



TOWN OF ST. JOHNSBURY

RO1-24-M-004

Town Manager's Office
51 Depot Square, Suite 3
St. Johnsbury, VT 05819
802-748-3926
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RE: FY2024 EPA Brownfield Multipurpose Grant Application

The Town of St. Johnsbury, Vermont is pleased to submit this proposal for FY2024 Brownfield Multipurpose Grant funding. Below we provide the information requested.

1. Applicant Identification:

Town of St. Johnsbury
51 Depot Square, Suite 3
St. Johnsbury, VT 05819

2. Funding Requested:

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

3. Location:

- (a) City: St. Johnsbury
- (b) County: Caledonia
- (c) State or Reservation: Vermont

4. Target Area & Priority Site Information:

- (a) Target Area: Summerville District
- (b) Census Tract Number(s): 50005957500
- (c) Address of Priority Site(s):
 - Site #1 – Public Works Yard & Municipal Forest: 217 Almshouse Rd, St. Johnsbury
 - Site #2 – True Temper Factory: 575 Concord Ave, St. Johnsbury
 - Site #3 – Salvage Yard: 85 Ely St, St. Johnsbury
 - Site #4 – Ames Building: 852 Portland St, St. Johnsbury

5. Contacts:

- (a) Project Director:
Name: Joe Kasprzak, Assistant Town Manager
Phone: (802) 748-3926 (extension 5) | Email: jkasprzak@stjvt.com
Mailing Address: 51 Depot Square, St. Johnsbury, VT 05819
- (b) Chief Executive/Highest Ranking Elected Official:
Name: Chad Whitehead, Town Manager
Phone: (802) 748-3926 (extension 2) | Email: cwhitehead@stjvt.com
Mailing Address: 51 Depot Square, St. Johnsbury, VT 05819

6. Population:

- Population of the Town of St. Johnsbury: 7,403

7. Other Factors:

Other Factors Criteria	Page #
Community population is 10,000 or less.	1, 5
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2*
The priority site(s) is in a federally designated flood plain.	2**
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4
At least 20% 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.	NA
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.	NA

Notes: *All four priority sites are located on the Moose River. **One priority site (Ames Building) is located in a federally-designated flood plain. NA = Not Applicable.

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

9. Releasing Copies of Applications: The Town requests to have the following information redacted:

- Point of contact information for project partners identified in Section 2.b.iii.
- Contract document included as Attachment C.

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

November 8, 2023

Town of St. Johnsbury
Attn: Joe Kasprzak, Assistant Town Manager
51 Depot Square, Suite 3
St. Johnsbury, VT 05819

Dear Mr. Kasprzak:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Town of St. Johnsbury intends to apply for a FY24 EPA Brownfields Multi-purpose Grant, and if awarded, to use the grant funds to conduct assessment and cleanup activities with a focus on the Summerville area adjacent to downtown St. Johnsbury, Vermont.

The State of Vermont is very appreciative of the Town's intent to apply for additional funding, as your local involvement in the Vermont Brownfields Program will be an asset in the assessment, cleanup, and redevelopment of properties in your region. Assessment and cleanup work on the target properties will help to progress the overall objectives of the Vermont Brownfields Program.

VT DEC looks forward to continued collaboration with the Town of St. Johnsbury as you progress with your efforts in brownfields assessments and cleanup, and working with you to assist in the completion of the target projects.

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 & PLANS FOR REVITALIZATION

1.a. Target Area & Brownfields

1.a.i. Overview of Brownfield Challenges & Description of Target Area: The Town of St. Johnsbury (pop. 7,403) is a tight-knit community on a picturesque landscape located in an area known as the Northeast Kingdom (NEK). The NEK comprises three counties (Essex, Orleans and Caledonia) in the northeast corner of Vermont. The NEK is a phrase coined to represent the area’s beauty and way of life. It is known for its quaint small towns, farms, mountains, state forests, lakes, rivers, and some of the best recreational amenities in the State. The NEK is one of five Rural Economic Area Partnership (REAP) Zones in the country due to its rural isolation and lack of local capital.¹

St. Johnsbury, the largest Town in the NEK and the geographic area for this project, was settled in 1786 and designated the Caledonia County seat in 1856. The Town became a rail and highway junction as well as the industrial, commercial, and cultural crossroads of the NEK because of its proximity to the Passumpsic, Moose and Sleepers Rivers, as well as its proximity to Canada. However, the area has lost its economic foundation coupled with continued population decline. Since 2015, Caledonia County has seen significant population loss (-4.0%) while the State of Vermont is seeing a population increase. The Town also has one of the highest elder populations (65+ years) in the State. As the population contracts and ages, businesses no longer have a sufficient base to support them, struggle to find employees, and inevitably close. These business closures vacate buildings on commercial and industrial sites, some of which have had continual use for 100-200 years. This has resulted in abandoned or underutilized brownfield sites from small corner gas station to large scale industrial facilities clustered in our small town.

St. Johnsbury is on the cusp of turning its economy around. The Town has an opportunity to enhance its economic base by focusing on creating a vibrant downtown, new business growth, attractive housing and neighborhoods, a vibrant creative arts industry, and leveraging its proximity to world class recreational facilities. The Town has worked hard planning and leveraging resources to address brownfields. In 2018 and 2021, the Town was included as a member of an EPA Brownfield Assessment Coalition Grant led by the Northern Vermont Development Association (NVDA) (both grant projects are complete). NVDA’s EPA Grants have been instrumental in facilitating multiple revitalization projects in St. Johnsbury. The Assessment Grant Program has strengthened the Town’s commitment to revitalizing its town centers and surrounding areas and additional funding is needed to carry forward this momentum.

The Target Area (TA) is the **Summerville District** – an area adjacent to the downtown center and bordered by the Passumpsic and Moose Rivers. Due to its location along two rivers (which connect downstream to the Connecticut River and Long Island Sound) and the Twin State Railroad running through its center, this area has been a micro-manufacturing hub of resource extraction and processing for over 200 years. By the 1940s, the area contained the largest scale producer (Fairbanks Scale), largest maple candy manufacturer (Maple Grove Candies), and largest candlepin manufacturer (Tempered Maple Corporation) in the world. Nearly all these companies are gone, along with the many employees and businesses they supported. Many of these brownfield sites operated well before any environmental regulations or standard for proper handling and disposal. Awareness of the health effects of hazardous substances and petroleum products was widely not a concern or unknown. Today the TA has one of the lowest annual incomes in Vermont, which coupled with a decline in population (31% since 1950) and disinvestment, creates significant financial hurdles for the Town. The TA has struggled to attract new investment and cope with the multitude of brownfield sites. To understand the scale of brownfield impacts in St. Johnsbury, under NVDA’s EPA Assessment Grants, we’ve assessed 19 brownfield sites in this small town of just 7,403 people. In the following section we describe four sites we have identified in the TA that are in dire need of significant assessment and remediation investment to protect our residents and improve economic conditions.

1.a.ii. Description of the Priority Brownfield Site(s): With a legacy of over 200 years of resource extraction and goods-producing industries, followed by decades of steady economic decline, there are presently over 100 brownfield sites throughout the Town, a significant number of which are clustered in the TA. Brownfields include former heavy industrial sites, salvage yards, oil pumping stations, automotive repair facilities, dry cleaners, gas stations and auto repair centers, and other vacant/underutilized properties. Below we describe our priority sites. These sites were selected due to the likelihood of redevelopment moving forward in the near-term and the long-term housing and economic benefits these projects will provide.

Priority Site Name & Address	Size	TABLE 1		
		Site Description & Environmental Concerns	Contaminants of Concern (COCs)	Funding Needs
St. Johnsbury Public Works Yard & Municipal Forest* 217 Almshouse Road, St. Johnsbury	1 Parcel (110 acres)	Owned by the Town of St. Johnsbury. Located along Moose River. Most of this parcel is occupied by the St. Johnsbury Municipal Forest that was once used for logging and now hosts a large network of recreational trails. Approximately 6 acres of the site is used by the Town’s Public Works Department for equipment and vehicle storage.	Pesticides, Heavy Metals, Misc. Hazardous Wastes, ACM, LBP	Phase II ESA, RBM Survey, ABCA/CAP, Remedial Action

¹ Note: The REAP Initiative was established by the USDA to address critical issues related to constraints in economic activity and growth, low density settlement patterns, stagnant or declining employment, and isolation that has led to disconnection from markets, suppliers and centers of information and finance. [Source](#)

Priority Site Name & Address	Size	TABLE 1		
		Site Description & Environmental Concerns	Contaminants of Concern (COCs)	Funding Needs
True Temper Factory* 575 Concord Ave, St. Johnsbury ^(a)	1 Parcel (7.7 acres)	Located along Moose River . Former wooden dowel manufacturing facility vacant for over 30 years. The property has been unkempt and fallen into disrepair with the 29,000 square foot factory building completely collapsed. Over 70 drums with unknown substances were dumped onsite. A railroad that operated from 1900-1980 runs through a portion of the property. Adjacent sites include former gas station/auto repair facility, dry cleaner and salvage yard. Residential properties border the west side of the property. A Phase II ESA completed in the early 1990s confirmed chlorinated solvents in groundwater. Current conditions are unknown but contamination is expected due to past operations and unpermitted dumping activities.	Creosote, Herbicides, Heavy Metals, PAHs, VOCs, PCBs, Misc. Hazardous Wastes, ACM, LBP	Remedial Action
Salvage Yard* 85 Ely St, St. Johnsbury	6 Parcels (7.0 acres)	Located along Moose River and located directly east of True Temper. The property has a history of environmental concerns and has been a community eyesore for decades. Large piles of tires, old machinery and automobiles, drums with unknown substances and other debris cover the site. A railroad runs through a portion of the site and residential properties border east side of the property.	VOCs, PAHs, Heavy Metal, Automotive & Mechanical Oils/Wastes, ACM, LBP	Phase I/II ESA, RBM Survey, ABCA/CAP
Ames Building** 852 Portland Street, St. Johnsbury	1 Parcels (3.7 acres)	Located along Moose River and at the gateway to downtown. Built in the early 1900s, this aging 33,000 square foot commercial building likely contains ACM, LBP and PCB in building materials and USTs are also suspected. The property has been vacant for over a decade and is currently for sale.	PAHs, ACM, LBP, PCB	Phase I/II ESA, RBM Survey, ABCA/CAP

*Adjacent to body of water. **Adjacent to body of water & located in floodplain. ^(a) A robust site investigation (~\$185K) is currently in progress for True Temper using NVDA's FY2023 EPA Brownfield Assessment Grant. The Town's goal is to complete site characterization and cleanup planning with NVDA's funding to position the site as ready for cleanup upon grant award in 2024.

Definitions: ABCA = Analysis of Brownfield Cleanup Alternatives; ACM = Asbestos Containing Material; CAP = Corrective Action Plan; ESA = Environmental Site Assessment; LBP = Lead-based Paint; PAH = Polynuclear Aromatic Hydrocarbons; PCB = Polychlorinated Biphenyls; RBM = Regulated Building Material; UST = Underground Storage Tank; VOC = Volatile Organic Compounds

1.a.iii. Identifying Additional Sites: The Town anticipates the priority sites described above plus Area-Wide Planning (AWP) for the Summerville District TA (further described in Section 3.a) will use all the Multipurpose Grant funds. Should additional funding remain, the Town will conduct outreach to solicit site nominations and work with the Brownfield Advisory Committee (BAC) (further described in Section 2.b.ii) to prioritize grant funds for sites with the greatest near-term redevelopment and community benefit potential. Sites located in the Summerville District TA (a disadvantaged CT according to CEJST² data [further described in Section 2.a.ii]) will be prioritized for funding.

1.b. Revitalization of the Target Area

1.b.i. Overall Plan for Revitalization: Each of the priority sites identified above fits integrally within the revitalization plans for the Summerville District and greater area. Unlike other areas of the country, every single new service, new job, and new house matters and is a point of pride for us. Priority site reuses directly support adopted master plan directives laid out in the *2017 St. Johnsbury Housing Study and Needs Analysis*, *2017 St. Johnsbury Town Plan*, *2019 Opportunity Zone (OZ) Prospectus*, and *2020 Main Street Brownfield Revitalization Study*. A key theme of all these documents includes addressing the Town's housing crisis; reducing blight; maintaining and protecting existing assets to grow the local economy through business, tourism, and creative endeavors; and forest preservation. At the same time, it is recognized that supporting this endeavor requires providing quality public services and affordable housing to both attract and maintain long-time residents, new residents, and seasonal workers that support the tourism and creative arts industries. Our own efforts, through the *2015-2023 Regional Plan for the Northeast Kingdom*, lays out strategies for future land use and development goals, with a focus on established centers, like St. Johnsbury, to produce a vital mix of commercial and residential offerings, including a variety of housing types available at different price options to support long-term sustainability. Additionally, under this document, ongoing, short-term, and long-term efforts are put forth to encourage adaptive reuse of historic structures, public investment in new affordable and senior housing in town centers (to put these groups closer to amenities and medical providers), and assessment/remediation of brownfields for new industrial uses where new infrastructure is not needed. Below we describe how each priority site aligns with our land use/revitalization plans and community priorities.

- **Public Works Yard & Municipal Forest:** The Town will retain ownership of this property but relocate the public works yard that occupies 6 acres of the 110-acre site to revitalize this area of the property to support the local creative economy (arts and culture). Local non-profit, Catamount Arts, would like to develop an outdoor arts, culture and music venue along this picturesque location that provides a panoramic view of the river, forest and historic downtown. The property is adjacent to a community baseball field and recreational pavilion developed at the

² Confirmed using the Climate and Economic Justice Screening Tool (CEJST) on 11/01/23.

Trailhead of the Municipal Forest. The site has never been assessed and a Phase II ESA is needed to inform cleanup and reuse planning. This reuse strategy supports the goals identified in the Town's *OZ Prospectus* to support the creative economy, enhance recreational amenities and support greenspace preservation. Additionally, it supports the goals in the *Town Plan* to increase the tourism market share.

- **True Temper Factory:** The Town's Select Board has approved funding for acquisition of this property pending completion of a Phase II ESA to quantify the environmental risks. The Town has drafted a purchase and sale agreement with the property owners and is forming a public-private partnership with a local housing developer. The Town is currently using NVDA's 2023 EPA Brownfield Assessment Grant (described in Section 1.a.ii) to conduct a site investigation. Additionally, NVDA is funding a wetland survey, boundary and topographic survey, geophysical survey, site clearing to remove overgrown nuisance vegetation (to allow for a comprehensive site investigation), RBM Survey and cleanup planning (ABCA and CAP). The total investment by NVDA for these activities is ~\$185K and the Town has secured \$300K (\$150K authorized by the Select Board and \$150K by the developer) for purchase of the property. The goal is to complete these activities by spring 2024 so the Town can complete acquisition of the property and use this Multipurpose Grant to initiate cleanup activities in late 2024. Preliminary reuse visioning for this site determined it can support up to 40 units of housing which includes a mix of multifamily and single-family homes. The area of the site that was occupied by the factory is proposed for a mass-timber manufacturing facility that manufactures softwood cross-laminated timber panels to build housing. The business plan proposes a unique technology for development of sustainable building materials through alternative use of a fast-growing crop that is sustainably harvested. This state-of-the-art mass-timber manufacturing site will position the Town at the forefront in solving a complicated housing problem throughout the NEK. Including the construction of housing units on the site will assist the developer with proof-of-concept while adding desperately needed housing in St. Johnsbury. This project will be the first of its kind in Vermont. This reuse strategy supports the housing and economic development goals identified in the *OZ Prospectus* and *St. Johnsbury Housing Study*. Additionally, it supports the goals in the *Town Plan* to increase our housing stock; target strong businesses and industry that advance the policies of the Town; and diversify the local workforce.
- **Salvage Yard:** This property borders True Temper to the east and is comprised of 6 contiguous parcels. The property is a community eye-sore and in desperate need of cleanup. The Town intends to carry forward the momentum started at the True Temper site to this site to support additional housing needs. While a formal reuse plan hasn't been prepared for this site yet, preliminary visions include a mix of condos/apartments for seniors, multifamily homes, and single-family homes (up to 60 total units of housing). This site can also support a community park and recreational trail along the Moose River. The Summerville District is located near the Town's Hospital District – the region's largest employment center. Recent zoning changes have been made to allow for development of senior housing near medical services and workforce housing near the hospital. This reuse strategy supports the housing goals identified in the *OZ Prospectus* and *St. Johnsbury Housing Study*. Senior housing on this property supports the regional goals to improve senior's access to medical services. Additionally, it supports Goal 2.0 in the *Town Plan* to increase our housing stock for young professionals, established retirees, young families and first-time home buyers.
- **Ames Building:** This property is located at the gateway to downtown. The 33,000 square foot vacant, blighted building was built in the early 1900s for the Ames Department Store. The site has been vacant for decades and is currently for sale. Reuse visions are affordable rental housing (20-25 units) and retail/commercial space. The structural integrity of the building has been evaluated and confirmed to be intact, providing an excellent opportunity for adaptive reuse. An RBM Survey and assessment activities are needed to help reuse plans move forward and attract an investor. This reuse strategy supports the housing goals identified in the *OZ Prospectus* and *St. Johnsbury Housing Study*. It also supports the goals of the *Main Street Brownfield Study* to revitalize catalyst sites for multifamily housing and improve the downtown gateway.

In summary, the vision for the Summerville District is to be a highly functional, mixed-use neighborhood that builds on the area's world class recreational amenities, highlights the small Town's cultural heritage, and incorporates a vibrant mix of land uses, pedestrian amenities, and open space servicing the surrounding historic neighborhoods. In Spring 2023, the Town secured a "**Neighborhood Development Area**" designation for the Summerville District from the State of Vermont. This new state designation allows for streamlined permitting of housing developments and new development incentives. This designation has attracted attention from several developers in the area and allowed the Town to begin forming public-private partnerships to cleanup blighted properties and redevelop them to meet the needs of the community. The *St. Johnsbury Housing Study* identified a shortage of 325 units (50 of which are needed for seniors) by 2021 but the Town estimates the number is much higher now as the COVID pandemic stalled development and cost of building materials drastically increased. The Summerville District is perfectly positioned to address the issue and it is estimated that the **True Temper Factory**, **Salvage Yard**, and **Ames Building** properties could collectively support up to 125 units of housing, approximately 20% of which would be senior housing.

1.b.ii. Outcomes & Benefits of Overall Plan for Revitalization: The Town's revitalization plans are focused on vacant and underutilized sites that will provide the most significant near-term benefits for our rural micro-community. Redevelopment of the priority sites are anticipated to provide the following benefits:

- **Spur Economic Growth in OZ:** The project will spur economic growth in the Town's OZ. The Town and its partners are actively marketing OZ opportunities and looking at related funding for reuse. Completing ESAs, RBM Surveys, CAPs, Reuse Plans, and cleanup of sites in the OZ is instrumental to attracting new investment.
- **Provide affordable, senior & multifamily housing:** Housing projects at the **True Temper, Salvage Yard, and Ames Building** could collectively provide 125 units of housing. This will have a significant impact on addressing our housing shortage and reduce cost burdening. The mixed affordable and senior housing developments at **True Temper** (up to 40 units) and the **Salvage Yard** (up to 60 units) will also help address the area's senior housing shortage for independent and assisted living, as well as create living spaces to accommodate our disabled population.
- **Create Jobs & Stabilize the Employment Base:** Returning former industrial sites to productive use, such as the factory area of the **True Temper** site will restore an important employment base for our small community. Attracting new employers to these sites has the potential to create 20 permanent full-time jobs and restore critical tax revenues for the Town that has very limited sources of income. Reuse of the **Public Works Storage Yard** to support the creative economy will bolster tourism-related job opportunities. Prior to COVID, the creative economy attracted 50,000 tourists to St. Johnsbury per year and provided a \$7M economic impact annually. Additionally, 10% of the jobs in St. Johnsbury were attributed to the creative economy. This industry has taken a significant hit since the pandemic and projects such as that spearheaded by Catamount Arts (described in 1.b.i) will help attract new attention and renewed interest from arts and culture enthusiasts. New employment opportunities will create a positive feedback loop that reduces poverty, cost burdening, and dependence on government programs by providing quality, living-wage jobs.
- **Support Climate Adaptation/Mitigation & Resilience:** The Town has formed a partnership with the VT Agency of Administration to establish a **Municipal Energy Resilience Program**. This program supports dependable and sustainable connections to critical municipal services. The Town is embarking on development of its first geothermal network in its historic district to replace fossil fuel heating systems with high-efficiency thermal heating systems. The Town is applying for a \$500K Resilience Grant from the State to expand this network and will prioritize the **Summerville District** as the next location for network expansion.
- **Support Adaptive Reuse & Energy Efficiency Projects:** Adaptive reuse projects such as the **Ames Building** will highlight historic preservation, infill development, and sustainable building design. These measures include new high-efficiency heating systems (such as the geothermal system described above), replacement of single pane windows and electrical upgrades. The Town also connects developers with federal grants to fund power infrastructure upgrades at old facilities with outdated and inefficient infrastructure.
- **Greenspace Preservation:** All priority sites are in developed areas. With appropriate cleanup and remediation, revitalization of the priority sites directs development away from undeveloped landscapes and helps preserve our prized forests. The prevention of sprawl and destruction of the natural environment is an integral component of our community's future, which greatly benefits from its natural surroundings and outdoor recreation (the main drivers of tourism in the NEK).

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: As a local unit of government, the Town is eligible and experienced with leveraging funding from a variety of public and private sources. Many of the funding sources identified below were secured for cleanup/reuse of sites assessed under NVDA's EPA Brownfield Assessment Coalition Grants (which the Town was a member of in 2018 and 2021). The Town is not a member of NVDA's 2023 Assessment Coalition Grant but, as previously described, NVDA is providing \$185K of grant funding for site investigation and cleanup planning activities at the True Temper site to position the site as cleanup-ready following Multipurpose Grant award. The Town will tap into the following sources to advance reuse of sites assessed with the Multipurpose Grant:

- As described in 1.a, the Town is located in one of five USDA REAP Zones in the US due to its rural isolation and lack of local capital. Priority consideration of **USDA Rural Development Grants and other federal programs** is given to REAP Zone applications. These funds can be used to further cleanup and redevelopment of sites.
- **VT Agency of Commerce & Community Development (ACCD)** helps obtain funding for cleanup and redevelopment of brownfields via the Brownfield Revitalization Fund (BRF), which offers grants and loans to municipalities and non-profits. ACCD also offers tax credits for brownfield sites.
- **VT Dept. of Environmental Conservation (VTDEC)** is responsible for administering the state Brownfield Program. VTDEC offers advice on leveraging funds with state programs, such as the Petroleum Cleanup Fund (PCF), which was used to pay for supplemental assessment and cleanup several sites assessed under the past EPA Assessment Grants. VTDEC's Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) Program will also be leveraged to provide safeguards to innocent landowners and prospective purchasers of brownfields.

- **VT Community Development Block Grant (CDBG) Fund** provides federal funding for eligible activities through Implementation Grants, Planning Grants, and Scattered Site Grants that assist in brownfield redevelopment.
- The Town has an ongoing partnership with the **St. Johnsbury Development Fund** and the **NEK Development Corporation (NEKDC)**. These partnerships provide opportunities to leverage additional funding from private and public sources, including Revolving Loan Funds (RLFs) and redevelopment capital.
- **Tax credits designed to assist with rehabilitation and capital improvements** are available for older and historic buildings located within designated downtowns, village centers and Neighborhood Development Areas (such as the **Summerville District**). The 10% State Historic Rehabilitation Tax Credit applies to the costs for substantially rehabilitating a certified historic building and combines with the 20% Federal Rehabilitation Investment Tax Credit.
- **VT Designated Downtown Tax Credits** provides financial incentives for business development in the designated downtown areas through public and private investments. These incentives include tax credits, permitting benefits, funds for capital transportation and related capital improvement projects, and priority site consideration by the State Building and General Services when leasing or constructing buildings.
- **Local Tax Stabilization Programs:** The Town adopted a municipal tax stabilization program that can assist new and expanding businesses that are creating new jobs.

1.c.ii. Use of Existing Infrastructure: The proposed projects support infill development activities that minimize urban sprawl and promote adaptive reuse of vacant/underutilized structures when feasible. Since all priority sites are located within the Town of St. Johnsbury, existing infrastructure is fully in place, including roads, water, sewer, stormwater management features, power, high-speed internet and telecommunications. It is the Town’s goals to fund sites that will cause the least strain on municipal budgets associated with expanding and maintaining a larger infrastructure network. This development strategy also minimizes impacts on our greenspaces.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding: Within a small rural town such as St. Johnsbury, need can be described as “all of the above.” At just 7,403 people, St. Johnsbury is the largest town in the NEK. For the Town, the sole tax revenue source is property tax, which leaves little ability for such rural areas to fund new or additional projects. As we begin to turn the corner from COVID, its impact on tourism and recreational-based businesses that frame our local economy has been a tremendous obstacle to reversing our population decline and aging base. As stated before, this area is one of only five USDA REAP Zones in the US because it is so incredibly rural, isolated, and lacking in local capital/funding. With such a **small population and a high low-income population**, the ability to address issues like environmental contamination is not possible. The financial situation is further exacerbated by an aging population, declining incomes, and lower than average workforce participation compared to the State and US. Demographic data below demonstrate lower than average tax revenues due to high poverty, below average median household income, and above average unemployment and social security income. Together these factors indicate much lower than average discretionary income, which results in less spending, decreasing business revenues and taxes.

Table 2.1: Demographic Information³	Summerville District (CT #50005957500)	Town of St. Johnsbury	Caledonia County	State of Vermont	United States
Population	3,735	7,403	30,402	542,827	331.9M
Senior Population (age 65+ years)	24.6%	23.3%	19.7%	20.6%	16.8%
Disabled Persons Population	17.0%	17.9%	16.2%	14.2%	12.6%
Population not in Labor Force (age 16+ years)	43.4%	42.6%	37.9%	34.9%	37.0%
Median Household Income	\$42,532	\$41,415	\$55,159	\$67,674	\$69,717
Poverty Rate	21.5%	20.4%	12.6%	10.5%	12.8%
Children/Youth Poverty Rate (<18 years)	39.1%	31.5%	21.1%	11.4%	16.9%
Households Receiving Social Security Income	11.7%	8.4%	7.6%	5.5%	5.2%
Cost Burdened Households (rent ≥30% of income)	51.6%	57.8%	50.9%	50.0%	50.0%

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

2.a.ii. Threats to Sensitive Populations:

2.a.ii(1) Health or Welfare of Sensitive Populations: As demonstrated in Table 2.1, St. Johnsbury is among the most impoverished areas of VT. Levels of distress are further compounded within the TA, resulting in significant welfare impacts to sensitive groups which include low-income residents of all ages but most notably seniors and children.

- **Aging Population:** Vermont has one of the oldest populations in the US, and the TA has some of the highest concentrations of seniors in the State. According to the latest Census, 25% of the TA population is aged 65+. By 2030 this age group is estimated to account for nearly 40% of the population. Residents in the 55+ age bracket are

³ Unless noted otherwise, all data reflects 2018-2021 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).

increasing, while those in the 35-54 age bracket are decreasing, reflecting an erosion of the highest earning age bracket and a growing population of those in retirement. As the population dwindles, local business that rely on residents lack a customer base and are forced to close leaving fewer options and services for those remaining.

- **Poverty:** Building off the previous statements, as business and industries have closed, those who stay and are under 65 see their good paying job prospects decline due to the rural nature of St. Johnsbury. It's not feasible to simply commute for another job or for everyday goods and services. Therefore, as shown in Table 2.1, 39% of residents <18 years of age are living in poverty and the TA has a median household income \$25,000 below the state average.
- **Housing:** Addressing the aging housing stock to provide affordable quality housing solutions for the high number of burdened homeowners and renters (housing costs > 30% of income) illustrated in Table 2.1 will be a major focus of this project. Low incomes and increasing age of the TA population inhibit the ability to maintain or upgrade a property, thus lowering market values and perpetuating blight. Many homes in the TA were built prior to 1940. These homes are often not equipped to meet the needs of the aging population, high percent of people with disabilities (nearly 1 in 5 for the TA), and the workforce the region seeks to attract. Deferred maintenance and unkempt housing are contributing to negative perceptions of the area. Newer construction most often occurs outside of town, leaving behind unkempt and decaying town centers. This blight acts as a barrier to investment in the community, often steering employers to locate elsewhere. Through use of the Multipurpose Grant, we intend to start a new chapter with quality affordable housing in the TA, new industry, and quality government services to meet the needs of the current population.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Health data is not available at the CT or Town level, so the next closest geographic area, Caledonia County, is being used. Of the 14 counties in VT, Caledonia ranks the 12th in the state, indicating a greater than normal incidence of disease.⁴ According to the VT Dept. of Health (DOH), between 2011 and 2015 lung, colorectal and cervical cancer rates for Caledonia County were higher than statewide rates. As stated in the previous section, the majority of homes in the TA were built prior to 1940 and makes exposure to RBMs likely. More acutely impacting health impacts, like cancers, could be attributed to largely unregulated use and/or disposal of VOCs, SVOCs, metals, and PCBs (which is suspected to have occurred at the **True Temper Factory** and **Salvage Yard**). These are the sites where our older population spent their working lives and had significant environmental exposure, and in some cases, where the current workforce may be dealing with unknown exposure to hazardous substances and petroleum in soil, groundwater and soil vapor. Within the small footprint of St. Johnsbury, VOC contaminated groundwater is known to exist at two of the priority sites, in addition to soil contamination.

Regular exposure to brownfield contaminants such as RBMs (ACM, PCBs and LBP), or VOCs, SVOCs, metals, and petroleum can increase lung cancer rates, liver disorders, and other forms of cancer, neurological system impacts, immune system impacts and skin disease. Sensitive populations are disproportionately impacted, such as elderly individuals, the large disabled population, and the large low-income population since they find themselves in closest proximity to these sites without the financial means to find safe housing or working conditions. Cleanup of brownfields such as the priority sites will substantially aid in mitigating the cumulative exposure of TA residents to contamination associated with brownfields and other sources of contamination contributing to these high rates of disease.

2.a.ii(3)(a) Environmental Justice: As discussed in 1.a, the TA was once a small manufacturing hub centered around industry, natural resource extraction, and processing. Now that many of those are gone, along with a significant portion of the population, the elderly population and children living in poverty are clustered in the TA vs the rural area surrounding it (although all of our jurisdiction has high rates of both). For these individuals, there is little to no ability to cleanup a site, move, or build a new house out of town. These residents are essentially trapped by their economic circumstances in the TA, living next door to blighted areas and contaminated sites (such as the priority sites). EPA's Environmental Justice tool "EJSCREEN" demonstrates that the elderly, disabled and low-income population in the TA are disproportionately impacted by exposure to hazardous substances. Table 2.2 compares environmental justice indices and demographics that encompass Vermont. As demonstrated in the table, **sensitive populations within the TA fall above the 75th percentile for disproportionate burden and exposure to many hazardous substance sources of pollution** when compared to other communities in Vermont. Additionally, **all the priority sites identified in the TA are located within a disadvantaged CT according to CEJST**.⁵ Table 2.3 illustrates the three indices CEJST identifies as disadvantaged for the TA. These data, along with the census and health data provided in the previous sections, demonstrate that economically impoverished populations and older individuals are disproportionately impacted by brownfields in our community. In order for our small rural Town to begin to tackle these issues, its integral we have the resources to fund cleanup of properties that serve a need within the community. These needs include affordable and senior housing as well as good jobs for working age individuals currently in poverty.

⁴ County Health Rankings & Roadmaps. 2023 County Health Rankings, Vermont. ([Link](#))

⁵ Confirmed using Climate and Economic Justice Screening Tool (CEJST) on 11/01/23.

2.a.ii.(3)(b) Advancing Environmental Justice: The proposed project will not displace any residents and will significantly advance EJ among a disadvantaged community. Specifically, the community suffers from lack of healthy housing and has significant exposure to lead paint (see Table 2.2) and old housing that does not meet the needs of the large elderly and disabled population (see Table 2.1) and crumbling from deferred maintenance. The *True Temper Factory* and *Salvage Yard* properties provide the largest area of contiguous parcels suitable for housing development in the Town. Providing affordable, healthy homes and supporting our elderly population is critical to protecting the health and welfare of this underserved community. These projects will provide quality, affordable housing options within the TA to support existing residents.

2.b. Community Engagement

2.b.i. Prior/Ongoing Community Involvement: As described in Section 1.b.i, the proposed priority site reuses directly support adopted master plan directives laid out in the *2017 St. Johnsbury Housing Study*, *2017 St. Johnsbury Town Plan*, *2019 OZ Prospectus*, and

Table 2.2: EJScreen Indices for Summerville District⁶

EJ Index	Percentile in VT
Diesel Particulate Matter	79%
Air Toxics Cancer Risk	91%
Air Toxics Respiratory Hazard Index	86%
Lead Paint Indicator	87%
Superfund Proximity	92%
Hazardous Waste Proximity	87%
Underground Storage Tank Proximity	89%
Low Income Population	94%
Demographic Index	90%

*Bold indicates distress factor >75th percentile.
 Shaded indicates distress factor >85th percentile.*

Table 2.3: Disadvantaged CEJST Indices for Summerville⁷

CEJST Category	CEJST Index	%tile in US
Energy	Energy Cost	92%
Workforce Development	High School Education (pop. ≥25 yrs with less than diploma)	12%
All	Low Income	81%

2020 Main Street Brownfield Revitalization Study. These documents were prepared with extensive community involvement, specifically from the Summerville Neighborhood Group which is comprised of residents and stakeholders in the TA. Additionally, redevelopment plans for the *True Temper Factory* have been discussed extensively at the Town’s monthly SelectBoard meetings which are open to the public and receive regular attendance by community members. Furthermore, the Town has drafted a purchase and sale agreement with the owners of the True Temper site who are supportive of the property transaction and proposed reuse plans. Similarly, the reuse plans for the *Public Works Yard* are strongly supported by the arts and culture industry and are being spearheaded by the local non-profit Catamount Arts.

2.b.ii. Project Involvement / 2.b.iii. Project Roles: NVDA is the regional planning commission that hosts a Brownfield Advisory Committee (BAC) that covers the tri-county area of the NEK and includes representatives from many community-based organizations. St. Johnsbury is a member of the BAC and routinely shares project updates at the monthly meetings. The Town will continue to participate in the meetings and will use this platform to inform the community of its Multipurpose Grant activities. Additionally, the Town’s monthly SelectBoard meetings are open to the public and are frequently attended by residents, business owners and community-based organizations. The SelectBoard meetings will also be used to advertise the project and solicit site nominations as needed. Below is a summary of project partners and their roles. Most of these partners are already members of NVDA’s BAC and are organizations the Town frequently collaborates with. Additional partners will be recruited throughout the project.

Organization Name	Point of Contact	Organization Purpose & Project Role
Northeastern Vermont Development Association (NVDA)	[REDACTED]	Purpose: Regional planning commission and economic development corporation assisting with land use planning. Role: Technical support and regional planning.
Summerville Neighborhood Group	[REDACTED]	Purpose: Represent interests of Summerville District. Role: Inform site prioritization and reuse planning.
RuralEdge	[REDACTED]	Purpose: Non-profit affordable housing developer. Role: Outreach, evaluating health issues & planning around cleanup decisions related to housing.
Catamount Arts	[REDACTED]	Purpose: Non-profit arts and culture organization. Role: Inform reuse plans for Public Works Yard.
Northern Forest Center	[REDACTED]	Purpose: Revitalization of communities in Northern Forest Region with emphasis on greenspace/forest preservation. Recreational tourism services. Role: Identify key sites in need of assessment and cleanup that support the workforce housing shortage and support recreational tourism industry.

⁶ Generated using EPA Environmental Justice Screening (EJSCREEN) Tool on 11/01/23.
⁷ Generated using Climate and Economic Justice Screening Tool (CEJST) on 11/01/23.

Northeastern VT Regional Hospital (NVRH)	Purpose: Regional hospital, protect health, disease prevention. Role: Outreach, evaluating health issues & planning around cleanup decisions. Connect developers to workforce and senior housing projects.
St. Johnsbury Development Fund	Purpose: Economic Development in Northern VT. Role: Identifying/leveraging funds, site selection, reuse planning.
Vermont Dept. of Historic Preservation	Purpose: Preserving Vermont's historic resources. Role: Input on cleanup decisions and relation to preservation.
NEK Development Corporation	Purpose: Regional economic development corporation. Role: Attract and retain business, address regional economic challenges.
NEK Collaborative	Purpose: Improve quality of life via economic & community development. Role: Address economic challenges. Inform site reuse.
NEK Community Action	Purpose: Provide social services that address poverty through education, community collaborations and community action. Role: Outreach to sensitive populations. Inform site reuse.
NEK Division of Developmental Services	Purpose: Help individuals with disabilities lead normal and complete lives. Role: Advisory role with outreach to sensitive residents.
VT Agency of Commerce & Community Develop.	Purpose: Enhance business, promote tourism & strengthen communities. Role: Municipal grants, planning and community development.
Vermont Dept. of Health (DOH)	Purpose: Protect health, disease prevention. Role: Outreach, evaluating health issues & planning.
VTDEC	Purpose: Protection of Human Health and the Environment. Role: Project oversight, potential funding support.

2.b.iv. Incorporating Community Input: The Town has worked with project partners and community stakeholders to form strong partnerships for all our grant projects. The Town will tailor outreach methods to the TA community and ensure equal access to project information for sensitive and underserved populations. The Town will collaborate with project partners and community members to gather quarterly and real-time feedback on site selection, reuse, and proposed cleanup options. Formal bi-annual or project specific (as part of the public comment period for each cleanup plan) meetings will be held as close as feasible to each cleanup site, in a hybrid format (in-person and virtually) as is the standard for all Town meetings. For public engagement meetings, to the extent possible, meetings will “piggyback” on other local community events to maximize attendance drawn from the TA and general promotion of the Town’s Multipurpose Grant. Prior to meetings, flyers and social media posts by the Town, project partners, and local groups, will publicize meetings. Within and outside of meetings, the Town will continually solicit community comment/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meeting materials will include copies of questions and answers received/provided during the quarter. Questions or concerns intended for the larger group of stakeholders will be addressed by the monthly BAC meetings for a consensus answer. All deliverables (site eligibility forms, Community Involvements Plan [CIP], Quality Assurance Project Plans [QAPPs], ABCAs/CAPs, etc.) will be maintained online by the Town and placed in the St. Johnsbury library area for ease of access.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS

3.a. Description of Tasks/Activities & Outputs: We anticipate the scope described below will be complete in 3 years.

Task 1: Project Management, Reporting & Other Eligible Activities
i. Project Implementation: Task 1 will include: 1) general Cooperative Agreement (CA) compliance oversight; 2) quarterly progress reporting; 3) annual Disadvantaged Business Enterprise (DBE) report and Federal Financial Report (FFR); 4) Property Profile Form submission and updates in EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; 5) a final performance report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned and resources leveraged; 6) biweekly check-in meetings with the consultant to ensure the project is progressing as planned; and 7) participation in national and regional brownfield conferences.
ii. Project Schedule: Activities will be ongoing throughout the project period (which we anticipate will be 3 years).
iii. Task Lead: The Town with support from the Qualified Environmental Professional (QEP).
iv. Output(s): 12 Quarterly Reports; 3 Annual FFR and DBE Reports; prompt ACRES reporting; 1 Final Performance Report and associated financial documents; 2 brownfield conferences attended by 2 Town staff; and 72 check-in meetings with QEP Contractor (24 meetings/year x 1 hr/meeting x 3 years).
Task 2: Community Engagement & Site Inventory/Prioritization
i. Project Implementation: The community engagement task will include the following: 1) preparation of a Community Involvement Plan (CIP); 2) monthly BAC meetings; 3) six community meetings; 3) outreach materials including fact sheets and creation and periodic updates of a project webpage; and 4) solicitation and response to community input. Inventory activities were completed as part of the 2017 <i>St. Johnsbury Housing Study</i> and 2019 <i>OZ Prospectus</i> . The Town will update these inventories as necessary for the site prioritization process. Inventory data, combined with a

focused Area-Wide Plan (AWP) (see Task 4 below), will be leveraged to identify additional catalyst projects that are most likely to spur reinvestment in the Summerville District. The inventory will be linked to the Geographic Information System (GIS) managed by NVDA (our regional planning commission).

ii. Project Schedule: The CIP, project webpage and fact sheets will be completed by the second quarter (2Q) of the project. Two community meetings will be hosted per year with the first during 2Q. BAC meetings are held monthly and will continue throughout the period of performance. Inventory updates (if necessary) will be completed by 3Q.

iii. Task Lead: The Town will lead outreach to residents and stakeholders with support from NVDA and the QEP. NVDA hosts monthly BAC meetings the Town participates in to share project updates with community stakeholders. The QEP will assist with facilitating public meetings and updating the site inventory as needed.

iv. Output(s): CIP. Monthly BAC meetings and meeting materials. Six community meetings. 2-3 project fact sheets. Project posters. Mailers. Public notices published in the local newspaper and Town website. Develop and update/maintain project webpage on Town's website. Updated brownfield inventory.

Task 3: Site Assessment & Cleanup Activities

i. Project Implementation: The Town estimates assessment activities will be completed for 4 sites and cleanup activities will be completed for 2 sites. The QEP Contractor will prepare Eligibility Determination (ED) requests for sites prioritized by the Town and BAC. We anticipate the QEP Contractor will conduct Phase I ESAs for 2 sites to support property transfers (Salvage Yard & Ames Building); Phase II ESAs for 3 sites (Public Works Yard, Salvage Yard & Ames Building); RBM Surveys for 3 sites (Public Works Yard, Salvage Yard & Ames Building); and Cleanup Plans for 3 sites (Public Works Yard, Salvage Yard & Ames Building). Prior to initiating sampling or other field investigation activities, the QEP will update the existing Master Quality Assurance Project Plan (QAPP) for EPA and VTDEC approval. The QEP will also prepare Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each site selected for a Phase II ESA and/or RBM Survey. The SAPs will be submitted to EPA and VTDEC for approval prior to fieldwork. Cleanup Plans will also be submitted to EPA and VTDEC for review and approval. Enrollment in VTDEC's voluntary cleanup program (BRELLA) will also be completed for the priority sites.

For sites where cleanup activities will be completed, the consultant will work with the State Historic Preservation Office (SHPO) and EPA to review compliance with the National Historic Preservation Act (NHPA). Cleanup activities will include 1) preparing a site-specific QAPP; 2) preparing bid specifications and completing a Davis-Bacon Act (DBA) and EPA compliant (2 CFR § 200.317-326) request for proposals (RFP) process to select a cleanup contractor; 3) remedial action, including all permitting and pre-work submittals, HASP preparation, set-up controls to secure the site, and remove, load, transport and dispose of hazardous wastes (the QEP Contractor will provide oversight of all cleanup activities, including ensuring compliance with all DBA elements); and 4) preparation of a Closure Report documenting all aspects of the cleanup project.

As described in 1.b.i and 1.c.i, the Town is currently using NVDA's Assessment Grant to fund a site investigation (total cost is ~\$185K) at the True Temper property with the goal of completing site characterization and cleanup planning activities in advance of the Multipurpose Grant award. The Town intends to acquire the True Temper site following completion of site investigation activities and begin cleanup activities as soon as possible in 2024. Due to the history of land use (logging activities) at the Public Works Yard, the Town anticipates remedial action will be required for this site prior to reuse by Catamount Arts as an outdoor arts and culture center.

ii. Project Schedule: Year 1: Update Master QAPP, 2 Phase I ESAs, 2 Phase II ESAs, 2 RBM Surveys; BRELLA Enrollment for 2 sites; Remedial Action at 1 site (True Temper) | Year 2: 1 Phase II ESA, 1 RBM Survey, 2 Cleanup Plans; BRELLA Enrollment for 1 site; Remedial Action at 1 Site (Public Works Yard); 1 AWP | Year 3: 1 Cleanup Plan

iii. Task Lead: QEP Contractor under the direction of the Town.

iv. Output(s): 1 Master QAPP, 2 Phase I ESAs, 3 Phase II ESAs, 3 RBM Surveys, 3 Cleanup Plans, 3 BRELLA applications, HASPs, SAP/Site-specific QAPPs, Cleanup Specifications/RFP, RFP Selection Process Documentation, DBA Compliance Documentation, Site Cleanup, Closure Report.

Task 4: Area-Wide Planning

i. Project Implementation: The Town intends to build on the *St. Johnsbury Housing Study* by using grant funds to conduct an area-wide brownfield revitalization plan for the Summerville District, similar to our *2020 Main Street Brownfield Revitalization Study* that has spurred significant developer interest and investment in our historic downtown. The AWP will assist the Town with advancing redevelopment goals and attracting developer interest. Elements of the AWP are anticipated to include a market analysis, site reuse plans/redevelopment feasibility studies for catalyst sites, infrastructure analysis, and redevelopment roadmap. The community engagement elements of the AWP will be addressed via the community meetings described under Task 2.

ii. Project Schedule: AWP activities will be initiated during the first year and completed by the second year.

iii. Task Lead: The QEP will lead all technical activities at the direction of the Town.

iv. Output(s): 1 AWP Study for the Summerville District.

3.b. Cost Estimates: Project cost estimates for each task are provided below. Town personnel costs are based on an average rate of \$70/hour (\$50 personnel salary + \$20 fringe benefits). The Town is requesting 4% of the grant for indirect costs (\$10K per task) for administrative expenses. No other administrative expenses are requested. QEP Contractor costs are based on an average rate of \$175/hour. Approximately **80% of grant funds (\$798,000 of contractual and construction services) are allocated for environmental cleanup, Phase I/II ESAs, RBM Surveys and cleanup planning.** As described above, we anticipate the project will be completed in three years.

Task 1: Project Mgmt., Reporting & Other Activities Total Budget = \$58,600 (\$48,600 Direct + \$10,000 Indirect)
Personnel & Fringe Total = \$14,000
<ul style="list-style-type: none"> • CA Management, Contractor Management & Reporting Activities: \$2,240 (32 hours x \$70/hr) • Biweekly Project Meetings: \$5,040 (24 meetings/yr x 1 hour/meeting x 3 years = 72 hours x \$70/hr) • Brownfields Conference Attendance: \$6,720 (8 hours/day x 3 days x 2 events x 2 staff = 96 hours x \$70/hr)
Travel Total = \$7,200
<ul style="list-style-type: none"> • National Brownfields Conference: \$4,800 (\$2,400/person x 2 Town staff x 1 conference) • State/Regional Brownfields Conference: \$2,400 (\$1,200/person x 2 Town staff x 1 conference) <p><i>(Note: Costs include lodging, meals, airfare, transportation, and incidental expenses.)</i></p>
Other Total = \$800
<ul style="list-style-type: none"> • Conference Registration Fees: \$800 (\$200/person x 2 Town staff x 2 conferences)
Contractual Total = \$26,600
<ul style="list-style-type: none"> • Compliance Reporting (Quarterly Progress Reports, ACRES updates, Final Performance Report, Annual FFRs & DBE Utilization Reports): \$14,000 (80 hours x \$175/hr) • Biweekly Project Meetings: \$12,600 (24 meetings/yr x 1 hour/meeting x 3 years x \$175/hr)
Indirect Costs = \$10,000 (Administrative Expenses)
Task 2: Community Engagement & Site Prioritization Total Budget = \$39,400 (\$29,400 Direct + \$10,000 Indirect)
Personnel & Fringe Total = \$4,900
<ul style="list-style-type: none"> • Review CIP & Project Fact Sheets; Develop/Maintain Project Webpage: \$1,960 (28 hours x \$70/hr) • Community Meetings & BAC Meetings: \$2,940 (42 meetings x 1 hours/meeting x \$70/hr)
Contractual Total = \$24,500
<ul style="list-style-type: none"> • Develop CIP & Project Fact Sheets, Provide Project Webpage Content: \$7,000 (40 hours x \$175/hr) • Community Meetings & BAC Meetings: \$14,000 (80 hours x \$175/hr) • Site Inventory/Prioritization: \$3,500 (20 hours x \$175/hr)
Indirect Costs = \$10,000 (Administrative Expenses)
Task 3: Site Assessment & Cleanup Activities Total Budget = \$819,200 (\$809,200 Direct + \$10,000 Indirect)
Personnel & Fringe Total = \$2,100
<ul style="list-style-type: none"> • QEP/Contractor Coordination/Oversight & Deliverable Review: \$2,100 (30 hours x \$70/hr)
Supplies Total = \$1,300
<ul style="list-style-type: none"> • Required Signage for Sites Undergoing Cleanup: \$1,300 (\$650/site x 2 sites)
Other Total = \$1,500
<ul style="list-style-type: none"> • BRELLA Enrollment Fees: \$1,500 (\$500/site x 3 sites)
Contractual Total = \$329,300
<ul style="list-style-type: none"> • Site Eligibility Checklists: \$2,800 (16 hours x \$175/hr) • NHPA Compliance: \$3,500 (20 hours x \$175/hr) • Update Master QAPP: \$2,500 lump sum • Phase II ESAs for Ames Building & Public Works Yard: \$80,000 (2 sites x \$40,000/site) • RBM Surveys for Ames Building, Public Works Yard & Salvage Yard: \$43,500 (3 sites x \$14,500/site) • ABCAs/CAPs for Ames Building, Public Works Yard & Salvage Yard: \$36,000 (3 sites x \$12,000/site) • Phase I ESAs: \$11,000 (2 sites x \$5,500/site) • Phase II ESA for Salvage Yard: \$150,000
Construction Total = \$475,000*
<ul style="list-style-type: none"> • Remedial Activities for True Temper: \$400,000 • Remedial Activities for Public Works Yard: \$75,000 <p><i>(Note: Costs include site-specific QAPP, bid specs, cleanup oversight, remedial activities, waste disposal and post-cleanup reporting.)</i></p> <p><i>*Over 50% of the budget for the QEP Contractor is for cleanup activities. Therefore, we included these costs under the Construction category.</i></p>
Indirect Costs = \$10,000 (Administrative Expenses)
Task 4: Area-Wide Planning Total Budget = \$82,800 (\$72,800 Direct Costs + \$10,000 Indirect Costs)
Personnel & Fringe Total = \$2,800
<ul style="list-style-type: none"> • Consultant Coordination/Oversight & Deliverable Review: \$2,800 (40 hours x \$70/hr)
Contractual Total = \$70,000
<ul style="list-style-type: none"> • AWP for Summerville District: \$70,000 (1 area x \$70,000/area)
Indirect Costs = \$10,000 (Administrative Expenses)

A summary of the proposed budget for grant funded activities is provided in the table below.

Budget Category	Task 1 Project Mgmt., Reporting & Other Eligible Activities	Task 2 Community Engagement & Site Prioritization	Task 3 Site Assessment & Cleanup Activities	Task 4 Area-Wide Planning	Total
Personnel	\$10,000	\$3,500	\$1,500	\$2,000	\$17,000
Fringe Benefits	\$4,000	\$1,400	\$600	\$800	\$6,800
Travel	\$7,200	\$0	\$0	\$0	\$7,200
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$1,300	\$0	\$1,300
Contractual	\$26,600	\$24,500	\$329,300	\$70,000	\$450,400
Construction*	\$0	\$0	\$475,000	\$0	\$475,000
Other	\$800	\$0	\$1,500	\$0	\$2,300
Total Direct Costs	\$48,600	\$29,400	\$809,200	\$72,800	\$960,000
Total Indirect Costs	\$10,000	\$10,000	\$10,000	\$10,000	\$40,000
TOTAL BUDGET	\$58,600	\$39,400	\$819,200	\$82,800	\$1,000,000

*Over 50% of the budget for the QEP Contractor is for cleanup activities. Therefore, we included these costs under the Construction category.

3.c. Plan to Measure & Evaluate Environmental Progress & Results: The Town’s Brownfields Project Manager will be responsible for tracking, measuring, and evaluating progress through measurable outcomes and outputs. A spreadsheet of expected outputs and outcomes will be maintained and updated quarterly. Anticipated **outputs** include: number of sites nominated and prioritized for funding; community meetings; Phase I/II ESAs completed; ABCAs/CAPs completed; sites remediated; sites receiving a Certification of Completion or equivalents from VTDEC; and sites enrolled in VTDEC’s BRELLA Program. Progress reports, financial reports, MBE/WBE utilization forms, and closeout reporting will also be outputs. Anticipated **outcomes** include number of attendees at community meetings/events; sites and acres assessed, remediated, and redeveloped; jobs created; housing units created; and dollars leveraged. Qualitative measures of long-term community education and overall improvement of quality of life will be monitored through surveys. Progress will be measured against meeting anticipated deadlines and community satisfaction. Should progress not be met on the anticipated schedule, the Town will consult with the QEP and EPA on corrective action strategies.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Capacity: The Town employs 22 staff, including planners, public works, administrative, and accounting professionals. The Town’s operations are supported by NVDA (the regional planning commission) who employs planners as well as business development and economic recovery specialists. As demonstrated on the Town’s current EPA Brownfield Cleanup Grant (described in 4.b), we have the capacity to successfully carry out and manage the programmatic, administrative, and financial requirements of a grant with this scope and complexity. For the Brownfield Cleanup Grant, the Town is responsible for overseeing the consultant team, compliance reporting to EPA, financial management, stakeholder engagement, and coordinating site access. The Town will lead these and other activities for the Multipurpose Grant.

4.a.ii. Organizational Structure: Our project management team has proven experience in the management and execution of prior grant projects and will employ similar strategies for this project to ensure timely and successful expenditure of funds and fulfill all technical, administrative, and financial requirements. The decision-making structure includes procedures for activities such as site selection, scope of work development for contractors, acquisition of permits/access agreements for assessments, and related aspects of grant activities ensuring the community is involved in how grant funds will benefit the area. As described in the attached Threshold Criteria and Section 4.a.iv, the Town has selected a QEP Contractor to lead all technical activities. The QEP Contractor was procured in accordance with federal requirements. Advanced procurement positions the Town for expedited project kick-off upon funding award. Additionally, we estimate this project will be complete within three years due to advanced site selection/prioritization and positioning sites to be cleanup-ready upon funding award.

4.a.iii. Description of Key Staff: The Town’s key personnel and their qualifications are provided below.

Chad Whitehead, PE, Town Manager: Chad has extensive experience with project management and funding procurement. Before becoming Town Manager, he led numerous projects as the Office Manager/Project Manager for Dufrense Group (an engineering firm). Chad is a licensed professional engineer and has worked on nearly \$50M of infrastructure projects within the Town. As Project Director, Chad will provide high-level oversight of the project.

Joe Kasprzak, Assistant Town Manager: Joe’s primary focus is community and economic development, including business support and recruitment, strategic planning, marketing and housing. Joe works with stakeholders to improve the economic vitality of St. Johnsbury and the greater NEK. Joe’s been an active member of his community and is Vice-

Chair of the St. Johnsbury Housing Committee and founder of the Burke Area Development Committee. Joe will serve as Project Manager and will be responsible for managing day-to-day project activities, including contractor oversight, project financials, EPA compliance reporting, BAC meetings, and compliance with the terms and conditions of the CA.

Lesley Russ, Financial Officer: Lesley has over 40 years of accounting and internal auditing experience, with the last 10 years in municipal government. Lesley's role at the Town includes annual budget development, monthly financial reporting to the SelectBoard, financial management of all grants, implementing and maintaining financial policies and internal controls, management of the annual external audit and payroll and related tax reporting. Lesley will be responsible for tracking financials and managing grant funds.

4.a.iv. Acquiring Additional Resources: The Town routinely contracts with consultants and has established equal opportunity procurement procedures for ensuring a fair bidding process. As described in the Threshold Criteria, the Town has selected a QEP Contractor to lead all technical activities. The QEP Contractor was procured in accordance with qualifications-based procurement and compliance with 2 CFR Part 200, 2 CFR Part 1500 and EPA's guidance documents (*Best Practice Guide for Procuring Services* and *Guidance on Competitively Procuring a Contractor*). The QEP Contractor will support project management and compliance reporting activities and complete all technical activities. Advanced procurement positions the Town for expedited project kick-off upon funding award.

The Town promotes strong labor practices and local hiring/procurement by distributing RFQ/Ps to local consultants via direct email, posting public notices in the local newspaper (*Caledonian Record*), and posting RFQ/Ps on VTDEC's Environmental Notice Bulletin (ENB). When a RFQ/P is posted to the ENB, all environmental consultants registered in the State of Vermont receive an email notifying them of the posting. The Town's selected QEP Contractor includes three Vermont-based firms which are located in close proximity to St. Johnsbury. Additional information regarding our procurement process is included in our Threshold Criteria response.

4.b. Past Performance & Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The Town has received two EPA Brownfield Cleanup Grants: FY2021 Cleanup Grant (\$500,000) and FY2010 Community-Wide Assessment Grant for sites impacted by hazardous substances (\$200,000). Both grants are further described below.

4.b.i.(1) Accomplishments:

Cleanup Grant: Activities include abatement of an Armory Building in the Town's historic district. This highly complex site is impacted with concentrations of PCBs in paint up to 20,000 parts per million in some areas of the building. Extensive characterization activities have occurred over the past 18 months to support cleanup planning. Abatement activities are estimated at \$2.5M and will occur in summer 2024. The Town has secured multiple federal and state funding sources to pay for cleanup. Once complete, the building will house the Town's police station and dispatch center.

Assessment Grant: Activities included a comprehensive site inventory, conducting outreach activities, providing technical assistance for many redevelopment projects, and completing the following site-specific activities: i) A 7-acre former salvage yard received a Phase I and II ESA. ii) Two other large industrial properties received Phase I/II ESAs, including a site with a varied history of industrial uses (KNTT Investment Property) and the former Fairbanks Morse Foundry. iii) An abatement and demolition plan was prepared. Following completion of assessment activities at the Former Fairbanks Morse Foundry, the site was repurposed for two new businesses: the Fairbanks Mill Construction Company on one area of the site and a firearms retailer on another area of the site. Combined these businesses created 10 new jobs. Assessment of the KNTT Site supported planned redevelopment as a recreational amenity. The site is now home to the recently completed Three Rivers Recreation Path and Trailhead Center that connects the Lamoille Valley Rail Trail (LVRT) to downtown St. Johnsbury. The other segments of the LVRT were completed in recent years and the trail now spans 94 miles, connecting St. Johnsbury to Swanton VT.

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

Cleanup Grant: The Town has maintained compliance with the workplan, schedule (10/01/21-09/30/24), and EPA terms and conditions. All progress reports and other deliverables were submitted on time and in compliance with EPA standards. Final cleanup activities will be completed in spring/summer 2024 and the Final Performance and Financial Reports will be prepared in summer 2024, at which time the CA will be formally closed.

Assessment Grant: The Town met all reporting requirements/milestones and maintained compliance with the CA (including terms and conditions, ACRES database updates, periodic reporting and Final Reporting). The impeccable reporting record was a result of the Town's experience managing state/federal grants including: Community Development Block Grants; USDA's Rural Business Opportunity and Technical Assistance Grants; and DEC Brownfield Planning Grants. All phases were successfully completed and target outcomes/outputs were achieved, including meeting DBE goals. All funds were expended within the 3-year grant period and the expected results were achieved.

ATTACHMENT A

Threshold Criteria Responses

1. APPLICANT ELIGIBILITY:

1.a. Applicant Type: The Town of St. Johnsbury (Town) is a “general purpose unit of local government” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfield Multipurpose Grant funding.

1.b. Federal Taxation Exemption Status: Not applicable. (The Town is not a 501(c)(4). As a unit of local government, the Town is exempt from federal taxation.)

2. COMMUNITY INVOLVEMENT: The Town has worked with project partners and community stakeholders to form strong partnerships for all our grant projects. The Town will tailor outreach methods to the Target Area (TA) community and ensure equal access to project information for sensitive and underserved populations. The Town will collaborate with project partners and community members to gather quarterly and real-time feedback on site selection, reuse, and proposed cleanup options. Formal bi-annual or project specific (as part of the public comment period for each cleanup plan) meetings will be held as close as feasible to each cleanup site, in a hybrid format (in-person and virtually) as is the standard for all Town meetings. For public engagement meetings, to the extent possible, meetings will “piggyback” on other local community events to maximize attendance drawn from the TA and general promotion of the Town’s Multipurpose Grant. Prior to meetings, flyers and social media posts by the Town, project partners, and local groups, will publicize meetings. Within and outside of meetings, the Town will continually solicit community comment/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meeting materials will include copies of questions and answers received/provided during the quarter. Questions or concerns intended for the larger group of stakeholders will be addressed by the monthly Brownfield Advisory Committee (BAC) meetings (described in Section 2.b.ii of the proposal narrative) for a consensus answer. All deliverables (site eligibility forms, Community Involvements Plan [CIP], Quality Assurance Project Plans, cleanup plans, etc.) will be maintained online by the Town and placed in the St. Johnsbury library area for ease of access.

3. TARGET AREA: The geographic area of the project is the Town of St. Johnsbury and the Target Area (TA) is the Summerville District (Census Tract #50005957500). The TA occupies the eastern side of Town and generally consists of a mix of residential, commercial, and industrial uses. It is bordered by the Moose and Passumpsic Rivers with the former Twin State Railroad running through the center.

4. AFFIRMATION OF BROWNFIELD SITE OWNERSHIP: The Town owns a 110-acre parcel (Caledonia County parcel #242010) located at 217 Almshouse Road, a site that meets the CERCLA § 101(39) definition of a brownfield and is: a) not listed (or proposed for listing) on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government. Assessment and cleanup plans for a 6-acre area of this site are described in the proposal narrative.

5. USE OF GRANT FUNDS: Below we describe where to find the required information:

- As indicated on pages 1, 2, 3, 9 and 10, the Town plans to conduct Phase II ESA activities at the following properties:
 - Public Works Yard – 217 Almshouse Road, St. Johnsbury
 - Salvage Yard – 85 Ely Street, St. Johnsbury
 - Ames Building – 852 Portland Street, St. Johnsbury
- As indicated on pages 2, 3, 9 and 10, the Town plans to conduct cleanup activities at the following properties:

ATTACHMENT A - THRESHOLD CRITERIA RESPONSES

- True Temper Factory – 575 Concord Avenue, St. Johnsbury (The Town is in the process of acquiring this property.)
- Public Works Yard – 217 Almshouse Road, St. Johnsbury (The Town owns this property.)
- As indicated described in the proposal narrative, the Town has laid the foundation for revitalization planning of the former True Temper Factory area by obtaining a “Neighborhood Development Area” designation from the State of Vermont in Spring 2023 (further described in Section 1.b.i of the proposal narrative). This new state designation allows for streamlined permitting of housing developments and new development incentives. This designation has attracted attention from several developers in the area and allowed the Town to begin forming public-private partnerships to cleanup blighted properties and redevelop them to meet the needs of the community. Revitalization Plans align with the Town’s 2017 *St. Johnsbury Housing Study and Needs Assessment*, 2017 *Town Plan*, and 2019 *Opportunity Zone Prospectus*. As indicated on pages 2, 9 and 10, Multipurpose Grant funds will be used to develop an Area-Wide Brownfield Revitalization Strategy for Summerville District that builds on these previously completed studies.

6. EXPENDITURE OF EXISTING GRANT FUNDS: The Town does not have an open EPA Brownfield Multipurpose Grant or Assessment Grant.

7. CONTRACTORS AND NAMED SUBRECIPIENTS:

7.a. Contractors: The Town completed a fair and open public procurement process in accordance with 2 CFR Part 200, 2 CFR Part 1500 and 40 CFR Part 33 to obtain the services of a Qualified Environmental Professional (QEP) Contractor. Below is the information requested:

- **Request for Proposals (RFP) Advertising Process:** The RFP was posted on the Town’s website, advertised in the local newspaper (the *Caledonian Record*), and posted on the Environmental Notice Bulletin (ENB) maintained by the Vermont Department of Environmental Conservation (DEC). When a RFP is posted to the ENB, all environmental consultants registered in the State of Vermont receive an email notifying them of the posting.
- **RFP Response Period:** The RFP was advertised for 30 days (from September 13, 2023 through October 13, 2023). A copy of the RFP is provided as **Attachment B**.
- **Inquiries & Responses Received:** Two proposals were received and both were reviewed and scored by the Town’s selection committee.
- **Firm Selected:** A team led by Montrose Environmental Solutions, Inc. was selected to provide grant application and implementation services. The team includes environmental professionals, urban planners, and real estate strategists. A copy of the executed contract is provided as **Attachment C**.

7.b. Subrecipients: Not Applicable. (No subrecipients are named.)