exposure to sensitive populations. Our community health partners will identify individuals with health needs that will benefit from affordable housing, access to fresh and healthy food and exercise benefits from new greenspace and POD.* **(3) Environmental Justice:** (a) Identification of Environmental Justice Issues: The underinsured populations in the target areas suffer from EJ concerns, high incidence of disease, poverty, low education rates, limited access to fresh food and affordable health care and housing, language barriers and exposure to contaminants. These challenges are exacerbated by food insecurity, living in older stock housing proximate to brownfields sites and facilities, lack of recreational opportunities and lack of jobs. Linguistically-isolated individuals in the target area exceed the 95<sup>th</sup> percentile<sup>40</sup>; our AALANA<sup>41</sup> population exceeds 80%<sup>42</sup> and the most common racial or ethnic group living below the poverty line in Brockton is Black or African American<sup>43</sup>. The student population is ethnically, racially, culturally and linguistically diverse, with 30 different languages represented<sup>44</sup>. Despite recent expansion in permanent, supportive housing for the homeless, the demand exceeds availability and the target area shelters are overwhelmed-The former “Tent City” homeless encampment at the railyard in the target area was dismantled in 2016, with increased need. (b) Advancing Environmental Justice: The City is committed to our reinvestment in the target areas to encourage economic growth and restoration of degraded Brownfields sites that pose a significant source of environmental burden and threat to the health, welfare and wellbeing of these sensitive populations. Working with the City’s Commission on Human Rights, Diversity, Equity & Inclusion, our key objective is to provide equity by focusing on equitable access to services, amenities and infrastructure. Infrastructure upgrades will ensure that that residents and businesses are prepared for and resilient

<sup>31</sup> The Brockton Neighborhood Health Center: An Institution Formed and Molded by Controversy. Jennifer Collins

<sup>32</sup> Ibid.

<sup>33</sup> EPA EJScreen

<sup>34</sup> EPA EJScreen

<sup>35</sup> Cancer Incidence in Massachusetts 2011-2015 for Brockton

<sup>36</sup> Massachusetts Communities with Highest Asthma Prevalence. Mass. Dept. of Public Health. 2017

<sup>37</sup> 500 Cities Project: Local Data for Better Health 2014. Brockton, MA

<sup>38</sup> Community Health Needs Assessment for the Greater Brockton CHNA. Dec 2010.

<sup>39</sup> 500 Cities project: Local Data for Better Health 2014. Brockton, MA

<sup>40</sup> EPA EJSCREEN

<sup>41</sup> African-American, Latino American, Asian, and Native American

<sup>42</sup> EPA EJSCREEN and Census 2020 data

<sup>43</sup> DATA USA: Brockton

<sup>44</sup> Brockton Public Schools Academic Profile

**Downtown and Trout Brook Redevelopment District Target Areas**

to the effects of climate change. Community engagement activities will include translators and accessible meeting locations to foster engagement in environmental, energy, and climate change/climate equity decision-making. All businesses and residents displaced by public action are entitled to receive relocation assistance and payment under Chapter 79A of the Mass. Gen. Laws. The City’s relocation plan will be refined and updated as the various project phases are finalized and no displacement will occur until a relocation plan has been finalized and approved by the Bureau of Relocation. The assessment grant will address legacy contamination that have disproportionately impacted EJ populations in the target area and will results in adaptive reuse and/or demolition at priority sites and will fill local funding gaps allowing for revitalization of target area brownfields sites.

**2.b. Community Engagement** The following is a list of project partners, project involvement and project roles:

<p><b>NeighborWorks Housing Solutions</b>, a non-profit developer for affordable and market rate housing and target area brownfields redevelopment projects, will provide support <u>on identifying candidate brownfield sites for affordable housing</u>. Tim Doherty (617) 770-2227. <a href="mailto:tdoherty@nwsoma.org">tdoherty@nwsoma.org</a>.</p>
<p><b>MassHire Greater Brockton Workforce Board</b> provides tools to connect the community <u>to employment resources and will identify opportunities workforce development in the target area to connect target area residents to new jobs</u>. Jason Hunter, Director of Operations (508) 584-3234. <a href="mailto:jhunter@bawib.org">jhunter@bawib.org</a>.</p>
<p><b>MassDevelopment</b>, the state’s development finance agency and land bank, works with businesses, nonprofits, banks, and communities to stimulate economic growth. The agency will provide <u>input on brownfields sites eligible for Brownfields Assessment/Cleanup funding, developer financing and tax credits</u>. Dottie Fulginiti, Sr. VP, Community Investment. (508) 612-3165. <a href="mailto:dfulginiti@massdevelopment.com">dfulginiti@massdevelopment.com</a></p>
<p><b>Brockton Housing Authority</b> manages low- and moderate-income public housing for the City and will provide <u>input on brownfields sites that can meet affordable housing needs, translators and meeting space</u>. Tom Thibeault, Executive Director. (508) 588-6880. <a href="mailto:tomt@brocktonhousingauthority.com">tomt@brocktonhousingauthority.com</a>.</p>
<p><b>Brockton Neighborhood Health Center</b> will provide support on <u>community health needs, health data community outreach, and translation services</u>. Sue Joss, CEO. (508) 559-6699. <a href="mailto:josss@bnhc.org">josss@bnhc.org</a></p>
<p><b>Brockton Redevelopment Authority</b> is a quasi-public agency contracted by the City, providing community development and economic revitalization support specifically for the benefit of low- and moderate-income household. BRA will provide support on <u>brownfields site access, property acquisition, brownfield reuse and redevelopment</u>. Nathalie Jean, Executive Director (508) 586-3887. <a href="mailto:njean@brocktonredevelopmentauthority.com">njean@brocktonredevelopmentauthority.com</a></p>
<p><b>Brockton Area Transit Authority</b> is a public, non-profit organization that provides public transportation in the City and will provide <u>input on transit/infrastructure and identifying additional bus stops in the target area to access resources and amenities</u>. Michael Lambert. Administrator. (508) 588-2240. <a href="mailto:mlambert@ridebat.com">mlambert@ridebat.com</a></p>

**2.b.iii. Incorporating Community Input:** We will build on recent successes conducted in the City, such outreach conducted during our EPA Brownfields assessment and cleanup activities and the outreach conducted as part of the Comprehensive Master Plan “A Blueprint for Brockton” with extensive community engagement and information program including “listening sessions”. The City will continue to offer open houses to test various reuse scenarios with members of the public, whereby feedback has been incorporated into final plans. These plans emerged from an ongoing collaborative process involving hundreds of citizens and other stakeholders throughout the community. We will utilize these same tools, including translators, City and Project and community partner websites, and conduct quarterly meetings to keep the community informed. We will also develop and distribute multilingual brochures, prepare charrettes, and exhibit posters (both printed and electronic) to educate the public. We will invite local newspapers, radio and television stations to cover meetings. We will host informational booths at community, governmental and cultural events in the target area. The City will continue to offer videoconferencing platforms and social distancing during COVID-19.

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

**3.a. Description of Tasks/Activities and Outputs**

Implementation of the EPA grant and completion of the project will be a collaborative effort between City staff, supported by project partners and stakeholders. The scope of work has been organized into four tasks:

***Task 1: Cooperative Agreement Oversight***

i. <u>Project Implementation:</u> We will resurrect the Brownfields Steering Committee and MassDEP and EPA staff will be invited. We will issue a RFP to select a Qualified Environmental Professional (QEP) and perform general program management. The Committee will initially meet monthly and then quarterly to execute the priorities and direction of the Brownfields Program. Meetings will be open to the public and held in the target area.
ii. <u>Anticipated Project Schedule:</u> Progress reports will be submitted on or before January 30th, April 30th, July 30th, October 30th of each year. Annual DBE reports will be submitted on or before October 30th of each year. Information on the target Sites will be entered into ACRES following execution of the cooperative agreement, and updated upon completion of milestones related to remediation, City approvals, and site redevelopment. The Committee will initially meet monthly and then quarterly to execute the priorities and direction of the Program.
iii. <u>Task/Activity Lead:</u> The Planning and Economic Development (PED) Director will serve as the Lead, with support from the Brownfields Steering Committee, City staff (Planning, Finance, Assessor, Legal Counsel), Brockton Redevelopment Authority (BRA) and QEP.
iv. <u>Outputs:</u> Quarterly progress reports, annual DBE reports, final closeout report, ACRES updates (as needed); Davis Bacon reporting; Contract with QEP; Site inventories.

***Task 2: Community Outreach and Engagement***

i. <u>Project Implementation:</u> Community meetings will be held to discuss the results of the assessment and reuse and eliciting input and feedback. We will perform “Town-hall” type meetings, neighborhood walks, surveys, face-to-face communications, to solicit and generate input. We will also use electronic tools (i.e., Zoom) for meetings and incorporate social distancing at in-person meetings. We will engage the community about the Brownfields process and translators will be utilized to support our multilingual population in the target area.
ii. <u>Anticipated Project Schedule:</u> Quarterly meetings will be held in Years 1&2 and Biannually in Years 3&4.
iii. <u>Task/Activity Lead:</u> The PED Director will serve as the Lead with support from staff, Brownfields Committee, QEP, Assessors Dept., and legal counsel.
iv. <u>Outputs:</u> CRP, Community input and feedback, updated websites, informational posters/flyers.

***Task 3: Phase I and Phase II ESAs***

i. <u>Project Implementation:</u> Phase I ESAs will be conducted for each eligible site in accordance with the ASTM 1527-13 Standard, which will include a summary of “recognized environmental conditions” (RECs) and recommendations for Phase II ESAs. P1 ESA reports will include a summary of “recognized environmental conditions” (RECs), and recommended Phase II ESA ( <b>P2ESA</b> ) activities. <b>P2ESAs</b> will include media sampling, lab analysis, and risk assessments.
ii. <u>Anticipated Project Schedule:</u> Phase I ESAs in Quarters <sup>45</sup> 2-9 and Phase II ESAs in Quarters 3-14. Cleanup planning will be conducted in Quarters 6, 8 and 15. Quarterly community meetings will be held to discuss the results of the assessments.
iii. <u>Task/Activity Lead:</u> The QEP/LSP <sup>46</sup> will lead this effort and in coordination with the PED Director and Planning staff.
iv. <u>Outputs:</u> Site Eligibility Forms; Access agreements, Permits, P1 ESA and P2 ESA reports.

***Task 4: Cleanup and Area-Wide Reuse Planning***

<sup>45</sup> Quarters are 3-month periods, with 16 quarters in the 4-year grant cycle.

<sup>46</sup> In 1993, Massachusetts created a model program that privatized the cleanup of hazardous waste sites in the Commonwealth. Licensed Site Professionals (LSPs) are authorized by the Commonwealth to work on behalf of property owners, operators, and other responsible parties to oversee the assessment and cleanup of contamination that has been released into the environment. LSPs are scientists, engineers, and public health specialists with significant professional expertise in oil and hazardous material contamination. LSPs are governed by the Massachusetts Board of Registration of Hazardous Waste Site Cleanup Professionals, also known as the LSP Board.

- i. **Project Implementation:** Cleanup Plans with integrated Analysis of Brownfield Cleanup Alternatives (ABCAs) will address remedial actions for sites exceeding state (MCP<sup>47</sup>) regulatory criteria. Cleanup Plans will include a feasibility analysis, protective of human health and the environment. Reuse Plans will include Site Reuse Assessments, Market Studies and Site Reuse Visions.
- ii. **Anticipated Project Schedule:** Quarterly public meetings will discuss the results of the assessments and proposed remediation and reuse planning to solicit public input.
- iii. **Task/Activity Lead:** PED will lead this effort, with support from staff, Brownfields Committee, BRA and QEP. We will rely on our development Project partners to provide redevelopment support. We will continue to provide “matchmaker” interface between site property owners and developers.
- iv. **Outputs:** Cleanup Plans, with integrated ABCAs<sup>48</sup> will address remedial actions for sites that come under the MCP<sup>49</sup>. Reuse Plans: 2 Site Reuse Assessments, 2 Market Studies and 2 Site Reuse Visions.

**3b. Cost Estimates**

Budget Categories		Project Tasks				Total
		Cooperative Agreement Oversight	Community Outreach and Engagement	Phase I and Phase II ESAs	Cleanup and Area-Wide Reuse Planning	
<b>Direct Cots</b>	Personnel	\$4,300	\$4,250	\$4,250	\$150,000	\$162,800
	Fringe Benefits					
	Travel	\$2,000				\$2,000
	Equipment					
	Supplies					
	Contractual	\$7,200	\$3,600	\$287,200	\$37,200	\$335,200
	Other					
<b>Total Budget</b>		\$13,500	\$7,850	\$291,450	\$187,200	\$500,000

**Development and Application of Cost Estimates**

- Task 1:** 86 staff hrs.(\$50/hr.) and QEP support (40 hrs. @ \$180/hr.). Travel is for one EPA Brownfields conference (\$2,000 for conference for airfare, hotel, per diem, and expenses).
- Task 2:** 85 staff hrs.(\$50/hr.) and QEP/LSP support (20 hrs. @ \$180/hr.)
- Task 3:** 85 staff hrs.(\$50/hr.). 14 Phase I ESAs @ \$5,200 ea.; 5 Phase II ESAs @ \$25,000 ea.; 1 Phase II ESA @ \$75,000; QEP/LSP support (80 hrs. @ \$180/hr.)
- Task 4:** 3,000 staff hrs.(50/hr.) 2 Site Reuse Assessments; 2 Site Reuse Visions; 2 Market Studies; 6 Cleanup plans @ \$5,000 ea. and QEP/LSP support (20 hrs. @ \$180/hr.)

**3.c. Plan to Measure and Evaluate Environmental Progress and Results**

Our anticipated outputs from the Brownfields Program include technical and quantitative reports to provide the City with the next steps to move the sites forward. We will prepare quarterly reports and update ACRES to document site progress. Outcomes include developer purchase of privately-owned sites for cleanup and redevelopment. We will measure the qualitative and quantitative outcomes of community engagement. We will

<sup>47</sup> The Massachusetts Contingency Plan is the state’s environmental regulation that provides for the protection of health, safety, public welfare and the environment by establishing requirements and procedures for the activities and cleanup of oil or hazardous materials.

<sup>48</sup> Analysis of Brownfields Cleanup Alternatives

<sup>49</sup> The Massachusetts Contingency Plan is the state’s environmental regulation that provides for the protection of health, safety, public welfare and the environment by establishing requirements and procedures for the activities and cleanup of oil or hazardous materials.

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incorporate schedule flexibility to adapt to potential changes (i.e., staff, weather, property ownership, developer). We anticipate increases in tax revenue, number of jobs created, crime reduction statistics, number of acres remediated/redeveloped, number of acres of greenspace created, kilowatt hours of renewable energy produced, miles of infrastructure upgraded, percent reduction in health issues, number of units of affordable housing, increase in transit (bus/rail) usage. Additional anticipated outcomes include decrease in homelessness, increase in awareness of EJ issues and decrease in EJ impacts, increase in public participation, increase in recreation (including pedestrians). We expect that some of the sites will trigger MassDEP reporting criteria outcomes and we will work with the Potential Responsible Parties (PRPs) to facilitate MassDEP registration.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a. Programmatic Capability:** This grant will be managed by the Dept. of Planning and Economic Development. The Director, Rob May, has significant experience managing state and federal grants and over 25 years of public and non-profit management experience including previous EPA and state (MassDevelopment) Brownfields grants. Mr. May and his Planning staff collaborate with various stakeholders and City departments to achieve the grant's goals and objectives. The Department's financial management staff and Auditor will ensure all invoices are paid within 30 days, and that all back-up documentation is on file to support expenditures of state and federal funds. Expenditures routinely monitored, reviewed and approved annually by the Auditor. Mr. May will be assisted by his Planning staff, who will provide mapping support and facilitate community engagement. Pamela Gurley, former administrative assistant and current City contractor, will provide financial management of the grant has over 28 years of grant and financial systems management experience. In the event of staff turnover or the loss of the agency, the Mayor's Office would become responsible for ongoing compliance/completion for the duration of the Grant period. We will seek support from municipal staff (including a new Brownfield Planner), city, state and federal agencies, and the private sector to support our Brownfields program. We will seek support from UCONN<sup>50</sup> for stakeholder workshops and charrettes. Old Colony Planning Council (OCPC) in Brockton will provide transportation planning support. City Fire, Police, and Health Dept. will provide safety, security and health support to assess Brownfields sites (i.e., potential discarded hypodermic needles, squatters, gang territory) and Dept. of Public Works and City Engineer will address infrastructure needs. We will work with the state Attorney General to seek Covenants Not to Sue. Additional state agency support includes DHCD<sup>51</sup>, Mass. Dept. of Veterans Services, DPH, State Police, Dept. of Transportation and federal agencies include HUD and Veterans Affairs Dept.

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

**4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments:** The City has received 5 EPA Brownfields Assessment Grants, 2 Cleanup Grants and 1 Revolving Loan Fund (RLF), totaling \$950K, from 1998 to 2021. Nine Phase I ESAs and five Phase II ESAs were completed from 2011-2012. The FY'04 Cleanup Grant addressed remediation of the former Montello Auto body site. A former manufactured gas plant was remediated in 2004 and redeveloped as the 3.7-acre Brockton Brightfield solar power plant. The former Ralsco Kitchen Manufacturing site was assessed, remediated and redeveloped as Charlie Tartaglia Park in 2017, providing year-round recreation of the underserved children. The former Montello Shoe Last Company was developed into 22 affordable and market-rate townhouses. Under the FY'19 EPA Brownfields Assessment Grant, the City completed 17 Phase I ESAs and 10 Phase II ESAs, resulting in 12 sites that have entered into exclusive negotiation and/or land disposition agreements with developers. The FY'21 EPA Cleanup grant addresses remediation of the Corcoran Building site (a prior EPA Brownfields Assessment site) and is underway. **(2) Compliance with Grant Requirements:** The City has complied with quarterly ACRES reporting requirements, including financial and progress reports. The City has never had any adverse audits and are in full compliance with all compliance reporting, documentation and expenditure of funds management. Since the hiring of Mr. May, the City has established management and program tracking to ensure that grants are expended within the grant period, including new accounting procedures for grant drawdowns and staff training. The City has effectively secured and applied cost share funding to supplement grant funds.

<sup>50</sup> The University of Connecticut provides Technical Assistance for Brownfields Communities Program for EPA Region 1

<sup>51</sup> Massachusetts Department of Housing and Community Development

## **THRESHOLD CRITERIA FOR ASSESSMENT GRANTS**

### **1. Applicant Eligibility**

The City of Brockton, Massachusetts is eligible to apply for an EPA Brownfields Assessment grant because it is a General-Purpose Unit of Government.

### **2. Community Involvement**

We will build on recent successes conducted in the City, such outreach conducted during our EPA Brownfields assessment and cleanup activities and the outreach conducted as part of the Comprehensive Master Plan “A Blueprint for Brockton” with extensive community engagement and information program including “listening sessions”. The City will continue to offer open houses to test various reuse scenarios with members of the public, whereby feedback has been incorporated into final plans. These plans emerged from an ongoing collaborative process involving hundreds of citizens and other stakeholders throughout the community. We will utilize these same tools, including translators, City and Project and community partner websites, and conduct quarterly meetings to keep the community informed. We will also develop and distribute multilingual brochures, prepare charrettes, and exhibit posters (both printed and electronic) to educate the public. We will invite local newspapers, radio and television stations to cover meetings. We will host informational booths at community, governmental and cultural events in the target area. The City will continue to offer videoconferencing platforms and social distancing during COVID-19.

### **3. Expenditure of Existing Grant Funds**

The City has expended FY’2019 EPA Brownfields Assessment funds and the grant is closed. The City does not have an EPA Multipurpose Grant.

### **4. Contractors and Named Subrecipients**

Not Applicable. The City will procure contractors subsequent to contract award.