

VILLAGE OF VALLEY FALLS, INC.

P.O. Box 157, Valley Falls, New York 12185

Village of Valley Falls, NY – Community Wide Assessment Narrative Information Sheet

- 1) Applicant Identification:
 - a) Village of Valley Falls, New York, PO Box 157, Valley Falls, NY 12185

- 2) Funding Requested:
 - a) Community-wide Brownfield Assessment
 - b) \$500,000 Federal Funds

- 3) Location: Village of Valley Falls, located partially in the Town of Pittstown, and partially in the Town of Schaghticoke in Rensselaer County NY.

- 4) Target Area and Priority Site/Property Information: Target area is the historic Village of Valley Falls (Census Tract 36083051800), zip code 12185. Priority Site for Community-wide assessment - Old Thompson Mill, Three tax parcels/sites (22.16-3-2.1, 22.16-3-1.2, and 22.16-3-1.1) in Valley Falls, NY 12185 identified as 273 Poplar Street. Secondary sites are the former Valley Falls Dry Cleaner (11 Lyon Street) and Jim's Auto facility (Rt. 67).

- 5) Contacts
 - a) Project Director

Kristina Younger
518-527-6577
vfthompsonmillprojectmanager@ gmail.com
PO Box 157, Valley Falls, NY. 12185

 - b) Chief Executive/Highest Ranking Elected Official:

Mayor Jay Overocker
vvftrusteejpo@gmail.com
518-753-6230
PO Box 157, Valley Falls, NY. 12185

- 6) Population
 - i) Village of Valley Falls – 472 (2020 Census)
 - ii) Town of Pittstown – 5,540
 - iii) Town of Schaghticoke – 7,445

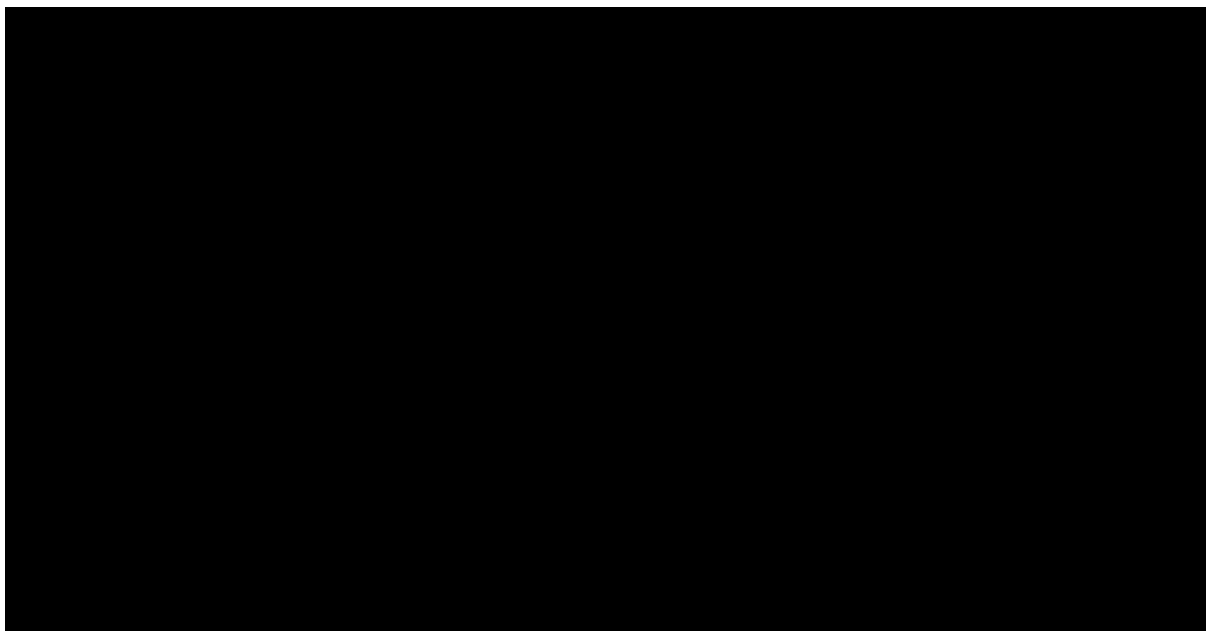
- 7) Other Factors Checklist:

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	4
The priority site is adjacent to a body of water.	1
The priority site is in a federally designated flood plain.	1,2,8
The proposed site will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	3

An October 30,2023 Acknowledgement letter from NYS Department of Environmental Conservation Bureau of Program Management Director Karen Diligent is attached.

No portion of this application is confidential, privileged, or sensitive.

Thank you for this opportunity. Because a picture is worth a thousand words, I hereby submit the essence of our proposal.



Sincerely,

JR Overocker

Mayor Jay Overocker

Attachment: NYS Department of Conservation Acknowledgement Letter from Bureau of Program Management Director Karen Diligent dated October 30, 2023

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Bureau of Program Management

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October 30, 2023

Kristina Younger
Village of Valley Falls
PO Box 157
Valley Falls, NY 12185

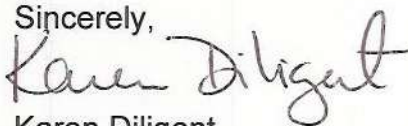
Dear Ms. Younger:

This is to acknowledge that the New York State Department of Environmental Conservation (DEC) received a request from the Village of Valley Falls, dated October 21, 2023, for a state acknowledgement letter for a Federal Year 2024 United States Environmental Protection Agency (USEPA) Brownfields grant.

I understand that the Village of Valley Falls plans to submit a Brownfield Community-Wide Assessment grant application for hazardous substances and petroleum in the amount of \$500,000. Focus of the funding will be to conduct a Phase II Assessment, including building demolition, for the old Thompson Mill site. Secondary sites include the Valley Falls Dry Cleaner and Jim's Auto facility. Funding will also be allocated for associated planning (including reuse and/or remediation planning) and community involvement activities. Please note that the USEPA criteria for an assessment grant specifies that, if selected, the Village of Valley Falls may only expend up to \$200,000 of the grant on a specific site.

DEC encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,



Karen Diligent
Director, Bureau of Program Management

cc: T. Wesley, USEPA Region 2
Y. DeJesus, USEPA Region 2
R. Mustico, DEC Albany
J. Haugh, DEC Region 4
C. O'Neill, DEC Region 4



Department of
Environmental
Conservation

NARRATIVE – Village of Valley Falls, Community-Wide Assessment

Project Area Description and Plans for Revitalization 2

1.a Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area: Valley Falls, New York, a historic village on the National Register, is a modest rural community of 185 households and a **total population of 510 residents** (Census tract 36083051800). **The Village of Valley Falls, the Target Area**, is only 0.5 square miles and lies on the boundary of the towns of Pittstown and Schaghticoke but is mostly in the northwestern part of Pittstown and is divided by the Hoosic River. The Target Area is generally bound by Route 67 and Bunker Hill Rd to the north, Riverview Drive to the east, Coons Road to the south and Powder Mill Rd to the west. The Village was founded at the turn of the 20th century due to its prominent location on the river. By 1863, the Village was a mini-industrial center with rail line access, the availability of water and waterpower for several mills, general stores, hotels, foundry, cartwright, farrier, and blacksmith shops. Unfortunately, today the Village is a shadow of its former self - a bedroom community with a very small residential tax base. There are no retail establishments, healthcare services, grocery stores or other amenities remaining in the Village, causing residents to travel to meet their basic needs. The closest senior center and grocery store is in Hoosick Falls, 16 miles away. There is no public transportation in the Village. Village life centers on the Free Library, churches, and the Community Hall. Broadband access is also lacking. The housing stock is dominated by houses dating back to or before the turn of the century.

The Thompson Mill represented the soul of the Village of Valley Falls. For over 100 years this important mill defined the town – employing most of its residents with a workforce of 110 in its heyday. When the James Thompson & Company moved its textile operation to Mexico in 1992, the old mill sat derelict for 25 years, and then in 2009, it went up in arson-created flames. The Village similarly declined. However, the mill's prominent location on a remarkably scenic bend of the Hoosic River, is the entry point to the Village, where Native American artifacts and Revolutionary War history abound, and it provides hope for a different future.

Prior to the late 1800's, when the mill complex was developed, nearby properties were developed for commercial uses that are long gone. The area is struggling from the many effects associated with abandoned and underutilized brownfields, including former dry cleaners, automotive repair facilities and other former commercial and/or industrial uses that left a wide array of known or suspected environmental contaminants. As a result, the Thompson Mill, located in the heart of the Target Area is a visual reminder of the blight and other environmental challenges faced by this small community following years of decline, resulting in little to no redevelopment, decreased property values, safety issues, diminished investment, and exposure to these contaminants. These Brownfields are known to be contaminated by polycyclic aromatic hydrocarbons (PAHs), heavy metals (chromium, lead, mercury, and others), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), as well hazardous building materials (HBM) including asbestos, lead-based paint (LBP) and polychlorinated biphenyls (PCBs). The Hoosic River, a productive fishery, is known to be impacted upstream with PFAS and PCBs contamination. These threats have not been studied in the Target Area, and the presence of these additional Brownfields sites is an obstacle to revitalization efforts. Sensitive populations living in the Target Area include families with children and women of childbearing age, low-income and minority residents and seniors (see 2.a.11.1) and this grant is critical to help reverse some of the environmental, economic, and health and welfare challenges the Village has been plagued with for decades.

ii. Description of the Priority Brownfield Sites: The Village has identified **three (3) of the four (4) parcels that comprise the 23-acre Thompson Mill complex, located at 273 Poplar Street, as well as an adjacent land-locked privately owned parcel potentially impacted by the former mill as its top Priority Sites.** This mill complex is developed on the north end with one remaining approximately 13,000 sq. ft., three-story brick former mill building, that was structurally damaged by the historic fire and continues to deteriorate. A number of former mill building foundations are visible along with rubble from their collapsed or demolished structures. The complex is adjacent to both youth recreational fields and residences, separated by a rail line. Located in the center of the Target Area and **along the banks of the Hoosic River, the Thompson Mill Site is in the federal floodplain.** Former mill activities included fabric dyeing and other manufacturing and milling operations.

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In addition, portions of the site have been used for illegal solid waste dumping. Known contamination identified during limited investigation activities include heavy metals (chromium, lead, mercury, and others), PAHs SVOCs, PCBs, LBP and asbestos in building materials. Impacted building debris is in soils around the former mill facility and the adjacent privately owned parcel, due to building collapses after the fire in 2009 that exacerbated the extent and comingling of contaminants and significantly damaged the buildings, which are now a magnet for vandalism, crime, and a significant safety hazard. A structural analysis has deemed the building unsafe to access. Furthermore, recent investigation activities around the building could not be performed within the ‘fall zone’ of the building or the building footprint. **Future investigations to be performed closer to the building and/or below the foundation, where potential impacts are expected, will require the structure to be demolished prior to investigation activities being performed.** Since petroleum storage and heating sources were co-located with other mill operations, and because of the fire, there may be residual petroleum compounds comingled with hazardous substances at this site. The Village wants to reclaim its riverfront and reuse this property to build a passive recreational green space that will provide river access to the public and includes walking trails, fishing/boat access, and historical displays of the significance of the mill in the Village’s history. Evaluation of the sites in this application is critical to implementing this revitalization plan.

A short distance from the mill is the former **Valley Falls Dry Cleaner (11 Lyon Street) and Jim’s Auto facility (Rt. 67), secondary Priority Sites** to the Village. A VOC impacted groundwater plume, including tetrachloroethylene (PCE), associated with the former dry cleaner has impacted local drinking water. In addition, the unknown environmental conditions associated with the petroleum Underground Storage Tanks (USTs) formerly used at Auto Facility are also a concern to the Target Area residents. Additional investigation activities are needed to evaluate the potential impacts to human health and the environment from these sites. It is a priority to Village residents that these brownfields properties be assessed, remediated if necessary, and brought back to beneficial reuse as small commercial business (including but not limited to restaurant or coffee shop / small grocery store / etc.) that serves the local Target Area, as residents currently need to drive several miles to the next town for such amenities and services.

The negative impacts associated with these Priority Brownfields Sites are significant. The mill’s peak production years were prior to the advent of environmental regulation and were in fact a reason that the former owner of the mill cited when it abandoned operations in Valley Falls and moved manufacturing to Mexico and other locations in 1992. In addition, the Hoosic River is a food source for area residents, which host bass and other sensitive fish and wildlife species in which the types of contaminants released from these sites have the potential to bioaccumulate. There are also several areas at the mill complex where there are known archeological artifacts and the potential exists for significant artifacts to be uncovered in other areas of the Site where paleosol soils were identified. If the Thompson Mill site remains unremediated, future flood events will further spread the known contaminants from the Site downstream. The Valley Falls Census tract is in the 75% (compared to NYS) for RMP facilities despite being rural. This could indicate that that the area is exposed to additional, non-regulated contaminants based on the density of facilities and the that the health of residents is burdened by documented exposure to PFAS, a known carcinogen.

iii. Identifying Additional Sites - The Village started its NYS funded Brownfield Opportunity Area (BOA) program in December 2022. The BOA program provides resources to NY communities to develop area-wide plans to address brownfields. As part of that project, a formal inventory of potential brownfields sites was done and prioritized in the Village for future assessment and cleanup/reuse planning activities. The criteria that the Village uses to identify its Priority Sites include but are not limited to: current regulatory status and history of the property; known or perceived environmental conditions; threats to human health, the environment, and underserved communities and sensitive populations; potential property end-uses and benefits to underserved / sensitive communities; community concerns and input; site access and ownership; and development interest and/or potential. ***Therefore, if grant funds remain after addressing the target area(s)/priority site(s), the Village will use the same criteria used to select the initial priority sites to select additional sites for the program.***

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b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: The Village’s vision, embodied in the preliminary Waterfront Park designs for the passive recreational green space, can only be realized if the hulking skeleton of the burned-out old mill occupying the southern bank of the river, and its impact to the environment, are cleaned up. It is a safety hazard (structurally and due to accessible HBM) and an eyesore as you enter the Target Area. Village Board discussions and community forums on alternate uses of the mill site and revitalization of the Target Area have led to the successful Historic District designation of the Village and its recent selection as a BOA by the State of New York. However additional assessment and cleanup planning is needed before the Village can seek cleanup and redevelopment funds from other sources. With community involvement already initiated and expected at every step in this tight-knit community, success is guaranteed.

The Village does not have formal Master or Revitalization Plans for the Target Area, or in general, due to its small size and lack of resources. However, the Village is making a concerted effort to implement the conceptual Waterfront Park design and to bring the mill complex and other brownfields sites back to beneficial reuse. The Village is using its state BOA nomination process to generate a brownfields revitalization and redevelopment plan to enhance local public-private engagement, stimulate an improved quality of life, and spur investment and economic activity in the Target Area. The proposed riverfront park and redevelopment of vacant brownfields properties will dramatically transform the Target Area with the removal of blight, environmental, health and safety concerns associated with these sites, as well as the introduction of a recreational greenspace that will attract visitors from the region, preserve and enhance river ecology, bring much needed commercial business to the Target Area residents and create a destination for local tourism.

ii. Outcomes and Benefits of Reuse Strategy: With a 23-acre waterfront park as an anchor and gateway, the historic Village of Valley Falls will retain a stable population and improve housing values and extend the walkability of the Target Area. It will attract visitors that stimulate the establishment of park-related businesses, such as kayak rental, coffee shops, restaurants, and private investment in the historic village, bringing in jobs. Redevelopment of underutilized properties will generate local tax revenue and expanded tax base, create job opportunities, stimulate community pride, and spur economic activity and growth in this small Village. When paired with the 2018 National Historic Register and the 2022 NYS Brownfield Opportunity Area (BOA) designation, the Village will be able to more fully articulate and quantify the economic benefits of this renewal. The creation of local jobs and services is an exciting benefit that assessment and cleanup of the priority sites will allow. The redevelopment of the former mill complex into a public recreational space will greatly advance the Village’s quest to attract residents and businesses that thrive in a supportive community.

The Assessment Grant will spur private investment by removing unknown liability issues for developers. Cleaning up the eyesore at the entrance to the Village will also increase community attractiveness to additional residential and commercial development. The community will also benefit from the decrease in crime (vandalism and trespassing), increased opportunities for recreational activity and a healthier lifestyle and access to the waterfront. As a flood prone site, the future park will be designed for climate resiliency.

The location of the mill site adjacent to the Hoosic River is of concern in times of high water, such as extreme weather events. If the site remains unmediated, the contaminants could be spread downstream to other communities if/when the site floods. With the increase in the number and severity of major storm events due to climate change, the removal of this risk is a significant benefit. The removal of hazardous buildings materials and contaminants from the site will provide greater flood storage and improve health conditions and allow the site to be opened to the public and provide access to the waterfront. New river access will increase awareness and care of natural resources. Reuse as green space will provide environmental benefits in terms of flood resiliency, increased wildlife habitat, and improved water quality. Return of the site to vegetation will mitigate climate change. Use of the site for renewable energy projects is not applicable due to its propensity to flood.

c. Strategy for Leveraging Resources

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i. Resources Needed for Site Reuse: Once assessment and cleanup planning is complete, the Village will seek funding sources at the state and regional level to support clean-up efforts and park redevelopment. These include **US EPA Cleanup Grants** and the **NYS Brownfields Program** for remedial activities and **the NYS Environmental Protection Fund**, the **Hudson River Foundation Hudson River Improvement Fund**, the **Hudson River Greenway**, the **At-Grade Railroad Crossing Improvement Fund**, and the **Restoration Fund administered by the Hudson River Natural Resource Trustees** for redevelopment. The mill's location on a major tributary to the Hudson River opens additional potential fund sources. **The Village has secured \$125K in NY State BOA funding** for area wide brownfields revitalization / redevelopment planning and designation on the National Historic Register and BOA are all part of the strategy to bring the necessary resources for brownfields cleanup and redevelopment to the table. A BOA designation also qualifies these sites for a tax credit 'bump up' in NY's Brownfields Cleanup Program, incentivizing development. In addition, the Village could seek **EPA TBA** funds if supplemental assessment activities are needed.

ii. Use of Existing Infrastructure: The Village will be able to use existing municipal infrastructure readily available at the Priority Sites as well as at the streetscape in the greater Village area, such as water, sewer, gas, and electricity to support proposed redevelopment and reuse activities in the Target Area. Existing infrastructure in the area has the capacity to handle this expansion, as well as any additional future growth. The proposed redevelopment of the Mill Site does not currently include buildings or other facilities requiring electricity, water, heat, or sewer, as only passive recreation is envisioned, but includes sustainable and green design components. However, the existing at-grade railroad crossing on the private road leading to the site will require safety upgrades to accommodate public use. There is a dedicated **NYS transportation funding** resource for this purpose that the Village will apply for at the appropriate time. In addition, the Village will be seeking **USDA ReConnect Loan and Grant Program, the NY "connectALL" fund** and/or other infrastructure sources to provide broadband service to the Village and Target Area, as the lack of broadband is one of the largest economic drags to redevelopment / revitalization.

2. Community Need and Community Engagement

a. Community Need

i. Community's Need for Funding: Due to its **extremely small, rural population (510)**, the Village does not have the financial resources to complete brownfields assessment and cleanup/reuse planning activities on its own. The \$500,000 assessment grant is approximately three times the entire annual operating budget of the Village (\$168,200). In addition, there is annual \$104,500 debt service and maintenance costs for the sewage treatment system and plant built in 2004. This \$2.1 million project was a significant undertaking for a Village this small; but was necessary to address raw sewage flowing into the Hoosic River due to ancient sewer lines. The debt service costs are currently being borne by the Target Area users of the system and will continue for the next ~15 years. The existing debt obligations for the sewer add more financial strain on a Village with extremely limited revenue. **The Village's population of 510 people**, and lack of industrial/commercial tax base, also limits its ability to leverage the needed capital from its residents. The Bureau of Economic Analysis data on Personal Income shows income in Rensselaer County, which includes the Target Area, on a per capita basis is dropping relative to the rest of New York State, from 19th in 2012 to 27th in 2013. This is compounded by the current state of the economy and the rapidly escalating rate of inflation, up 8.2% as of September 2022, which is also impacting the Village and its residents' ability to carry out assessment and remediation of brownfields properties in the Target Area.

ii. Threats to Sensitive Population:

Health or Welfare of Sensitive Populations: **As of the 2020 census, there were 510 people in the rural Village of Valley Falls**, continuing a downward trend in population while the number of households is stable. Of the 185 households, 20.8% had children under the age of 18 living with them. The average household size is 2.33, down from 2.6 in 2016. **The EPA EJSCREEN tool highlights the lead paint indicator (56th percentile in NY), wastewater discharge indicator (55th percentile in NY), RMP Facility Proximity (75th percentile in NY), and population under 5 (89th percentile) as pollution and socioeconomic indicators for the Village and Target Area.** Other than the 15 residents who work from home / walk to work, all remaining 253 workers commute to their place of employment, with an average commute time of 40 minutes, 43% longer than the

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average metropolitan commute time of 28 minutes. In addition, according to EJSCREEN the Target Area is at a **62% increased risk of flooding** and is identified as a **critical gap service area for broadband at 79%**, when compared to the US.

In the village, **the population includes 26.47% under the age of 18 and 15.5% who were 65 years of age or older. Median income is \$77,750 and 1.3% of the population are below the poverty line. 96% of the population 15 or older is not enrolled in college / higher education. (2020 Census).** Target Area residents are exposed to contaminants daily via dermal contact, ingestion, and/or inhalation, including children passing sites on their way to the ballfield or school, dust and/or runoff during storm/flood events, consuming fish from the river adjacent to the mill complex or drinking VOC impacted groundwater. **Regional studies of PFAS have shown impact not just to the Hoosic River, but also evidence of PFAS in the air and soil. The state and federal health databases do not take emerging contaminants such as PFAS into consideration. The health of sensitive populations is threatened by an understudied regional contaminant contributed by upstream facilities.** This brownfield program will allow the Village to further assess contaminants and reduce exposure to contaminants in soil, groundwater, indoor air, surface water and/or sediment as well as hazardous building materials. Through this grant, the rural historic village will benefit by the identification and reduction of health hazards through the reduction of crime, including arson, trespassing, vandalism, and illegal dumping at the mill site, and increased investment in the area, which will increase property values and decrease the burden on municipal finances and services.

1. Greater than Normal Incidence of Disease & Adverse Health Conditions: Given the very small size and population of the Valley Falls and Target Area community, health data statistics are not readily available from public information databases. According to www.statecancerprofiles.gov, Rensselaer County where the Target Area is located, has a **higher rate of cancer incidence** (536.3 per 100,000) than New York State (487.7) or the US (453.8) which translates into higher mortality from cancer (187.9 per 100,000 vs. 162.3 for NYS). The EPA EJSCREEN indicates that the Target Area's high proportion of children under 5 (66th percentile) suffers from lead paint exposure (81% in US), and according to CEJST, **52% of the population suffers from Asthma. According to NY State Department of Health, of the 5,054 births that occurred in Rensselaer County between 2006-2008, 106 were determined to suffer from birth defects.** According to the CDC, **approximately half of the population in Rensselaer County as of 2017-2018 is obese.**

Although statistics are limited, due to the known Brownfields sites in Target Area, it is reasonable to presume Target Area residents are adversely affected from exposure to VOCs (liver, kidney, nervous system damage; **birth defects; cancer**), heavy metals – including lead (immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory, kidney damage; **cancer**), petroleum (nervous system, immune, liver, kidney, respiratory damage; **cancer**), PAHs (liver disorders; **cancer**), as well HBM including asbestos (lung scarring, mesothelioma and lung **cancer**) and PCBs (immune, hormone and neurological system; liver and skin disease). **High prenatal exposure to PAHs is associated with cognitive dysfunction, childhood asthma and other adverse birth outcomes.** The cleanup/redevelopment of the Target Site as a recreational park, as well as the secondary sites, will reduce these threats, create recreational opportunities, and improve the overall physical health and wellbeing of Target Area residents.

Identifying Environmental Justice Issues and Advancing Environmental Justice: Valley Fall's census tract is not designated as disadvantaged in CEJST. However, the sensitive populations in the target area (including children under 5, senior citizens, and low-income individuals) have environmental justice challenges and/or disproportionately share the negative environmental consequences resulting from brownfields. The mill abandonment and ongoing deterioration has hurt the Village's revitalization potential and adds to the burden faced by sensitive populations in town. This grant will directly address the primary threat of contamination from these priority sites, mitigate exposure, eliminate blight, decrease crime and provide an outlet for outdoor, waterfront recreation – a documented mental health booster! Implementation of this grant will reduce the loss of population, encourage investment, improve property values, and increase access to services and job opportunities. Valley Falls will ensure that Target Area groups and agencies representing EJ community issues and concerns are included on all information distribution, meetings, and events. Throughout the process, Valley

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Falls will encourage the reuse of brownfields to advance Environmental Justice objectives, eliminate blight, provide jobs, create affordable housing and improved quality of life to ensure the sensitive populations and underserved communities benefit from developments that shape their neighborhoods. The proposed redevelopment plans will not cause displacement of residents or businesses in the target area. Grant implementation will obtain community input regarding site remediation and reuse that will eliminate exposure to hazardous substances and provide access to recreational opportunities, jobs, and services at revitalized sites.

2.b Community Engagement

i. Project Involvement / ii. Project Roles The Village of Valley Falls Board, together with its Brownfields Advisory Committee (BAC), a panel of citizen advisors from community organizations making partnership commitments to this project, will use three basic strategies in our tool kit – public meetings and workshops that follow COVID-19 protocols, web-based publication, and smaller meetings and consultations. This is consistent with the Village’s lack of broadband access limits the effectiveness of offering live on-line or hybrid events. The Village’s partnerships with community organizations to encourage involvement in the planning and implementation of this project are shown in the table below.

Name of organization / entity / group	Point of contact (name, email, and phone)	Specific role in the project
Rensselaer Land Trust – <i>preserves open space</i>	Bob Crowley, 518-659-5263 [REDACTED]	Cleanup and Reuse planning / Park design and community outreach support / BAC
Hoosic River Watershed Assoc. – <i>citizens group</i>	Andy Kawszak, 413-664-6545 [REDACTED]	Outreach support, BAC, volunteer labor, participate in cleanup and reuse planning
Valley Falls Free Library	Ralph Marino, 518-753-4230 ramarino@nycap.rr.com ,	Outreach support, meeting space and Information Repository
Valley Falls United Methodist Church	Richard Palmer, 518-753-4848 [REDACTED]	Outreach support, volunteer labor, meeting space
Pittstown Historical Society	Constance Khell, pittsownhs@gmail.com	Outreach support, historic information and advice, cleanup/reuse planning activities
Valley Falls VFW Post 1938	Harry Rifenburg, 518-753-7707 No email.	Outreach support, volunteer labor

There are no business organizations in the Village because there is little commercial activity. Because the desired future use for the top priority mill property is public green space, realtor involvement would come into play as there are several properties currently for sale, where the burned-out mill at the major entrance to the Village is an obstacle to housing sales and a downward influence on home values. The Village will collaborate with area realtors to present and promote plans to assess, remediate and improve the mill site to improve property values in the Village.

iii. Incorporating Community Input: The Village will require the qualified environmental professional (QEP) to produce project newsletters suitable for distribution to the public at three milestones – completion of the contamination assessment, draft clean-up strategy recommendations, and when a site reuse proposal is available. This newsletter, which will be subject to Village review and approval prior to distribution will be in both paper and electronic formats. Electronic versions will be distributed through our community organization partners, and through the www.historicvalleyfalls.com website. Paper copies will be made available at Town Hall, the Free Library, the Fire Hall and the Community Hall – the hubs of Village life. The Village Free Library in the Target Area will serve as the Information Repository and location for hard copies of all program-related documents for review by the public. **As a rural area, internet service is available via satellite or phone lines and is not universally subscribed by households. Therefore, the village is prioritizing the use of paper-based communication in addition to electronic communication.** There is a local paper covering the area, the Express, and this media outlet will be used. The Village has a Facebook page that has achieved 275 followers, which has been a valuable tool to announce and promote the program, communicate progress, solicit input, provide feedback, and advertise meetings. The Village will consider and respond to all community input.

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3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Description of Tasks/Activities and Outputs

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

Task 1: Cooperative Agreement Oversight
<p>EPA-funded tasks: The Village will procure and manage Project Manager (PM) and Qualified Environmental Professionals (QEPs); ACRES, Quarterly Reports, Annual MBE/WBE/DBE & FFR reports and Final grant close out reporting; Eligibility Determinations, Access Agreements, comply with Section 106 Historic Preservation Act requirements; Brownfield Advisory Committee; Attend EPA and state workshops, and national conference; Coordination with QEP, property owners, and relevant State agencies; Maintain financial records and complete drawdowns; maintaining project files and information repository. Non-EPA funded resources needed: Village will provide in-kind services in the form of staff time for cooperative agreement oversight activities beyond those that have been budgeted for task.</p>
<p>Schedule: Competitive procurement of PM & QEP by 12/20/24. Other activities to be conducted from 10/1/24-9/30/28. Quarterly Reports submitted within 30 days after the end of each reporting period (Jan / April / July / Oct). Annual FFR and M/W/DBE reports submitted by October 30 of each grant year. ACRES updated when assessments are started/completed, new information becomes available and other major milestones. Advisory Committee meetings. Final Closeout report submitted within 90 days after end of cooperative agreement.</p>
<p>Task/Activity Lead: Village will lead procurement tasks. Contracted PM will lead Brownfields Advisory Committee and oversee QEP with Village supervision; QEP will provide technical & programmatic assistance (QRs/ACRES/eligibility/etc.)</p>
<p>Outputs: RFQ. Procure QEP; 16 Quarterly Reports; BAC Meetings; Updates ACRES to track program measures; 3 annual M/W/DBE & FFR reports; Site eligibility determinations; Closeout Report; Grant drawdown requests; executed access agreements. Attend National Brownfields Conference</p>
Task 2: Community Engagement
<p>EPA-funded tasks: The Village, PM and BAC will provide community outreach and engagement, and focus gathering input from the Target Area residents on site selection and cleanup/reuse planning for priority sites. Outreach materials will be prepared for posting throughout the Village. Newsletters will be generated to provide updates and general Brownfield Assessment Program information. The Village will publicize meetings and ensure the Target Area audience is fully engaged, as well as the broader community. The Village will conduct outreach to local and regional press/media outlets. *Non-EPA grant resources needed: Village will provide in-kind services in the form of staff and materials/supplies for any community engagement activities beyond those that have been budgeted for as part of their task.</p>
<p>Schedule: Community engagement activities are expected to begin Winter/Spring 2025 and continue through Spring/Summer 2028. The Village anticipates a minimum of three (3) public meetings to educate and inform the community about the grant, to present assessment results and next steps and solicit feedback from the community regarding potential sites and/or redevelopment/reuse options.</p>
<p>Task/Activity Lead: The PM with assistance from the Village will lead this task. Brownfields Advisory Committee (BAC) and QEP will be the Village’s partners, providing support with technical expertise and other community outreach assistance, as well as helping identify and prioritize potential sites, if applicable.</p>
<p>Outputs: Engage the community in the site selection and assessment process, conduct a minimum of three (3) public meetings, meeting minutes, presentation materials, newsletters, flyers, handouts, brochures, etc.</p>
Task 3: Phase I and Phase II Environmental Site Assessments (ESAs)
<p>EPA-funded tasks: Phase I ESAs will be completed in accordance with American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: E 1527-21 and EPA’s “All Appropriate Inquiry”. Based on the results of the Phase I ESAs, site-specific Quality Assurance Project Plans (QAPPs) and Health & Safety Plans (HASPs) will be prepared and approved by EPA prior to the commencement of field activities and Phase II ESAs will be completed to confirm or dismiss the presence of Recognized Environmental Conditions (RECs) at each site in accordance with ASTM’s most current Standard Practice for Phase II ESAs. The QEP will conduct the Phase I/II ESA assessment work, which may include</p>

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<p>Hazardous Building Material assessment, and will also be responsible to enroll sites into the state’s voluntary cleanup program (if appropriate) and prepare report(s) for regulatory compliance. *Non-EPA grant resources needed: The Village does not anticipate needing non-EPA grant resources to carry out this Task. If necessary, the Village will provide in-kind services in the form of staff time for any personnel activities beyond those that have been budgeted for as part of this task or apply for leverage funding to conduct supplemental activities.</p>
<p>Schedule: Begin assessments in spring 2025. Assessment activities at Target Properties will be conducted simultaneously, if possible, to maximize efficiencies and available resources. Complete before 6/30/28.</p>
<p>Task/Activity Lead: The QEP will conduct the Phase I / II ESAs, HASPs, and QAPPs. PM and BAC will review reports for accuracy and completeness. PM and Village, with assistance from the QEP, will enroll sites into the NYSDEC’s Environmental Restoration Program (ERP), if applicable.</p>
<p>Outputs: Up to 2 Phase I and up to 3 Phase II reports. Enroll sites into the NYSDEC’s ERP, if applicable.</p>
<p>Task 4: Cleanup & Reuse Planning</p>
<p>EPA-funded tasks: Cleanup/reuse planning will be conducted in accordance with EPA’s Green and Sustainable Remediation guidance and will consider the climate resiliency of the proposed cleanup/reuse. The Phase II and redevelopment plans will be utilized to develop an Analysis of Brownfields Cleanup Alternatives (ABCA) and Reuse Plan for the Thompson Mill Site. Proposed remedial alternatives will be evaluated based on cost, feasibility, and effectiveness in protecting human health and the environment. This task may also evaluate options for compliance with and closure under NYDEC’s VCP, if applicable to the site, which may include a combination of risk characterization and remediation, specifically regarding the types of activities that can be allowed at the site with or without an Activity and Use Limitation (AUL). * Non-EPA grant resources needed: Village does not anticipate needing non-EPA grant resources to carry out this Task. If needed, Village will provide in-kind services in the form of staff time beyond those that have been budgeted.</p>
<p>Schedule: Final 18-36 months. Village is confident all work can be completed within 4 years.</p>
<p>Task/Activity Lead: The QEP will complete ABCA/Reuse Plans. Village and PM, with assistance from the BAC, will review reports for accuracy and completeness.</p>
<p>Outputs: One (1) Cleanup Plan / ABCA and one (1) Reuse Plan</p>

b. Cost Estimates - The Village requests a \$500,000 community-wide assessment grant. The Village and/or its non-profit partners will provide in-kind services to allow more funds to be spent directly on assessment and engagement activities. Costs have been estimated based upon scopes provided under past grants, experience with tasks, and estimates from QEPs. 5% Indirect costs will cover Village administration.

<p>Task 1 – Cooperative Agreement Oversight: Total = \$34,860 = \$33,200, plus \$1,660 in indirect costs</p> <ul style="list-style-type: none"> • Travel: \$3,500 <ul style="list-style-type: none"> ○ \$2,100 for National Brownfield Conference Attendance for PM for mileage, hotel, per diem ○ Project-related local mileage at federal rate of \$0.655/mile (2,137 miles over 4-years = \$1,400). • Supplies: \$1,000 for Project related supplies including but not limited to printing and postage. • Contractual <ul style="list-style-type: none"> • Legal Services: \$2,500 (Contracted, if needed) • Contracted Project Management (PM): \$15,000, The Village will competitively procure contract program management support services. PM support includes assistance in completing EPA quarterly reports, MBE/WBE forms, and EPA ACRES database. Other activities include completion of EPA work plans, attending EPA and state workshops, and national conference; Coordination with QEP, property owners, and relevant State agencies and other programmatic support necessary to maintain compliance with EPA cooperative agreement terms and conditions. PM @ \$50/hour, 300 hours total over the four-year grant period to perform EPA reporting/records management and facilitate progress meetings. • QEP: \$11,200 [(~\$104/hr x 3 hrs per quarter for 16 quarters = ` \$5,000 (rounded) to provide technical elements of quarterly reporting and ACRES. QEP will also provide general CA Oversight Assistance, including but not limited to site Eligibility Determination research and forms, Access Agreements,
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compliance with Section 106 Historic Preservation Act requirements; Assume (62 hours x \$100/hour = \$6,200).];
Task 2 - Community Outreach: Total = \$16,275 = \$15,500, plus \$775 in indirect costs
<u>Contractual:</u> <ul style="list-style-type: none"> • The Village’s contracted PM will perform and lead all community engagement work (PM @ \$50/hr, 50 hrs total over life of 4-year grant = \$2,500) • QEP will assist (\$3,000/meeting @ 3 meetings = \$9000, includes presentation preparations and attendance, + ~\$1,333/newsletter @ 3 = \$4,000, for a total of \$13,000 (rounded)).
Task 3 – Phase I / II Assessment: Total = \$406,875 = \$387,500, plus \$19,375 in indirect costs
<u>Contractual total: QEP: \$387,500</u> <ul style="list-style-type: none"> • 2 Phase I assessments @ \$7,500 per site = \$15,000 • 3 Phase II assessments costs are much more variable but are anticipated to average approximately \$87,250 per site, including Work Plan, HASP and QAPP for 2 sites. For the third site \$198,000 is earmarked for the Thompson mill as partial demolition (approved by EPA in 2021) is required to adequately assess the site. The cost estimate for partial building demolition for the purpose of assessment was prepared by demolition subcontractors by calculating the total cost of demolition and factoring it down. Due to the unsafe structural condition of the building, partial demolition was approved by EPA to fully define contamination nature and extent within the building footprint.
Task 4 – Cleanup & Reuse Planning: Total = \$41,990 = \$40,000 plus \$1900 in indirect costs.
<u>Contractual –</u> <ul style="list-style-type: none"> • QEP: \$40,000 [Up to three (3) Remedial Action Plans / Analysis of Brownfields Cleanup Alternatives (ABCA) will be produced at an estimated cost of \$7,500 each or \$22,500. Site Reuse Planning activities for the Dry Cleaner Site will include a sustainability assessment and conceptual reuse design alternatives. The estimated cost of this Task is \$17,500 (~140hrs X ~\$125/hr).

Budget Categories		Task 1: Coop. Agree. Oversight	Task 2: Community Outreach	Task 3: Phase I & II Assessments	Task 4: Cleanup and Reuse Planning	Total
Direct Costs	Personnel					
	Travel	\$3,500				\$3,500
	Supplies	\$1,000				\$1,000
	Contractual - QEP	\$11,200	\$13,000	\$387,500	\$40,000	\$451,700
	Contractual – Legal	\$2,500				\$2,500
	Contractual – PM	\$15,000	\$2,500			\$17,500
Total Direct Costs		\$33,200	\$15,500	\$387,500	\$40,000	\$476,200
Indirect Costs (~5%)		\$1,660	\$775	\$19,375	\$1,990	\$23,800
Total Budget		\$34,860	\$16,275	\$406,875	\$41,990	\$500,000

c. Plan to Measure and Evaluate Environmental Results - ACRES, quarterly reporting and monitoring of the Work Plan and project schedule are the primary tools to measure the Assessment environmental results. The system established in the previous EPA contract will continue to be used to achieve project goals, effectively manage schedules and costs to ensure timely and effective use of funds. The Village will track the results of this Brownfield project by regularly scheduling team progress meetings and producing progress reports. If a project is not on schedule, the reasons will be documented in the quarterly report and a corrective action plan to get the project back on track will be implemented. Future leveraging funding to clean up the mill site and build the park, two critical accomplishments will also be tracked. The additional priority sites (former dry cleaner, auto repair) evaluation will also provide the community with a blueprint for action. Long-term outcomes such as the number

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of jobs created, the number of acres made ready for reuse; the volume of soil remediated, etc. will continue to be measured and tracked, and entered into ACRES as appropriate.

4) Programmatic Capability and Past Performance

4.a Programmatic Capability

i. Organizational Capacity / ii. Organizational Structure / iii Description of Key Staff: The Village of Valley Falls has the experience, knowledge, resources, and ability to obtain and supervise/control those resources it lacks in house to ensure successful completion of all required aspects of this project and grant by procuring resources strategically. **Project Management (PM) and Qualified Environmental Professional (QEP) oversight** services will be competitively procured by the Village. This is consistent with Village practices and was successfully completed for the **administration of the previous site-specific EPA assessment grant, which was completed on time and on budget.** Project **financial oversight** will be provided by the **Village Treasurer**, Julie Weston, with progress reports to the Board of Trustees. Annual training on accounting, legal, and regulatory matters for Continuing Education Credits are a requirement of the Treasurer position. **Jay Overocker, the Village’s Mayor**, and the Village Board of Trustees will oversee the PM and will also serve as interim or replacement project manager in the event of PM loss. ***This organizational structure will focus on working together successfully and provides this small village with the capacity to successfully carry out and manage the programmatic, administrative, and financial requirements of the projects and grant.***

iv. Acquiring Additional Resources: **Upon award, the Village will initiate a Request for Proposals (RFP) process to competitively procure a PM and QEP.** The Village will use a **QEP** overseen by the Village Board of Trustees and PM to assist with outreach and cooperative agreement oversight activities and to accomplish the assessment and cleanup and reuse planning activities at Priority Sites. The QEP will be competitively procured and be contractually responsible for ensuring compliance with all applicable federal and state requirements of the project and the funding sources, particularly those related to labor practices and local hiring. This will explicitly include reporting, community outreach, and safety tasks. Any **legal services** required, will also be arranged through a competitive contract, as the Village does not employ an attorney. This is consistent with past legal services.

b. Past Performance and Accomplishments - Has Previously Received an EPA Brownfields Grant

1. Accomplishments: Valley Falls received a \$200,000 EPA Brownfields Site Specific Assessment grant (BF-96267417-0) in 2017 that was 100% expended and closed by the EPA on July 21, 2021. These grant funds allowed the Village of Valley Falls to complete All Appropriate Inquiries (AAI) and a Phase I ESA Report prior to attaining site ownership of the Thompson Mill after foreclosure on the tax delinquent owner; generated a SAP, HASP, QAPP and a Phase II ESA report for the mill site, which were all reviewed and approved by EPA. EPA and the QEP identified significant remaining data gaps following the Phase II ESA, due to the need/requirement to demolish the building in order to access and complete an adequate assessment of the property; The site was fenced and warning signs were posted to prevent potential exposure to hazardous materials, as well as the structurally unsound building, and prohibit unauthorized access to the site; A site-specific hazardous waste variance was applied for and approved from the NYSDEC; The Village procured legal services to investigate prior owner liability. Conceptual site reuse plans were generated and updated based on community input. Community engagement and outreach on progress on site activities occurred throughout the duration of the project, particularly at major project milestones.

2. Compliance with Grant Requirements: The Village complied with the work plan, schedule and terms and conditions of the EPA grant, with one request for an extension due to a delay relating to the COVID-19 pandemic. Quarterly reports were submitted on time and were complete. ACRES database is up to date including the findings of the site-specific assessment activities. All grant funds were fully expended.

THRESHOLD CRITERIA DOCUMENTATION – Village of Valley Falls Old Thompson Mill Site

1. Applicant Eligibility

The Village of Valley Falls NY is a general-purpose unit of government, incorporated in 1904.

2. Community Involvement

The Village of Valley Falls Board, together with its panel of citizen advisors drawn from community organizations making partnership commitments to this project **will use three basic strategies in our tool kit – public meetings and workshops that follow COVID-19 protocols, web-based publication, and smaller meetings and consultations.** This is consistent with COVID-19 protocols and reflects the *lack of broadband access* in the Village to provide live on-line events. The Village of Valley Falls has established partnerships with community organizations to encourage involvement in the planning and implementation of this project. A full description of the Community Engagement and Partnerships in this project is contained in the narrative starting on page 5.

The Village of Valley Falls held a Public Information Meeting on Thursday, October 15, 2020 to discuss the findings of the site-specific Thompson Mill assessment thus far and to describe the project application and seek input. This was advertised using flyers at key community locations and the Village Facebook page. 10 people attended following COVID-19 protocols (Face masks required, 6 ft. spacing). The rural nature of this small village, where internet access is limited, argues against the use of virtual workshops. The Village posts critical items on its Facebook page. **The Village intends to continue holding such meetings at critical project milestones, following current COVID 19 protocols.**

In addition, as part of the grant application submission to the NYS Brownfield Opportunity Area Program (BOA) to the New York State Department of State via the Consolidated Funding Application process for the purpose of developing a BOA nomination for the Village focusing on the old Thompson Mill site the Village published notice of its intent to apply in the local paper, accepted written comments, and held a public meeting on July 6, 2021. Over **65** public comments were received **in support** of the proposed application and the need for designation as a BOA. These comments are available for review. This grant application was approved. The Village is now 80% complete in its contract to prepare a BOA Nomination package. As part of this process, www.historicvalleyfalls.com was established, community surveys were conducted, and the advisory committee expanded to 12 members. The first public meeting for the BOA nomination, held on May 15, 2023 attracted 45 participants. The next is scheduled for December, and a final Public Hearing in February 2024.

3. Expenditure of Existing Grant Funds: Valley Falls does not have any open EPA grants.

4. Contractors and named subrecipients: There are no contractors or named subrecipients in this application. Competitive procurements will be conducted.