

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

### **1.a. Target Area & Brownfields**

**1.a.i. Background & Description of Target Area:** The project Target Area, the Town of St. Johnsbury (“the Town”) (pop. 7,157), Vermont, owes its heritage to its location in a geographic area known as the Northeast Kingdom (NEK). 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 hiking in the State. The NEK is one of five Rural Economic Area Partnership (REAP) Zones in the country, identified because of its rural isolation and lack of local capital.<sup>1</sup> The NEK comprises three counties in the northeast corner of the state including Essex, Orleans and Caledonia – the host county to St. Johnsbury and the subject site known as the **St. Johnsbury Armory Building (“the Armory”)**. The Armory is located on the Town’s Main Street in the heart of downtown and **the Town’s Designated Opportunity Zone (DOZ)**.

St. Johnsbury, the largest Town in the NEK, was first settled in 1786 and designated the Caledonia County seat in 1856. St. Johnsbury 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. Over the years, prosperity waned as roads replaced rivers as the primary form of transportation, and changes to the manufacturing industry forced businesses to close their doors. Thus, the Town and region has been littered with run-down abandoned former industrial and commercial properties for decades. Modern-day St. Johnsbury is recognized for its arts and cultural opportunities, tourism, hiking, biking, snowmobiling, swimming, and fishing.

St. Johnsbury has long been on the cusp of turning its economy around. St. Johnsbury has an opportunity enhance its economy by focusing on quality of life for our residents and visitors, new business segment growth, attractive housing and neighborhoods, vital downtown, and proximity to world class recreational facilities. We believe cleanup and revitalization of the Armory will not only protect the health of the many adjoining residents but will be the cornerstone project that will raise the spirits of local residents and provide a catalyst for a renaissance of livability, public safety and economic improvement in our community.

**1.a.ii. Description of the Brownfield Site:** The Armory is owned by the Town and is the focus of this cleanup project. The Armory was constructed in 1916 and is located on Main Street adjacent to two churches and near museums, residences and the St. Johnsbury Academy High School. The Armory site consists of a two-story brick and block structure located on 0.44 acres in the center of the historic Main Street development corridor in the Town’s DOZ. The building envelope covers 16,700 square feet (ft<sup>2</sup>) including a basement. The Armory is a state registered historic building and is the most significant opportunity for the Town as a driver of redevelopment in the corridor. The Armory was sold to the Town in 1975 and was home to several municipal departments, including the St. Johnsbury Police Department until 2009 when it was determined that existing Regulated Building Materials (RBMs) would make it too costly for the Town to provide upgrades to meet existing building codes. The building has been vacant for the past decade due to the presence of RBMs and structural concerns.

The Armory, as do similar buildings its age, contains abundant Asbestos Containing Materials (ACM), Polychlorinated Biphenyls (PCBs) and Lead-Based Paint (LBP). Abatement costs associated with these materials are a major hurdle to future development. Environmental surveys previously completed at the site (see Threshold Criteria for report names and dates) have identified and generally quantified RBMs in the building along with an Opinion of Probable Cost (OPC) for abatement. In June 2020, the Town procured a contractor to complete a Remediation Planning Cost Estimate for abatement of the RBMs at the Armory. The OPC projected abatement costs to range from \$800K to \$1.3 million. The methodologies and projected costs identified in the environmental reports were used to prepare a draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the project which is included in this application. In support of this application, the Town also applied for, and was selected for, an EPA Targeted Brownfield Assessment (TBA) to conduct additional RBM sampling and refine estimated abatement costs. The TBA work is currently ongoing. The results of the ongoing TBA will be incorporated into the final ABCA and Corrective Action Plan (CAP) that will be prepared following award of EPA Cleanup Grant funding.

Cleanup of hazardous building materials is required not only to initiate revitalization of the Armory, but also to protect the health of nearby residents and visitors. This would also provide a catalyst for renovation of the building which would eliminate physical hazards associated with local youths and the homeless population that

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<sup>1</sup> 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: <https://www.rd.usda.gov/programs-services/businesses/rural-economic-area-partnership-program-reap-zones>)

have been breaking and entering the structure despite the efforts undertaken by the Town to secure the property.

### **1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy & Alignment with Revitalization Plans:** The overall reuse strategy for the Armory is to create a new location for the St. Johnsbury Police and Dispatch Center. That use directly aligns with the *2017 Town Plan* and the Northern Vermont Development Association's (NVDA) *Regional Plan* and will play a vital role in local economic development and preservation of the historic character of the building. With the police and dispatch currently seeking a centralized location, they are very interested in moving to the Armory. Relocating the police to the hub of our planned Main Street Development Corridor will play a significant role in the revitalization of our community. The revitalization benefits of this concept are numerous and include: renovation of the Armory removing blight from the Town's downtown core, spurring revitalization of surrounding vacant and underutilized properties, supporting economic development in a DOZ, eliminating health hazards and physical concerns, encouraging new businesses to locate to the Main Street Corridor, job creation and associated spending at local restaurants and shops, and a subsequent increased tax base. These benefits are consistent with the principles of the Brownfield program and local community revitalization plans. It also places the dispatch center, which services over 10 communities (St. Johnsbury and its surrounding small towns and villages), in a centralized location, thus, increasing communication and efficiency between agencies and departments.

This **adaptive reuse strategy** also aligns well with St. Johnsbury's *2017 Town Plan* which focuses on revitalization of the Main Street Corridor and surrounding target areas, public safety, and historic preservation. One of the primary goals established in the *Town Plan* is to maintain community assets to enable and sustain growth through new business, tourism and creative endeavors. Reuse of the Armory as a police headquarters and dispatch center was identified in the Town's *Main Street Brownfield Planning Study* (completed August 28, 2020 in support of this grant application) as a cost effective, practical, and highly beneficial option for the community. The *Planning Study* was developed through an extensive public and stakeholder outreach process facilitated by the Town and its consultants. The cost-benefit analysis from the *Main Street Brownfield Planning Study* identifies this option as the least difficult and most fiscally responsible strategy to execute. It is also the fastest and most effective way to support existing businesses and add vigor to struggling commercial districts.

This approach is likely to render early benefits by revitalizing a large, blighted building from the heart of the community's downtown economic district. A renovated Armory would invite other economic development opportunities to the center of St. Johnsbury. Tourism support prospects in the corridor would also be attractive to businesses such as skiing, hiking, and clothing shops as there are many and varied low capital opportunities to establish these businesses. **The site is also located within one of St. Johnsbury's DOZ which will also promote developer interest in the Corridor and promote similar adaptive reuse projects.** Creating new opportunities for small businesses to enter the Main Street Corridor will generate restaurants, bed and breakfast lodging and other establishments to support tourism as well as a renewed workforce population and their customers. New business opportunities will inject vitally needed revenue into the local economy and enhance tourism for the established arts and recreation lifelines of our community. It also aligns with community goals to create new business ventures and jobs.

**1.b.ii. Outcomes & Benefits of Reuse Strategy:** First and foremost, our **adaptive reuse** strategy for the Armory will eliminate a potential public health issue, the magnitude of which increases each day that the condition of the building deteriorates. It will also provide a new space for our police department and the dispatch center providing security for our residents and advancing our destination arts and tourism economic strategy. Our reuse strategy will result in a long list of direct economic development and community benefit outcomes, but there will also be indirect benefits as well. **A repurposed Armory will serve as a catalyst for additional brownfield revitalization activities in the Town's DOZ.** Implementation of the Armory reuse strategy is projected to have a ripple effect on a site adjacent to the Armory on the Main Street Corridor – a vacant, 4-parcel site known as the "Main Street Fire Site" due to a fire in 2009 that burned all the buildings to the ground (none of which have been replaced). The Fire Site has undergone Phase I and II ESAs funded by the NVDA's 2018 EPA Assessment Coalition Grant and has been identified as a potential location for mixed use retail and housing with several developers recently showing interest in that concept.

**Energy efficiency measures** will be incorporated into our reuse strategy. These measures include a new high-efficiency heating system and replacement of single pane windows. We plan to tap into funding sources to implement these measures such as incentives offered by local utility companies.

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

**1.c.i. Resources Needed for Site Reuse:** Since 2009, the Town has completed architectural, structural, environmental, and economic evaluations of the Armory to determine its best reuse for the community. This has been accomplished by leveraging state and federal grants and incorporating local funding sources. In 2009, a Building Evaluation/Accessibility Assessment was completed which evaluated the structure and property and developed concept plans for accessibility. In 2012, a Phase I ESA was completed for the Armory as part of an evaluation for future use of the site by the St. Johnsbury History and Heritage Center. The Phase I was followed up in March of 2013 by an RBM Survey. The environmental studies identified RBMs that require abatement prior to renovations which made existing reuse proposals unfeasible due to associated costs. Town funding was also used to complete an Armory Renovation Design Report in 2016. The proposed abatement and design provided the Town with an upgraded, fully functional office building while simultaneously preserving the historical qualities that the Armory provides for the community and more specifically the Main Street Historic District. The remaining barrier to redevelopment continued to be the cost associated with abating RBMs in the Armory building which caused development concepts to stall.

The Town also leveraged funds from the USDA Rural Development through a Technical Assistance Grant to identify development opportunities for vacant buildings in downtown St. Johnsbury. In 2020, additional funding was obtained to evaluate the Armory for potential use as the Town's Police headquarters and Emergency Dispatch Center. Since the beginning of the year, this concept has gained momentum as the following funds have been leveraged for development tasks: the Police and Dispatch Center worked with the Town's Architect to develop renovation plans for the building (Wiemann Lamphere, July 2020); EPA Small Technical Assistance Grant (administered by Vermont Department of Environmental Conservation [VTDEC]) for a Main Street Development Feasibility Assessment ({DFA} - \$20,000); USDA Rural Development Grant (administered by Northern Community Investment Corporation [NCIC]) for completing an ABCA to evaluate RBM abatement at the Armory; and NVDA assisted the Town with preparing a TBA application for the Armory which was approved by EPA in summer 2020 (Phase II ESA work is currently ongoing by EPA contractors). The DFA Report identified the use of the Armory for a future Police and Emergency Dispatch Headquarters as a significant opportunity to jumpstart revitalization of the Main Street Corridor. As TBA findings would not be available in time to submit with this application the Town also hired ATC to provide an OPC (June 2020) for RBM abatement at the Armory. As described in Section 1.a.ii., the TBA scope of work includes a Phase additional sampling of RBMs to refine quantities present and associated costs for abatement. The results of these activities will inform the final ABCA and CAP developed after EPA Grant funds are awarded.

We will continue to seek funding from a broad range of sources including but not limited to: 1) Vermont Agency of Commerce and Community Development; 2) Community Development Block Grant Slum & Blight Fund; 3) Vermont Historic Preservation and/or Preservation Trust of Vermont; 4) National Trust for Historic Preservation grants; 5) US Department of Agriculture Rural Development Program grants; 6) Brownfield Revitalization Funds from VT ACCD; and 7) Brownfield Response Program funds from VTDEC. This EPA Brownfield Cleanup Grant for completion of RBM abatement will make a significant dent in overall funding required for the project. With the Town as the leading program manager, we can ensure that our essential vision for the community, region and property is implemented.

Through revitalization of the Armory, the Town can promote a number of incentives intended to leverage investment in our community including: 1) the property is within a DOZ, and its redevelopment will help spur economic development within that DOZ; 2) the property, and downtown are located within Enterprise Zones (EZs) which provide property tax incentives to companies making business investments in the area; and 3) the Town is located in one of five designated REAP Zones in the country, providing us with priority consideration for USDA Rural Development funding.

**1.c.ii. Use of Existing Infrastructure:** St. Johnsbury is a long-established Town well-served by sewer, storm, drinking water, electrical, telecommunications, natural gas, and transportation infrastructure. We have completed detailed infrastructure capacity studies, including consideration of resiliency, that indicate no additional needs in our Target Area. We are currently working on a multi-year project to improve potable water, sewer and storm water infrastructure in our community under the Combined Sewer Overflow (CSO) Project while working to meet Vermont goals for hazard resiliency and energy efficiency. The implementation of our Armory Building reuse strategy will require minimal infrastructure improvements beyond the boundaries of the property. Our downtown and Main Street Corridor have a mature block-based street grid with ample on-street parallel parking that will support new business ventures. Furthermore, our proposed project is centered on **adaptive reuse** and historic preservation of the existing building.

## 2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

### 2.a. Community Need

#### 2.a.i. The Community's Need for Funding:

As described in Section 1.a.i., the NEK is one of five REAP Zones in the country, identified because of its rural isolation and lack of local capital. With a small population base, tax revenues used to fund local government are very limited. In our region this is further exacerbated by an aging population, declining incomes, and lower than average workforce participation compared to the County, State and US. Regional statistics provided in Table 1 demonstrate lower than average tax revenues due to below average median household income and labor force participation, and above average unemployment. Together these factors indicate much lower than average discretionary income, which results in less spending, decreasing local business revenues and the business taxes they pay.

The income and tax revenue characteristics described demonstrate the inability of local government to allocate funding to brownfields in a meaningful way. Over the last few years, tax revenues have increased very little and our priorities continue to be funding essential public safety functions such as fire and police. EPA Grant funding is vital to help us revitalize the Armory, thereby reducing health threats (ACM, PCBs and LBP) and physical hazards relating to trespassing by teens and the homeless.

**2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations:** As indicated in Table 2, there is a high prevalence of low income, disabled persons and elderly people in our Town and region. The most striking statistics are the high rate of poverty, child poverty, and population not in the workforce throughout the region. Income per capita for the Town ranks last out of 12 Vermont Cities profiled<sup>2</sup>. Sensitive receptors are more likely to live near brownfields due to associated depressed property values and cheaper rents. Sensitive populations are also disproportionately exposed to brownfield-related blight causing mental distress and associated health impacts such as anxiety, diabetes and high blood pressure.

Our residents and visitors including the young, elderly, and pregnant woman in our region are impacted directly and indirectly by brownfields every day. The Main Street Corridor, like other commercial districts in our area, is frequently visited by these sensitive receptors as well as students attending public and private schools as they access the educational facilities and the goods and services of everyday life. Regular exposure to brownfield contaminants such as RBMs (ACM, PCBs and LBP) can increase lung cancer rates, liver disorders, other forms of cancer, neurological system impacts, immune system impacts and skin disease.

Data Type	Town of St. Johnsbury	Caledonia County	State of Vermont	US
Population <sup>2</sup>	7,157	30,425	624,977	323 M
Senior Population	19.7%	19.3%	18.2%	15.2%
Median Income	\$37,967	\$49,348	\$60,076	\$60,293
Labor Force Participation	56.5%	60.3%	65.8%	63.3%
Unemployment (1 year, March 2020)	4.5%	4.4%	3.4%	4.4%

Source: Unless otherwise indicated, data is from US Census Bureau 2017 ACS.

Data Type	Town of St. Johnsbury	Caledonia County	State of Vermont	US
65 Years & Older	19.7%	19.3%	18.2%	15.2%
Poverty Rate	15.0%	12.3%	11.2%	14.1%
Child Poverty Rate	21.8%	16.4%	14.1%	19.5%
Food Insecurity	Not Listed	12%	12%	9%
Disabled Persons	22.6	18.5%	14.4%	12.6%
Households Receiving Food Stamps	20.1%	15.3%	12%	12.2%
Per Capita Income	\$22,898	\$28,085	\$33,238	\$32,621

Source: US Census Bureau 2010 Demographic Profile Data.

**(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions:** In Vermont, health data are available for counties but not individual towns and have not been aggregated for general public use. According to the Vermont Department of Health (DOH), between 2011 and 2015 lung, colorectal and cervical cancer rates for Caledonia County were higher than statewide rates.

Considering the contaminants of concern at the Armory, it is reasonable to assume they would contribute to adverse health conditions in the surrounding community. Addressing brownfields such as the Armory will substantially aid in mitigating the cumulative exposure of Town residents to contamination associated with brownfields and other sources of contamination contributing to these high rates

Data Type	Caledonia County	State of Vermont
Cancer Deaths	182.2	168.6
Heart Attack (per 10K)	34	1,053
COPD (rate per 10K)	46	1,135
Child Lead Poisoning	251	5631

Source: <https://www.healthvermont.gov/sites>

<sup>2</sup> <https://www.biggestuscities.com/demographics/vt/income-per-capita-by-city>

of disease. This grant will remove these exposure pathways at the site.

**(3) Disproportionately Impacted Populations:** Environmental injustices typically disproportionately affect poor communities, and those with low levels of education. EPA's Environmental Justice tool "EJSCREEN" demonstrates that minority and low-income people that live in and frequent commercial districts with brownfields, like the Main Street Corridor, are disproportionately impacted by brownfields. Table 4 compares environmental justice indices and demographics from EJ Screen 2020 that encompass Vermont and EPA Region

1. These data along with census and health data provided in Tables 1, 2 and 3 in the previous sections demonstrate that economically impoverished populations are disproportionately impacted by brownfields in our community. EPA Grant funding we help us to clean up the Armory, thereby reducing health threats being experienced by the underserved and most sensitive populations in our community.

Table 4			
EJ Index/Demographic Data	Town of St. Johnsbury	EPA Region 1	US
Air Toxics Cancer Risk	72	65	46
Respiratory Hazard Index	61	63	45
Lead Paint Indicator	86	70	74
% Minority	57	26	13
Low Income Population	89	85	64

Source: EPA EJSCREEN. Note: All EJ Index values are percentile.

## 2.b. Community Engagement:

**2.b.i. & 2.b.ii Project Involvement & Project Roles:** An Armory Building Advisory Committee (ABAC), led by the Town, will be formed with members from NVDA, the St. Johnsbury Chief of Police and Dispatch and other community representatives identified in the Table below. The ABAC will meet monthly during the project and will act in an advisory role to the Town Select Board for the duration of the project. Monthly ABAC meetings will be open to the public and these meetings will serve to keep the community engaged in the project. The Town will make a concerted effort to advertise these meetings in the local newspaper (the Caledonian Record) and on the Town's website to encourage public participation.

The following project partners have indicated their interest in collaborating with the Town to revitalize the Armory Building and the surrounding Main Street Corridor.

Organization Name	Organization Purpose	Point of Contact	Project Role
Northern Vermont Development Association (NVDA)	Regional planning commission assisting with land use and transportation planning.	David Snedeker, Executive Director (802) 748-8303 dsnedeker@nvda.net	Technical Support, regional planning for sustainable growth.
Northern Community Investment Corporation (NCIC)	Non-profit organization dedicated to addressing regional economic challenges.	Mike Welch, Senior Project Manager (802) 748-5101 x 2027 mwelch@ncic.org	Attract & recruit businesses that foster economic development opportunities for priority brownfields.
Vermont Dept. of Health (VTDOH)	Protect health, disease prevention.	Jon Bouffard, Town Health Officer (802) 748-8925 jbouffard@stjvt.com	Outreach, evaluating health issues & planning.
Vermont Dept. of Environmental Conservation (VTDEC)	Protection of Human Health and the Environment.	Sarah Bartlett, Site Manager 802-249-5641 sarah.bartlett@vermont.gov	Project oversight, potential funding support.
St. Johnsbury Works	Environmental quality protection.	Brendan Hughes, President (802) 745-7826 bhughes@stjvt.com	Outreach, public participation, project advisory.
St. Johnsbury Police	Protection of citizens on property.	Tim Page, Police Chief (802) 748-2170 tpage@stjvt.com	End user, collaboration on design.
Vermont Police Chiefs Association	Agency cooperation in crime prevention, education of public, legislation support.	Tim Page, Police Chief (802) 748-2170 tpage@stjvt.com	Advisory support.
St. Johnsbury Development Fund	Economic Development in Northern VT.	Daniel Kimbell, President (802) 751-4334 dkimbell@passumpsicfinadvisors.com	Identifying and leveraging funds.
Vermont Dept. of Historic Preservation	Preserving Vermont's historic resources.	Laura Trieschmann, Preservation Officer (802) 828-3222 laura.trieschmann@vermont.gov	Input on Armory historic preservation.

Organization Name	Organization Purpose	Point of Contact	Project Role
Vermont Agency of Commerce & Community Development (ACCD)	To enhance VT business climate, promote tourism and strengthen communities.	Kristie Farnham, Dir. of Business Support (802) 398-5268 Kristie.Farnham@vermont.gov	Municipal grants, planning and community development.
NEK Division of Developmental Services	Help individuals with disabilities lead normal and complete lives.	Tomasz Jankowski, NEK Human Services tjankowski@nkhs.net (802) 334-6744	Advisory role with design and access.
St. Johnsbury Academy	Education	Dr. Sharon Howell (802) 751-2033 showell@stjacademy.org	Collaboration of public safety concerns.
St. Johnsbury School District	Education	Dr. Brian Ricca, Superintendent (802) 745-2789 bricca@stjdsd.org	Collaboration of public safety concerns.
Friends of the Armory	Historic preservation and re-purpose the Armory.	Irene Nagle, Senior Planner (802) 424-1423 inagle@nvda.net	Community participation and historic preservation input.

**2.b.iii. Incorporating Community Input:** Our primary means for communicating project progress to the community will be ABAC meetings, which generally will be held monthly. At each of these meetings a brief project update will be provided, and following the achievement of key project milestones, a more comprehensive update will be provided in the form of a Town-led presentation followed by a questions and answer period. Additionally, we will communicate project progress and solicit input from the local community using the following:

- A project specific webpage will be created on the Town's website within three months of project initiation. A link to the project webpage will also be posted on NVDA's "Brownfields" webpage. Information posted on the website will include: 1) project-specific fact sheets; 2) a calendar indicating the project schedule and notices of upcoming meetings; 3) links to the EPA and other brownfield websites; and 4) the Community Relations Plan (described in Section 3.b).
- Hold a minimum of five cleanup focused meetings where participation from the general public will be emphasized (see Section 3.b.ii for detailed schedule), the first of these meetings was held on October 13, 2020, and fulfilled EPA's community notification application requirement. These meetings will include a presentation regarding project progress given by St. Johnsbury and interactive exercises to engage attendees in providing their ideas regarding revitalization of the Armory.
- Use of local print/online media (such as the Caledonian Record, the Town's website, and NVDA's website) to report project progress and publicize upcoming public meetings.
- We will attend and present information regarding the project at our Welcome Center in the Pomerleau Building located at 51 Depot Square which has adequate capacity for public seating. On average two meetings will be held each year over the life of the project. These meetings will be planned and led by the Town and our consultant team. At all meetings special accommodations will be made available to ensure the participation of people with disabilities and non-English speakers.
- In response to the COVID-19 pandemic, the Town makes all Select Board and other public meetings available via Zoom for those who wish to participate in the meetings virtually. The Zoom meeting link is made available on the Town's website and the Town will practice the same approach for all meetings hosted for this project. Additionally, social distancing measures are practiced at all in-person meetings.

To ensure that community input is considered, responded to, and in many cases adopted, the following actions will be taken: 1) we will publish the results of meeting data gathering efforts and other input received to ensure transparency amongst stakeholders; 2) we will work actively to enhance the leadership capacity of community members and groups to empower them in being heard; and 3) we will describe how project decisions were affected by community input, and explain how this input positively influenced the economic, social, and environmental successes of the project. We are very conscious of the fact that the greatest opportunity to consider community input is the revitalization plan that will follow cleanup and will therefore intentionally solicit input on this subject.

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

**3.a. Proposed Cleanup Plan:** Contaminated media to be addressed by the cleanup plan includes the following:

- **Asbestos Containing Materials (ACM):** Plaster walls/ceilings - throughout the building ▪ Exterior window caulk (white) - to be quantified (TBQ) ▪ Exterior tar brick caulking - TBQ ▪ Door insulation - 1 safe door ▪ Air cell



insulation - ~100 linear feet (LF) ▪ Fireplace brick – 30 square feet (ft<sup>2</sup>) ▪ Mudded pipe joint packings - 10 LF ▪ Boiler insulation – covering boiler in boiler room. ▪ Potential ACMs including roofing felts, papers, flashing and shingles. ▪ Inaccessible presumed ACM - door insulation, fire brick, vibration cloth, boiler door insulation, boiler internal materials.

- **PCB Containing Materials:** Grey floor paint throughout the basement at concentrations up to 5,700 parts per million (ppm).
- **Lead-Based Paint (LBP):** Lead-containing paint in good and poor condition at concentrations ranging from 0 to > ~10 mg/cm<sup>3</sup> (the maximum instrument reading). LBP at concentrations above the instrument detection limit included window components and window wells. Other LBP materials were found in the following materials; walls and ceilings, stairways, flooring and the side porch.

Cleanup methods employed for the Armory will include complete abatement and off-site disposal of all identified ACM and LBP in poor condition. Cleanup will also include the encapsulation of LBP in poor condition. A certified asbestos and LBP abatement contractor will be procured by the Town to implement cleanup following award of the EPA Cleanup Grant.

Non-friable ACM abatement wastes generated during the project will be disposed of at the Coventry Landfill in Newport, VT. There are also several permitted facility options for friable ACM waste disposition in the New England area. PCB wastes will be disposed at the US Ecology facility in Michigan which is operated in compliance with Resource Conservation and Recovery Act (RCRA) Subtitle D Landfill requirements. If hazardous wastes are generated during the project, they will also be disposed at a facility in Michigan, which is operated in compliance with RCRA Subtitle C requirements.

**3.b. Description of Tasks/Activities & Outputs:** The scope has been organized into the tasks described below.

<b>Task 1 – CA Management, Reporting &amp; Other Eligible Activities</b>
<b>i. Project Implementation:</b> 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 the 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; and 6) participation in brownfield conferences. Non-EPA grant resources used to carry-out Task 1 will include 180 hours (\$10,800) of in-kind St. Johnsbury personnel/fringe.
<b>ii. Schedule:</b> Periodically throughout the project (see schedule graphic in Section 3.b.ii.).
<b>iii. Lead:</b> The Town with support from a QEP.
<b>iv. Outputs:</b> Quarterly progress reports with budget status tables (12), annual DBE Report and FFR (3 each), periodic ACRES reporting, and Final Performance Report (1) and associated financial documents.
<b>Task 2 – Community Outreach</b>
<b>i. Implementation:</b> The community engagement task will include the following: 1) preparation of a Community Relations Plan; 2) attendance of all ABAC meetings; 3) five community meetings, one that has already occurred and four as indicated in the schedule provided in Section 3.b.ii; 3) outreach materials including fact sheets and creation and periodic updates of a project website; and 4) solicitation, consideration, and response to community input. Non-EPA grant resources used to carry-out Task 2 will include 180 hours (\$10,800) of in-kind St. Johnsbury personnel/fringe as well as \$1,575 of supplies costs the Town will pay for (e.g. purchase of materials for posters and other meeting engagement tools made by the Town, printing and public notice mailing costs, etc.).
<b>ii. Schedule:</b> Periodically throughout the project (see schedule graphic in Section 3.b.ii.).
<b>iii. Lead:</b> The Town with support from the QEP.
<b>iv. Outputs:</b> Community Relations Plan. Monthly ABAC meetings and meeting materials. Five community meeting and meeting materials. 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.
<b>Task 3 – Cleanup Planning &amp; Implementation</b>
<b>i. Implementation:</b> Property cleanup/cleanup planning will include: 1) finalize the ABCA; 2) Develop a CAP; 3) Develop site-specific Quality Assurance Project Plan (QAPP) that details all project cleanup-related sampling protocols and quality assurance/quality controls; 3) EPA-required National Historic Preservation Act (NHPA §106) activities; 4) prepare bid specifications and complete a Davis-Bacon Act and EPA compliant (2 CFR § 200.317-326) request for proposal (RFP) process to select a cleanup contractor; 5) implement the

cleanup plan described in Section 3.a including all permitting and pre-work submittals, health and safety plan preparation, set-up controls to secure the building, and remove, load, transport and dispose of ACM, PCB and LBP wastes (QEP will provide oversight of all cleanup activities, including ensuring compliance with all Davis-Bacon Act elements); and 6) preparation by the cleanup contractor (reviewed and approved by QEP) of a Closure Report documenting all aspects of the cleanup project.

Non-EPA grant resources used to carry-out Task 3 will include 80 hours (\$4,800) of in-kind St. Johnsbury personnel/fringe as well as \$72,025 of monetary contribution from the Town's economic development reserve funds and leveraged funds discussed in Section 2.

**ii. Schedule:** The schedule for all Task 3 elements are detailed in the schedule graphic in Section 3.b.ii.

**iii. Lead:** QEP under the direction of the Town.

**iv. Outputs:** Final ABCA, CAP, site-specific QAPP, Cleanup Specifications/RFP, RFP Selection Process Documentation, Davis-Bacon Act Compliance Documentation, Site Cleanup, Closure Report.

**3.b.ii Anticipated Project Schedule:** The graphic that follows provides a detailed schedule demonstrating our plan to complete the project well within the 3-year period of performance.

Task No.	Task Name	Description	FY2021		FY2022				FY2023			
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
--	Funding Decision & CA	Funding Announcements	•									
		Prepare CA Work Plan		■								
		CA Issued		•								
1	CA Mgmt., Reporting & Other Eligible Activities	Quarterly Reporting				•	•	•	•	•	•	•
		Annual DBE Report & FFR				•	•	•	•	•	•	•
		ACRES Database Submittals/Updates				•	•	•	•	•	•	•→
		Final Performance Report									•	
2	Community Outreach	Community Relations Plan			■							
		Develop Project Webpage & Fact Sheets			■							
		Advisory Committee Meetings			■							
		Public Meetings				•		•		•		•
3	Cleanup Planning & Implementation	Finalize ABCA/Develop CAP			■							
		Site-Specific QAPP Preparation/Approval				■						
		NHPA Requirements			■							
		Develop/Issue Abatement Contractor RFP				■						
		Review/Select Abatement Contractor					•					
		Conduct Cleanup						■				
		Prepare Cleanup Report								■		

**3.c Cost Estimates:** Project cost estimates are provided by task below. St. Johnsbury personnel costs are based on an average rate of \$55/hour (\$32 personnel salary + \$23 fringe benefits). QEP costs are based on an average rate of \$150/hour. Abatement costs are based on an engineering estimate that was recently completed on behalf of the Town by ATC (2020 Remediation Planning Cost Estimate, St. Johnsbury Armory Building, June 4, 2020) in conjunction with a Draft ABCA prepared by Stantec (October 2020) in support of the grant application. The Town's required cost share (\$100K) will be provided in the form of \$26,400 of in-kind services from Town staff and \$73,600 of the Town's economic development reserve funding.

**Task 1 – CA Management, Reporting & Other Eligible Activities:**

**\$12,500 EPA-funded + \$9,900 Town-funded = \$22,400**

**Personnel & Fringe Total = \$10,800 (Town-funded/in-kind services):**

- CA Management, Contractor Management, & Reporting Activities: \$6,380 (116 hours x \$55/hr)
- Brownfields conference attendance: \$3,520 (8 hours/day x 2 days x 2 events x 2 staff = 64 hours x \$55/hr)

**Travel Total = \$5,000 (EPA-funded):**

- National Brownfields Conference: \$3,200 EPA-funded (\$1,600/person x 2 Town staff)
  - Regional/State Brownfields Conference: \$1,800 EPA-funded (\$900/person x 2 Town staff)
- (Note: Costs include lodging, meals, transportation, incidental expenses and conference registration fees.)

**Contractual Total = \$7,500 (EPA-funded):**

- Compliance Reporting (quarterly reports, ACRES updates, Final Performance Report, Annual DBE Reports & FFRs): \$7,500 (50 hours x \$150/hr)



<b>Task 2 – Community Outreach: \$18,000 EPA-funded + \$11,425 Town-funded = \$29,425</b>	
<b>Personnel &amp; Fringe Total = \$9,900 (Town-funded/in-kind services):</b>	
• Community Relations Plan, Community Input Evaluation, Project Webpage Development/Maintenance, Advisory Committee Meetings, & Public Meetings: \$9,900 (180 hours x \$55/hr)	
<b>Supplies Total = \$1,525 (Town-funded):</b> Purchase of materials for posters and other meeting engagement tools made by the Town. Printing and public notice mailing costs.	
<b>Contractual Total = \$18,000 (EPA-funded):</b>	
• Community Relations Plan: \$7,500 (50 hours x \$150/hr)	
• Outreach Materials & Meetings (Develop project webpage content, fact sheets, posters, mailers, meeting materials, etc. and assist with facilitating public/advisory committee meetings.): \$10,500 (70 hrs x \$150/hr)	
<b>Task 3 – Cleanup Planning &amp; Implementation: \$469,500 EPA-funded + \$78,675 Town-funded</b>	
<b>Personnel &amp; Fringe Total = \$4,400 (Town-funded/in-kind services):</b>	
• Contractor & QEP Coordination & Oversight: \$4,400 (80 hours x \$55/hr)	
<b>Contractual Total = \$548,175 (\$469,500 EPA-funded + \$74,275 Town-funded):</b>	
<b>QEP (\$47,250):</b>	
• Finalize ABCA & Develop CAP: \$7,500 (50 hours x \$150/hr)	
• Develop Site-Specific QAPP: \$4,500 (30 hours x \$150/hr)	
• Develop Bid Specifications & Contractor RFPs: \$15,000 (100 hours x \$150/hr)	
• Cleanup Oversight & Final Report Review: \$20,250 (135 hours x \$150/hr)	
<b>Contractor (\$496,525):</b>	
• ACM Abatement: \$313,240 (Cost includes pre-work submittals, mobilization, air cell pipe thermal systems insulation (TSI) 100 linear feet, plaster walls and ceilings located throughout the building; pipe joint compounds, boiler door insulation, fire brick, vibration cloth, boiler covering and internal materials, window caulking, and exterior brick caulking. There is an additional estimated fee of \$10,000 for pre-work/mobilization)	
• PCB Abatement: \$173,285 (Cost includes pre-work submittals, mobilization, grey floor paint in basement – removal by scarification and concrete resurfacing, additional removal of, management and disposal of excluded PCB wastes.). There is an additional estimated fee of \$10,000 for pre-work/mobilization.	
• LBP Abatement: \$10,000 (Contingency for potential LBP removal if required.)	

A summary of the overall proposed budget is provided in the following table. Please note grant funds are not requested for personnel, fringe benefits, equipment, supplies or indirect costs. Therefore, these budget categories are not included in the table. (As detailed in the table above, 100% of the costs for personnel, fringe benefits and supplies as well as a portion of the costs for contractual services will be funded by the Town.)

Budget Categories	Task 1: CA Mgmt, Reporting & Other Eligible Activities	Task 2: Community Outreach	Task 3: Cleanup Planning & Implementation	Total
Travel*	\$5,000	-	-	\$5,000
Contractual	\$7,500	\$18,000	\$469,500	\$495,000
<b>Total Direct Costs</b>	<b>\$12,500</b>	<b>\$18,000</b>	<b>\$469,500</b>	<b>\$500,000</b>
<b>Total Federal Funding</b>	<b>\$12,500</b>	<b>\$18,000</b>	<b>\$469,500</b>	<b>\$500,000</b>
<b>Cost Share</b>	<b>\$9,900</b>	<b>\$11,425</b>	<b>\$78,675</b>	<b>\$100,000</b>
<b>Total Budget</b>	<b>\$22,400</b>	<b>\$29,425</b>	<b>\$548,175</b>	<b>\$600,000</b>

\*Travel costs for up to 2 Town personnel to attend one regional/State and one national brownfields-related conference.

**3.d. Measuring Environmental Results:** Upon notice of award, the Armory project schedule will be updated with tasks, subtasks, milestones, and reporting requirements specific to the EPA Grant, including the outputs associated with each task as detailed in Section 3.b. This schedule will be reviewed on a biweekly basis throughout the project to identify deviations in schedule as soon as they occur, so corrective measures can be developed and implemented to maintain progress and keep the project on track. Copies of the updated schedule will be included with each quarterly progress report submitted to EPA. All project outputs are listed in Section 3.b. The overall project result anticipated is a building with no environmental cleanup needs, ready for revitalization. Eventual project outcomes, and the units that will be used to measure them include: 1) Square feet of building repurposed for office use; 2) Number of jobs directly and indirectly created; 3) Community needs addressed: (meet Main Street Revitalization Plan goals, Public Safety headquarters centralized in the Main Street Corridor of the County seat, preservation of a historic landmark, etc.); and 4) Amount of public and private funding leveraged for cleanup, revitalization planning, and redevelopment. All outputs and outcomes completed during and after the three-year grant period will be reported and updated in ACRES.

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

##### **4.a. Programmatic Capability**

**4.a.i. Organizational Structure:** The Town will lead all technical, administrative and financial activities for this project. Key Town personnel and their qualifications are provided below.

The Town will also select a QEP to support the cleanup project. The QEP will be procured in accordance with EPA requirements (2 CFR § 200.317-326). The QEP will assist the Town in all technical aspects of the project. As indicated in Section 3.b.ii., our anticipated schedule for the project indicates a project duration of two years, well short of the maximum project duration of three years specified by the EPA.

**4.a.ii. Description of Key Staff:** The Town's staff listed below will manage all grant related technical, administrative and programmatic tasks.

***Chad Whitehead, Town Manager, Town of St. Johnsbury:*** Town Manager Whitehead 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 engineering firm. Chad is a licensed professional engineer and has worked on more than \$41,000,000 of infrastructure projects within the Town. As Project Director, Chad will provide high-level oversight of the project.

***Joe Kasprzak, Assistant Town Manager, Town of St. Johnsbury:*** 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, Advisory Committee meetings, and compliance with the terms and conditions of the Cooperative Agreement.

***Rachel Waterhouse, Administrative Assistant, Town of St. Johnsbury:*** Rachel Waterhouse is the Administrative Assistant for the Town of St. Johnsbury. Her duties include payroll, benefits administration, and human resource related duties. Rachel comes to the Town with a background in Human Resource and Office Management. Before working for the Town, Rachel spent nine years working in the non-profit sector. As Project Coordinator, Rachel will assist with compliance reporting, updating the Town's project webpage, and administrative tasks.

***Lesley Russ, Financial Officer, Town of St. Johnsbury:*** Lesley Russ has forty years of accounting and internal auditing experience with the last seven years in municipal government. Lesley's role at the Town includes annual budget development, monthly financial reporting to the Board, 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. As the Financial Officer, Lesley will be responsible for tracking project financials and managing grant funds.

**4.a.iii. Acquiring Additional Resources:** During its period of operation, Town staff have prepared RFP solicitations; reviewed proposals; and selected, contracted with, and directed consultants. The Town will be acquiring additional resources to complete Armory cleanup activities. Our QEP will prepare technical specifications used for this solicitation, and oversee the selected cleanup contractor's work, include ensuring that the cleanup contractor fulfills its obligations regarding the scope and costs provided in their proposal. The Town will abide by EPA procurement requirements (2 CFR § 200.317-326) in procuring a cleanup contractor and any additional project resources.

##### **4.b. Past Performance & Accomplishments:**

**4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:** The Town received a \$200K FY2010 EPA Brownfields Community-Wide Assessment Grant for sites impacted by hazardous substances.

**(1) Accomplishments:** 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 was the primary focus of the grant, receiving 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 and a former foundry. iii) An abatement and demolition plan was prepared.

**(2) Compliance with Grant Requirements:** The Town met all reporting requirements/milestones and maintained compliance with the Cooperative Agreement (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 VTDEC Brownfield Planning Grants. All phases were successfully completed and target outcomes/outputs were achieved, including meeting DBE goals. All funds were expended within the three-year grant period.