



January 27, 2026

RE: FY2026 EPA Brownfields Assessment Coalition Grant Application

The Windham Regional Commission and its coalition members, the Towns of Rockingham and Brattleboro, are very pleased to submit this application for \$1,000,000 of EPA Brownfields funds to expand our successful community-wide brownfields assessment program to a new coalition approach.

Since 2000 the Windham Region Brownfields Reuse Initiative (WRBRI), a program of the Windham Regional Commission, has been instrumental in the redevelopment of properties that have been abandoned or underused due to real or perceived contamination. Due to the continued demand to redevelop brownfield sites in the region, we are applying for \$1,000,000 of assessment funds to be used throughout the Windham Region and within our proposed coalition target areas. Funds will be used primarily for site assessments and cleanup planning; however, public outreach, and the ongoing development and implementation of redevelopment strategies for brownfield properties will also be a significant component.

Narrative Information Sheet

- 1) **Applicant Identification:** Windham Regional Commission
139 Main Street, Suite 505
Brattleboro, VT 05301
UEI: CN8MYY4JRVL3
- 2) **Website URL:** Windham Regional Commission <http://www.windhamregional.org/>
Town of Brattleboro <https://brattleboro.gov/>
Town of Rockingham <https://www.rockinghamvt.org/>
- 3) **Funding Requested:**
 - a. **Assessment Grant Type:** Assessment Coalition
 - b. **Federal Funds Requested:** \$1,000,000
- 4) **Location:** The geographic area will include the 27 southeastern Vermont towns that compromise the Windham Regional Commission (WRC).
 - a. **Cities/Towns:** 23 towns - Athens, Brattleboro, Brookline, Dover, Dummerston, Grafton, Guilford, Halifax, Jamaica, Londonderry, Marlboro, Newfane, Putney, Rockingham, Somerset, Wardsboro, Westminster, Weston, Whitingham, Wilmington, Windham, Winhall and Vernon - in Windham County; the neighboring

towns of Readsboro, Searsburg, and Winhall in Bennington County; and Weston in Windsor County.

b. Counties: Windham County, Bennington County and Windsor County

c. State: Vermont

5) Target Area and Priority Sites:

Coalition Lead: Windham Regional Commission Target Area 1) Towns of Putney and Dummerston; and 2) Small communities and village centers throughout the Windham Region (outside of Brattleboro, Rockingham, Putney and Dummerston)

- Priority Site #1 is Soundview Vermont Holdings, 3 Mill St., Putney & Kathan Meadows Rd., Dummerston
- Priority Site #2 is the Windham School Site, 5940 Windham Hill Road, Windham

Coalition Non-lead Member: Town of Brattleboro; Target area is the Core Downtown Area of the Town of Brattleboro

- Priority Site #3 is Former McNeill’s Brewery, 90 Elliot St., Brattleboro

Coalition Non-lead Member: Town of Rockingham; Target area is the Village of Bellows Falls within the Town of Rockingham

- Priority Site #4 is Moore and Thompson Paper Mill Complex, 33 and 29 Bridge St., Bellows Falls

6) Contacts:

Brownfields Project Director

WRC Chief Executive

Susan Westa, Program Manager
 Windham Regional Commission
 139 Main Street, Suite 505
 Brattleboro, VT 05301
 802-257-4547, ext.108
swesta@windhamregional.org

Christopher Company, Executive Director
 Windham Regional Commission
 139 Main Street, Suite 505
 Brattleboro, VT 05301
 802-257-4547, ext.106
ccampany@windhamregional.org

7) Population: The Windham Regional Commission’s service area has a population of 48,538 according to the 2020 U.S. Census. WRC’s Priority Sites are located in Putney, population 2,617, Dummerston, population 1,865, and Windham, population 449. The Nonlead Members and their Priority Sites are the Town of Brattleboro with a population of 12,184; the Town of Rockingham with a population of 4,832.

8) Other Factors Checklist

Other Factors	Page #
Community population is 15,000 or less.	1 & 2
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA

The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous 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)	2
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4
At least 30% of the overall budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority sites within the target area(s).	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	NA

- 9) **Letter From State Environmental Authority:** Attached is a letter from Sarah Bartlett, Brownfields Program Coordinator, Sites Management Section/Waste Management and Prevention Division, Department of Environmental Conservation, Vermont Agency of Natural Resources.
- 10) **Releasing Copies of Applications:** This application does not contain confidential, privileged or sensitive information.

If you have any questions about the proposal or the WRBRI program please contact Susan Westa, WRBRI Program Manager (802-257-4547 x108). We hope for and look forward to an opportunity to continue this important work.

Sincerely,



L. Christopher Company
Executive Director



Susan Westa, AICP
Brownfields Program Manager

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

January 7, 2026

Windham Regional Commission
Attn: Chris Company
139 Main Street, Suite 505
Brattleboro, VT 05301

Dear Mr. Company:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Windham Regional Commission (WRC) along with the Towns of Brattleboro and Rockingham, intends to apply for an EPA FY26 Brownfields Assessment Coalition Grant, and if awarded, to utilize the grant funds to conduct assessment activities associated with the characterization of brownfield properties within Brattleboro and Rockingham, as well as the WRC service area as a whole.

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

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

Best of luck in the competition.

Sincerely,



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

CC: Sue Westa – WRC
Dorrie Paar – USEPA



Narrative

1. Project Area Description and Plans for Revitalization

Coalition Members, Target Area and Brownfields

a. Coalition Members

The Windham Regional Commission (WRC), the lead coalition member, is a regional planning organization encompassing the 23 towns of Windham County, as well as the towns of Readsboro, Searsburg, and Winhall in Bennington County and Weston in Windsor County. The non-lead coalition members are the Town of Brattleboro and the Town of Rockingham. Both communities are local governments within the Windham Region. Both towns have very limited financial resources and lack capacity to apply for, administer and manage brownfields grants and the Town of Rockingham has never received an EPA brownfield grant. Although Brattleboro is the largest WRC community, population 12,184, and has some staff, they also have significant needs and limited capacity to do this work alone. Rockingham, population 4,832, does not have the capacity to conduct this work nor do they have the experience of managing a large federal grant. Both communities have significant brownfields issues and rely on WRC to provide funding assistance and oversee assessment work and cleanup work. In the past, a significant amount of WRC's assessment funds have gone to addressing contamination in both towns.

b. Overview of Brownfields Challenges and Description of Target Areas

Southeastern Vermont is recognized as a bucolic vacation destination. However, the region's rural economic stagnation and abandoned or underutilized former industrial sites, result in limited opportunities for the people that live here. Contaminated industrial and commercial sites preclude redevelopment where it is otherwise well-suited, depriving communities of jobs, housing, services, revenue, and anchor social and commercial institutions.

The Windham Region is comprised of 27 towns in a 920 sq. mile area, which are the geographic boundaries for this grant application. The total population of the region is 48,538 (2020 Census). None of our communities have a population over 15,000. Brownfields challenges are found in or near historic compact settlements, downtowns and village centers located along rivers and streams. **A total of 510 hazardous sites have been identified throughout the Windham Region.** This includes 143 hazardous sites in Brattleboro and 69 in Rockingham.

The lead coalition member has identified two target areas: 1) the Towns of Putney and Dummerston and 2) the remaining 23 small rural communities and village centers within the Windham Region outside of other target areas. Many village centers were historic locations of early manufacturing located along rivers and streams, including printing presses, textile, lumber and paper mills. The non-lead coalition members located on the Connecticut River are the Towns of Brattleboro and Rockingham. Brattleboro's target area is the core downtown, including the state designated downtown located on Main, High, Eliot and Flat Streets. Rockingham's target area is the Village of Bellows Falls, including the Bellows Falls Island and Under the Hill. These target areas are the location of residences, childcare centers, nursing homes, schools, hospital/health centers, homeless shelters and affordable housing developments, and have been examined by WRC in relation to existing and completed brownfield sites. Sensitive populations can be found within a quarter mile of brownfield sites. Prior to entering WRC's program, part of a former manufacturing site was developed as an Early Head Start program in Brattleboro. Testing revealed high levels of arsenic in the playground soils before cleanup. Assessing brownfields contamination and ultimately cleaning up contaminated sites opens up redevelopment opportunities in small villages and downtowns in our target areas which cannot be done without this grant to support the region.

c. Description of the Priority Brownfield Site(s)

WRC has identified Soundview Vermont Holdings properties as a priority site in the target area of Putney and Dummerston. **Soundview Vermont Holdings properties are located at 3 Mill Street in Putney (population 2,617) and Kathan Meadows Road in Dummerston (population 1,865).**

These five parcels are located along Sacketts Brook (paper mill) and the Connecticut River (warehouse), total 62 acres and are the former location of a paper mill and warehouse that closed in 2024. This closer has negatively impacted the economy and employment opportunities in the area. A portion of the warehouse site in Dummerston is located within the 100-year floodplain. Contaminants of concern are related to the paper mill, USTs, a paper sludge lagoon and a warehouse. A fuel oil spill occurred in 2023 and has resulted in ongoing remedial efforts. Funding will be needed for a Phase I/II ESA, HBMA, ABCA/Corrective Action Plan (CAP) & Reuse Plan. Redevelopment of these sites is a priority for Putney and Dummerston because of the known environmental contamination issues. The communities also understand the important opportunities these sites present due to their location in the village center and within close proximity to I-91.

WRC's second target area is the region's small rural communities and village centers (outside of other target areas). **The priority site within this area is the Windham School site.** The school (3.7-acre site) was recently closed due to very low attendance, an issue for many of our small rural communities and more schools will be closing in the near future. The Town of Windham, population 449, would like to reuse the school as a community center, town office space, as well as office space for rent. A recently completed Phase I identified environmental issues related to an existing UST, an onsite septic system (hazardous products) and potential building materials including asbestos, lead and PCB's. There will be a need for Phase II, HBMA and ABCA/CAP.

Brattleboro's priority site is the former McNeill's Brewery site at 90 Elliot Street. This 0.05-acre parcel, located in the core downtown, is the former location of police and fire stations and a brewery. Multiple brownfields sites are in close proximity, including a fire station and multiple dry cleaners. Additional testing is needed for VOCs (Naphthalene) and PFAS which were found above standards. An ABCA/CAP will be needed prior to cleanup. The town would like to redevelop the site for housing. In 2021, the town completed a Housing Action Plan that identified an immediate need for over 500 additional housing units. This site's location within the core downtown makes it ideal for new housing development.

Rockingham's priority site is the Moore and Thompson Paper Mill Complex located at 33 and 29 Bridge Street in Bellows Falls, a village within the town. The site consists of two parcels totaling 1.66 acres on the Connecticut River and a portion of the 29 Bridge Street site is located within a 100-year floodplain. The site is the location of a former paper mill and other manufacturing uses. One UST was removed and there have been multiple reported environmental violations. Hazardous waste was generated related to optical instrument and lens manufacturing. Methyl ethyl ketone, nonhalogenated solvents are a concern as well as other contaminants related to the paper mill. Funding will be needed for a Phase I/II ESA, HBMA, ABCA/CAP & Reuse Plan. This site is located on the Bellows Fall Island and Under the Hill, within the scope of a recently completed Areawide Plan.

d. Identifying Additional Sites

WRC's Brownfields Steering Committee led by the Program Manager oversees the Windham Region Brownfields Reuse Initiative (WRBRI) program and meets bi-monthly. WRBRI's structure and committee membership have ensured the success of WRC's previous brownfield programs and will easily continue that record of success with the proposed Coalition Assessment

Grant project. The Steering Committee is made up of Windham Region Commissioners who represent towns and are appointed by Selectboards. Non-lead coalition members are represented, as well as stakeholders from the development community. Applicants submit a completed Site Nomination form to the Committee who is responsible for evaluating sites and uses a prioritization matrix. The criteria consider site reuse plans, economic impact of reuse, ability to leverage private investment, reuse of historic structures, other neighborhood and community benefits, relation to local and regional plans, open space provisions and sustainability measures. Having these robust and proven systems in place will benefit the proposed Coalition Grant project.

Revitalization of the Target Area

e. Reuse Strategy and Alignment with Revitalization Plans

State, regional and municipal policies make compact settlement and mixed-use development a priority in Vermont. The Windham Regional Plan, and Brattleboro and Rockingham's Town Plans direct redevelopment opportunities to village centers and areas where growth will minimize infrastructure expansion, revitalize the area and help manage the cost of services for residents.

WRC's target areas are Putney and Dummerston, as well as the region's rural communities and village centers. The Soundview priority sites, located in Putney's village center and near Rt. I-91 in Dummerston, are a key redevelopment parcels. Putney updated their Town Plan in 2023 and is in the process of updating their zoning bylaws. Village redevelopment is a priority for the town and they are preparing a Comprehensive Village Plan to further implementation of the town plan. Putney and Dummerston would like to see redevelopment of these priority sites for housing and commercial uses to support the area. The Windham School priority site is the town's top redevelopment priority and they recently commissioned a study to analyze reuse alternatives.

Brattleboro updated their Land Use and Development Regulations in 2023 in part to promote additional housing development in the core downtown and surrounding neighborhoods. The priority site at 90 Elliot Street is located in the core downtown. The town would like to pursue redevelopment of this site for housing to address a significant need identified in a 2021 Housing Action Plan. The priority project is an important step toward addressing that need.

The Bellows Falls Island and Under the Hill Area of the Town of Rockingham have been the focus of various studies, including an Areawide Plan in 2023 and technical assistance through EPA's Land Revitalization Program. The priority site at the Moore and Thompson Paper Mill Complex is an important piece of this redevelopment. The town would like to reuse the upper mill site as an artist and light manufacturing incubator space and the lower mill as part of the food hub that is planned for the former Robertson Paper Mill Site (cleaned up) with freezer and cooler storage for farmers/producers. The location of these sites in close proximity to the downtown, the train station and free electric power make them important redevelopment parcels for the town.

f. Outcomes and Benefits of Reuse Strategy

Brownfield assessment and cleanup will lead to redevelopment, which will raise tax revenue, create new commercial and/or light industrial opportunities, as well as jobs and homes. Potential economic benefits are among assessment site selection criteria. We anticipate that new jobs will be created through assessment and ultimate cleanup that results from this grant, as well as construction jobs related to site redevelopment. Revitalization of village centers and downtowns enables formerly blighted property to contribute to the local economy by fostering new businesses, the arts, affordable and accessible housing and green infrastructure for floodwater attenuation.

Redevelopment outcomes for WRC's Priority Site in Putney's village center and Dummerston

fully supports ongoing village and housing planning efforts. Putney’s Comprehensive Village Plan RFP states that “Putney has suffered a long economic decline with lost jobs, an aging population, a struggling Village Center, and a severe lack of access to affordable, healthy, accessible, and climate-resilient housing to meet current and future resident needs.” Redevelopment of the Soundview site for a mix of uses, including housing and commercial use, will play an important role in reversing that trend. Redevelopment outcomes for reuse of the Windham School directly benefits the town which has lost an important community anchor.

Housing is the focus of plans for Brattleboro’s Priority Site at 90 Eliot Street. The location of this parcel within the core walkable downtown makes it very attractive for new affordable housing. Services to meet daily needs are located in close proximity, as well as public transit. A building previously located on this site was demolished after a fire in 2022. This infill development opportunity will help the community address the affordable housing needs of its lower income residents. Use of renewable energy features and energy efficiency measures are considered an integral component of this development.

Reuse outcomes for the Moore and Thompson complex in Bellows Falls are an important next step to rounding out redevelopment of the Island and Under the Hill. This reuse will complement ongoing redevelopments including the train station, a food hub, housing development and an Island trail system. New employment opportunities will be supported by the development of a manufacturing and artist incubator space and food storage related to the planned food hub. All island development will incorporate resilience measures, like the train station redevelopment currently underway which includes structural improvements to protect against future flood events.

Strategy for Leveraging Resources

g. Resources Needed for Site Reuse

This grant will provide assessment data needed to reduce risk and stimulate the availability of additional funding to further cleanup and redevelopment. WRC and its coalition members have established partnerships and working relationships with many funding sources and programs to leverage brownfields funds and cleanup sites. These include VT Brownfields Technical Assistance, VT Brownfields Revolving Loan Fund, VT Petroleum Cleanup Fund, VT Community Development Block Grant (CDBG), EPA Assessment and Cleanup grants, and USDA Rural Development. WRC will continue to assist with site redevelopment and support funding requests and technical assistance through VT and Federal Tax Credits (New Market, Historic, Affordable Housing), CDBG, Windham County Economic Development Program, VT Economic Development Authority, USDA Rural Development, National Park Service Rivers & Trails Program, VT Community Loan Fund and VT Community Foundation.

WRC brownfields assessment and cleanup funds can leverage other funds needed to redevelop the target areas and priority sites in Brattleboro, Rockingham, Putney, Dummerston and Windham. These projects are complex and expensive, requiring all potential funding sources. WRC continues to work with funding partners to leverage funds needed to move important affordable housing and economic development projects forward and to improve the environmental health of the region.

h. Use of Existing Infrastructure

WRBRI prioritizes use of existing infrastructure and revitalizing blighted property when remediation allows. This is among assessment site selection criteria. Assessment funds target reuse of historic structures and sites within downtowns and villages. All four Priority Sites will utilize existing infrastructure since they are located in downtowns or villages. Putney, Brattleboro and

Rockingham's centers are served by wastewater and water supply systems, sidewalks and roads. Rockingham's Priority Site will reuse existing structures to the extent possible (partial demolition may be required). Brattleboro's site is currently vacant. It is unclear if the structures at Putney/Dummerston's site will be reuseable and the Windham School structure will be reused.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

The Windham Region is rural. The largest towns, Brattleboro and Rockingham (including the Village of Bellows Falls) have populations of 12,184 and 4,832, respectively (2020 Census). WRC's Priority Sites are in the Towns of Putney and Dummerston with populations of 2,617 and 1,865, respectively. 41% of Windham Region towns have fewer than 1,000 residents and lack the fiscal or admirative capacity to fund assessment activities. WRC's second Priority Site is in the town of Windham with a population of 449. The cost per person of delivering basic infrastructure and services, such as roads and education, is high. WRC receives most of its funding through grants and a performance-based contract with the state. WRC received additional brownfields assessment funding from the state in recent years, however that funding source ends this year and regional needs remain significant. If successful, this grant will meet those needs by providing funding for new assessment work.

Income data indicates that a significant percentage of our targeted communities' residents fall below county, state, and national median income levels. Windham County has the lowest median income at approximately \$58,100¹, compared to the state of Vermont and other Vermont Counties. Brattleboro and Rockingham's very low median incomes are \$47,500 and \$54,800, respectively. Brownfield site rehabilitation represents an important opportunity to improve area communities, provide economic growth opportunities and improve public health.

b. Health or Welfare of Sensitive Populations

Brattleboro's core downtown area has significant percentages of sensitive populations. 19.3% of Brattleboro residents live under the poverty line and 19% of those residents are children. Two downtown Brattleboro census block groups have high limited English-speaking populations of 3.4% and 4%, and education rates are lower than state averages with 24.3% of area residents holding a bachelor's degree compared with 49.3% statewide. There are also significant older populations within these tracts with almost 25% of residents reported as elderly, which is in line with state averages.²

The Town of Rockingham also has a significant percentage of sensitive populations. The Village of Bellows Falls has a 13.9% poverty rate overall and 27.5% of those are children. The Village has a high percentage of population with less than a high school education at 16%. The Windham Region also has a high percentage of sensitive population of those over 64 years of age at 21%.³

Many Windham Region villages, especially non-lead coalition target areas, have high poverty, low median incomes, crime, and health issues (lead and asthma). Due to the industrial heritage and dense development of the non-lead target areas, sensitive populations have been disproportionately impacted by the large numbers of brownfields sites. All brownfields sites in Brattleboro and Rockingham are located in areas where 25% and 23% of households respectively, are eligible for

¹ Area Median Income County Data Table: housingdata.org: (HUD) 2025

² 2023 American Community Survey 5-year estimates for Poverty, Education, Language

³ 2023 American Community Survey 5-year estimates for Poverty, Education, Language

SNAP benefits, an indication of the intersecting adversity of populations in the target areas. Brownfields occupy prime industrial and commercial sites in Windham Region communities, shifting the tax burden disproportionately on homeowners. Tax rates in our target communities are some of the highest in Vermont, contributing to financial hardship and instability for sensitive populations.⁴ Blighted sites contribute to crime making these communities less desirable for redevelopment. Brattleboro experiences the third highest crime rate in the state⁵, whereas Bellows Falls is slightly below that number⁶.

Brownfield sites in the Windham Region create severe health risks for sensitive populations due to the presence of hazardous contaminants such as solvents, petroleum products, PAHs, PCBs, arsenic, lead, heavy metals, VOCs, and asbestos. Addressing brownfields issues throughout the region's target areas with the support of this grant will have a significant positive impact on the environmental health of sensitive populations by removing blight, reducing risk factors associated with brownfields, increasing quality of housing and improving quality-of-life for sensitive populations in Brattleboro, Bellows Falls and throughout the region.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Lead levels in perimeter soils at pre-1950 Vermont homes commonly test at two to nearly four times EPA cleanup levels for play areas.⁷ In the coalition's non-lead target areas, approximately 70% of Brattleboro's homes and 81% of Bellows Falls' homes were built before 1950.⁸ The percentage of 1 and 2 year old's in Vermont who had blood lead levels greater than or equal to 5 µg/dL during the period from 2006 through 2017 decreased from 19% and 22% respectively, to 10.4% for 1 year olds and 8.2%⁹ in two year old's respectively, however these levels are still a concern¹⁰.

The prevalence of asthma in Vermont has historically been among the highest in the nation with the 10th highest asthma rate out of 53 US States and Territories¹¹. In 2022, the prevalence of asthma in Vermont adults, 12%, was greater than the U.S asthma prevalence, 9%¹². Vermonters with a high school education or less, saw an increase in asthma from 16% in 2010 to 22% in 2017 and low-income households saw an increase from 15% in 2010 to 22% in 2017¹³. These numbers are in line with expected cases throughout the Windham Region. Those who rent, have a disability, less education or a lower household income are more likely to be diagnosed with asthma. Women also are 3% more likely to have asthma than males (12% v.15%).¹⁴

Cancer is the leading cause of death in Vermont¹⁵. The rate of new cancers and cancer deaths in Vermont also exceeded the national average with 454.7 per 100,000 people versus the US rate of 442.2¹⁶. Brownfield sites in the Windham Region's target areas often contain known carcinogens

⁴ VT Department of Taxes - FY 15 Vermont Tax Rates by Town (tax.vermont.gov/content/tax-rates-county-2015)

⁵ Brattleboro Reformer: 12/14/22 "Brattleboro has second highest crime rate in Vermont"

⁶ Datacommons.org: Overall 2023 Crime Rate: All Crimes

⁷ Vermont Office of the Attorney General and Department of Health. "Get the Lead out of Vermont." 2007.

⁸ 2009-2013 American Community Survey 5-Year Estimates, DP04 Selected Housing Characteristics

⁹ VT Dept. of Health: <https://www.healthvermont.gov/environment/tracking/childhood-lead-poisoning>

¹⁰ 2018, Vermont Department of Health, *Lead Poisoning Prevention: Report on 2017 Program Outcomes and Activities*

¹¹ VT Dept of Health: Asthma in Vermont

¹² American Lung Association: Current Asthma Demographics: 2022

¹³ Vermont Department of Health, "Vermont Asthma Goal Tracker" August 2019.

¹⁴ VT Dept of Health: Asthma in Vermont

¹⁵ Vermont Cancer Data Pages: 2024

¹⁶ VT Dept of Health: Vermont Cancer Registry: 2023

like lead, asbestos, PCBs, VOCs and PAHs. These contaminants also contribute to high rates of asthma and high lead levels. Assessment and eventual cleanup of WRC’s Priority Sites and others through this grant will reduce risk factors that exacerbate the prevalence of adverse health effects on sensitive populations through exposure to contamination such as heavy metals and asbestos.

d. Economically Impoverished/Disproportionately Impacted Populations

Economically disadvantaged populations throughout the Windham Region disproportionately bear the negative environmental and health consequences of historic industrial and commercial activity. Residents who live in close proximity to brownfield sites in the target areas of Rockingham and Brattleboro, as well as Windham Region villages, have a greater likelihood of developing certain types of cancers, asthma and high lead levels. These negative health impacts exacerbate existing economic hardship, as many neighborhoods in the target area live in poverty.

Surveying potential brownfield sites in the Windham Region there appear to be several that would be ideal for increasing access to health care and services. These sites are in downtown or village center locations with strong transportation links and access to impacted sensitive populations. As indicated previously, the priority sites in the Windham Region include sites on Bellows Falls Island, a site on Elliot Street in Brattleboro, the former Sound View Paper Mill in the center of Putney Village (WRC’s 4th largest town) and Dummerston, and the Windham School (WRC’s 6th smallest town). Assessment and cleanup of these sites will impact the Windham Region in positive ways besides the removal or containment of contaminated materials. Assessment and eventual clean-up will provide quality jobs in areas that sorely need them. These jobs, coupled with outreach and training programs could impact the long-term poverty and health issues discussed above. Additionally, sites will be redeveloped for much needed affordable housing and permanent new jobs that directly impact underserved populations throughout the region, as well as improving environmental health.

Community Engagement

e. Project Involvement and f. Project Roles

WRC will continue to engage with a broad constituent and stakeholder base, provide updated project information, facilitate public dialogue, and provide opportunities for public participation regarding site selection for assessments, cleanup and reuse. WRC partners serve in advisory roles on an as needed basis. Non-lead coalition members will be informed and engaged throughout the project with representation on the Brownfields Steering Committee, who selects sites (including priority sites) for assessment and cleanup.

WRC partners include:

Partner Name	Point of Contact	Role/Commitment
Bellows Falls Downtown Development Alliance	Casey Griffin, 806-460-2333 bfdda1@gmail.com	Advisor on downtown issues & outreach to downtown property owners
Brattleboro Development Credit Corporation	Adam Grinold, 802-257-7731 Ext. 224 agrinold@brattleborodevelopment.com	Steering Committee member, Advisor on industrial & economic developments needs and regional sites identification
Brattleboro Savings & Loan	Stephanie Huestis 802-275-3983 shuestis@brattbank.com	Financial Advisor for future reuse planning projects and for cleanup grants/loans

Town of Brattleboro	Sue Fillion, 802-251-8154 sfillion@brattleboro.org	Non-lead Coalition & Steering Committee Member
Downtown Brattleboro Alliance	Kate Trzaskos 802-257-4886 kate@brattleboro.com	Advisor on downtown issues & outreach to downtown property owners
Preservation Trust of Vermont	Ben Doyle, 802-839-9914 ben@ptvermont.org	Advisor on historic pres. & reuse technical assistance
Town of Putney	Dan Toomey DTOOMEY@landmark.edu	Lead Coalition & Steering Committee Member
Town of Rockingham	Gary Fox, 802-463-3964, ext. 1110 development@rockbf.org	Non-lead Coalition & Steering Committee Member & economic devel. needs advisor
Town of Rockingham	Bonnie North, 802-463-3964 BonnieNorth@rockbf.org	Non-lead Coalition, Steering Com. & Select Board Member
Town of Wilmington	Gretchen Havreluk, (802) 464-8591 ext. 117, ghavreluk@wilmingtonvt.us	Advisor on economic development needs
Windham & Windsor Housing Trust	Elizabeth Bridgewater, 802-246-2109 ebridgewater@homemattershere.org	Steering Committee Member & advisor on housing needs

g. Incorporating Community Input

WRC will reach out to the community in multiple ways including the following:

Steering Committee: WRC’s Brownfields Steering Committee, led by the Program Manager and including non-lead coalition members, oversees the WRBRI program and meets bi-monthly in person and/or on Zoom. The Committee is made up of WRC Commissioners and includes a planner, economic developer, sustainability coordinator, town officials from targeted communities and an affordable housing advocate. The Committee is responsible for evaluating and selecting sites, overseeing assessments and cleanup planning. The Committee applies a prioritization matrix for new sites and incorporates public input into decision making as appropriate.

Public Meetings: WRBRI holds public meetings online and in person as needed to present assessment findings, address concerns, and solicit feedback on site reuse. Meetings are publicized with press releases, email and direct mailings. Four weeks are allotted for public comment. Public comments and feedback will be considered, responded to, and used to guide potential reuse plans.

Informational Resources: Public ability to contact program staff directly by email and phone is WRBRI’s most important informational resource. Public input is collected, tracked and responded to by the Program Manager. WRC shares program information and updates in our newsletter, social media, local newspapers and on our website, <http://www.windhamregional.org/brownfields>.

Record Documentation & Repositories: WRC is subject to Vermont’s Open Meeting Law. All Steering Committee minutes and recordings are public record and posted on our website within 5 days. Assessment work products are stored on our internal network and available upon request.

3. TASK DESCRIPTION, COST ESTIMATES, AND MEASURING PROGRESS

Description of Tasks/Activities and Outputs

The following task descriptions apply to WRC’s assessment program and for each task include: a. Project Implementation; b. Anticipated Project Schedule; c. Task/Activity Lead; and d. Outputs.

Task 1 - Cooperative Agreement Oversight: The WRC Brownfields Program Manager will lead and oversee development of the EPA/WRC cooperative agreement, project coordination, cooperative agreement compliance and management of environmental professionals. The WRC Finance Manager manages all financial and auditing tasks. The Executive Director provides program advice as needed. The Steering Committee with Program Manager assistance will develop requests for proposals, evaluate, rank and hire qualified environmental professionals. The first milestone is cooperative agreement development. As lead coalition member, WRC will also lead execution of a Memorandum of Agreement with non-lead coalition members that will document the site selection process and define roles to achieve the project's goals. Non-lead members are Steering Committee members and play an integral role in the site selection/prioritization process.

WRC will begin to address Priority Sites in the first year, followed by additional sites within target areas (two minimum/each target). Additional sites will be prioritized with an updated site selection matrix within the first year. Selection criteria used in the matrix to select additional priority sites include economic, environmental and community benefits such as improving low/mod income areas, job creation/retention and providing affordable housing. The WRC Steering Committee and Program Manager will select new qualified environmental professionals (QEP) for this work. We will develop a request for proposals, evaluate, rank and hire QEPs. The Program Manager updates ACRES, conducts reporting quarterly, and attends a national or regional EPA sponsored conference annually. The WRC Program Manager and Executive Director's work related to this grant will be funded by EPA. The Finance Manager's work will be contributed by WRC. Steering Committee members are all volunteers who receive no compensation. Non-lead coalition member staff will also participate on the Steering Committee with no additional compensation.

Outputs for Taks 1 will include: the EPA/WRC cooperative agreement; Pre-qualified QEPs procured; information on site eligibility and determination of initial priority site eligibility by EPA Region 1; QEP reports are accurate, completed on time and address EPA/VTDEC requirements; attendance at a national brownfields conference and regional brownfields trainings; EPA Acres database updated, and quarterly reports and annual reports completed on time.

Task 2 – Community Engagement: The WRC Brownfields Program Manager will work with community-based organizations, attend local meetings and collect citizen feedback. Our coalition will solicit, receive and respond in writing to input from the public. Public feedback is considered in the site selection decision-making process. WRC will disseminate an updated program brochure and other information on our website within the first year. The Program Manager will lead the coalition and the Steering Committee, which meets bimonthly, and works with prospective purchasers/developers. All WRC meetings are open to the public and minutes are published online. As assessments activities get underway, milestones will include public meetings and outreach.

Outputs for Task 2 will include: WRC Steering Committee meetings, bimonthly (24); WRC Brownfields webpage is up to date and newsletter articles on brownfields are published; Partner with community-based organizations and attend meetings as needed; and Steering Committee meetings to discuss assessment findings, site remediation, site reuse and gather public input.

Task 3 – Site Assessments Activities: Environmental professionals will lead and conduct Phase I and II site assessments. WRBRI will assign assessment projects to the QEPs and coordinate the development of 13 Phase I assessments and 12 Phase II assessments, beginning with Priority Sites in year one. The number of sites addressed may change depending on site characteristics and cost. Phase II projects will include preparation of Quality Assurance Project Plans (QAPP) approved by

EPA. The Program Manager and Assistant (both funded by EPA for this work) will coordinate work with owners and prospective purchasers to ensure site access and share results. Staff will review QEP work and coordinate EPA and VT Department of Environmental Conservation (VTDEC) reviews. At least three Phase I and two Phase II assessments will be conducted per year to ensure funds are expended in a timely manner. WRC’s Program Manager and Assistant will take the lead on coordination and communication with all parties. Outputs for Task 3 include: 13 Phase I Hazardous Substances Assessments; and 12 Phase II Hazardous Substances Assessments.

Task 4 – Site Reuse and Cleanup Planning: Remediation planning and site reuse planning will take place upon completion of Phase II assessment work. WRBRI contracted QEPs will lead remediation planning, including the development of ABCA/Corrective Action Plans on up to 9 sites. The Program Manager and Assistant will be responsible for reviewing these plans, coordinating reviews with EPA and VTDEC, and communicating with property owners and prospective purchasers. WRC’s QEPs will conduct site reuse planning work on each of the priority sites and others in the target areas, up to 5 total. This work will involve market analysis, identification of best use and site planning activities. Since most remediation planning in our region occurs in historic centers and along river corridors, this task also includes 4 historic and archeologic reviews to comply with the National Historic Preservation Act. Most of this work will be completed in the third and fourth years of the grant period upon the completion of the Phase II assessments of Priority Sites. Outputs for Task 4 will include: 9 ABCA/Corrective Action Plans; 5 Site Reuse Plans; and 4 Historic and Archeologic Assessments or Reviews, as needed.

e. Cost Estimates

The following cost estimates are based on WRC’s experience with brownfields assessment work. WRC will fund all necessary administrative activities, including the Finance Manager, to complete all requirements of the cooperative agreement and coalition assessment project.

Task 1 and Task 2: Staff personnel/fringe costs to carry out activities described above, include WRC Program Manager at \$46.16/hour for an estimated 225 hours/year, Program Assistant at \$43.96/hour for an estimated 120 hours/year and WRC Executive Director at \$61.07/hour for an estimated 5 hours/year. Travel costs include travel to a national and regional conference annually. Other is conference registration. Supplies include a laptop computer.

Task 3: 13 Phase I assessments at an average of \$4,000 each¹⁷ for a total of \$52,000; and 12 Phase II assessments at an average of \$48,000 each¹⁸ for a total of \$576,000.

Task 4: 9 Corrective Action Plans at a cost averaging \$15,000 per site¹⁹ for a total of \$135,000. Site Reuse Planning for 5 sites at \$15,000 per site and 2 market analysis for \$20,000 each for \$115,000²⁰ total. Historic and archeologic reviews are estimated for 4 projects for \$30,000 total.

	Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Site Assessments Activities	Task 4 Site Reuse and Clean Up Planning	TOTAL

¹⁷ Cost is based on average costs of previous Phase I assessments.

¹⁸ It has been WRC’s experience that the cost of the Phase II assessment depends on size and former use and has varied from \$25,000 to \$63,000 for an initial Phase II investigation.

¹⁹ Average Corrective Action Plan costs with ABCA.

²⁰ Average cost of Site Planning and Market Analysis based on WRC’s experience.

Personnel	\$51,000	\$12,800	\$0	\$0	\$63,800
Fringe Benefits	\$18,000	\$6,000	\$0	\$0	\$24,000
Travel	\$2,000	\$0	\$0	\$0	\$2,000
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$1,200	\$0	\$0	\$0	\$1,200
Contractual	\$0	\$0	\$628,000	\$280,000	\$908,000
Other	\$1,000	\$0	\$0	\$0	\$1,000
Total Direct Costs	\$73,200	\$18,800	\$628,000	\$280,000	\$1,000,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total	\$73,200	\$18,800	\$628,000	\$280,000	\$1,000,000

f. Plan to Measure and Evaluate Environmental Progress and Results

The WRC Brownfields Program Manager tracks the progress of the program by reporting developments on the ACRES website and producing quarterly reports for EPA. In addition, the Program Manager will share with the Brownfields Steering Committee an updated spreadsheet on the status of each site, as well as private funds leveraged, sites cleaned up, and sites redeveloped. Since the committee serves as the decision-making entity of the program, staff keeps the committee current with project outputs, overall results and outcomes. Site progress information is also posted on WRC’s Brownfields webpage and success stories are shared in our newsletter, as well as local press. WRC has developed a robust and successful system for tracking these accomplishments and we will continue to track and report outcomes beyond the project period.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

The following task descriptions apply to WRC’s programmatic capability and include: a. Organizational Capacity; b. Organizational Structure; and c. Description of Key Staff.

WRC has been in continuous operation for over 50 years. Susan Westa, AICP has served as WRC’s Brownfields Program Manager for 7 years and has over 35 years of community development and environmental planning experience. Ms. Westa manages environmental professionals to ensure the timely completion of brownfields projects. She has oversight of assessment funds and programmatic requirements and serves as liaison between communities, state officials and EPA. She works closely with WRC’s Finance Director, Inessa Muse who has been with the Commission for more than 6 years. Ms. Muse has an MBA and previously served as a Business Manager for various private schools. WRC now also has a Brownfields Program Assistant, Mike McConnell, AICP who has 13 years of planning and community development experience. Mike will provide additional program support to enhance our capacity to deliver brownfields program success. Chris Campany, WRC’s Executive Director, who serves as a project advisor, has been in his position for 16 years and has over 31 years of experience as a planning professional.

The WRBRI Steering Committee is made up of volunteer Windham Regional Commissioners. The non-lead coalition members, Towns of Brattleboro and Rockingham, are and will continue to be represented on the committee. It is the committee who reviews projects for eligibility and determines how funding will be used to benefit the coalition’s target areas and the project’s broader geographic area. The committee meets on a bimonthly basis to ensure the timely expenditure of funds. The Brownfields Program Manager brings questions about funding distribution to the committee and implements other programmatic and administrative requirements. Before

expending funds, a Memorandum of Agreement will be developed that clearly lays out the site selection process. The three coalition members have been working together for many years and have a very good working relationship.

d. Acquiring Additional Resources

WRBRI will procure environmental professionals to conduct site assessments, site reuse planning and cleanup planning. WRC has self-certified its procurement procedures for personnel services and equipment in compliance with applicable federal regulation, 2 CFR 200, 2 CFR 1500, and 40 CFR 33. Procurement policies were developed in accordance with all state and federal regulations. In accordance with these policies, we will develop a request for proposals, evaluate, rank and hire QEPs.

WRBRI contributes in-kind staff time, overhead and supplies needed to complete administrative activities and indirect costs not covered by brownfields grants. WRC's EPA Brownfields Cleanup Revolving Loan Fund (RLF) projects that are assessed with funds from this grant will be given priority for cleanup loans and/or grants (over \$2.6 mill. committed). The Program Manager also oversees WRC's Community Development Program, funded with state and local funds²¹ and approximately \$5,000 a year goes to the integration of the WRBRI with other WRC programs.

Past Performance and Accomplishments

e. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

Since its inception in 2000, WRBRI has provided assistance to 80 sites, the majority of which have been redeveloped or are in the planning or implementation phase of redevelopment. Program outputs have been completed in a timely manner. Recent outcomes include redevelopment for 118 units of affordable housing on multiple sites, a homeless shelter and reuse of an active historic train station. The most recent assessment grant closeout was in 2023 with minimal funds remaining at closure, Cooperative agreement BF-00A00418, \$300,000/16 sites and an areawide plan.

WRC currently manages a Brownfields RLF (96151501, 10/1/2011-9/30/2026), including a Supplemental RLF (4B-00A01073, 10/1/2022-9/30/2027) and a 2023 Assessment Grant (00A01263). Almost 92% of the 2023 assessment grant, which assessed 14 sites, was drawn down by 9/30/2025 (see attached ASAP report). 21 sites have been cleaned up or are in the process of being remediated with our RLF. We will closeout our original RLF grant this year but work under the supplemental grant will continue. All work is accurately reflected in ACRES.

(2) Compliance with Grant Requirements

WRC has a record of compliance with EPA Terms and Conditions, quarterly reports and property profiles, which are up-to-date in the ACRES database. Satisfactory progress has been made in achieving results detailed in the work plan and tasks are completed on schedule. For the open assessment grant, WRC procured environmental professionals, continued community outreach, updated its website, assisted with reuse planning and spoke with numerous prospective purchasers. All funds under the current assessment grant will be expended by the end of the period of performance as defined in 2 CFR § 200.121. The only time that WRC was behind on brownfields reporting occurred with the 2016 Assessment Grant (00A00215), when the long-time Program Manager left and the Finance Director passed away (in 2019) but this was quickly rectified by the new Program Manager.

²¹ This funding comes to the WRC through Vermont Property Transfer Tax and municipal per capita assessments.

Attachment A: Threshold Criteria

THRESHOLD CRITERIA

1. a. ELIGIBILITY OF LEAD AND NON-LEAD COALITION MEMBERS. The lead coalition member is the Windham Regional Commission (WRC), a Vermont Regional Planning Commission who is eligible to apply as a regional council or group of general purpose units of local government. See also Attachment C, § 4341. Creation of regional planning commissions.

The non-lead coalition members are the Towns of Brattleboro and Rockingham and both towns are eligible for funding.

b. The coalition members are not exempt from Federal taxation under section 501(c)(4). The non-lead coalition members are not an instrumentality of or affiliated with the lead member or other non-lead members.

2. TARGET AREAS. The target areas of each coalition member have been identified in the Narrative, as well as the Information Sheet.

3. NON-LEAD MEMBER THAT NEVER RECEIVED AN EPA MARC GRANT. The coalition non-lead member, the Town of Rockingham, has never been awarded an EPA Brownfields MARC grant.

4. LEGAL AUTHORITY TO EXPEND GRANT FUNDS ON BEHALF OF NON-LEAD COALITION MEMBERS. As a Vermont Regional Planning Commission, the Windham Regional Commission has the authority to expend grant funds on behalf of the non-lead members, the towns of Brattleboro and Rockingham, who are located within WRC's geographic boundaries.

5. COALITION AGREEMENT. Coalition non-lead members have submitted letters of agreement to be part of the coalition, see Attachment B.

6. COMMUNITY INVOLVEMENT. The purpose of our community involvement plan is to engage a broad constituent and stakeholder base to provide updated project information to facilitate public dialogue, and provide opportunities for public participation. Community outreach efforts detailed in the application show how the Windham Region Brownfields Reuse Initiative (WRBRI) will continue to involve affected residents, businesses, municipal officials and local organizations in the decision-making process regarding site selection for assessments, cleanup, and reuse. Community involvement will include, but is not limited to WRBRI Steering Committee, community meetings, informational resources (website, newsletter, brochure, etc.), record documentation and repositories, interpretive services and working with community partners.

7. EXPENDITURE OF EXISTING GRANT FUNDS. The lead coalition member, the Windham Regional Commission, has an open EPA Brownfields Assessment Grant (00A01263). This 2023 grant was drawn down by almost 92% as of September 30, 2025. See the attached financial report/ASAP report in Attachment A. Disbursements of drawn down funds have complied with requirements in EPA's General Terms and Conditions for timely disbursement of EPA funds, including substantial disbursement of all funds within 5 business days of draw down.

8. CONTRACTORS AND NAMED SUBRECIPIENTS. N/A - no contractors have been selected. Subrecipients N/A.