



**Western Connecticut Council of Governments
1 Riverside Avenue, Sandy Hook, Connecticut 06482**

1. Applicant Identification:

Western Connecticut Council of Governments (WestCOG)
1 Riverside Road
Sandy Hook, CT 06482

2. Website URL:

www.westcog.org

3. Funding Requested:

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

4. Location: WestCOG intends to serve the 18 communities that make up the region. The below 18 communities make up the Western CT Council of Governments and will be affected by the project:

- Bethel, Connecticut, Fairfield County, Connecticut
- Danbury, Connecticut, Fairfield County, Connecticut
- Newtown, Connecticut, Fairfield County, Connecticut
- Ridgefield, Connecticut, Fairfield County, Connecticut
- Wilton, Connecticut, Fairfield County, Connecticut
- New Caanan, Connecticut, Fairfield County, Connecticut
- Darien, Connecticut, Fairfield County, Connecticut
- Stamford, Connecticut, Fairfield County, Connecticut
- Greenwich, Connecticut, Fairfield County, Connecticut
- Westport, Connecticut, Fairfield County, Connecticut
- Weston, Connecticut, Fairfield County, Connecticut
- New Fairfield, Connecticut, Fairfield County, Connecticut
- Redding, Connecticut, Fairfield County, Connecticut
- Norwalk, Connecticut, Fairfield County, Connecticut
- Sherman, Connecticut, Fairfield County, Connecticut
- Brookfield, Connecticut, Fairfield County, Connecticut
- Bridgewater, Connecticut, Litchfield County, Connecticut

- New Milford, Connecticut, Litchfield County, Connecticut

5. Target Area and Priority Site/Property Information:

The target areas selected for this application are as follows:

- 72 -80 Maple Ave & 33 East Franklin Street, Danbury, CT 06810
- 6 Youngs Field Road, 20 Youngs Field Road, 72 Housatonic Avenue, New Milford, CT 06776
- 20 North Main St, 50 Bennett St, and 30 North Main St, Redding, CT 06896

6. Contacts

a. Project Director

Betsy Paynter, Project Manager; Phone 475-323-2069; bpaynter@westcog.org Western Council of Governments; 1 Riverside Road, Sandy Hook CT 06482

b. Chief Executive/Highest Ranking Elected Official

Francis Pickering, Executive Director, 475-323-2070, fpickering@westcog.org, Western Connecticut Council of Governments, 1 Riverside Rd, Sandy Hook, CT 06482

7. Population

According to the ACS, 2019-2023:

- **Danbury:** 86,456
- **New Milford:** 28,161
- **Redding:** 8,756

8. Other Factors Checklist

Other Factors	Page #
Community Population is 15,000 or less	Yes, Redding see page 1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A for this application
The proposed brownfield site(s) is impacted by mine-scarred land	N/A for this application
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Yes, New Milford, Redding & Danbury, see page 1
The proposed site(s) is in a federally designated flood plain.	Yes, Redding, Danbury & New Milford see page 1
The reuse of priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	N/A

The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Yes, New Milford, Redding & Danbury, see page 2
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	Yes, See Page 1
The target area(s) is impacted by a coal-fired power plant that has recently closed (2013 or later) or is closing.	N/A

9. Letter from the State or Tribal Environmental Authority:

Please see attached letter from the Connecticut Department of Energy and Environmental Protection – **Attachment (FORMAT)**

10. Releasing Copies of Applications

- There are no CBIs accompanying this application – it can be made available for the public

December 18, 2025

Jaclyn Giannini
Project Manager
Western Connecticut Council of Governments
1 Riverside Road
Sandy Hook, CT 06482

Re: State Acknowledgement Letter for EPA's Community-wide Assessment Grant for FY26

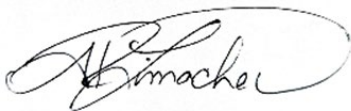
Dear Jaclyn Giannini:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Western Connecticut Council of Governments intends to apply to the US Environmental Protection Agency (EPA) for a Community-wide Assessment Grant for Federal Fiscal Year 2026. DEEP understands that the Western Connecticut Council of Governments plans to use the grant funding to conduct assessments at various properties contaminated with hazardous substances and/or petroleum in the communities served by your organization.

If EPA awards grant funds, DEEP or EPA must determine the eligibility of each site before any site-specific assessment activity is undertaken using petroleum assessment grant funds.

If you have any questions about this letter, please contact me at (860) 424-3351 or by e-mail at Amanda.Limacher@ct.gov. Good luck with your application.

Sincerely,



Amanda Limacher
Brownfields Coordinator

c: Ms. Katy Deng, EPA (via e- mail)

1.PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1a. Overview of Brownfield Challenges and Target Areas: WestCOG is the regional planning agency for 18 municipalities in southwestern Connecticut (Fairfield County and two Litchfield County towns), serving 620,549 residents across urban, suburban, and rural communities. The region includes 150+ confirmed brownfields, reflecting legacy industrial practices, hazardous building materials, and historic waste handling. **Priority target areas are Danbury, New Milford, and Redding, selected based on (1) proximity to sensitive populations and documented health vulnerability, (2) redevelopment readiness and catalytic potential in downtown cores, and (3) limited local capacity to perform assessments without federal assistance.** Danbury, with a population of 86,086, includes approximately 36 brownfield sites and contains legacy industrial properties near downtown and low-income neighborhoods. New Milford, with a population of 28,161 and the largest town in Connecticut at 63.7 square miles, includes 17 brownfield sites, including a riverfront municipal public works operation near downtown. Redding, with a population of 8,765, contains a large, complex mill brownfield in its commercial center, plus seven additional sites, with limited staff capacity to advance assessment and redevelopment. EPA Community-Wide Assessment funding will provide the environmental due diligence needed to define contamination, reduce redevelopment risk, and support cleanup and revitalization planning.

1b. Priority Brownfield Sites: WestCOG selected three priority sites due to public health relevance, proximity to sensitive populations, and redevelopment potential. Funding for assessments will support determining the eligible reuse and area-wide planning activities. **Danbury – 72–80 Maple Ave & 33 E Franklin St (approximately 2 acres; Census Tract 09190210101):** A city-owned (tax foreclosure) vacant factory complex with four deteriorated buildings in Danbury’s downtown. Historic manufacturing includes silk, hats, ball bearings, sensors, and connector parts. The site borders Pembroke Brook (to the Still River) within a 500-year flood plain, Danbury Police Headquarters, and Laurel Gardens public housing, and is adjacent to residential uses. The property attracts trespassers and vandalism. Suspected contamination (soil/groundwater/vapor) and building conditions present potential exposure risks. The parcel is within Danbury’s D-TOD district, creating strong reuse potential for affordable housing and/or mixed-use redevelopment. **New Milford – 6 & 20 Youngs Field Rd and 72 Housatonic Ave (approximately 7.8 acres; Census Tracts 0952560, 0952561):** Three parcels comprising the Town’s long-standing public works facility on the shores of Housatonic River, in a 500-year flood plain, adjacent to downtown. Current uses include active buildings, fleet storage, fueling, and salt storage. Based on long-term municipal operations, contaminants of concern include PCBs, arsenic, petroleum, and hydrocarbons. A nearby private fuel depot raises additional concern for off-site migration. Phase I/II assessment is needed to confirm presence, location, and pathways, and to support next-step cleanup planning. **Redding – Gilbert & Bennett Wire Mill (≈44 acres; 20 N Main St / 50 Bennett St / 30 N Main St; Census Tracts 09190240100, 09190240200):** A 44-acre former wire mill complex in Redding’s commercial center with seven deteriorated buildings, parking, a Factory Pond, created by a dam of the Norwalk River going through the site. The site also sits in the 500-year flood plain. Historic operations included metal fencing/screening and related manufacturing. The Town acquired the site in 2015 and, with state and prior EPA support, initiated assessment of buildings, soil, and water. Additional assessment is needed to address remaining data gaps and support a community-driven reuse concept that includes river restoration (dam removal), trails/open space, and mixed-use redevelopment consistent with local planning objectives.

1c: Identifying Additional Sites: WestCOG has developed a comprehensive regional Brownfield inventory, utilizing CT Department of Energy and Environmental Protection (DEEP) data, EPA reported sites, and information from discussions with municipalities’ land use departments. If awarded this EPA Assessment grant, WestCOG will work with the newly formed Regional Brownfields Coalition (RBC), made up of community liaisons, first selectmen, nonprofit leaders, financial institutions, and economic development professionals to review inventory and determine additional sites for assessment. Priority will be given to sites that show redevelopment

readiness and investor interest, environmental conditions, proximity to low-income communities, job creation, and opportunities to expand green space, and generate improvements to public and environmental health.

1d: Reuse Strategy and Alignment with Revitalization Plans:

In Danbury, redevelopment of the contaminated downtown factory complex has the potential to provide substantial community and municipal benefit by returning a long-blighted property to productive use. EPA Community-Wide Assessment funding will enable the city to conduct environmental assessments of buildings, soil, and groundwater to identify contamination, define exposure pathways, and evaluate the site's suitability for reuse. Given the site's location in a historically disinvested neighborhood with a higher concentration of low-income residents, assessment will support informed planning for reuse that may include affordable housing and mixed-use development. These outcomes would advance community goals related to housing access, job creation, and reduction of environmental hazards while improving redevelopment readiness.

In New Milford, the Town's long-standing River Revitalization Project seeks to address contamination along the downtown riverfront, unlock underutilized land for redevelopment, and reconnect the commercial district to the Housatonic River. EPA-funded assessment of the 7.8-acre public works site will provide the environmental data needed to evaluate contamination adjacent to the river, inform cleanup planning, and determine appropriate reuse locations within the Town's master plan. Because the Housatonic River flows through multiple municipalities and ultimately to Long Island Sound, assessment will also help address potential downstream environmental risks while supporting redevelopment that expands the downtown district, creates employment and housing opportunities, and increases public access to natural and recreational resources such as trails and riverfront open space. **At the Gilbert & Bennett Wire Mill in Redding, the Town has initiated a community-driven planning process to guide reuse of a large, centrally located brownfield site.** Proposed strategies include dam removal to restore natural river flow, improve aquatic habitat, and create new opportunities for trails and open space. Initial planning and market analysis have identified potential uses such as arts and cultural space, residential development, small businesses, maker space, and limited hospitality. EPA assessment funding will support continued evaluation of environmental conditions needed to advance cleanup planning and reuse feasibility, helping expand the commercial district, generate jobs and tax revenue, and reduce long-term environmental risks in a community with limited local capacity to undertake complex assessment work independently.

1.e. Outcomes and Benefits of Reuse Strategy

EPA-funded assessment of environmental conditions at the three priority sites will advance redevelopment readiness and support outcomes that stimulate local economic development, expand community-serving green and recreational assets, and improve resilience to the impacts of extreme weather events and natural disasters, consistent with EPA Community-Wide Assessment priorities. In **Danbury**, assessment of the abandoned downtown factory complex will reduce redevelopment risk and support reuse of a long-blighted, tax-foreclosed property in the City's Downtown Transit-Oriented Development (D-TOD) district. This work will facilitate infill redevelopment that supports housing and job creation in a historically disinvested neighborhood adjacent to sensitive populations, including residents of nearby public housing. Assessment will also inform cleanup and site planning that reduces the risk of contaminant mobilization during heavy precipitation and flooding along the Pembroke Brook–Still River corridor. In **New Milford**, assessment of the riverfront public works facility will provide the environmental data needed to advance the Town's River Revitalization strategy by enabling safe redevelopment of underutilized downtown-adjacent land and expanding public access to the Housatonic River. Given the site's location along a major waterway, assessment and cleanup planning will strengthen community resilience by identifying contamination and runoff pathways that may worsen during extreme weather events, protecting nearby neighborhoods and downstream communities.

In **Redding**, additional assessment at the Gilbert & Bennett Wire Mill will close remaining data gaps and sustain momentum for a community-driven redevelopment of a large brownfield site in the town center. Planned reuse concepts—including river restoration, expanded open space and trails, and mixed civic and commercial uses—will reduce long-term environmental risks, improve public access, and enhance resilience by restoring natural river functions and limiting exposure pathways during storms and flooding.

Across all three sites, EPA assessment funding will reduce potential exposure to contaminated soil, groundwater, and air; support redevelopment that benefits sensitive populations, including seniors and low-income households; and position communities with limited local capacity to pursue cleanup funding and private investment. Where feasible as reuse plans advance, municipalities will encourage energy-efficient design and infrastructure improvements to improve long-term affordability and resilience.

1f. Resources Needed for Site Reuse: WestCOG can assist developers as a pass-through entity from the Connecticut Department of Economic and Community Development (DECD) Office of Brownfield Remediation and Development (OBRD) to investors/developers to clean up blighted sites and encourage redevelopment. EPA Assessment funding will reduce due diligence barriers for developers by providing environmental data needed to secure financing, obtain approvals, and advance redevelopment proposals. EPA Assessment grants could accelerate the process while reducing investor risk concerns. **WestCOG will continue to support municipalities and investors will access remediation funds to create a more vibrant region.**

1g. Use of Existing Infrastructure: **All three target sites have access to existing public infrastructure, including: sewer, water, electricity, gas, sidewalks and roadways.** Redding has a wastewater facility on the mill site with significant underutilized capacity. The Danbury site has water and sewers running near the target site with sewer capacity available. New Milford's target site has sewer and water connections today. If connections or upgrades are needed for redevelopment, the private investor and/or the municipality would help fund. The EPA funds will help assist in the testing to determine the uses in the development and leverage the existing infrastructure. Incorporating existing infrastructure in the marketing of the project will be beneficial to attract investment as it becomes more turnkey.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Communities' Need for Funding: **The communities of Danbury, New Milford, and Redding face distinct but related economic and capacity constraints that limit their ability to assess and advance redevelopment of brownfield sites without federal assistance.** **In Danbury,** approximately **11%** of residents live below the poverty line (DataHaven/CT Equity Profiles). The target site is located adjacent to a public housing development serving low-income families, placing vulnerable residents near suspected contamination. Environmental conditions in this area pose disproportionate health and economic risks and contribute to persistent disinvestment, underscoring the need for EPA assessment funding. **In New Milford,** the target site is located near an **economically challenged neighborhood adjacent to the Town's public works facility.** Approximately **8%** of residents live below the poverty line (U.S. Census Bureau ACS), and the town's unemployment rate, at approximately 6%, exceeds the statewide average. Limited local financial and staffing resources constrain the Town's ability to independently conduct environmental assessments, making EPA Brownfields funding critical to advancing site evaluation and redevelopment planning. **In Redding,** a rural community with a **small population of 8,765 (2020 Census),** limited municipal staffing presents significant barriers to managing complex brownfield projects. Redevelopment planning for the historic Gilbert & Bennett Wire Mill has relied heavily on a volunteer economic development commission. While prior support from the Connecticut Department of Economic and Community Development (DECD) and an earlier EPA grant following the Town's acquisition of the site in 2015 enabled initial planning and testing, additional assessment funding is needed to address remaining data gaps and advance redevelopment planning. EPA Community-Wide Assessment funding will provide essential capacity

across all three municipalities by supporting environmental site assessments in communities with limited financial and staffing resources. These funds will enable informed decision-making, reduce barriers to redevelopment, and support equitable revitalization of sites located near low-income and resource-constrained populations.

2.b. Health or Welfare of Sensitive Populations: Sensitive populations, including older adults, people with disabilities, low-income households, and pregnant women, are present within and immediately adjacent to the proposed assessment areas in Danbury, New Milford, and Redding, increasing vulnerability to potential exposure from suspected brownfield contamination. In Danbury, the target site is in the downtown, low-income census tract and directly abuts a public housing development serving low-income families and older adults. Danbury has a median age of 41.7, with 21.1% of residents age 65 or older, compared to 16.8% nationally and 14.7% of residents reporting a disability (American Community Survey). Asthma affects approximately 10% of Danbury's adult population, exceeding Fairfield County averages (Connecticut Department of Public Health). Downtown census tracts show elevated asthma prevalence and moderate cancer burden in combination with socioeconomic and environmental stressors, indicating heightened sensitivity to cumulative exposure. In New Milford, the target site is in the downtown commercial center, where seniors, families, and women live, shop, and walk. New Milford's median age is 39.5, with 15.3% of residents age 65 or older and 6% of seniors living in poverty (ACS). Downtown New Milford exhibits elevated health vulnerability, including an estimated 10.8% adult asthma prevalence, above the Connecticut baseline, and approximately 8.4% adult cancer prevalence. The site is adjacent to a low-income neighborhood, 8% of residents lack health insurance, compared to 5.8% statewide (ACS). In Redding, the median age is 48.3, and 22.3% of residents are age 65 or older, compared to 16.5% in Fairfield County (ACS). Adult asthma prevalence is approximately 9.5%, and adult cancer prevalence is estimated at 11.8%. While these rates are comparable to statewide averages, the older population and proximity of sensitive receptors near the target site increase concern for long-term exposure impacts. EPA Community-Wide Assessment funding will directly benefit these sensitive populations by enabling targeted environmental site assessments that identify contamination, define exposure pathways, and inform cleanup and redevelopment planning. These activities will reduce potential exposure to contaminated soil, groundwater, and air; support safer, more walkable downtown environments; and advance redevelopment that protects public health in communities with limited capacity to address contamination without federal assistance.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Communities surrounding the target sites in Danbury, New Milford, and Redding experience elevated rates of environmentally linked health conditions, particularly asthma, consistent with long-term exposure to legacy contamination from historic industrial activity, impaired waterways, and aging municipal and manufacturing infrastructure (Connecticut Department of Public Health [CT DPH] Asthma Surveillance; Connecticut Tumor Registry, 2017–2021). In Danbury, the vacant factory complex along Pembroke Brook and the Still River is located within a downtown, low-income census tract and directly abuts the Laurel Gardens public housing development (U.S. Census Bureau ACS). CT DPH asthma surveillance data show persistently elevated asthma-related emergency department visits and hospitalizations in surrounding neighborhoods, indicating heightened respiratory health vulnerability associated with local environmental conditions (CT DPH). In New Milford, census tract-level data identify elevated asthma emergency department and hospitalization rates, exceeding 60 per 10,000 residents, in areas surrounding the Town's public works complex along the Housatonic River (CT DPH Asthma Surveillance). The site is adjacent to economically challenged neighborhoods and a major regional waterway. Documented and suspected contaminants, including PCBs, arsenic, petroleum, and hydrocarbons, present ongoing risks for respiratory illness and long-term cancer outcomes (CT DPH; Connecticut Tumor Registry). In Redding, the historic Gilbert & Bennett Wire Mill contains documented contamination from heavy metals, petroleum hydrocarbons,

and hazardous building materials (CT DEEP). According to Connecticut cancer data, Redding's cancer prevalence is approximately 11.8%, exceeding the 9% national prevalence (Connecticut Tumor Registry; CDC). The site's proximity to Factory Pond and the Norwalk River raises concern for both localized and downstream exposure pathways. Across all three municipalities, asthma surveillance and cancer incidence data indicate a measurable disease burden consistent with cumulative exposure to contaminated soil, groundwater, vapor intrusion, and air toxics associated with former industrial and municipal operations (CT DPH; Connecticut Tumor Registry). EPA Community-Wide Assessment funding will address these conditions by enabling targeted site assessments that identify contamination, define exposure pathways, and support cleanup planning that protects public health in communities with limited local capacity.

2.d. Economically Impoverished/Disproportionately Impacted Populations:

The Danbury and New Milford priority sites are located within downtown commercial districts proximate to low-income populations, where legacy contamination, deteriorated structures, and historic industrial and municipal uses have resulted in disproportionate environmental and economic burdens. In Danbury, the abandoned factory complex contains decaying buildings and suspected soil and groundwater contamination and is directly adjacent to public housing and surrounding low-income residential neighborhoods. These conditions present ongoing safety concerns, limit economic reinvestment, and increase the potential for exposure to environmental contaminants among populations with limited capacity to mitigate risk. EPA Community-Wide Assessment funding would enable site-specific testing needed to identify contamination and exposure pathways, reduce uncertainty, and support redevelopment planning consistent with the City's updated zoning, thereby reducing environmental burdens while improving readiness for affordable housing and mixed-use reuse that supports economic opportunity. In New Milford, the riverfront public works site is located near economically challenged neighborhoods along the Housatonic River, where suspected contamination and uncertainty constrain redevelopment and pose risks to environmental quality. Potential contaminated runoff and subsurface conditions may affect surface water, aquatic habitat, and downstream communities as the river flows through multiple municipalities to Long Island Sound. EPA assessment funding would provide the environmental data necessary to evaluate contamination and migration pathways, inform cleanup planning, and support the Town's downtown riverfront revitalization strategy. These actions would reduce environmental stressors affecting nearby low-income residents while enabling reinvestment that expands employment opportunities and public access to natural resources. In Redding, although overall poverty rates are lower, the Town experiences disproportionate impacts driven by limited local capacity, including a small population, constrained staffing resources, and reliance on volunteer-led redevelopment efforts. The 44-acre Gilbert & Bennett Wire Mill represents a significant environmental and economic challenge for the community. EPA assessment funding would support the technical evaluation needed to advance reuse planning, reduce long-term environmental risks, and enable redevelopment concepts that include senior serving uses, mixed commercial activity, and community amenities. These efforts would expand the commercial district, generate jobs and tax revenue, and improve environmental conditions for an older population that is particularly sensitive to environmental hazards. Across all three communities, EPA Community-Wide Assessment funding will help address disproportionate environmental, economic, and capacity-related impacts by generating site-specific environmental information needed to prioritize cleanup, reduce exposure pathways, and remove barriers to reinvestment. By supporting assessment in areas with documented vulnerability or limited local capacity, the project advances EPA's goals of protecting public health, promoting equitable redevelopment, and fostering sustainable community revitalization.

2.e.f. Community Engagement: WestCOG is committed to meaningful community involvement, consistent with EPA's emphasis on inclusive, transparent, and culturally responsive engagement. The partners below and

residents within the target areas will play an active role in site prioritization, reuse visioning, and evaluation of redevelopment impacts.

Name of Organization	Entity's Mission	Point of Contact	Specific Involvement in the project/assistance
Gilbert & Bennett Wire Mill Advisory Committee	Committee's goal is to reopen the Wire Mill property to the public in 2029, with a focus on enhancing the former mill's Main Office and <u>unlocking the potential of downtown Redding.</u>	<u>Julia Pemberton</u> jpemberton@redding.ct.gov	Provide community outreach in Redding, connection to potential developers, decision making on target sites. Julia will be beneficial with her years of brownfield knowledge at the Redding target site. Member of Regional Brownfield Coalition (RBC)
<u>The New Milford Economic Development Corporation</u>	Mission is to promote and assist the <u>growth, development and expansion of business and job opportunities</u> in New Milford.	<u>Oley Carp</u> [REDACTED]	Provide community outreach in New Milford and connection to investors and redevelopment Member of Regional Brownfield Coalition (RBC)
<u>Fairfield County Bank</u>	<u>Reinvest earnings back into the community</u> through commercial and residential lending and charitable giving.	Eric Erdtmann eric.erdtmann@fairfieldcountybank.com	Provide financial outlook and connection with investors for redevelopment. Member of Regional Brownfield Coalition (RBC)
<u>United Way of Coastal & Western Connecticut</u>	Committed to building our community <u>into a place where everyone can thrive.</u> We prioritize and leverage our strong partnership with the community to ensure our work is improving lives and creating a future of greater inclusion and equity.	Ashley Gaudiano ashley.gaudiano@unit-edwaycwc.org	Assist in defining community needs, housing data and community outreach. Member of Regional Brownfield Coalition (RBC)
Danbury Housing Authority	The Authority's mission, in support of the City of Danbury, is <u>to provide safe, affordable and decent housing</u> within the City of Danbury.	<u>Jennifer Delaney</u> idelaney@hacdct.org	Community outreach in Danbury, identify community needs especially as they relate to housing cost and availability, provide data to the RBC and engage reuse visioning regarding affordable housing.
Mount Pleasant AME Zion Church	Affiliated with the African Methodist Episcopal Zion Church (AMEZ), a historically African American Christian	Reverend L. Christopher Lewis [REDACTED]	Communication with local Danbury congregation, community outreach with sensitive populations, help to identify need and collect public input by meeting people where they are

	denomination, <u>committed to social justice and the empowerment of African Americans</u> within the Methodist tradition.		
<u>Danbury Office of Economic Development</u>	foster the health and expansion of existing businesses while <u>advocating for future growth within the city</u> . They aim to maintain Danbury as a thriving business community	Farley Santos f.santos@danbury-ct.gov	Danbury community outreach, engage investors, engage in future reuse planning that supports community need while also prioritizing economic growth and small businesses. Member of Regional Brownfield Coalition (RBC)

2.g. Incorporating Community Input: For each selected assessment, WestCOG and the RBC will host a neighborhood kickoff meeting and provide project updates during and after assessment. Outreach will include bilingual (English/Spanish) notices, ADA-accessible venues, interpretation as needed, and virtual participation options. Partners will support “meet people where they are” engagement through trusted community locations (e.g., churches, libraries, town halls). Public comments will be accepted throughout the project via email and the WestCOG website, and responses and updates will be posted online with project FAQs.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a-d. Description of Tasks and Activities:

Task/Activity 1: Cooperative Agreement Oversight
<p>a. Project Implementation: <u>EPA-funded tasks/activities</u> will include program management of tasks to implement the project. WestCOG will establish and convene the Regional Brownfields Coalition (RBC) made up of community connectors (first selectman, financial partners, nonprofits) to guide site prioritization, community engagement, and redevelopment strategy. WestCOG staff will perform procurement (RFP) in accordance with state and federal regulations to select a qualified QEP to conduct environmental assessments, brownfield inventory updates, participate with RBC and public meetings. WestCOG, RBC and QEP team will update the regional brownfield inventory and prioritize WestCOG’s potential brownfield sites. The team will develop a Brownfield Assessment application & eligibility framework for site selection, and solicitation of grants semi-annually. Staff will coordinate semi-annual meetings with the RBC for site selection to complete all required quarterly performance and financial reporting through EPA’s ACRES system in compliance with cooperative agreement terms. The RBC will also host one annual public meeting to review funding, projects and progress made, collect public input and considerations. Minutes prepared from public meetings with public comments will be available on WestCOG’s website and email. Two WestCOG staff will attend 2 National and 2 Regional Brownfields annual conferences. No other resources are needed.</p>
<p>b. Anticipated Project Schedule: Create the RBC (Months 1-2) Prepare RFP for qualified QEP selection (months 2-3), Establish application framework (Months 3-4), Update the brownfield inventory (months 5-6), 8 RBC site selection internal meetings throughout grant term (4-years), 1 annual public RBC meeting to review program progress, financials. Annual conference (2 National and 2 Regional) for 2 WestCOG staff attendance.</p>
<p>c. Task/Activity Lead(s): WestCOG; Jaclyn Giannini, Project Manager, will oversee brownfield inventory, QEP procurement and community communications. Betsy Paynter, Program Director, will oversee financial management, the RBC meetings and all elements of EPA Assessment funding, RBC members will review applications and provide guidance to WestCOG on site selection, QEP will help with brownfield inventory, community meetings and site selection/assessments.</p>

d. Output(s): Updated brownfield inventory, Assessment grant application with eligibility framework, minimum of 8 internal semi-annual meetings, 4 public annual RBC general meetings, 16 ACRES quarterly reports, QEP Procurement, 2 national and 2 regional conference attendance for 2 staff.

Task/Activity 2: Community Engagement

a. Project Implementation: EPA-funded tasks/activities once the selected assessment applications are granted, WestCOG, the RBC and selected QEP will host a public meeting to kick off each project in regional communities. The RBC will implement a coordinated outreach strategy including newsletters, multilingual flyers, digital updates, and partner-led communications to ensure broad and inclusive participation. Additional public progress meetings will be held in the middle of the project and at the end to update project progress and solicit public input in coordination with community partners. Follow up to public comments and questions will be addressed publicly and in writing on websites, emails and newsletters. No other resources are needed.

b. Anticipated Project Schedule: Approximately 16 public kickoff meetings over the 4-year grant period. With 32 progress and final public meetings supporting the estimated 10 Phase I EASs and 6 Phase II/III EASs Meeting announcement materials produced supporting the public meetings in Spanish and English.

c. Task/Activity Leads: WestCOG; Jaclyn Giannini; Project Manager will oversee the public meeting agenda and outreach with RBC and community partners, Betsy Paynter; Program Director will prepare financial updates and lead public meetings, RBC members will support the community outreach for public meetings, participate in public meetings, QEP will support community outreach, provide status and Q&A with public.

d. Outputs: 48 public meetings hosted by WestCOG, RBC, QEP. 48 meeting minutes from public meetings with responses to the community from all public input, follow up information posted on WestCOG’s website, via emails, newsletters, meetings as needed.

Task/Activity 3: Environmental Site Assessments (Phase I-II/III)

a. Project Implementation: EPA-funded tasks/activities will include Phase I, II, III Site Assessments on target sites in full compliance with ASTM E1527-21 and EPA Brownfields Program requirements. Phase I ESAs anticipated for the 3 target sites and 7 additional priority sites identified by the RBC. Phase II/III ESAs are estimated for the 3 target sites plus 3 additional sites. Site eligibility and access agreements will be obtained when necessary. No other resources are needed.

b. Anticipated Project Schedule: 2027/2028: Phase I and Phase II/III ESAs for 3 target sites, Q1-Q2, 2028 Phase I for 7 additional priority sites; Q3-Q4 2028, Q1-Q2 2029: Phase II for 3 additional priority sites.

c. Task/Activity Lead(s): Applicant to manage their assessment grant, QEP to perform assessments, WestCOG and RBC to hold public update meetings and select additional sites.

d. Output(s): 10 Phase I ESA Reports, estimate of 6 Phase II/III ESA reports, quarterly internal check-in meetings with QEP as needed.

3.e. Cost Estimates:

Budget Category		Project Tasks (\$)				Totals
		Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Environmental Site Assessments	Administrative Costs	
Direct Costs	Personnel	\$7,500	\$10,000	\$7,500	\$12,535	\$37,535
	Fringe Benefits					
	Travel ¹	\$8,211	\$300	\$300		\$8,811
	Equipment ²					
	Supplies	\$545	\$300	\$300		\$1,145

	Contractual		\$5,000	\$410,221		\$415,221
	Construction ³					
	Other					
	Total Direct Costs⁴	\$16,256	\$15,600	\$418,321	\$12,535	\$462,712
	Indirect Costs⁴	\$7,451	\$9,934	\$7,451	\$12,452	\$37,288
	Total Budget	\$23,707	\$25,534	\$425,772	\$24,987	\$500,000

Task 1 Oversight: \$7,500 personnel cost for program oversight (150 hours \$50/hour); **\$8,211:** Travel:

Travel Costs: 4 Conferences, EPA National (2027 and 2029, assuming Oklahoma City rate for 2027 and 2029) EPA Region 1 (2026, 2028, assuming Region One Newport, RI rates for 2026 and 2028) sending two staff = \$8,211

- National conferences total cost = \$5,995.08,
 - Airfare \$678 round trip/person/trip, based on USGSA rates to OK City
 - Milage and parking (to airport): \$210.77/person/trip, office to Bradley In't airport
 - Hotel (3 nights) = \$348/person/trip. (GSA rates in OK City)
 - Food (4 days) = \$272 /person/trip
- EPA Region 1 Conferences total cost = \$2,255.6
 - Milage = \$147.9 /person/trip
 - Hotel (2 nights) = \$280/person/trip, based on USGSA rates in Newport, RI for both trips
 - Food (2 days) \$136/person/trip

\$545 supplies/community engagement, communications, flyers, RBC meetings. **\$7,451** Indirect Costs calculated based on Negotiated Indirect Cost Rate Agreement (NICRA) of 99.34%. **Total=\$23,707.** **Task 2 Community Engagement: \$10,000** personnel, conduct public outreach, public meetings (200 hours \$50/hour); **\$300** for travel to meetings (mileage/tolls); **\$300** for supplies for community engagement, communications, flyers, RBC meetings, **\$5,000** contractual for QEP to assist inventory preparation and review/guidance, communications and public meetings. **\$9,934** Indirect Costs calculated based on NICRA of 99.34%, **Total= \$25,534.** **Task 3 Environmental Site Assessments: \$7,500** for personnel cost (150 hours @ \$50/hour); **\$300** for travel to meetings/sites; **\$300** supplies for community engagement, communications, flyers, RBC meetings; and **\$410,221** contractual for QEP to conduct 10 site-specific Phase I ESAs (10 @ \$6,000/each = \$60,000), and Phase II & III ESAs for an estimated 6 sites (6 @ \$58,370/each = \$350,220). Indirect Costs calculated based on NICRA of 99.34%. **Total=\$425,772.** **Administrative Cost: Total=\$24,987**

3.f. Plan to Measure and Evaluate Environmental Progress and Results: WestCOG will implement a structured project management and performance-tracking system to monitor schedules, expenditures, deliverables, and outcomes, utilizing Excel as a tracking system. WestCOG, the RBC, and, selected QEP will develop projected timelines and anticipated outcomes. Project tracking reports will be shared with all parties and presented during RBC and QEP meetings. This will ensure successful project management, keep projects on schedule, and consideration of additional tasks depending on budget. WestCOG will submit quarterly reports as required in ACRES. Success will be measured by completion of assessments and planning documents, increased readiness for cleanup funding, and demonstrated progress toward redevelopment outcomes such as job creation, improved environmental quality, and enhanced public health.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a.b.c. Organizational Capacity, Structure and Description of Key Staff: WestCOG has seventeen employees, over a decade of experience administering complex, multi-million-dollar federal and state grants, with strong systems for fiscal oversight, procurement compliance, and performance reporting. One Program Manager and one Program Director with environmental and economic development experience manages WestCOG's Brownfield Program. Jaclyn Giannini, Project Manager, has a B.S. in Biology (Environmental Science) and

experience performing environmental Phase I and II assessments and QAPPs. Jaclyn is currently managing an EPA funded sewer infrastructure feasibility study and a flood assistance program. Betsy Paynter, Program Director, has a bachelor's degree and fifteen+ years of experience in Economic Development. She leads the Western Connecticut Economic Development District (WCEDD), EDA Planning Partnership grant, and has experience in business and community development, land use, and brownfield assessments/remediation. Francis Pickering, Executive Director, has twenty+ years of experience in land use and transportation planning, GIS and policy development. Francis holds a B.A. from Princeton University, an M.A. in Environmental Management and an M.A. in Geography. Francis will participate as a RBC member and provide oversight. Michael Towle, Deputy Director, holds a B.S. in Environmental Science, an M.S. in GIS with 10+ years of experience in environmental planning, analytics and public outreach. Michael has managed federal and state grant programs successfully performing contractual oversight and budget development. Michael will assist with oversight in grant management and processes. Victoria Ricks, Financial Director, has a bachelor's degree in accounting and over twenty years of financial management and grant reporting, tracking and record keeping. Victoria will manage the grant funds, process payments and prepare reports.

4.d. Acquiring Additional Resources: Appendix A of WestCOG's adopted Procurement Policy (2024) addresses policies applicable to EPA grants. This Policy will ensure fair and open competition for the procurement of a consultant to conduct environmental assessment work. Requests for Proposals (RFP) are solicited in compliance with local, state and federal laws and regulations including 2 CFR Part 200; with 40 CFR 33.301, and (if applicable) 2 CFR 1500.4(b). WestCOG procurements also follow standard practices outlined in Appendix A for fund accounting, accounts payable, timekeeping/payroll, and drawing of federal funds. WestCOG has implemented the Policy to help all its municipalities compete successfully for grant funds and manage awards, particularly where municipal staff resources are modest.

4.f. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

4.f.1. Purpose and Accomplishments: WestCOG manages the WCEDD, the region's Economic Development District, EDD. Members represent a range of regional business sectors, who develop the 5-year regional Comprehensive Economic Development Strategy (CEDS). The WestCOG was awarded two rounds of a three-year EDA Planning Partnership Grant in the amount of \$210,000 per round to develop and implement the CEDS, in concert with the WCEDD. This grant is similar in terms of scope and relevance in structure, community engagement, and/or deliverables to the proposed brownfield assessment project. Since 2015, WestCOG has managed two Metropolitan Planning Organizations (MPOs), receiving \$2,000,000 in annual funding for comprehensive transportation planning from CT DOT. The MPOs' Unified Planning Work Programs (UPWP) are reviewed by CT DOT, FHWA and FTA, which outline transportation planning activities carried out over a two-year period.

4.f.2. Compliance with Grant Requirements: WestCOG complies with EDA grant requirements, submitting biannual grant progress reports, quarterly financial payment requests, and projects that are produced by grant guidelines. The WCEDD is preparing for a CEDS update later this year with renewal due 2028, compliance of a five-year update per the EDA. WestCOG complies with quarterly reports to CT DOT, FHWA, and FTA regarding progress, output and outcomes and funding. Across multiple federal programs, WestCOG has consistently met performance milestones, maintained budget discipline, and shown strong stewardship of public funds, positioning the organization to successfully implement this EPA Community-Wide Assessment Grant. WestCOG staff have successfully completed the required quarterly grant progress, providing an overview of key accomplishments and milestones, financial updates, identified risks, and overall progress to date.

Threshold Criteria for Assessment Grants

1. **Applicant Eligibility:** The Western Connecticut Council of Governments (WestCOG) is a Regional Council established under the governmental authority or group of General-Purpose Units of Local Government established under Federal Government. WestCOG is eligible to apply as a “political subdivision of the state” and “general purpose unit of local government” for the purpose of the EPA Brownfield program, pursuant to Connecticut Gen. Stat. 84-24j and B-31a. This attachment serves as certification of the Western Connecticut Council of Government’s (WestCOG) compliance with section III.B., Applicant Eligibility. Enabling statutes are available for your review at the following:
 - https://www.cga.ct.gov/current/pub/chap_295.htm#sec_16a-4c
 - https://www.cga.ct.gov/current/pub/chap_050.htm#sec_4-124i
- a) Indicate if your organization is exempt from Federal taxation under section 501(c)(3) of the Internal Revenue Code. A copy of WestCOG’s tax exempt status certificate is attached.
2. **Description of Community Involvement:** WestCOG staff will communicate brownfield assessment project progress to the local communities through the Regional Brownfields Coalition (RBC) which is comprised of a diverse membership of municipal economic development professionals, community organizations and business groups across the region. Additional outreach to residents, municipalities and property owners include articles in WestCOG’s monthly newsletters, flyers, WestCOG’s social media channels, announcements at monthly Western Connecticut Council of Governments meetings and with Western CT Economic Development District Council (WCEDD) quarterly meetings. The RBC will host one public annual program meeting and project kick off public meetings for all assessments in each community to solicit input. Community input will be accepted in person and in writing through email. Community input and feedback will be considered and incorporated into the design and redevelopment plans. All meetings will support bilingual populations with other languages made available, as needed upon request. There will be a dedicated landing page on WestCOG’s website to also inform the region’s communities about the RBC program, grant application details, solicitation and meeting schedules.

WestCOG will work with community-based organizations, such as the Zion Church, The United Way, local economic development to connect with neighborhoods and encourage resident participation in target project communities. The organization is highly involved in community needs assessment and services and has direct access to the residents in the target areas. Meetings will be set up to solicit input from the community about what they would like to see in their neighborhood and communicate the cleanup process, timelines and how results will be communicated. Questions raised at the meetings will be compiled into a FAQ sheet that will be posted on the website. We will also provide a sign-in sheet at each meeting to collect email addresses so staff can send monthly emails to keep interested residents informed about the project. Meetings will be advertised in Spanish and English. Sign language interpretation and translation services will be available.
3. **Expenditure of Existing Grant Funds:** Western Connecticut Council of Governments does not have an open EPA Assessment Grant currently.
4. **Contractors and Named Subrecipients:** The Western Connecticut Council of Governments has not selected or procured contractors, nor named subrecipients.