### IV.A. Narrative/Ranking Criteria

### 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Springfield, Massachusetts (the City) is in Hampden County on the eastern bank of the Connecticut River, 100 miles inland of the Atlantic Coast (Western Massachusetts). The City has a population of 155,929 covering an area of 33 square miles. Springfield is the 3rd largest city in the State, and the 4th largest in New England. Springfield is known as the "City of Firsts," a moniker earned through a history of innovation, including America's first Armory and military arsenal and the first American made automobile. Springfield is also well known for two other innovations - the birthplace of basketball and Theodor Geisel ("Dr. Seuss"). However, with a manufacturing history dating back to the 1700s, Springfield has also become known for its Brownfield challenges, and the contamination and negative impacts it has had on the health and welfare of its underserved communities. According to the Massachusetts Office of Energy & Environmental Affairs, 95.8% of Springfield's total population is in block groups designated as Environmental Justice neighborhoods due to low-income, minority and/or English fluency status. Over the years, most of these industries (textile, paper, distilleries, and metals, etc.) have disappeared, leaving many City residents living, working and playing next to contaminated brownfields sites. There are over 1,290 known hazardous release sites in Springfield according to the Massachusetts Department of Environmental Protection (MassDEP), and the City estimates there are an additional 250 Brownfield sites including vacant schools, warehouse buildings, abandoned mill buildings, run-down commercial buildings, former gas stations, auto repair facilities and dry cleaners, tax foreclosed properties and vacant lots, each ranging in size from approximately one acre to over ten acres, covering more than 200 acres in total. These properties are impacted with volatile organic compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), heavy metals (lead, arsenic), petroleum, and/or hazardous building materials (HBM), such as asbestos, lead-based paint (LBP) and polychlorinated biphenyls (PCBs). These brownfield sites have resulted in decreased property values, increased public health and safety risks, crime, blight, neglect and diminished local business investment and tax base. Brownfields have also contributed to the significant economic disparities and amplified exposure to the underserved communities in the area.

The Target Area is the neighborhood of Indian Orchard, identified as census tract 25013800102. In addition to the clusters or large brownfield sites located within Indian Orchard, there are also minority and other underserved populations that experience the negative effects of their contamination. Indian Orchard is among the most impoverished neighborhoods that also lack quality employment opportunities and access to healthy foods. The City is in desperate need of this Cleanup Grant which is critical to help reverse some of the environmental, economic, and health and welfare challenges the residents in the Target Area and City have been plagued with for decades.

#### ii. Description of the Proposed Brownfield Site(s)

**ES Pinevale** is an approximately 16-acre vacant parcel of land located on the east side of Pinevale Street, north of Goodwin Street, in the Indian Orchard target neighborhood of Springfield. The Site was formerly part of a 54-acre property owned and operated by the Chapman Valve Manufacturing Company, circa 1874, and the Crane Company, manufacturers of specialty metal valves for federal agencies, until the 1980s. Historical manufacturing uses included brass and iron foundries as well as steel and iron machine shops. Crane Co. dissolved the 54-acre property into numerous parcels, which were sold to various parties, except for the 16-acre ES Pinevale Street parcel. Crane Co. demolished the original 12 factory buildings located at the Site between the 1980s and 1996. Concrete slabs from the foundations of the historical manufacturing buildings remain across the property. The Site went through various property transfers between 2003 and 2013 before the City of Springfield acquired the Site through tax title taking in May 2013.

Documented releases of Oil and Hazardous Materials (OHM) at the Site include metals, petroleum

hydrocarbons (total, extractable and volatile), PAHs, asbestos-containing material (ACM), VOCs and SVOCs, and polychlorinated biphenyls PCBs in soil; and petroleum hydrocarbons, metals, VOCs, and SVOCs in groundwater. In general, soils across the Site consist of varying types and amounts of fill materials to depth ranging from two (2) to 10 feet below ground surface (bgs). The primary source of contamination is believed to be related to releases from historical Underground Storage Tanks (USTs) and other surficial releases from former manufacturing activities that have co-mingled and migrated into the soil and groundwater. Metals (i.e., lead) and PAH impacts may also be the result of industrial by-products included in the fill materials and/or historical Site use as a valve manufacturing facility. ACM impacts in surficial soils may be the result of disturbance to already damaged ACM insulation and building materials at the Site during previous investigations, excavations, demolition activities, and/or natural degradation.

### b. Revitalization of the Target Area

## i. Reuse Strategy and Alignment with Revitalization Plans

The most significantly interested potential developer in the ES Pinevale Site is a non-profit organization proposing to develop an "Eco-Industrial Park", on the 16-acre site that will build upon an existing hydroponic greenhouse facility located to the northwest corner of target property. The redevelopment vision is for a zero-waste, closed-loop site with a food and sustainability focus that combines greenhouse production with recycling and material use, sustainable energy generation, a landscaping business and open space. The site would also include a farm stand and café / kitchen as well as educational space and would put Springfield at the forefront of urban green development nationally. Goals of the project include job creation, modeling cooperative, eco-industrial and permaculture practices, as well as connecting and inspiring people with ecological dynamics, nature, gardening, abundance, and each other. The Permaculture, Landscaping and Construction Co-op would design, install, and maintain permaculture landscapes. Landscape wastes would be used in the proposed biodigester or as compost. The biodigester would processes organic waste from institutions and households to produce sustainable energy (methane gas and electricity) to power co-op businesses, with the effluent used for composting and fertilizer. A Mushroom Farm Co-op would grow mushrooms on cardboard, biodegradable packing material, junk mail, wood chip, and coffee ground substrate. Spent substrate is a great soil amendment to improve its physical and chemical properties. The Compost Co-op would compost wood waste, tree trimmings, used mushroom substrate, greenhouse waste, etc. Effluent from the biodigester would speed the process of composting. Compost would be used in the greenhouses and community garden. The Community Gardens would include individual plots providing space for fruit and vegetable production, helping community members meet their basic needs, mentoring and support in food growing, and room to expand. The greenhouses would grow lettuce and other produce to expand access to year-round locally grown produce for local retail/institutional markets as well as food deserts in the Springfield region. The cafe would serve healthy light fare, with a focus on local sourcing. The space would allow for community gatherings; cooking, nutrition, and permaculture workshops; as well some food processing.

The City's objectives are to provide equitable and economic development and improve the City infrastructure, public facilities, recreational parks, and community programs. As part of our housing development goals, we are incorporating energy efficiency requirements for new construction projects to assist low-income families and are encouraging it for all rehabilitation projects. The City's Master Rebuild Plan endorses EPA's brownfield principles and encourages the reuse of sustainable redevelopment. The proposed site reuse also aligns with Springfields's 2017 Strong, Healthy & Just – Climate Action & Resilience Plan which seeks to increase community resilience through adaptation to and mitigation of climate change impacts with a focus on the city's vulnerable populations where they live and work, maintaining an ongoing commitment to and emphasis on climate justice throughout all current and planned work. The city is also currently embarking on a series of neighborhood plans with partner Pioneer Valley Planning Commission (PVPC), a project that will result in a new neighborhood plan for each of Springfield's 17 neighborhoods including the Indian Orchard Target Area.

## ii. Outcomes and Benefits of Reuse Strategy (C&P)

Springfield anticipates tremendous environmental, social, economic, and public health benefits associated with the proposed redevelopment under this grant. Through the cleanup and redevelopment of the ES Pinevale Site, we will reduce blight, create jobs, increase property values, generate a larger tax base, provide access to fresh food, and improve the quality of life for Target Area residents, making it a safer and more enjoyable place to live. Addressing this large, 16-acre site that has lied vacant and underutilized for almost 30 years, will provide significant **health benefits** to residents, including reduced environmental exposures resulting from the remediation of the property, reduced poverty and healthier food choices. The social benefits of Brownfields redevelopment will include investment in the community, reduction of blight, reduced crime and vandalism, additional jobs, and increased community pride. This proposed cleanup will create 16 acres of viable land with significant redevelopment potential. Indian Orchard is a historically neglected neighborhood in the City, and a vast redevelopment of a major blemish in the community shows the City's investment in neighborhood revitalization. The addition of new commercial opportunities will reinvigorate the Target Area by providing easily assessable quality and community services and resources that will improve the community's quality of life while also stimulating the local economy by expanding the City's tax base and creating new jobs. The proposed operations on the Site will encourage nearby residents to "buy local" and add local cash flow in the local economy. Each acre of Brownfields redeveloped will also increase community pride and nearby residential property values. During redevelopment, site contaminants will be cleaned up to MassDEP's standards providing significant environmental benefits including improved quality of soil, groundwater, and air, as well as removal of exposure pathways and minimized impacts to downgradient properties.

Although the site is not located near the coast or within the FEMA flood plain of the Chicopee River, the Site is at risk of increases in air and water temperature, extreme precipitation, and more frequent/intense extreme storm events. The proposed project will improve local climate adaptation / mitigation capacity and resilience to protect residents and community investments by employing practices that minimize resource use, waste generation, energy use, and greenhouse gas emissions. Specifically, the proposed reuse as a zero-waste, reduced carbon footprint redevelopment associated with the implementation of closed loop commercial/light industrial uses, renewable energy generation and energy efficiency and/or sustainable practices, will.

# c. Strategy for Leveraging Resources

Springfield will use key funding resources, as needed, to support the completion of assessment, remediation, and/or site reuse activities at the Sites. The City has leveraged almost millions dollars for Brownfields projects in the past few years alone, which in turn stimulates the availability of additional funds from other local, state and federal sources:

- i. <u>Resources Needed for Site Characterization</u> Supplemental site characterization may be completed at the Site to help refine areas of asbestos and other impacts to further support remedial planning and design efforts. Therefore, the City may use its FY23 Community Wide Assessment Grant Funds and/or apply to MassDEP or PVCP for additional site assessment and/or cleanup planning activities.
- ii. <u>Resources Needed for Site Remediation</u> The City of Springfield is requesting EPA Brownfields Cleanup funding sufficient to complete the remediation at the ES Pinevale Site, obtain regulatory site closure under the state's VCP, and ready the site for reuse. In the event additional cleanup resources are needed, the City may apply to MassDevelopment or MassDEP for additional resources.
- EPA Brownfields Cleanup funding is a critical first step to ensuring a financially feasible and successful development that aligns with the community's priorities; therefore, no additional firm leveraging commitments are yet in place for the site reuse. The City is currently working with the community to refine development objectives for the site. The inclusion of an Eco-Industrial Park and open

space is among the redevelopment objectives; as such Springfield anticipates and is committed to working with the selected developer to pursue numerous leveraged resources to support the project which may include, but may not be limited to, resources identified in the table below.

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
EPA	Assessment	Secured	City's FY23 Community Wide Assessment grant may be used for supplemental assessment, public engagement and/or cleanup and reuse planning.
PVPC	Assessment  Cleanup & Reuse Planning	Secured	\$\$\$\$ from PVPC's FY23 Community Wide Assessment Grant to be used for cleanup & reuse planning. Additional funds may be requested for supplemental site characterization, if needed.
1.10.552 C. Crop	Assessment and/or Remediation	Unsecured	Funds generally up to ~\$250K in assessment and ~\$750k for cleanup available. Loans and/or grants will be applied for if needed, at applicable time.
MA Brownfields Tax Credit Program	Reuse	Unsecured	Credit for cost incurred on a Brownfields remediation project. City will work with eligible developers / non-profit organizations as appropriate.
MA New Market Tax Credit	Reuse	Unsecured	Created to stimulate business investment in designated low-income communities.
1	Remediation and/or	Unsecured	Climate resiliency planning and adaptation implementation funding. May be applied for at appropriate time

### iv. Use of Existing Infrastructure

The E/S Pinevale Site has complete access to municipal water, sewer, electrical, natural gas, public transit, and broadband services that are fully equipped to accommodate future growth. Springfield's zoning ordinances have been designed to uphold several of the City's most important values including protecting the health and safety of the community, promoting economic development, encouraging appropriate land use, and preserving the City's cultural, historical, architectural, and open space heritage. In addition, the City more recently developed design standards, which require sustainable and green building design components, such as green infrastructure (e.g., raingardens and/or bioswales for stormwater retention, etc.) and renewable energy to be incorporated during site redevelopment. Funding as identified in the section above from the state's MVP program may be sought to implement this work.

## 2. <u>COMMUNITY NEED AND COMMUNITY ENGAGEMENT</u>

### a. Community Need

## i. The Community's Need for Funding

The Target Area is a designated Minority EJ population block group by the State of Massachusetts with the following characteristics: Minority population: 74%; Median household income: \$66,250; Households with language isolation: 4%. Indian Orchard, and all the remaining block groups within the City of Springfield are some of the most impoverished areas in Massachusetts, as the entire city is designated as an EJ population by the state, due to low-income, minority and/or English fluency status. The City has a median household income of \$41,571 which is 49% of the MA MHHI. Along with low median incomes, events in recent years have adversely impacted the City's fiscal health. According to the Mayor's FY22 Recommended Budget, the COVID-19 pandemic, and the business shutdowns and other restrictions imposed to stop its spread, cost the City of Springfield to lose \$10+ million in lost annual revenue,

leaving the City in a very difficult financial position that will impact vital services and programs. In addition, the current state of the economy and the rapidly escalating rate of inflation, up 8.2% as of September 2022, is also impacting the City and its residents' ability to draw on other sources of funding to carry out assessment, remediation, and subsequent reuse of brownfields properties in the Target Area. Utility rates in Massachusetts are expected to see a 27% to 65% increase for gas and electricity, respectively, commencing this month as the long winter heating season begins. The Target Area is a state designated Environmental Justice (EJ) community for Low Income and Minority. Greater than 94% of these underserved communities are Housing Cost Burden and more than 90% are also energy burdened (CEJST). What's more, the city is still suffering from the effects of the category EF-3 tornado that damaged or demolished 800 buildings and condemned 200 more in the City in June 2011. The tornado created an estimated \$106 million dollars in damages. More than 300 families were displaced from their homes and forced into shelters. In November 2012, a major explosion resulting from a gas leak occurred in a commercial building located in Springfield's Metro Center target neighborhood. The force of the explosion left a crater and damaged dozens of buildings, displaced numerous residents, and dealt a financial blow to many downtown businesses resulting in a huge economic disruption. In addition, the blast left several buildings and properties beyond repair, creating additional Brownfield issues. A fire at the Chestnut Junior High School necessitated the City borrowing \$2.1 million dollars against its bond for asbestos removal and demolishing of the building. The city has had other significant Brownfields issues citywide, including the need to clean up 846 & 876 Bay Street. The city borrowed \$281,886.54 for removal and disposal of 2,000 tires and waste drums, a Hazmat Survey, removal/disposal of asbestos, and removal of 2,300 gallons of oil/water from former car crusher on this abandoned, tax-title property.

# ii. Threats to Sensitive Populations

# (1) Health or Welfare of Sensitive Populations

Springfield has significant health and welfare impacts from contaminated properties and environmental exposures. According to the EPA's EJSCREEN, Indian Orchard is identified as an Underserved Community due to low income (97%), high minority (97% people of color) and linguistic isolation (95%). The Target Area is also identified as Low-income & Low Access "Food Desert" census tract where a significant number or share of residents are more than ½ mile (urban) from the nearest supermarket. The childhood population in the Target Area ZIP code 01151 is 21.4%. More than 80% of the individuals aged 25 and over in the Target Area do not have a high school degree. As a highly populated City and Target Area near numerous abandoned and derelict Brownfield sites, Springfield residents are exposed to contaminants on a daily basis via dermal contact, ingestion, and/or inhalation, including children passing sites on their way to school and runoff during storm events. The Target Area is in the 80-100th percentile for Hazardous Waste Proximity. 97% of the population in the Target Area is expected to suffer from Low Life Expectancy. According to the Pioneer Valley Asthma Coalition (PVAC), Springfield's ponds and waterways have suffered extensive historic industrial and biological pollution resulting from long-term migration of century-old contaminants in soil and groundwater. Consequently, City residents have experienced higher rates of health disparities including asthma, lead poisoning, and other illnesses. Per EPA's EJSCREEN, most of the neighborhoods in Springfield, including the Target Area, are within the 95-100th percentile for asthma occurrences. Due to the age of the City's housing stock and other structures, many buildings in the city contain hazardous building materials such as asbestos, PCBs, and lead-based paint. The Target Areas is in the 70-80th percentile for presences of lead. Due to widespread structural damage to buildings in the city resulting from the tornado in 2011, more hazardous building materials were released to the environment, subjecting Springfield's population to additional pollutants. This event caused additional pathways for contaminant exposure associated with these sites. With this grant, the City will be able to reduce contamination hazards to human health and the environment, which will bring improved health and welfare to the Target Area residents through the reduction of blight and crime, increased investment and prosperity in the Target Area and City as whole, as well as pride of ownership, which will increase property values and decrease the burden on already strained municipal services and budgets.

# (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Target Area of Indian Orchard is designated as Medically Underserved Areas/Populations as having too few primary care providers, high infant mortality, high poverty or a high elderly population (EJSCREEN). Type 2 diabetes is one of the City's most significant health problems, and the target neighborhood is in the 60th percentile for type 2 diabetes occurrences (EJSCREEN). The Target Area is a food desert and the accessibility to fresh, nutritious produce is a priority for the city. The Target Area is in the 95th percentile for asthma diagnoses (EJSCREEN). While it has made strides since recently being known as the "Asthma Capital of the United States" in 2019 by the Asthma and Allergy Foundation, Springfield still ranks as the 12th most challenging place to live with asthma in the country in the latest report. Springfield residents of color are at substantially greater risk of experiencing complications from asthma than White Springfield residents. Latinx residents visited the emergency room for asthma-related emergencies at nearly five times the rate of White Springfield residents, while Black residents had rates double that of Whites. Children ages 0-14 also experienced these inequities with the highest rates among Latinx children with rates double those of Whites (PVAC). Asthma in older adults is a serious problem in Massachusetts and particularly in Springfield. Older adults rate of hospitalization is second highest of any age group and on the rise. Asthma-related incidents in Springfield account for twice the State average and are representative of unsafe conditions resulting from high number of Brownfield sites adjacent to residences. Highways including Interstates 91 and 291 encompass the City and cross through several neighborhoods, including Indian Orchard, near schools increasing exposure to air pollution. The Target Area is in the 94th percentile for traffic proximity and volume (CEJST). Springfield is defined as a "highrisk" community for lead poisoning by MA Department of Public Health. Approximately 90% of the houses in Springfield were built before 1979, so there is a significant presence of lead paint and other HBM. Although statistics are limited, it is reasonable to presume Target Area residents are adversely affected from exposure to PAHs (liver disorders; cancer), petroleum (nervous system, immune, liver, kidney, respiratory damage; cancer), heavy metals including lead (immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory, kidney damage; cancer), VOCs (liver, kidney, nervous system damage; birth defects; cancer) and HBM including asbestos (lung scarring, mesothelioma and lung cancer) and PCBs (immune, hormone and neurological system; liver and skin disease). Cleanup and redevelopment of the ES Pinevale Street site, which is located in a largely residential neighborhood surrounded by sensitive populations, will help address these problems and improve the overall health and wellbeing of Target Area residents by improving soil, groundwater and air quality at the site, decreasing the likelihood of residents encountering toxic substances and exposure to environmental contaminants and providing access to healthier foods, while also providing educational opportunities and access to other goods and services.

#### (3) Environmental Justice

### (a) Identification of Environmental Justice Issues

The Target Area maintains a high concentration of poverty and minority populations relative to remaining portions of the City and have been disproportionately impacted. Springfield is a designated Environmental Justice community and consists of approximately 46% Latino, 21% African American, 3% Asian and 30% non-Latino white (2021 Census). Approximately 38% of Springfield residents speak a language other than English in the home (2021 Census). In addition to environmental impacts associated with Brownfields, Springfield suffers high unemployment, high poverty, extremely low median income, and low educational attainment. A study conducted by PVPC confirms that our education and transportation systems are two major contributing factors preventing City residents from attaining goodpaying jobs. Approximately 21% of our youth population (years 18 to 24) have not achieved a high school degree. The Springfield Metropolitan Area unemployment rate, which has dropped significantly since the spike in unemployment from Covid-19, is now 3.7%, which is .6% higher than the state's. Despite having Pioneer Valley's highest total employment opportunities, we currently experience higher

unemployment rates. The City's largest employers include health service and social service providers, retail, and manufacturing. According to the New England Public Policy Center, the City's workforce participation, educational attainment, and homeownership are all extremely low. **Hampden County has the highest rate of childhood and overall food insecurity at 15.2% for children and 10.9% overall**. Rates of cardiovascular diseases and asthma are significantly higher among Black residents in Springfield. State data shows that in Hampden County, the obesity rate is 28.8% with rural clusters showing lower rates than urban clusters. A 2019 Springfield Youth Heavy Survey showed that 28% of youth were obese and 23% were overweight. Another study done by the Center for Disease Control and Prevention showed that weight gain among youth increased during the Covid-19 pandemic, particularly among youth that were already obese.

## (b) Advancing Environmental Justice

After cleaning up and redeveloping the Target Property, the opportunities for economic development at the Site will improve neighborhood conditions for the disadvantaged communities. With additional tax base from the site, neighborhood improvements can be more readily made. The Target Site will provide much needed resources, including increasing job opportunities, eliminating food deserts by providing local fresh produce and healthy food options, providing educational opportunities and access to other goods and services. Remediation will improve soil, groundwater and air quality and decrease the likelihood of residents encountering toxic substances, improving their overall health and wellbeing.

Based upon the City's successful brownfields redevelopment experience, the City does not anticipate the proposed revitalization plans to cause displacement in the Target Area. The City and its partners will continue to engage the community in the brownfields reuse process and will have discussions with the community about how to minimize displacement through the cleanup and reuse progress. Proper strategies and/or policies will be implemented to minimize the displacement of residents and/or businesses if needed, such as community benefit agreements, small business preservation programs, inclusionary zoning, community land trusts, tax abatement and/or financial programs.

# b. Community Engagement

i. Project Involvement / ii. Project Roles

ORGANIZATION / POINT of CONTACT	SPECIFIC INVOLVMENT IN PROJECT/ASSISTANCE					
Indian Orchard Citizens Council	Liaison between City and Target Area residents. Neighborhood					
Zaida Govan _413.209.8240	organization will reach out to constituencies and educate them about the Site					
IOCC.council@gmail.com	and the role of brownfields redevelopment in the community. Will assist the					
	City by engaging the public for input with respect to the decisions associated					
	with the cleanup and future reuse of the Site. Will provide meeting notice to					
	Target Area residents and space for public meetings as needed. Commit to					
	participate in QEP selection process with City and Brownfields Committee.					
<b>Pioneer Valley Planning Commission - PVPC</b>	Contracted with city to produce neighborhood plans including community					
(Regional Planning Commission for County)	engagement in the Target Neighborhoods. As a Brownfields Advisory					
Erica Johnson 413-781-6045	Committee (BAC) member, will participate in QEP selection and assist the with					
<u>ejohnson@pvpc.org</u>	site identification, prioritization, and selection process.					
MassDevelopment	A significant Brownfields funding partner for the city, MassDevelopment will					
Sean Calnan and Richard Griffin	work with the City and future developer to provide development expertise					
www.massdevelopment.com	and/or financial resources to advance the future reuse of the site. BAC Member.					
413-731-8848						
Springfield Redevelopment Authority	Quasi agency separate from City responsible for Urban Renewal Planning. Will					
Amanda Pham 413-787-6020	assist the City with community engagement efforts and provide support to the					
apham@springfieldcityhall.com	city and future developer with respect to reuse planning efforts. BAC Member.					
Wellspring Collaborative	Currently functions on a private portion of the site, conducted neighborhood					
Fred Rose Phone NUmber	outreach, interested developer					
Fred.rose@wellspringcoop.org						

### ii. Incorporating Community Input

Springfield has a strong track record using the resources of our community-based organizations and forming partnerships within the local target community and area developers to achieve brownfields success. In 2022, the city embarked on a significant neighborhood planning process with PVPC that will result in the development of distinct neighborhood plans for each of our 17 neighborhoods, including the Target Area of this application. Through this process we will include information on the Brownfields program and gather community feedback on cleanup and reuse plans, as well as potential impacts and opportunities. We are fortunate there are active neighborhood organizations as well as non-profit groups to assist in the community engagement portion of projects. Throughout the grant, community involvement will include: BAC Meetings: Quarterly virtual, in-person or hybrid meetings to discuss cleanup and reuse planning activities and alternatives. Public Meetings: We intend to hold up to four (4) public meetings at various project milestones (e.g., pre-cleanup to discuss Phase II results and proposed remedial alternative, during remediation to discuss project progress and reuse planning, and post cleanup to discuss next steps and redevelopment planning). Meetings will be hybrid, when feasible. The public meetings will be held at different times during the day in person and/or via Zoom to accommodate working parents, seniors and others. Recordings will be available online for those who were unable to attend. In-person meetings will be at handicapped accessible spaces with access to transit. Outreach Materials: Program flyers and other educational materials will be distributed at in person community events to meet the residents where they are, such as at local farmers market or other community gatherings. Website & Social Media: Updates regarding program, public meeting notices, online repository of project files and reports, etc. Surveys: Solicit community feedback and input on proposed cleanup and redevelopment plans, as well as the needs/desires of community & Target Area residents. Translation Services: As Spanish is the second most spoken language in the Target Area, translation services will be provided for meetings and materials.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### a. Proposed Cleanup Plan

The goals of the project are to protect and improve human health and the environment and bring a vacant and underutilized property back to beneficial use for the community. The site is not currently suitable for reuse due to the presences of comingled lead, PAH and asbestos contaminated soils at the Site. Regulatory closure can be achieved if the source of impacts is eliminated or controlled. Therefore, the proposed cleanup plan is to install an engineered control in the form of a cover system, consisting of an 18-inch clean soil cap underlain with a geotextile barrier, to prevent access to contaminated soils that pose the greatest potential exposure risk to future users of the Site. Institutional controls in the form of an Activity and Use Limitation (AUL) deed restriction will be required to prohibit disturbances to the cap to prevent potential exposure to impacted soils. The proposed remedial alternative will allow for future Site redevelopment and will attain and maintain a condition of "No Significant Risk" under the Massachusetts MCP; 310 CMR 40.0000 – the state of Massachusetts' voluntary cleanup program (VCP) and achieve regulatory Site closure by effectively removing contaminant exposure pathways from soil.

# b. Description of Tasks/Activities and Outputs

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

#### Task #1 – Cooperative Agreement Oversight

**EPA funded tasks/activities:** Manage and conduct cooperative agreement (CA) oversight activities which include: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); Competitively procure and manage qualified environmental professional (QEP) and remediation contractors; Conduct financial reporting and drawdowns; Establish information repository, public website and maintain project files; Project coordination with stakeholders and BAC; Ensure program remains on schedule and budget. Travel/attend National Brownfields Conference and local events.

**Non- EPA grant resources needed:** City will provide in-kind services (in the form of staff time, travel, materials) for any additional activities not budgeted as part of this task.

Anticipated Project Schedule: Task will be completed over the four (4) year grant performance period. Springfield anticipates completing the procurement of a QEP by December 31, 2024. Kick off program January 2025. Quarterly BAC mtgs. Quarterly reports will be submitted within 30 days of end of each quarter (Jan April/July/Oct), and

MBE/WBE and FRR reports annually by Oct. 30 each grant year. ACRES will be updated upon grant award and at regular intervals as project cleanup and redevelopment milestones are achieved and/or new information available. Final closeout report will be submitted within 90-days after the end of the C.A. performance period (no later than 12/30/28).

**Task/Activity Lead(s):** Springfield will lead CA oversight tasks to ensure compliance with Brownfields Programmatic Requirements. QEP will be Springfields partner and provide technical support, as well as information and updates to ACRES and annual reports, and general programmatic assistance related tasks and activities.

**Output(s):** EPA Reporting (ACRES/DBE/FRR reports, 16 Quarterly Reports, Closeout Report), prepare Request For Qualifications for QEP & remedial contractor procurement, drawdown requests, 16 BAC Meetings, general C.A. oversight and attend National Brownfields Conference and local brownfield events.

### Task #2 - Community Outreach & Engagement

**EPA funded tasks/activities:** City will conduct extensive outreach & communication with Target Area residents & community stakeholders throughout project implementation. The City will establish an information repository at the City's Office of Planning and Economic Development and will designate a Community Relations Spokesperson. The QEP, in collaboration with the City of Springfield, will prepare a community involvement plan (CIP) which will detail the steps to ensure adequate public notice and opportunity for the community to provide input / feedback on the proposed cleanup/reuse plan and response to comments, etc. Reports and other materials will also be posted to the City's website. Public notice of the updated draft ABCA and CRP will be provided and presented at a public meeting with a 30-day comment period for members of the community to review and provide their input. Written responses to public comment will be provided and incorporated into the finalized CRP and ABCA. The City will closely coordinate with project partners to ensure target area community input on the proposed remediation and redevelopment.

**Non- EPA grant resources needed:** The City will provide in-kind services (staff time, mailings, postage, travel, materials, etc.) for any additional activities not budgeted as part of this task.

Anticipated Project Schedule: Outreach activities are anticipated commence in the Spring 2025 with the generation of the CIP and occur over the following three (3) years throughout project implementation, until cleanup related filed work is completed, estimated to be Spring 2028. Outreach anticipated to be conducted at the following project milestones: 1) Spring 2025: Post CIP and present updated draft ABCA. 2) Spring 2026: Pre-cleanup and to solicit feedback from the community regarding proposed redevelopment. 3) Fall 2027: During Cleanup to discuss status of remediation and reuse planning update. 4) Spring 2028: Post cleanup and next steps.

**Task/Activity Lead(s):** Springfield will lead community engagement activities. QEP will be the City's partner and generate the CIP and ABCA and provide technical expertise and support at meetings. Springfield will review deliverables to ensure compliance state/federal Brownfields Programmatic Requirements. Translation services will be provided for meetings and materials.

**Output(s):** Outreach materials, website updates, public notices, meeting presentation materials, social media posts. Four (4) public meetings held at key project milestones to share information, solicit feedback.

#### Task #3 – Site Specific Cleanup Activities

**EPA funded tasks/activities:** QEP will prepare documentation required for cleanup implementation, including a Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Remediation / Engineering Plans & Specifications, and MCP/VCP required documents and Remedial Action Plans. Springfield will prepare a public bid package with support from QEP for the procurement of a cleanup contractor. QEP will provide bid support to the City during competitive procurement process. Cleanup contractor will implement cleanup tasks with oversight from QEP.

**Non- EPA grant resources needed:** Springfield will provide in-kind services (staff time & materials) for any additional support activities not budgeted as part of this task. If necessary, City will apply for supplemental funds from MassDevelopment and/or MassDEP and/or other resources.

Anticipated Project Schedule: Spring 2025: Coordination with potential developer to ensure final cleanup plan supports site reuse design features. Spring to Winter 2025: Generate cleanup plans, remediation / engineering designs and specifications, issue invitation for bids for cleanup contractor. Winter 2025 to Spring 2026: award cleanup contractor, secure permits. Spring/Summer 2026: Commence site remediation. Spring/Summer 2027: Complete site remediation related field tasks.

**Task/Activity Lead(s):** Springfield will lead procurement of cleanup contractor with QEP support. QEP will prepare ABCA, QAPP, MCP/VCP reports and remedial engineering plans & specifications. Springfield will review deliverables to ensure compliance state/federal Brownfields requirements. Cleanup contractor will obtain permits and implement specified cleanup tasks with QEP support / oversight.

**Output(s):** HASP, QAPP, MCP/VCP report(s), remedial engineering plans & specifications, site remediation & restoration. Engineered control / cap installation over soils: import of 15,200 cy of clean soil (clean backfill and loam)

over 200,000 sq yds orange demarcation layer. Risk to reuse removed.

## Task #4 - Site Cleanup Oversight and Cleanup/Completion Reports

**EPA funded tasks/activities:** During site remediation, the QEP will perform observation activities and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA and the MCP / state VCP requirements. The QEP will prepare and submit state required Remedial Action Plan, Remedial Status Reports, and Cleanup Completion reports to the MassDEP and EPA. The QEP will review construction of the cover system is consistent with the drawings and specifications. Site will be surveyed for as-built plan and institutional controls; AUL deed restriction will be recorded. QEP will issue closure report to MassDEP and EPA.

Non- EPA grant resources needed: Springfield will provide in-kind services (staff time, travel, materials) for additional activities not budgeted as part of this task.

Anticipated Project Schedule: Cleanup activities and oversight are expected to occur *Spring/Summer 2026 – Spring/Summer 2027*. Final documentation and Cleanup Completion report is anticipated in *Spring 2028*.

**Task/Activity Lead(s):** QEP will provide technical oversight, conduct disposal characterization sampling for materials required to be disposed of off-site following grubbing / clearing, and document remedial activities for compliance with applicable MassDEP/EPA standards & requirements. Springfield will review deliverables to ensure compliance state/federal Brownfields Programmatic Requirements and record AUL with the Registry of Deeds.

**Output(s):** Bills of Lading/Manifest, Remedial Action Plan, three (3) Status Reports, and Cleanup Completion & Closure Report. AUL. Regulatory closure under MCP/VCP through a Permanent Solution Statement with Conditions (PSC). 16-acres ready for reuse that does not pose a threat to human health or the environment completed in 4 years.

#### c. Cost Estimates

The City is requesting \$4,936,530 to be used to complete the tasks above. Costs have been estimated based upon past experience and estimates from environmental contractors and in consultation with the EPA's Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines. Please note, no fringe, indirect, equipment or supply costs are requested. Task 1: Personnel = \$12,500 (~4hrs/mo x 48 mo x \$65/hr); Travel: \$5,000 Brownfield Conferences – 2 attendees (air travel, lodging, per diem = \$1,500/pp for national conference + \$1,000/pp for mileage/hotel/per diem for local events). Contractual = \$32,600 [General Cooperative Agreement Assistance, Quarterly Reports (16) and ACRES updates (~5hrs/mo x 45 mo @ \$135/hr average)]. Task 2: Personnel = \$5,200 (80hrs x 65/hr; Contractual = \$29,200 [QEP (~\$2,000/mtg x 4 public meetings) + \$8,000 for CRP and ABCA + \$5,500 for production of outreach materials (40 hrs @ \$135/hr average) + \$7,700 Translation Services ( $\sim$ \$750/mtg for live interpretation +  $\sim$ \$1000/mtg for materials +  $\sim$ \$700 for survey]. Task 3: <u>Personnel</u> = \$2,500 (~6 hrs/mo x 6mo x \$65/hr); Contractual: \$165,500 [OEP = 1225 hrs @ \$135/hr average for: HASP, QAPP, Remediation/Engineering Plans & Specifications, and MCP/VCP required documents and Remedial Action Plans]; Construction: Remediation Contractor \$4,498,210 [\$1,178,010 in remediation contractor costs {including mobilization (\$214,500), site preparation expenses (\$700,000 for erosion controls, clearing & grubbing, dust controls/air monitoring, utilities/site trailer, silt curtain/catch basin protection, windscreens, etc.), and permits (\$57,000) for 16 acre site; + \$701,700 in on-site consolidation of asbestos containing soil {including non-traditional asbestos abatement work plan, HASP by certified Industrial Hygienist, Excavation and Relocation, and transportation and disposal of non-consolidation materials such as rootballs, etc.\ + \$2,618,500 in cover system construction \{\\$854,400 \text{ geotextile barrier (79,111 sy @)} ~\$10.80/sy) + \$1,764,100 import and placement clean material [\$1,015,260 clean backfill (30,765 CY of (20.532) + \$664,860 loam placement { $(79,150 \text{ sy } (20.58,40/\text{sy}) + $56,700 \text{ grading} + $27,110 \text{ seeding}}$ }. **Task 4**: Personnel =  $\$3,120 \ (\sim 6 \ hrs/mo \ x \ 8 \ mo \ x \ \$65/hr)$ ; Contractual =  $\$182,700 \ [QEP = \$105,600 \ (960 \ hrs/mo \ x \ 8 \ mo \ x \ \$65/hr)$ ; @ \$110/hr average) for ~8 months of remediation oversight &/or construction administration services plus \$30,000 for survey required for AUL / institutional controls; plus \$47,100 (365 hours @ \$130/hr for AUL and regulatory cleanup completion/closeout report for compliance with MassDEP/EPA requirements].

Pudget Cetegories	Project Tasks (\$)				
Budget Categories	Cooperative Agreement Oversight	Community Engagement	Site Specific Cleanup Activities	Cleanup Oversight & Report	Total

Costs	Personnel	\$12,500	\$5,200	\$2,500	\$3,120	\$23,320
	Fringe Benefits					
	Travel <sup>1</sup>	\$5,000				\$5,000
	Equipment <sup>2</sup>					
ect.	Supplies					
Direct	Contractual	\$32,600	\$29,200	\$165,500	\$182,700	\$410,000
	Construction <sup>3</sup>			\$4,498,210		\$4,498,210
	Other (include subawards)					
Tota	l Direct Costs <sup>4</sup>	\$50,100	\$34,400	\$4,666,210	\$185,820	\$4,936,530
Indi	rect Costs <sup>4</sup>					
Total Budget		\$50,100	\$34,400	\$4,662,210	\$185,820	\$4,936,530

# d. Plan to Measure and Evaluate Environmental Progress and Results

The City will track and measure progress with support from the QEP. The Project Manager will utilize project management software in conjunction with quarterly reporting to track timelines, expenditures, and project progress. The collected data will be entered into ACRES at appropriate milestones as well as long-term outcomes such as the number of jobs created, funding leveraged, the number of acres made ready for reuse, and volume of soil remediated. A work plan will be prepared that details those project milestones, and the City will track and measure progress against the work plan and goals to ensure grant funds are expended as planned within the three-year grant period. This process has been followed in the past and has been both successful and effective. If a project is not on schedule or track with Work Plan, the issue will be documented in the quarterly report and a corrective action plan will be implemented immediately. Reports prepared to satisfy state VCP requirements will further document cleanup activities and the effectiveness of the selected remedial action.

### 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

# a. Programmatic Capability

## i. Organizational Structure / ii. Description of Key Staff

The city has not encountered any adverse audit findings. We have an excellent record of management and compliance on all grants. The Office of Planning & Economic Development (OPED) shall serve as the project lead. **Project Manager, Wilson Darbin** has 4 years of experience within grant and project management. Wilson will oversee the performance of cleanup activities ensuring the timely and successful expenditure of funds and the completion of all technical, administrative, and financial requirements of grant. **Cathy Buono, Director of Administration and Finance,** will assist Wilson by managing and monitoring all financial transactions. Cathy has managed federal grant funds for the City for over 25 years, including HUD, EPA, and EDA funding. **Brian Connors, Deputy Director of OPED**, is our liaison between OPED and other City, state, and federal partners. He will serve as interim or replacement project manager in the event of project manager loss or re-assignment. Brian has over 20 years combined experience in directing EPA Brownfields programs and successfully managed several EPA Brownfields grants. He currently provides a support role offering technical guidance and assistance while overseeing the performance of assigned directives. In the event of staff turnover, the Mayor's Office would become responsible for ongoing compliance/completion for the duration of the Grant period. The **City's Law Department** will review contracts with QEP and remedial contractor and provide legal assistance.

### iii. Acquiring Additional Resources

The City will hire a QEP/MassDEP-approved Licensed Site Professionals (LSPs) using a competitive qualifications-based selection (RFP) process in accordance with City policies and Massachusetts law. The City's bidding requirements are consistent with 40 CFR Part 30. Selection will be based on the application of comparative evaluation criteria. The EPA Cooperative Agreement Terms and Conditions will be included

in the RFP and as part of the final contract. Translation services are expected to be competitively procured as part of QEP services. In addition, a qualified remedial contractor will also be competitively procured to conduct cleanup activities at the Site. The City prioritizes local hiring and procurement; the cleanup and anticipated redevelopment for the site will necessitate a variety of contractors and vendors, and the City plans to utilize local workforce as frequently as possible. Language about this priority will be incorporated into the RFP.

City ordinances discussing local hiring requirements

# **b.** Past Performance and Accomplishments

- i. Currently Has or Previously Received an EPA Brownfields Grant
- (1) Accomplishments: Springfield has successfully managed EPA Brownfields grants since 1998. The City has accomplished many projects with Brownfields funding in recent years, including: 2023 Community Wide Assessment Grant: 2023 Brownfields Conference attendance and RFP drafting. 2019 Community-Wide Assessment Grant: Four (4) Phase I/ Phase II ESAs have been completed. 2011 Cleanup Grant: \$95 million cleanup, restoration and redevelopment of historic Union Station on Frank B. Murray Street in downtown Springfield was completed in 2017, which integrated multiple transit modes (local and inter-city bus; Amtrak inter-city and planned New Haven, Hartford, Springfield commuter rail; and taxi, bicycle and pedestrian travel in one state-of-the-art transportation complex. The Union Station project won the Phoenix Award for Region 1 and the grand prize for best Brownfields redevelopment project in the Nation in 2017, awarded at the National Brownfields Conference in Pittsburgh, PA.
- (2) <u>Compliance with Grant Requirements:</u> The City's compliance has remained consistent throughout the reward periods. Assessments were completed in accordance with all applicable state and federal regulations. Overall, programs completed in accordance with workplan, schedule and terms and conditions. All funds, with the except of minor 'leftover change' were expended by the end of the grant periods. The city prepared and submitted all quarterly reports, ACRES reporting, FFR, WBE/MBE measures and status reports on time. Accomplishments, including leveraged funding, was entered into ACRES and updated regularly. Cleanup activities were complete and closure under the MA VCP.