

COMMUNITY INVOLVEMENT PLAN

Central & Main Windsor Housing

133 & 137 Street

Windsor, VT 05101

February 15, 2024

Overview

The purpose of the Community Involvement Plan ("CIP") is to describe the strategy to address the needs and concerns of the Town of Windsor residents potentially affected by the proposed Brownfields cleanup and redevelopment through an approved Corrective Action Plan (CAP) at the Central & Main Windsor Housing property ("the property") located in the Windsor, Vermont.

The plan for the property consists of redevelopment into a new three story, twenty-five (25) unit mixed-income residential apartment building. As part of the redevelopment project, three (3) existing abutting parcels, totaling approximately 1.06 acres, will be redefined into two parcels known as Lot 1 and Lot 2. The property, or Lot 1, currently consists of an empty vacant lot of approximately 0.58-acres.

This CIP outlines how Central & Main Limited Partnership (CMLP) has involved, and will continue to involve, affected residents, Windsor, VT officials, and local organizations regarding the environmental cleanup at the property. The success of the cleanup and subsequent redevelopment of the property hinges on informed citizens being aware of the Brownfields cleanup process.

The current owner of the property is CMLP. The planned redevelopment is anticipated to begin in March 2024. The CAP will be implemented by CMLP.

Spokesperson and Information Repository

The Spokesperson for this project is Mr. Peter Paggi of CMLP, who's contact information is as follows:

Mr. Peter Paggi, Central & Main Limited Partnership

68 Birge Street, Brattleboro, VT 05301

802-246-2113

ppaggi@homemattershere.org

Copies of all environmental assessment reports are available in Montpelier, Vermont at the Vermont Department of Environmental Conservation (VT DEC), Waste Management and Prevention Division offices. Inquiries can be directed to Ms. Cassandra Kimmey, VT DEC Site Manager, at (802) 505-8060. Reports are also available on the Environmental Research Tool at: <https://anrweb.vt.gov/DEC/ERT/HazSites.aspx>

Site Description

The property is in Windsor, VT along the eastern side of Main Street (US Route 5) with River Street to the north, Central Street to the east, and Etta Frasier Drive to the south. The property is located

within the central business zoning district, which is characterized as a mixed residential and commercial area. The property contains unleveled grounds throughout with a substantial slope along its western and eastern portions (e.g., down from Main Street and towards Central Street). The Windsor Diner (135 Main Street) and area immediately around it (e.g., 10 feet from building footprint) consist of a land lease specified in land records associated with Lot 2. Otherwise, there are no other buildings on the project site. The property is covered by grass vegetation and contains a partially buried concrete slab along the eastern edge of the lot. A gravel driveway (Etta Frasier Drive) from Central Street leads to a gravel parking area. From this gravel parking area, a gravel path leads to the Windsor Diner, although the primary access to the restaurant appears to be via Main Street.

Based on a review of topographic maps and aerial photography, the project area lies at an approximate elevation of 345 feet above mean sea level. The nearest surface water is the Connecticut River, which is located approximately 0.25 miles east. Based on topography, the surface drainage from the property is anticipated to flow in a general easterly direction. Utilities servicing the property appear to consist of municipal sewer, with a manhole located along the northeastern portion of the property. No other subsurface infrastructure is known to be present beneath the project area and none has been reported by the Town of Windsor.

Site History

The property has historically operated for residential purposes dating back to at least 1889.

Nature of Threat to Public Health and Environment

A significant amount of site assessment work and environmental investigations have been completed to date. These environmental investigations have identified impacts to environmental media at the property which are summarized below.

A Phase I Environmental Site Assessment (ESA) was completed at the Site property in July 2021. The Phase I assessment revealed evidence of the following recognized environmental condition (REC) in connection with the property:

1. The potential presence of historical fill material beneath the property as a result of historical urban use and historical fire(s).

In October 2021, a Phase II ESA was completed at the property and the adjacent parcel to the south (139 Main Street; Lot 2). The objective of the Phase II ESA work was to provide data to evaluate the potential impacts the REC may have had on the property soil and to provide information relevant to evaluating business environmental risk associated with potential future use and development of the property. The means by which this objective was completed included soil boring advancement and laboratory analysis of soil samples.

On October 6, 2021, six soil borings (SB21-1 through SB21-6) were advanced at various locations on the property to assess the potential presence of urban fill. No elevated photoionization detector (PID) readings or odors were noted in any of the soil borings advanced on October 6, 2021. Composite soil sampling was completed at the property to assess the potential for arsenic, lead and polycyclic aromatic hydrocarbon (PAH) impacts. PAHs were detected in five of the six samples at concentrations above the laboratory reporting limits. Samples COMP A (0-2'), COMP A (2-5'),

COMP B (0-2') and COMP B (2-5') contained Benzo(a)pyrene (BaP) at a concentration exceeding the applicable Vermont Soil Standard (VSS) for a residential property. PAHs expressed as the Toxic Equivalent Quotient (TEQ) for BaP exceeded the background level soil concentration for urban sites in the COMP A (0-2'), COMP A (2-5'), COMP B (0-2') and COMP B (2-5') samples. A concentration of arsenic and lead was reported in all samples; however, the concentrations were below the applicable VSS.

On July 6, 2022, eighteen soil borings (SB-1 through SB-18) were advanced at various locations on the property to further assess PAH, arsenic and lead impacts to soils. SB-1 through SB-6 were within Lot 2. SB-7 through SB-18 were within the property (identified as Lot 1). No elevated PID readings or odors were noted in any of the soil borings. Discrete soil samples were collected from the soil borings at shallow depths, (0-18" below grade), intermediate depths (between 18" to the native sandy layer), and depths within the deeper native soil to assess the potential for arsenic, lead and PAH impacts. PAHs expressed as the TEQ for BaP exceeded the background level soil concentration for urban sites in eleven (11) of eighteen (18) shallow soil samples and in six (6) of eighteen (18) intermediate soil samples. No PAHs were detected in any of the deeper underlying native soil samples. Arsenic and lead concentrations were reported in all the samples (shallow, intermediate, and native sand samples); however, the concentrations were below the applicable VSS except at SB9-S (shallow 0-18" sample) where total lead was reported at 410 mg/kg, which is slightly above the VSS of 400 mg/kg.

The source of the PAH impacts is believed to be related to the historical placement of fill on the property. Fill soils containing brick, wood and slate were observed throughout the property down to a maximum depth of 5.0 feet below grade. Soils above the native sandy layer have been shown to be impacted with PAHs above regulatory standards.

A CAP was prepared in accordance with the VT DEC *Investigation and Remediation of Contaminated Properties Rule* (I-Rule) to address the proper management of impacted soils during future redevelopment and was approved by the VT DEC on September 19, 2023.

Proposed Remediation

Redevelopment plans consist of building a three (3) story, twenty-five (25) unit mixed-income residential apartment building. The objective of the corrective actions at the property is to mitigate the potential exposure of impacted soils to future property users to the maximum extent practicable during and after redevelopment. This will be accomplished by implementing the following:

1. A soil management plan to ensure that impacted soils disturbed during construction are managed appropriately, do not migrate, and do not present a risk to potential sensitive receptors during construction. Impacted soils will be reused onsite as much as feasible. Excess soils will be properly disposed offsite;
2. Installation of engineered barriers to isolate impacted soils that will remain. The physical barriers will mitigate the potential for direct contact with contaminated soil; and,
3. Use of institutional controls to ensure engineered controls remain effective over time.

Community Background

The property is in the downtown area of the Windsor, Vermont. The Town of Windsor is located in Windsor County. As of the 2021 census, there were 2,145 people in the Town of Windsor with a median age of thirty-seven (37).

The Town of Windsor was chartered on July 6, 1761 and in 1777, the signers of the Constitution of the Vermont Republic met at Old Constitution House to declare independence from Great Britain. Windsor began development at the end of the 18th century and achieved importance in Vermont history as the location of the framing of the constitution of Vermont. It is known as the birthplace of Vermont, where the state constitution was signed, and acted as the first capital until 1805 when Montpelier became the official state capital. In 1820, Windsor was the State of Vermont's largest town and contained a thriving center for trade and agriculture. In 1835, the first dam was built in the Town across Mill Brook to provide water power. Several factories were present at this time which manufactured guns, machinery, tinware, furniture and harnesses. The Town is named for Windsor, Connecticut.

According to the United States Census Bureau, the Town has a total area of 19.8 square miles (51.2 km²), of which 19.5 square miles (50.6 km²) is land and 0.2 square miles (0.5 km²) (1.06%) is water. The median household income is estimated at \$37,283, which is well below Vermont's average household income of approximately \$70,000.

Chronology of Community Involvement

CMLP submitted an application to the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program as prospective purchasers of the property on February 21 2023. As part of this application a public notice was published in a local newspaper on February 25, 2023. No public comments were received. CMLP was accepted into the BRELLA program on April 7, 2023.

CMLP attended a development review board (DRB) meeting with the Town of Windsor on April 18, 2023. No public comments regarding the proposed corrective action were received.

CMLP attended the Selectboard for a public meeting (for the purposes of a VCDP application) on August 22, 2023. No public comments regarding the proposed corrective action were received.

A draft of the CAP dated September 23, 2023 was available to the community for comments. The CAP was posted to the VT Agency of Natural Resources (VTANR) Environmental Notice Bulletin (ENB) as well as to the VT Environmental Research Tool (ERT) on September 19, 2023. The comment period ran through October 23 2023 and one public comment was received, which was addressed by CMLP and did not result in revisions to the CAP.

A Notice of Approved Corrective Action Plan for the property was issued by the VT DEC on October 23 2023.

Key Community Concerns

To date, the communities of Windsor have not expressed concerns related to the project.

Continued Community Involvement

We actively solicit input of all kinds, and we will continue to meet with community members individually and/or collectively whenever they wish. We do not anticipate that the environmental remediation work will require further follow-up with the community following implementation.

A repository for documents related to this proposed cleanup project and public comment period has been compiled and includes environmental assessments, risk assessments and other environmental information and proposed cleanup plans. This repository can be accessed on Mount Ascutney Regional Planning's website under webpage 'Public Meetings for Proposed Cleanup Projects' ([marcvt.org/Programs/Brownfields/Public Meetings for Proposed Cleanup Projects](http://marcvt.org/Programs/Brownfields/Public%20Meetings%20for%20Proposed%20Cleanup%20Projects)). The documents can also be viewed at the Windsor Town Office by appointment by contacting Peter Paggi at (802) 246-2113 or at ppaggi@homemattershere.org. All comments, responses, meeting minutes and other relevant communications will become part of this Community Involvement Plan and the repository information will be updated.

Public Meeting

Jeremy Roberts, P.G. on behalf of CMLP will present the elements of the proposed remediation work at a public meeting as part of a public comment period. A public notice, including location and time, will be publicized through the Valley News newspaper and on the Mount Ascutney Regional Commission website at <https://www.marcvt.org/clean-up-projects.html> several days prior to the public hearing to initiate the public comment period. The public meeting specific to the CAP objectives, methods, and schedule will be held through a virtual Zoom meeting on February 27, 2024 @ 6:30 PM. The meeting can be accessed using the following link: <https://meet.google.com/vkz-scgf-jni> or via telephone at (US) +1 315-925-6316, PIN: 644 330 084#

The public notice is attached.

Sources of information:

- Windsor, VT, United States Census Bureau: <https://datausa.io/profile/geo/windsor-vt/>
- Vermont QuickFacts, United States Census Bureau: <https://www.census.gov/quickfacts/VT>
- Windsor, Vermont Wikipedia page:
- https://en.wikipedia.org/wiki/Windsor,_Vermont

Project Schedule

1. 9/23/2023 – CAP posted for public comment
2. 10/23/2023 – CAP approved
3. 2/17/2024 – Public notice of EPA funded Brownfields cleanup published
4. 2/27/2024 – Public meeting
5. 3/18/2024 – End of public comment period
6. 3/19/2024 – Respond to public comments
7. 3/20/2024 – Commencement of cleanup activities and construction
8. 9/1/2024 - Completion of corrective action

ATTACHMENT

PUBLIC NOTICE

Public Notice

Public Meeting (Virtual)
Use of MARC Brownfields Reuse Program Funding
For Corrective Action Plan Implementation at 133 & 137 Main Street, Windsor
Town of Windsor Selectboard Meeting
Tuesday, February 27, 2024, 6:30 PM
Accessed at: <https://meet.google.com/vkz-scgf-jni>
Or via telephone at (US) +1 315-925-6316, PIN: 644 330 084#

The Mount Ascutney Regional Commission (MARC) will be providing loan funds through its Brownfields Reuse Program to Central & Main Limited Partnership to mitigate the potential exposure of impacted soils to future property users to the maximum extent practicable during and after redevelopment at 133 & 137 Main Street in Windsor, Vermont. The funding for this cleanup project was made available to the MARC through a grant from the U.S. Environmental Protection Agency's Brownfield's Cleanup Grant Program. Remedial work is expected to begin in March 2024.

All interested parties are welcome to view the Community Involvement Plan and the Corrective Action Plan for this project, which describe the former and proposed use of the site and the proposed plan for clean-up of the identified contaminated soils. Documents can be found on MARC's website at <https://marcvt.org/brownfields-2/> under 'Public Meetings for Proposed Cleanup Projects'.

Members of the community are cordially invited to attend the meeting virtually to be held prior to the Selectboard Meeting to provide comment. Please contact Peter Paggi at ppaggi@homemattershere.org for information on attending the virtual meeting or go to the Windsor town website at <https://www.windsorvt.org/events-calendar> for the meeting link. Community members may also submit their comments in writing to Cindy Ingersoll of Mount Ascutney Regional Commission at cingersoll@marcvt.org or at (802) 674-9201.

All comments are to be received by March 18, 2024.