



***Bennington County Regional Commission***

210 SOUTH STREET • SUITE 6 • BENNINGTON, VERMONT 05201 • (802) 442-0713

November 10, 2023

**1. Applicant Identification:**

Bennington County Regional Commission  
210 South Street, Suite 6  
Bennington, VT 05201

**2. Funding Requested:**

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

**3. Location:**

Bennington County, Vermont

**4. Target Area and Priority Site Information:**

Target Areas

- Bennington (census tract 50003971200)
- Town of Pownal (census tract 50003971300)

Priority Sites

- Former Bennington High School, 650 Main St., Bennington, VT 05201
- Lauzon Machine & Engineering, 757 Main St., Bennington, VT 05201
- Center Street Site, 2851 N. Pownal Rd., Pownal, VT 05261

**5. Contacts:**

a. Project Director

Jim Henderson  
Environmental Program Manager  
201 South Street, Suite 6  
Bennington, VT 05201  
802-442-0713  
E-mail: [jhenderson@bcrcvt.org](mailto:jhenderson@bcrcvt.org)

b. Chief Executive/Highest Ranking Elected Official:

Bill Colvin  
Executive Director  
201 South Street, Suite 6  
Bennington, VT 05201

802-442-0713

Email: [bcolvin@brcvt.org](mailto:bcolvin@brcvt.org)

- 6. Population:** Bennington County: 37,235  
Target Area 1: Bennington Census Tract 9712: 4,372  
Target Area 2: Pownal Census Tract 9713: 3,290

**7. Other Factors:**

<b>Provided Information on Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <u>Section I.B.</u> , for priority site(s) within the target area(s).	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

**8. Letter from State of Vermont:**

Attached

**9. Releasing Copies of Applications:**

Not Applicable

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

November 2, 2023

Bennington County Regional Commission  
Attn: Jim Henderson  
210 South Street, Suite 6  
Bennington, VT 05201

Dear Mr. Henderson:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Bennington County Regional Commission (BCRC) intends to apply for an EPA Brownfields Community-Wide Assessment Grant, and if awarded, to utilize the grant funds to conduct assessment activities associated with the characterization of brownfield properties within the BCRC region of Vermont.

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

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

Best of luck in the competition.

Sincerely,



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

CC: Dorrie Paar - USEPA



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

### **a. Target Area and Brownfields** *i. Brownfield Challenges & Description of Target Area*

The Bennington County Regional Commission (BCRC) is applying for a \$500,000 EPA brownfields community wide assessment grant to address brownfields sites in Bennington County Vermont (geographic boundary). Bennington County is the southwestern most county in Vermont with a population of 37,235.<sup>1</sup> Bennington County was at the center of the industrial revolution and signs of that time are evident today in the form of mills and factories in the urban areas, landfills containing industrial wastes, and former mines and quarries throughout the region. Beginning in the 18<sup>th</sup> century, trains ran through the valley, stopping at our industrial and manufacturing facilities. Textile manufacturers, tanneries, electronic component manufacturers, and petroleum storage, processing, and distribution establishments as well as the businesses that supported them have operated in our communities. Land uses on any given property shifted from one purpose to another several times over. Contamination at our brownfields sites include heavy metals, PCBs, volatile organic compounds, lead, petroleum, asbestos, solvents, PFOA, and other potentially hazardous materials. Brownfields affect Bennington County's housing shortage in two ways: our homeless population starts using brownfields sites for shelter, exposing themselves to potential contamination and brownfield sites affect our ability to use the land and infrastructure to meet the needs of this same population.

Our target areas for this grant are the town of Bennington census tract 9712 and town of Pownal census tract 9713. Bennington was Vermont's first town, chartered in 1749. The Walloomsac River provided power to operate mills and machinery. Many of the original town buildings and factories still stand, vacant, in the shadows of US manufacturing decline as factories moved overseas. Pownal census tract incorporates multiple small communities including the villages of Pownal, North Pownal and Pownal Center (collectively known as Pownal). Pownal was also a mill area and cotton and woolen mills operated during the 19<sup>th</sup> century. In the 20<sup>th</sup> century, the village of Pownal grew around a horse and greyhound racing track. Due to the seasonality of this industry, manufactured and mobile homes were used for seasonal workers. With time, these homes became permanent residences.

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

The Vermont Department of Environmental Conservation (DEC) reports 78 hazardous sites, 34 dry cleaners, 1 salvage yard, 4 listed Superfund sites, and more than 200 leaking underground storage tank sites in Bennington County. Additionally, with our past brownfields grants we have added sites to our inventory, and most are not on any state list. We have 10 known brownfields sites in our target areas and have three priority sites that are described in further detail below.

**Former Bennington High School, Bennington:** Located in the 100-year flood hazard zone<sup>2</sup>, the former Bennington High School (Benn Hi) was constructed in 1835 and used for residential purposes until 1912 when it was converted to the Bennington High School and later the Mount Anthony Middle School. This 99,000 square foot building has been mostly vacant since 2004, partially due to the immense costs associated with a large deteriorating site. The building has known asbestos, polychlorinated biphenyls (PCBs), and lead in building materials. An underground storage tank was removed but at a time when residual contamination was not evaluated. It is a priority because the city has a lease to purchase agreement with the current owner and a developer is lined up to redevelop part of the building for affordable and market rate housing.

**Lauzon Machine & Engineering, Bennington:** This large brick manufacturing building on 1.37 acres is located in the 100-year flood hazard zone and bisected by Barney Brook, a tributary of the Walloomsac

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<sup>1</sup> US Census Bureau, 2021 ACS 5-Year Estimates

<sup>2</sup> FEMA FIRM Panel # 50003C0414D, effective on 12.2.2015

River.<sup>3</sup> This site historically hosted a woolen mill and was most recently used by Lauzon Machine & Engineering (Lauzon Machine) as a machine shop. A Phase I environmental site assessment (ESA) identified several recognized environmental conditions (RECs). The Vermont DEC recently completed a Phase II investigation and identified PCBs in soil and PCBs and naphthalene in sub slab soil. A supplemental Phase II ESA and regulated building material survey for asbestos and lead-based paint are needed. A New-York based developer is interested in purchasing the property to convert it to multi-family housing with possible retail space.

**Center Street Site, Pownal Center:** In the 1950s, the Center Street site was leased to the Warren Wire Company which applied Teflon-coating to wires on site. BCRC assessed this site with its first brownfields grant on behalf of the property owner that wanted to build a Vermont country dairy bar, but stopped development plans after the site was determined to be the source of Perfluorooctanoic Acid (PFOA) contamination in soil and groundwater. This 2.87-acre property is vacant and not used. The site is a priority for BCRC because of its walking distance to the elementary school, local park, and town hall. The parcel was also designated as one of the top five sites in “Town of Pownal, Vermont Siting Criteria Plan for Community and Economic Development”, a 2023 report produced by BCRC.

### *iii. Identifying Additional Sites*

BCRC has several sites already identified as the next priority sites: Bradford Commons (former retail plaza), Amerigas Propane (former propane dealer), 301 Depot Street (commercial) and the Sweeney Sawmill (former sawmill) due to their locations, likely contamination, and reuse potential. Sites in addition to these will be identified through community outreach, particularly through the steering committee as described in Section 2.b. Sites will be prioritized based on imminent threat to human health or the environment, redevelopment plans, developer interest, property owner interest, site access, housing redevelopment, and job creation. Sites will also be evaluated to see if they are in a disadvantaged community as designated by the Justice 40 criteria. Sites within the two target areas, -disadvantaged census tracts, will automatically receive a high priority.

### **b. Revitalization of the Target Area** *i. Reuse Strategy & Alignment with Revitalization Plans*

The 2020 updated Southern Vermont Comprehensive Economic Development Strategy (CEDS) identifies making *critical infrastructure improvements so that Southern Vermont is resident and business ready* as an objective with housing as a priority specifically stating to *emphasize rehabilitating old structures over building new*. This is precisely what we are doing by assessing and redeveloping our priority sites. The 2021 Housing Needs Assessment, conducted in coordination with an Energizer Reuse Study, found there is a need for appropriate housing for 604 renter households and 452 homeowner households in Bennington. Thirty-three percent of the housing was built in 1939 or earlier and approximately 75% of Bennington’s housing was built before 1980. Redevelopment at Benn Hi will create affordable and market rate housing in the building by a developer, and the other portion will be kept by the Town of Bennington and redeveloped for non-profit use. Lauzon Machine has a developer interested in purchasing the building for housing and retail. These two sites will have a direct impact on the dire housing need in Bennington. BCRC conducted an economic development planning study for Pownal in 2022-2023 and the Center Street site was designated as one of five top priority sites for mixed use development due to its location, access to sewer and ideal slope for redevelopment. In May 2023, the town began conversations with the property owner, DEC and the responsible party about purchasing the land to facilitate additional assessment and to pursue remediation allowing for site development.

### *ii. Outcomes and Benefits of Reuse Strategy*

A brownfields assessment grant will provide a path forward for housing development in Bennington and provide a community amenity in Pownal. Benn Hi will be redeveloped into a mixed-use development

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<sup>3</sup> FEMA FIRM Panel # 50003C0418D, effective on 12.2.2015

that will expand the tax base and create jobs. The portion that will be owned by Hale Resources will have 22 market-rate and 15 affordable residential units, supporting housing needs across the demographic spectrum in the community. Bennington has identified several tenants for its portion of the building including the YMCA, Meals on Wheels, and the Bennington Senior Center, providing much needed services to the community. The town also plans to create a childcare facility in the basement and the building will be renovated to support additional commercial and non-profit uses including office space. A New York City developer is interested in negotiations with the property owner of the Lauzon Machine site and has plans for multi-family housing and possible mixed uses with additional economic benefits. Pownal intends to develop half of the Center Street site for building and the other half will remain green space as it was identified as part of the Vermont Significant Wetlands Inventory and serves as a retention basin for runoff.

BCRC's assessment grant will help address climate vulnerabilities. At the Center Street site, keeping the wetland area will help the community battle flooding, as it is in the 80<sup>th</sup> percentile for projected risk from floods within the next 30 years<sup>4</sup>. BCRC will encourage all redevelopment plans to implement up-to-date energy efficiencies including upgraded windows and thermal insulation as well as the use of renewable energy sources. Additionally, all new construction must meet Vermont's Residential Energy Standards and the town of Bennington and Pownal's Municipal Energy Plans.

**c. Strategy for Leveraging Resources** *i. Resources Needed for Site Reuse*

BCRC has a proven track record of leveraging assessment grant funds. As a planning commission, BCRC is eligible and aware of numerous grant programs available to property owners, potential purchasers and BCRC. We will apply for additional EPA brownfields assessment, cleanup, and/or revolving loan fund and to the Vermont DEC Brownfields Program for assessment and cleanup funds. The Vermont Agency of Commerce and Community Development has annual grant funding available for up to \$25,000 for revitalization project planning. As a rural county, USDA Rural Development funds are available for community facility upgrades, incorporating renewable energy into projects, and planning projects. HUD funding is available for low-income housing projects and their use is anticipated in the redevelopment of Benn Hi and Lauzon Machine. The Vermont Community Development Program has community development block grant funding available for housing and economic development projects. Bennington has a downtown redevelopment district with TIF funding and state tax credits available that can be used for cleanup, and it is in an Opportunity Zone. These tools will help spur redevelopment within this area. The assessment grant will directly leverage funding from private sources for affordable and market-rate housing.

*ii. Use of Existing Infrastructure*

Existing infrastructure in the target areas includes electric, natural gas, cable/high speed internet, and municipal water and sanitary sewer infrastructure. Each of our priority sites has access to these services. The buildings onsite at Lauzon Machine and Benn Hi will be reused, and each is on a paved roadway with sidewalks. The Center Street site was selected as a top development property due to its access to infrastructure. When additional infrastructure is needed, ultimately the property owner or developer will be responsible, but BCRC will assist in seeking outside funding if available.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need** *i. The Community's Need for Funding*

Vermont is unique in that there are no county governments, leaving many tasks to organizations such as BCRC. BCRC does not receive tax revenue like a government and most environmental work is funded through grants. Bennington County has a small population, limiting the resources available for

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<sup>4</sup> Climate and Economic Justice Screening Tool



assessment, cleanup, and reuse of brownfield sites. The poverty rate in the Bennington target area is 15.5%, higher than the county (11.3%) and the state of Vermont (10.3%)<sup>5</sup>. In the past four years, three major employers closed their doors in Bennington adding to the economic struggles. A combined 600 jobs were lost between Energizer Battery, Plasman Composites, and the Southern Vermont College. But for this grant, these communities will not be able to conduct much needed brownfields assessment work to promote economic development.

	US Census 2021 ACS 5-Year Estimates			
	Vermont	Bennington County	Census Tract 9712 (Bennington)	Census Tract 9713 (Pownal)
Population	641,637	37,235	4,372	3,290
Living below poverty level	10.3%	11.3%	15.5%	9.1%
Population under 18	18.5%	19.0%	14.0%	19.4%
Under 18 below the poverty level	10.4%	18.0%	47.4%	9.9%
Population 65 and older	19.5%	22.5%	27.2%	24.5%
65+ below the poverty level	9.1%	7.1%	15%	6.5%
Median Household Income	\$72,431	\$63,448	\$39,402	\$63,654

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations

Seniors aged 65 and older and those living below the poverty level are the most prevalent sensitive populations in our target areas (see table in 2.a.i.). Bennington County ranks 14<sup>th</sup> out of 14 counties in Vermont for health rankings.<sup>6</sup> And strikingly, 17.3% of the population is disabled in Bennington County, although that is not nearly as high as our target areas with 39.9% (Bennington) and 18.4% (Pownal)<sup>7</sup>.

Bennington has a notable number of low-income households in need of housing or housing that better aligns with their needs. There are long wait lists for existing affordable units, which currently cannot meet the full need for affordable units in the community. Seniors have been identified as particular household types in need of affordable housing.<sup>8</sup> Assessing sites like Lauzon Machine and Benn Hi, will provide a path toward additional housing, including affordable housing. In the Pownal census tract 9713, 20.1% of homes are mobile homes and in Pownal Center, 31.3% of homes are mobile homes<sup>9</sup>. Pownal would like to acquire the Center Street site and develop it. This grant will facilitate the assessment and ultimately help mitigate the welfare issues of sensitive populations through the improvement of housing and economic conditions.

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

Our sensitive populations are at higher risk of negative impact from environmental contamination stemming from the brownfields in their communities. Bennington County is ranked among the least healthy counties in Vermont for health outcomes which represents how healthy a county is right now, in terms of length of life and quality of life. Bennington County also has a higher cancer incidence rate than the state of Vermont or US.

	Bennington County	Vermont	US
All Cancers Rate <sup>10</sup>	473.5	457.0	449.4
All Cancers Rate 65+ <sup>10</sup>	2,042.4	1999.4	1977.8

\* per 100,000

The cancer rate for those 65 years and older is

<sup>5</sup> US Census 2021 American Community Survey 5-Year Estimates

<sup>6</sup> County Health Rankings 2023. <https://www.countyhealthrankings.org/explore-health-rankings/vermont?year=2023>

<sup>7</sup> US Census 2021 American Community Survey 5-year Estimates

<sup>8</sup> 2021 Housing Needs Assessment, Energizer Reuse Study

<sup>9</sup> US Census, 2021 American Community Survey 5-year Estimates

<sup>10</sup> NIH State Cancer Profiles, [statecancerprofiles.cancer.gov](http://statecancerprofiles.cancer.gov)

also higher than Vermont and the US.<sup>11</sup> In Tract 9712 the asthma prevalence is at the 79<sup>th</sup> national percentile and cancer prevalence at the 82<sup>nd</sup> percentile. In Tract 9713, the corresponding percentiles are 79<sup>th</sup> for asthma and 74<sup>th</sup> for cancer<sup>12</sup>. The contaminants of concern at our brownfields sites are many, including asbestos, heavy metals, and TCE which are all carcinogens<sup>13</sup>. A brownfields assessment grant is the first step toward cleaning up sites with carcinogens which may be affecting our already disadvantaged populations who already suffer from greater than normal incidence of diseases and conditions including cancer and asthma.

**(3) Environmental Justice (a) Identification of Environmental Justice Issues**

Bennington census tract 9712 is identified as disadvantaged due to flood risk, asthma rates, proximity to Superfund sites, the density of underground storage tanks, and a low-income population, indicating the community is disproportionately exposed to contaminants.<sup>15</sup> Pownal census tract 9713 is also identified as disadvantaged, particularly due to transportation barriers, legacy pollution associated with the nearby Pownal Tannery Superfund site, and a low-income population. The table below shows the supplemental environmental justice indexes for our target areas. The supplemental indexes combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator<sup>16</sup>. As one can see, our residents are particularly vulnerable to added environmental challenges.

Bennington County also faces additional concerns related to PFOA. PFOA contamination zones were delineated around former industrial sites in North Bennington and Pownal in 2016. Sampling of private wells is still ongoing and to date over 400 private wells have been impacted. One public water supply in Pownal was also found to be contaminated.

Supplemental EJ Index <sup>14</sup> state percentile	Census Tract 9712 (Bennington)	Census Tract 9713 (Pownal)
Particulate Matter 2.5	92	80
Ozone	98	92
Diesel Particulate Matter*	90	60
Air Toxics Cancer Risk*	93	75
Air Toxics Respiratory HI*	87	70
Toxic Releases to Air	94	73
Traffic Proximity	94	67
Lead Paint	92	64
Superfund Proximity	98	89
Hazardous Waste Proximity	96	68
Underground Storage Tanks	94	54
Wastewater Discharge	45	78

**(b) Advancing Environmental Justice**

An EPA brownfields assessment grant will allow BCRC to advance environmental justice in Bennington County. First, we will assess contaminants and develop cleanup plans so that resident exposures to contaminants can be reduced in the target areas. Next, it will expand the available affordable and market rate residential units available. The redevelopments at Benn Hi and Lauzon Machine will foster economic opportunities by providing mixed-use spaces for businesses and non-profits, consequently generating fresh job prospects. Without Pownal stepping in and acquiring the Center Street property, it may never be cleaned up and continue contributing to PFOA contamination in the region. And importantly, due to the site locations, site vacancy, and reuse planning, no residents or businesses will face displacement with the assessment, cleanup, or redevelopment.

**b. Community Engagement i. Project Involvement ii. Project Roles**

BCRC has a brownfields steering committee comprised of seven members plus two from BCRC. Our committee includes a 501(c)(3) housing organization, the communities of Bennington, Pownal, and

<sup>11</sup> NIH National Cancer Institute State Cancer Profiles  
<sup>12</sup> EPA EJ Screen  
<sup>13</sup> NIH National Cancer Institute Cancer-Causing Substances in the Environment  
<sup>14</sup> EPA EJ Screen  
<sup>15</sup> Climate and Economic Justice Screening Tool  
<sup>16</sup> EPA EJ Screen



Manchester, the Southwest Vermont Chamber of Commerce, and a local real estate property broker. The steering committee has been successful helping select and prioritize sites, engage with the community, and coordinate with property owners and developers.

Name of organization/ entity/group	Point of contact (name & email)	Specific involvement in the project or assistance provided
Shires Housing* (501(c)(3) non-profit housing organization)	Catherine Bryars, Executive Director <a href="mailto:Cat.bryars@shireshousing.org">Cat.bryars@shireshousing.org</a>	Assist with affordable housing planning & development.
Bennington*	Daniel Monks, Assistant Town Manager <a href="mailto:dmonks@benningtonvt.gov">dmonks@benningtonvt.gov</a>	Disseminate information to the community about BCRC's program. Provide names of potential sites from Bennington. Gather and provide input from residents.
Pownal*	Tara Parks, Executive Assistant <a href="mailto:Executive.assistant@townofpownal.org">Executive.assistant@townofpownal.org</a>	Disseminate information to the community about BCRC's program. Provide names of potential sites from Pownal. Gather and provide input from residents.
Southern Vermont Economy Project (organization that promotes Southern VT)	Meg Staloff <a href="mailto:mstaloff@brattleborodevelopment.com">mstaloff@brattleborodevelopment.com</a>	Market Bennington County to developers; assist in community capacity building
Senior Citizen's Service Center	Carrie Fabricius, Director <a href="mailto:cfabricius@benningtonvt.gov">cfabricius@benningtonvt.gov</a>	Will be a tenant at Benn Hi after redevelopment.
Bennington County Industrial Corporation	Jonathan Cooper, Community & Economic Development, BCRC <a href="mailto:jcooper@bcrcvt.org">jcooper@bcrcvt.org</a>	Provide staff resources to recruit businesses to locate on brownfields sites.
Southwestern Vermont Chamber of Commerce*	Matt Harrington, Executive Director <a href="mailto:matt@bennington.com">matt@bennington.com</a>	Advertise brownfields sites available for redevelopment. Disseminate information about BCRC's brownfields program to businesses.
Maple Leaf Realty*	Lilli West, Commercial Property Broker, <a href="mailto:lilli@lilliwest.com">lilli@lilliwest.com</a>	Find developers and other potential buyers for brownfields sites.

\*Indicates a steering committee member. Steering committee members will assist with site selection and prioritization.

### iii. Incorporating Community Input

As a rural county, we have strong connections to community members and the individual communities are invested in the work of BCRC. We will use several means to announce the assessment grant award, public meetings, and other public outreach campaigns: press releases in the Bennington Banner newspaper, on social media, in our monthly newsletter and announcements on our website. Announcements will also be sent to all 17 community governments and steering committee members for distribution. We regularly work through our communities and partners to provide information and obtain feedback in the most effective way for each community. Some communities have small populations where posting information at community bulletin boards is more effective than publishing information online. Other communities find social media and our newsletter is most helpful. We will update our current brownfields website throughout the grant period. We will hold an initial kickoff meeting within 3 months of the cooperative agreement. We will combine the kick-off meeting with our regional planning commission meeting to engage the most stakeholders. This meeting will be held in person and virtually using Teams so a virtual audience can also participate. At this kick-off meeting we will announce the grant award, describe the program, and discuss strategy to engage landowners, developers, and the public and address questions about the program. Then to continually engage stakeholders, we will develop informational guides for distribution including fliers, brochures, and our newsletter. Our monthly

newsletter is our most important public engagement resource as it is emailed to 350 people, and we know many of those people forward it on. Our newsletters provide information on how and where the community can provide feedback, typically our website (bcrcvt.org) and our Facebook page. We will also hold one-on-one meetings with property owners and developers. Any additional public meetings will be held in person and virtually. Interpreters and translated documents will be made available upon request to assist non-English speaking residents to ensure full participation.

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

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

There are no non-EPA grant resources needed to implement the tasks and activities.

<b>Task/Activity: Programmatic Activities</b>
<b>i. Project Implementation:</b> EPA-funded tasks: Prepare work plan and submit to EPA for approval, procure 3-4 QEPs, manage and oversee project, reporting (ACRES, DBE, quarterly, annual), attend 2 EPA and 2 regional brownfield conferences.
<b>ii. Anticipated Project Schedule:</b> Workplan completion upon notification of award of the cooperative agreement. Procurement and selection of QEPs within 3 months of cooperative agreement. Quarterly reports submitted within 30 days after reporting period. Site information updates in ACRES with site updates. Continuous project oversight, obtaining site access and submitting site eligibility forms.
<b>iii. Task/Activity Lead:</b> BCRC
<b>iv. Outputs:</b> 1 pool of QEPs, 1 work plan, 16 quarterly progress reports, DBE reports, outreach meetings and materials, annual reports, meetings with QEPs, ACRES site updates.
<b>Task/Activity: Community Outreach</b>
<b>i. Project Implementation:</b> At least two county-wide public meetings will be held. Steering committee meetings. Small-scale meetings with local stakeholders. Community outreach through BCRC newsletter, press releases, social media, website. Incorporating/sharing community input.
<b>ii. Anticipated Project Schedule:</b> First kick-off county-wide public meeting within three months of cooperative agreement. Second toward the end of grant period. Steering committee meetings quarterly, and small-scale meetings regularly and as needed. Monthly updates in BCRC newsletter. Press releases, social media, BCRC website updates quarterly or more often.
<b>iii. Task/Activity Lead:</b> BCRC
<b>iv. Outputs:</b> 2 county-wide public meetings with minutes, 16 steering committee meetings with minutes, documentation of press releases, social media posts, newsletters
<b>Task/Activity: Site Assessment</b>
<b>i. Project Implementation:</b> Completion of Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for EPA and DEC approval. With a pool of QEPs, each completes their own quality assurance project plan (QAPP) and submits it with the SAP to EPA. QEPs are required to update their QAPPs at least every 5 years. BCRC is not charged for this task. All Appropriate Inquiry (AAI) compliant (ASTM E1527-21) Phase I ESAs. ASTM E1903-19 compliant Phase II ESAs. Regulated building material surveys completed in accordance with V.S.A. Title 18, Chapter 26. BCRC rotates the selected QEPs unless one has already worked on a project or is not available.
<b>ii. Anticipated Project Schedule:</b> First Phase I ESA completed within 2 months of QEP procurement, other Phase I ESAs as sites are selected. First SAP/HASP submitted to EPA and DEC within 4 months of QEP procurement. First Phase II ESA within one month of EPA SAP approval. With several QEPs, we can complete multiple Phase I ESAs and Phase II ESAs simultaneously. Assessments will commence throughout the grant period.
<b>iii. Task/Activity Lead:</b> QEP
<b>iv. Outputs:</b> 10 Phase I ESA reports, 8 SAPs, 8 HASPs, 8 Phase II ESA reports, 4 regulated building material survey reports

<b>Task/Activity: Cleanup/Reuse Planning</b>
<b>i. Project Implementation:</b> Cleanup and reuse will be evaluated following the results of Phase II ESA data for each site based on potential reuse scenario(s). Remedial actions are evaluated on cost, intended use, feasibility, and effectiveness in protection of human health and environment. Completion of corrective action plans in accordance with VTDEC policies which include the components of an analysis of brownfields cleanup alternatives (ABCA)
<b>ii. Anticipated Project Schedule:</b> Cleanup planning will be assessed and conducted throughout the grant period following the completion of associated assessment activities.
<b>iii. Task/Activity Lead:</b> QEP
<b>iv. Outputs:</b> Up to 8 corrective action plans

**b. Cost Estimates**

Budget Categories		Project Tasks (\$)				Total
		Task 1: Programmatic	Task 2: Outreach	Task 3: Assessment	Task 4: Cleanup/ Reuse Planning	
Direct Costs	Personnel	\$31,796	\$9,348		\$1,798	\$42,942
	Fringe Benefits*	\$15,618	\$4,952		\$952	\$21,522
	Travel	\$6,336	\$805			\$7,141
	Equipment					
	Supplies		\$1,444			\$1,444
	Contractual			\$338,400	\$64,000	\$402,400
	Construction					
Total Direct Costs		\$53,750	\$16,549	\$338,400	\$66,750	\$475,449
Indirect Costs 61.57% (Indirect only calculated on PM's programmatic time & fringe)		\$24,551				\$24,551
<b>Total Budget</b>		<b>\$78,301</b>	<b>\$16,549</b>	<b>\$338,400</b>	<b>\$66,750</b>	<b>\$500,000</b>

\*BCRC's fringe rates are different for each staff position. It is dependent on how the position is funded.

**Task 1 – Programmatic Activities \$78,301**

- Personnel: 580 hours for program manager at \$44.94/hr = **\$26,065**  
131 hours for financial administrator at \$43.75/hr = **\$5,731**
- Fringe: 580 hours for program manager at \$23.81/hr = **\$13,810**  
131 hours for financial administrator at \$13.80/hr = **\$1,808**
- Travel: 1 staff @ 2 national, 1 regional, 4 state conferences/roundtables = **\$6,336**
  - National: \$500/flight, \$300/hotel night x 3 nights (\$900) \$50/day per diem for 3 days (\$150), \$300/rental car, \$150 conference registration = \$2,000 x 2 conferences = **\$4,000**
  - Regional: 300 miles round trip @ \$0.655/mile (\$196.50), \$50/day per diem = \$237.50 x 4 regional conferences/roundtables = **\$986**
- Indirect Costs: BCRC's approved indirect rate is 61.57%. BCRC is only requesting indirect for the program manager's programmatic costs: \$26,065+\$13,810=\$39,875 x 61.57% = **24,551**

**Task 2 –Community Outreach \$16,549:**

- Personnel: 208 hours for program manager at \$44.94/hr = **\$9,348**
- Fringe: 208 hours for program manager at \$23.81/hr = **\$4,952**
- Travel: 1000 miles @ 0.655/mile (\$655), 10 lunches @ \$15 per diem (\$150) = **\$805**

- Supplies: advertising, postage, outreach materials = **\$1,444**

### **Task 3 – Site Assessments \$338,400**

- Contractual: 9 Phase I ESAs @ \$4,000 (**\$36,000**), 8 Phase II ESAs (Lauzon Machine \$41,400 per QEP estimate, 7 additional Phase II ESAs at \$31,000) (**\$258,400**), 4 regulated building material surveys at an average of \$10,000 each (**\$40,000**) = **\$338,400**

### **Task 4 – Cleanup/Reuse Planning \$66,750**

- Personnel: 40 hours for program manager at \$44.94/hr = **\$1,798**
- Fringe: 40 hours for program manager at \$23.81/hr = **\$952**
- Contractual: 8 corrective action plans at \$8,000 each = **\$64,000**

### **c. Measuring Environmental Results**

The program manager will perform monthly grant reviews ensuring sufficient progress is being made and key outputs are on schedule and on track for completion. BCRC uses an excel spreadsheet for internal tracking purposes. Corrective actions will be taken immediately to minimize delays and grant progress and activities will be reported to and monitored by the steering committee. The program manager will meet quarterly with the steering committee to evaluate and make necessary adjustments to the project. While the number of completed Phase II ESAs and corrective action plans will also be used as measures of success, their number and cost to complete will be dependent on the outcome of Phase I ESAs. A site-specific “property profile” will be completed in the ACRES database for each parcel that benefits from the use of EPA funds and a quarterly progress report summarizing project activities will be submitted to the EPA Region 1 Project Officer (via ACRES) within 30 days of the previous reporting period. BCRC will ensure that the following measures of success are tracked and documented in quarterly reports/ACRES: brownfields assessments started and completed with expended amounts; properties with brownfields redevelopment activities underway; cleanup & redevelopment dollars leveraged; jobs leveraged; properties with brownfields cleanup activities started; properties with brownfields cleanup activities completed; and those without cleanup.

Additionally, the quarterly progress reports will include modifications to the work plan; project activities relative to the EPA grant; task progress/schedule; site identification and targeted sites; cleanup redevelopment activity; summary of expenses by category; and other financial assistance leveraged. Electronic copies of all Phase I, Phase II, and corrective action plans completed during the quarter will be forwarded to the EPA Project Officer and DEC via email within a week of completion.

## **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **a. Programmatic Capability** *i. Capacity ii. Structure iii. Description of Key Staff*

BCRC was created in 1969 by the seventeen towns and villages it serves. It works on behalf of those communities and provides planning and community development assistance. BCRC is managed by a 7-member Executive Committee selected from Commissioners appointed from each of its seventeen member municipalities. BCRC employs ten staff with an annual operating budget of approximately \$1,400,000. BCRC has managed millions of dollars in federal, state, and local funds including successfully managing four past EPA brownfields grants. The steering committee will oversee all program activities. The committee is comprised of individuals from a variety of backgrounds including non-profit housing, town managers, chamber of commerce, and the real-estate industry.

BCRC’s brownfields program manager is Jim Henderson, our Environmental Program Manager. Jim has a master’s degree in Regional Planning and a bachelor’s degree in environmental science, both from the University of Massachusetts. He has been with BCRC for 35 years and managing BCRC’s brownfields program for 14 years. His time living and working in the community has provided a level of trust between him, property owners, developers, and the public that is hard to find anywhere else. Jim is assisted by Amanda Stevens, BCRC’s Financial Manager. Amanda has more than eight years of

experience managing grants and associated accounting functions. In her four years at BCRC she has successfully managed accounting functions for more than 50 state and federal grants, including all federal compliance accounting. She will be responsible for the financial management of the grant.

*iv. Acquiring Additional Resources*

BCRC uses a qualifications-based selection process that complies with state (Vermont State Administrative Bulletin 3.5) and federal (2 CFR § 200) procurement requirements. BCRC regularly uses this process to solicit proposals and bids according to its duly adopted Procurement Policy. All BCRC bid opportunities are publicly available on our website at [bcrcvt.org/news](http://bcrcvt.org/news). We will use this process to select a pool of three to four QEPs to complete grant activities. We have found having a pool of QEPs allows us to complete work when we are ready instead of waiting for a company's schedule. Should staff turnover or additional consultants or subcontractors be necessary, BCRC will use the same procurement process followed during the initial search for the QEP. BCRC will also receive support from the previously mentioned community partners in Section 2(b)(i-ii) and will use the services provided by the Technical Assistance to Brownfields (TAB) program as needed.

**b. Past Performance and Accomplishments** *i. Currently Has or Previously Received an EPA Brownfields Grant* (1) Accomplishments

BCRC has been fortunate to receive four previous EPA Brownfields Assessment Grants awarded in 2004, 2008, 2010 and our most recent award was in 2017 for \$300,000. Cooperative Agreement BF00A00228 included \$200,000 in hazardous substances funding and \$100,000 in petroleum funding. With the 2017 funds, outputs included nine Phase I ESAs, five Phase II ESAs, one cleanup plan, 20 quarterly reports, 10 public meetings and more than 60 one-on-one meetings with landowners, developers, residents, and other stakeholders. Outcomes realized from these assessments include 251 acres of property made available for redevelopment, a community space in Arlington providing performing arts, a fitness center, and public meeting space, a 15-acre solar array, and at least eight jobs created. In addition, the economic benefits from this grant are enormous. At the Bennington Brush site, we spent about \$76,000 on a Phase I ESA, Phase II ESA, and corrective action plan. The developer purchased the building for \$300,000 in 2019, invested \$3.2 million dollars into the building for remediation, remodeling, energy efficiency upgrades, and landscaping, which is now appraised at \$5 million. Eighteen local contractors worked on the redevelopment. BCRC spent about \$16,000 on assessment at the St. Margaret Mary's Church in 2020. Since then, more than \$650,000 has been invested into the building itself and additional amenities for the community.

With our other three grants, we completed over 20 Phase I ESAs, Phase II ESAs, and remediation plans. Among our accomplishments, those grants led to a 40-unit housing development in Bennington, the relicensing/rehabilitation of a hydroelectric facility and establishment of the Paper Mill Covered Bridge Park which was recognized as an EPA Brownfields Success Story in 2013, the creation of eight full time jobs, the reuse of a property as a 500-kW solar facility and the development of an area-wide plan.

(2) Compliance with Grant Requirements

The BCRC is in full compliance with past cooperative agreements, has submitted required quarterly reports, financial status reports, and has kept site information current through timely submission of property profile forms and the ACRES database. Our 2017 assessment grant was extended due to the Covid-19 pandemic and the cooperative agreement ended on September 30, 2022. We had \$12,547 remaining for the hazardous substances grant and \$12,801 for the petroleum grant. For the Bradford Commons site, the Phase I ESA was conducted in September 2022 and there was not enough time remaining to complete a Phase II ESA. We also had a property owner delay signing the access agreement at another site not allowing for time to expend the funds. For the two grants prior the 2017 assessment grant (BF-977186601 and BF-961315010), all funds were expended, and the grants were closed out in October 2011 and September 2014 respectively.



## THRESHOLD CRITERIA

### Bennington County Regional Commission

1. **Applicant Eligibility:**

- a. The Bennington County Regional Commission (BCRC) is a regional planning agency established in 1967 by its 17 member municipalities under authority granted by the State of Vermont (24 V.S.A. Chapter 117). As such, it is eligible to apply for EPA Brownfields Grants as a regional council or group of general-purpose units of local government. Documentation of eligibility is attached.
- b. BCRC is a 501(c)(3) organization and not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. **Community Involvement:** As a rural county, we have strong connections to community members and the individual communities are invested in the work of BCRC. We will use several means to announce the assessment grant award, public meetings, and other public outreach campaigns: press releases in the Bennington Banner newspaper, on social media, in our monthly newsletter and announcements on our website. Announcements will also be sent to all 17 community governments and steering committee members for distribution. We regularly work through our communities and partners to provide information and obtain feedback in the most effective way for each community. Some communities have small populations where posting information at the grocery store is more effective than publishing information online. Other communities find social media and our newsletter is most helpful. We will update our current brownfields website throughout the grant period. We will hold an initial kickoff meeting within 3 months of the cooperative agreement. We will combine the kick-off meeting with our regional planning commission meeting to engage the most stakeholders. This meeting will be held in person and virtually using Teams so a virtual audience can also participate. At this kick-off meeting we will announce the grant award, describe the program, and discuss strategy to engage landowners, developers, and the public and address questions about the program. Then to continually engage stakeholders, we will develop informational guides for distribution including fliers, brochures, and our newsletter. Our monthly newsletter is our most important public engagement resource as it is emailed to 350 people, and we know many of those people forward it on. We will also hold one-on-one meetings with property owners and developers. Any additional public meetings will be held in person and virtually. Translators and translated documents will be made available upon request to assist non-English speaking residents to ensure full participation.

3. **Expenditure of Assessment Grant Funds:** BCRC does not have an open US EPA Brownfield Assessment Grant or Multipurpose Grant.

4. **Contractors and Named Subrecipients:** Not Applicable