

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

### **A. Target Area & Brownfields**

**i. Background & Description of Target Area** – Norwalk (population 89,005) is a seaport community on the Long Island Sound that is easily accessible via Interstate 95 (I-95), Amtrak and Metro-North commuter rail. The distressed South Norwalk (SoNo) neighborhood along the city’s working waterfront struggles with a manufacturing history that dates to the colonial period. SoNo was once considered a prime spot for industry, which thrived for generations. Hats, clothing and other products were manufactured in this working-class neighborhood until the 1970s. When the factories closed, years of disinvestment in SoNo hid a legacy of soil and groundwater contamination.

One of SoNo’s major industries was hat manufacturing. Until the mid-20<sup>th</sup> century, hat making involved processes with chemicals including mercury. As Lewis Carroll’s “Mad Hatter” in *Alice’s Adventures in Wonderland* demonstrates, these practices caused serious health impacts. As the furs of animals were separated from their skins, a solution containing mercuric nitrate was used as a smoothing agent. The phrase “mad as a hatter” is associated with felt hat workers, and the symptoms of exposure include cognitive and memory loss, mental instability, speech problems, and ataxia. Connecticut outlawed the use of mercury in hat making in the 1940s. However, mercury remains in the soil where factories once stood.

***The low-income SoNo neighborhood (Census Tract 441 and Opportunity Zone ID #09001044100) is the key revitalization Target Area.*** SoNo, a state designated Environmental Justice (EJ) community with a long history of brownfields, is an emerging neighborhood for young families. The cost of living is less expensive due to older housing stock as well as the area’s industrial fabric which is woven throughout the community. The Target Area currently hosts multiple gas stations, body shops, dry cleaners, metal finishing companies, marinas, and fuel yards. As such, it presents a risk to a growing population of residents vulnerable to hazardous substances and petroleum, including pregnant women and children. Redevelopment efforts in SoNo seek to reduce real health and public welfare concerns.

The SoNo Train Station serves 1.7 million transit riders annually, is located adjacent to densely populated residential neighborhoods in the Target Area of SoNo, is less than 1/10<sup>th</sup> of a mile from two (2) elementary schools, and is less than ¼ mile from Ryan Park, the sole recreational space in SoNo. SoNo Train Station serves passengers along the Metro-North line, one of the busiest passenger railroads in North America (more than 86 million riders in 2017). Norwalk seeks EPA Brownfields resources to cleanup and redevelop a portion of the contaminated SoNo Train Station property to support transit-oriented development. A commuter parking garage and transit-oriented mixed-use development are planned reuses of the Site. Growth surrounding the SoNo Train Station will be incentivized with federal tax incentives, derived through the area’s Opportunity Zone (O.Z.) designation in 2018.

**ii. Description of the Brownfield Site** – Norwalk seeks to clean up a portion of the SoNo Train Station, located at 30 Monroe Street, which is currently used as a parking lot. The Site consists of an irregularly-shaped parcel totaling 3.03 acres of land. Norwalk acquired the property from the Penn Central Railroad in 1971. Historical uses of the property raise the potential for on-site contamination. Former railroad operations have included the handling and potential disposal, dumping, or releases of petroleum, solvents, coal, ash, and other potentially hazardous materials. Sanborn Fire Insurance Maps indicate that the site may have included hat manufacturing. Filling activities are suspected to have occurred on-site many decades ago. The location is listed by the Connecticut Department of Energy and Environmental Protection (CTDEEP) as a hazardous waste release site. Chemicals of concern associated with historic site operations include heavy metals (lead, arsenic, chromium, cadmium, mercury, etc.), petroleum hydrocarbons, volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs).

The topography of the site is generally level. The property sits at approximately 20 feet above mean sea level. The nearest surface body of water is Norwalk Harbor, located 2,000 feet east. The site was historically developed with manufacturing facilities, including the South Norwalk Electric Works Facility. The target property is also surrounded by nearby brownfields: 1) A parcel to the north had been used as a staging area for

rail cars. Incinerator ash was remediated when the site was redeveloped into a Norwalk Police Department facility. 2) To the east, the vacant textile manufacturer Corday Tie sits. Manufacturing operations likely included use and storage of petroleum, inks/dyes, solvents, and other textile-related chemicals. 3) Land abutting the site to the southwest hosted a former hat manufacturer. Another adjoining southwest lot was previously a dry cleaner. Typical constituents related to these activities include various metals, chlorinated solvent compounds and petroleum hydrocarbons.

Residential properties also surround the SoNo Train Station. As such, SoNo brownfields pose serious health, welfare, and environmental risks. Phase I and II assessments conducted at the Site indicate the presence of metals, petroleum hydrocarbons, PAHs and VOCs, including chlorinated solvents such as tetrachloroethylene (PCE) and trichloroethylene (TCE). Seven (7) total remedial areas were identified on the property. More than 1,700 tons of impacted material were excavated and disposed of from three (3) of these remedial areas in 2013. However, additional funding is needed to complete the cleanup at the four (4) remaining areas.

## **B. Revitalization of Target Area**

**i. Reuse Strategy & Alignment with Revitalization Plans** – The planned reuse of the site includes transit oriented mixed-use development and construction of a parking garage to serve one of the busiest passenger railroads in North America, which will help Norwalk meet the community’s goals of growing mixed-use development and encouraging public transit use. In 2016, the Norwalk Common Council adopted the *South Norwalk Transit-Oriented Development Redevelopment Plan*. The goal of this plan is to encourage private investment in underused land and buildings, and support the development of a compact, socioeconomically-diverse neighborhood within easy walking distance of the SoNo Train Station. The area designated for transit-oriented development is a patchwork of buildings and relatively small parcels. Current uses include surface parking lots, deteriorated buildings and industrial facilities. A major focus of the *South Norwalk Transit-Oriented Redevelopment Plan* is the preservation of existing affordable housing and the historic character of the area. Norwalk seeks to protect residents from displacement due to gentrification. Reclamation of brownfields in SoNo will help expand housing choice and reduce the cost of living for low-income residents. Cleanup also aligns with the *Washington Village/South Norwalk Choice Neighborhoods Transformation Plan*. The planning effort brought residents, social services, city agencies, and community organizations together, and linked affordable housing with quality education, public transportation, good jobs, and safe streets. Brownfield investment in the SoNo Train Station complements this renewal effort and is in conformance with all local, regional, and state plans.

**ii. Outcomes & Benefits of Reuse Strategy** – EPA resources will support Norwalk’s efforts to revitalize the distressed SoNo neighborhood, improve property values, invigorate the local economy, provide long-term employment opportunities, remove human health and environmental hazards, and help spur economic growth within Opportunity Zone ID# 441. The area is prime for transit-oriented development. Brownfields investment that enables Norwalk to implement its *South Norwalk Transit-Oriented Redevelopment Plan* is expected to leverage 595 new market rate and affordable housing units, 37,557 square feet of retail space and approximately \$24 million in City property taxes over a 30-year period. Of that projected development, 488 residential units have been built and leased. 276 residential units are under construction and include 3,870 sf retail space. 129 residential units are in permit and include 11,000 sf office and 5,800 sf retail. New housing and economic development opportunities will primarily benefit the area’s low-income residents. New jobs will provide employment in people’s backyards. Brownfields reclamation supports the creation of “inviting and active open space” that will provide young families with recreational opportunities. Smart growth will reduce transportation costs and enhance livability. Development projects in SoNo must adhere to the Agency’s *Sustainable Design Guidelines*, which promote “energy-efficient and sustainable building design.”

## **C. Strategy for Leveraging Resources**

**i. Resources Needed for Site Reuse** – Norwalk has extensive experience leveraging federal dollars with additional public and private resources. *The City has already secured other funding resources to support the SoNo revitalization strategy*, including a \$30 million HUD Choice Neighborhoods Implementation grant to

rebuild Washington Village into a \$108 million, LEED-ND mixed-use development with 136 high-quality public housing units, 68 affordable workforce units and 68 market-rate units. \$2 million in Federal Highway Administration grants to improve signalization in the corridor and \$640,000 in federal Transportation Alternatives pass-through funding from the Connecticut Department of Transportation (ConnDOT) for Complete Streets and streetscaping. Additionally, the City and State have invested \$9 million in road and sustainability improvements throughout the area and \$2 million from a Connecticut Office of Brownfield Remediation and Development grant to remediate and improve recreational opportunities in nearby Ryan Park. These public funds have leveraged an additional \$350 million of private investment into the neighborhood.

The following additional resources may be leveraged by EPA Brownfields cleanup dollars for redevelopment:

Source	Purpose	Amount	Status
Private Mixed-Use Redevelopment Project	Redevelop the site for housing	\$50M	Under negotiation
City & Norwalk Redevelopment Agency	Planning Study for SoNo Station TOD	\$150,000	Underway
Connecticut Office of Brownfield Remediation and Development, Brownfields Grant	In the event additional remediation funding is needed to complete project	TBD	To be pursued, if applicable
ConnDOT, Transportation Alternative Grant	Funding to realign rail tracks at SoNo Train Station	\$2-4M	To be pursued at applicable time
U.S. Department of Transportation (DOT), BUILD Grant	Funding to realign rail tracks at SoNo Train Station	\$10M	Pending

*The Opportunity Zone designation of Census Tract 441 provides an additional tool to attract private sector interest.* The City is actively reaching out to landowners, developers, tax experts, wealth advisors, and fund managers to promote the tax benefits, as well as market Norwalk properties.

**ii. Use of Existing Infrastructure** – The municipal burden to maintain underused infrastructure in the urban core increases as new development moves to Norwalk’s fringe. Revitalization of SoNo takes advantage of the use of existing infrastructure in the area that has the capacity to handle this expansion. The area is fully served by roads, water, sewer, electricity, gas, parks, and other public utilities (including high speed internet). The Target Area is also home to the eastbound SoNo Passenger Train Station, which was built in 1920 and served approximately 1.7 million commuter rail riders annually as of 2019. Brownfields cleanup would support proposed transit-oriented development in SoNo. The City of Norwalk has already invested in SoNo’s infrastructure, including sidewalks and crosswalks. HUD Community Development Block Grant dollars have helped create a more sustainable community, with infrastructure investments that raised the elevation of streets and infrastructure by 2-6 feet above the 500-year floodplain to alleviate flooding, along with a smart growth design as complete streets. EPA Brownfields investment will also make Norwalk more competitive for other funds. The City is currently seeking resources to realign rail tracks at the SoNo Train Station, including DOT BUILD dollars.

## II. COMMUNITY NEED & COMMUNITY ENGAGEMENT

### A. Community Need

**i. Community’s Need for Funding** – Norwalk is not able to complete cleanup of the site without EPA assistance. The Norwalk Redevelopment Agency has an annual budget of \$1.6 million, which primarily supports payroll and operating expenses. Norwalk has been forced to spend its limited resources recovering from damages sustained in several nationally declared disasters in recent years, including Hurricane Irene (2011) and Hurricane Sandy (2012) and Hurricane Isaias (2020). Between August 4 and October 10, 2020, the Norwalk Department of Public Works spent \$652,000 cleaning up from Hurricane Isaias, which included hauling 2,620 tons of debris off-site. Due to the COVID-19 health crisis, the City of Norwalk lost approximately \$2 million in foregone revenue from fees, and had to spend an estimated additional \$4 million in pandemic related response actions, including \$2.5 million for technology for schoolchildren, \$1 million for public facilities cleaning and social distancing preparation, and \$0.5 million for police overtime. In fiscal year 2019-2020, more than 90% of the housing units in the SoNo floodplain were adversely impacted. In addition, public property and infrastructure losses in the area totaled more than \$2.3 million. While Norwalk was able to clean up a portion of the SoNo Train Station Site in 2013, it has been unable to complete remedial activities

due to competing priorities for the City's limited funds. EPA funding will enable Norwalk to finish the project and move forward with the proposed transit-oriented redevelopment and reuse.

## **ii. Threats to Sensitive Populations**

**1. Health or Welfare of Sensitive Populations** – The SoNo Train Station poses serious health and welfare concerns. Assessments conducted at the Site have revealed hazardous materials comingled with petroleum contamination, including heavy metals (mercury, lead, arsenic, chromium, cadmium), PAHs, and VOCs (including PCE and TCE). EPA has designated some of these substances as priority pollutants. As such, they are highly carcinogenic, mutagenic and teratogenic. This grant will allow the City to identify and address these threats and reduce environmental exposures to the sensitive populations in the Target Area.

The existence of harmful contaminants present significant risks to SoNo's vulnerable populations, including minorities; pregnant women; children; low-income; and low educational attainment populations. Residents are exposed to contaminants daily via ingestion, inhalation, and/or dermal contact with contaminated soils and/or groundwater. As discussed, exposure to mercury can impair neurological development, as well as damage the gastrointestinal tract, nervous system and kidneys. High prenatal exposure to PAHs is associated with lower IQ, *childhood asthma* and other adverse birth outcomes. EPA has named TCE as "*carcinogenic to humans* and as a human non-cancer health hazard." Sensitive populations and those with certain diseases (*e.g.*, diabetes) or lifestyle factors (*e.g.*, alcohol consumption) are more at risk to TCE exposure. Lead interferes with a variety of body processes and is toxic to many organs and tissues. Low levels of lead in the blood of children can result in permanent damage to the brain and nervous system, leading to behavior and learning problems, lower IQs, slowed growth, and anemia. Pregnant women are also highly vulnerable to lead exposure, which *can result in serious effects on the pregnancy and the developing fetus*.

Furthermore, brownfields contribute to negative psychological impacts for residents in SoNo. Contaminated sites cut people off from downtown and disconnect neighborhoods. Blight, such as vacancy, facilitate criminal activity. In the recent past, the Federal Bureau of Investigation was called into SoNo to help the City address rising gun violence. EPA funding will initiate the process to clean up these contaminants and reduce exposure threats to sensitive populations, improve health conditions, and the overall welfare of the Target Community.

**2. Greater than Normal Incidence of Disease & Adverse Health Conditions** – Exposure to hazardous substances is likely a contributor to poor health outcomes. The Connecticut Tumor Registry shows higher cancer rates in Fairfield County (520.6 per 100,000), where the Target Area is located, than across the state (509.4 per 100,000). CDC 500 Cities Projects provides data that indicates high concentrations of *asthma* and incidences of childhood lead poisoning cases. Exposure to heavy metals, including lead and mercury, can cause immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory, and kidney damage, as well as *cancer*. Residents are acutely aware of these dangers posed by such contaminants such as lead and mercury (two common contaminants in the Target Area due to former manufacturing and hat-making industries) in the soils and groundwater of SoNo. Norwalk ranks fifth in the state for active lead poisoning cases, according to the Connecticut Department of Public Health. Lead concerns intensified following national attention on the health crisis in Flint, Michigan. In 2016, the City Health Department identified 66 Norwalk children with high lead exposure. Cleanup along this contaminated corridor will help to mitigate these risks.

**3. Disproportionately Impacted Populations** – SoNo has historically consisted of a mix of industry and residences in working-class neighborhoods. Much of the Norwalk's manufacturing base was once located in SoNo. The Target Area currently hosts multiple gas stations, body shops, dry cleaners, metal finishing companies, marinas, and fuel yards. SoNo is one of several state designated EJ communities within the City of Norwalk. Brownfields have unquestionably impacted the economy of SoNo. Contaminated sites depress area property values and reduce the City's tax base. The unattractiveness of these properties contributes to blight and incidents of crime. Brownfields discourage businesses from locating SoNo, thereby costing distressed neighborhoods job opportunities that would otherwise exist if not for the expensive environmental clean-up costs of brownfields. By some measures, community disinvestment in SoNo has intensified over time. According to the U.S. Census Bureau's 2012-2017 American Community Survey, *poverty rates are more than*

*two times higher in SoNo than across the City* (18.9% compared to 9.2%), and *household median income is approximately 20% less in the Target Area Census Tract / O.Z. #441* (\$68,571) compared to Norwalk as a whole (\$81,546). As such, a greater percentage of SoNo residents rely upon Food Stamp and Supplemental Nutrition Assistance Program benefits (16.3% compared to 8.0%). More than 15% of SoNo households do not own a vehicle. Exactly 15.0% of the adults in SoNo have no high school diploma. SoNo is a majority-minority community, with 66.1% non-white residents. Revitalization efforts in SoNo will create tremendous economic benefits. For years, businesses have bypassed SoNo for other areas of Southwestern Connecticut. Cleanup of the SoNo Train Station is critical to creating a vibrant, mixed-use community. Outcomes of successful transit-oriented development will include new jobs for Target Area residents. Remediating contaminants in this low-income neighborhood will limit exposure to hazardous substances, particularly for children and pregnant women, thereby reducing cancer and other health risks. Brownfields cleanup will also remove blight and crime and will increase community pride as well as the local tax base.

**iii. Community Engagement**

**i. Project Involvement and ii. Project Roles** – A Community Engagement Team (CET) will be formed to share information and gather community input. This team will organize and host a series of 3 meetings during the project timeframe. Local outreach activities will focus on Target Area SoNo residents, particularly sensitive populations. The purpose of this engagement is to share information, collect feedback, and describe next steps. Input will also be gathered to shape the cleanup and reuse of the Site.

<b>Name or organization / entity / group</b>	<b>Point of Contact (name, email &amp; phone)</b>	<b>Specific involvement in the Project or assistance provided</b>
SoNo Task Force - <i>Comprised of residents, business owners, and other stakeholders</i>	Bill Collins (203-846-1109) <a href="mailto:9collins@optonline.net">9collins@optonline.net</a>	Steering Committee, conduct outreach & educate community, engage residents in cleanup & reuse planning & support econ. dev.
SoNo Alliance - <i>Neighborhood association</i>	Rebecca Prosper <a href="mailto:rprosper@norwalkct.org">rprosper@norwalkct.org</a> 203 854 3002	Steering Committee, conduct outreach and encourage residents/ businesses to participate in cleanup and reuse planning process of project
Greater Norwalk Chamber of Commerce - <i>Business association</i>	Brian Griffin (203-866-2521) <a href="mailto:bgriffin@norwalkchamberofcommerce.com">bgriffin@norwalkchamberofcommerce.com</a>	Steering Committee, conduct outreach and encourage businesses to participate in the project, and support economic development
Housing Authority of the City of Norwalk - <i>Assists lower-income population find local housing</i>	Adam Bovilsky (203-838- 8471) <a href="mailto:abovilsky@norwalkha.org">abovilsky@norwalkha.org</a>	Help conduct community outreach, and help engage residents of South Norwalk in the cleanup and reuse planning process.
Norwalk Health Department - <i>Local health department</i>	Deanna D'Amore (203-854-7776) <a href="mailto:ddamore@norwalkct.org">ddamore@norwalkct.org</a>	Provide health-related technical assistance and help conduct community outreach

**iii. Incorporating Community Input** – Norwalk recognizes the role of community engagement in project success. Representatives from Project Partner organizations will be invited to participate on the CET and Steering Committee. Staff will meet regularly with these groups (at least quarterly) either in person or virtually, according to relevant CDC guidelines. Partners will also help engage residents and businesses. Personnel from the Norwalk Health Department will share information with residents on the safety of remediated brownfields. Engagement activities will occur according to relevant guidelines regarding social distancing, mask-wearing, and virtually through social media, and webpage and email updates, as needed. Information will be shared and feedback gathered through conference calls and virtual public meetings to minimize participants’ exposure to Covid-19 and held at convenient times. Traditional mass media, including the local newspaper, TV and/or area radio, will be used to disseminate information. Project updates will be provided at scheduled meetings, including Common Council sessions. Web sites and social media will describe brownfields efforts, provide links to recordings of virtual meetings, and promote engagement and feedback opportunities. Norwalk will also communicate through email, newsletter, and/or flyer mailings and other communication tools. All written outreach materials will be made available in English and Spanish. The proposed outreach tools are appropriate for the community, as Norwalk has used these communications methods with previous success.

### III. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS

**A. Proposed Cleanup Plan** – Based upon the results of a previous Phase II assessment, the site is not suitable for reuse without cleanup. As described in the attached Analysis of Brownfields Cleanup Alternatives (ABCA), three remediation approaches were considered:

- Alternative #1: No action. This alternative is not effective in controlling or preventing the exposure of potential receptors to contamination at the site.
- Alternative #2: Capping is an effective way to prevent potential receptors that could come into direct contact with contaminated soils on the subject property, if the cap is maintained. Alternative #2 involves removal of pavement and excavation to a depth of 27 inches. The site would then be restored with 24 inches of clean backfill material and paved with a minimum of 3 inches of asphalt. This alternative requires filing an Environmental Land Usage Restriction (ELUR) with the Connecticut Department of Energy and Environmental Protection to restrict future site use to industrial/commercial purposes. The approximate cost of Alternative #2 ranges from \$371,000 - \$474,000.
- Alternative #3: Excavation with off-site disposal of impacted soil followed by backfilling excavations with clean materials is an effective way to eliminate risk for all potential receptors, while still allowing access to the subsurface for future development, as contamination will be removed and the exposure pathways, including the potential for vapor intrusion, will no longer exist. Alternative #3 also meets the remedial goals established for the site and an ELUR would not be required. The approximate cost of Alternative #3 ranges from \$547,000 to \$687,000.

The City cannot accept Alternative #1 as it does not address the identified risks. Alternative #2 will not achieve the remedial goals established for the site if chemicals are left on-site at concentrations that exceed residential criteria. Alternative #3 is the preferred and most cost-effective approach for removing risk. Norwalk will enroll the property in Connecticut’s Voluntary Cleanup Program. The City will contract with environmental professionals to comply with and submit all required state and federal documentation. A professional engineer will develop and review necessary design and institutional control plans, as needed.

#### B. Description of Tasks/Activities and Outputs

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

EPA funding will enable Norwalk to build on past successes and cleanup the contaminated SoNo Train Station. The project will engage community residents, finalize the ABCA, and excavate and dispose of contaminated soils. This work is critical to achieving transit-oriented development in Norwalk. Norwalk will ensure timely implementation of key activities by: Procuring Contractors: Environmental contractors will be competitively procured through a Request for Proposals (RFP) process, to support community engagement, finalize cleanup plans and remediate the Site. Robust Monitoring and Reporting: Norwalk will establish specific benchmarks, evaluate ongoing progress and keep EPA abreast of all project developments. Strong State and EPA Coordination: The City will enroll its site into Connecticut’s Voluntary Cleanup Program. EPA Region 1 and the State will be invited to review plans.

Task / Activity	TASK #1
i. Proj. Implementation	<b>COOPERATIVE AGREEMENT OVERSIGHT</b>
Discussion of EPA-funded activities	Management & execution of cooperative agreement oversight activities including but are not limited to: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); procurement & management of a qualified environmental professional (QEP); maintaining financial records & completing drawdowns; maintaining project files & administrative record; project coordination with stakeholders; quarterly Steering Committee meetings, and ensuring the program remains on schedule and budget. Travel & attendance at National Brownfields Conference.
Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time for cooperative agreement oversight activities (\$50/hour for 50 hours). The City will provide additional in-kind services in the form of staff time, as needed, beyond those that have been budgeted for as part of this task to manage the grant.

ii. Anticipated Project Schedule	General C.A. Oversight activities will occur over the lifetime of the grant. The City will competitively procure a QEP by 12/31/21. Kick off program January 2022. Quarterly Reports will be submitted within 30 days after the end of each reporting period (Jan / April / July / Oct). Annual FFR and M/W/DBE reports will be submitted by October 30 of each grant year. ACRES will be updated when cleanup activities are started/completed, when new information becomes available & any other major milestones. Quarterly Steering Committee meetings. Final Closeout report will be submitted within 90 days after cooperative agreement period of performance ends.
iii. Task / Activity Lead(s)	The City will lead this task in coordination with and assistance by their partner, the QEP, who will provide technical expertise and provide programmatic assistance, including preparing QRs, ACRES, etc.
iv. Output(s)	EPA Reporting (ACRES, 3 annual FFR & M/W/DBE reports, 12 Quarterly Reports, Closeout Report, etc.), prepare request for qualifications and procure QEP, grant drawdown requests, 12 Steering Committee Meetings, attendance at National Brownfields Conference.
Task / Activity	<b>TASK #2</b>
i. Proj Implementation	<b>COMMUNITY OUTREACH &amp; INVOLVEMENT</b>
Discussion of EPA-funded activities for the priority sites	A key project component is continued community engagement, commencing in the second quarter of the project. A total of 3 public meetings will be conducted throughout the project period to share information, collect feedback and describe next steps. The City will establish and maintain an information repository for the site at the City's library and will designate a Community Relations Spokesperson. The City and CET will conduct extensive outreach and communication with Target Area residents and community stakeholders prior to undertaking the cleanup efforts and following the successful completion of remediation. The QEP will prepare a draft Community Relations Plan (CRP). The CRP will outline the steps to provide reasonable notice of proposed cleanup activities, opportunity for public involvement, response to comments, and other records that are available to the public. The draft CRP and an updated ABCA will be presented to the public a community meeting for review and comment over a 30-day comment period
Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time for community outreach activities (\$50/hour for 50 hours). The City will provide additional in-kind services in the form of materials/supplies (stationary / postage and mailings / etc.), as well as additional staff hours, as needed, beyond those that have been budgeted for as part of this task. The City will use the Agency for Toxic Substances and Disease Registry (ATSDR) Brownfields/Land Revitalization Action Model to foster dialogue among the diverse members of the community
Anticipated Project Schedule	Community Outreach and Involvement activities are expected to commence in the Winter of 2022 with the generation of CRP and occur over the lifetime of the grant. The City anticipates completing three (3) public meetings: 1) Pre-Cleanup (Post-CRP / Updated ABCA) ~Spring 2022; 2) Mid-Cleanup to discuss project status and solicit feedback from the community regarding proposed redevelopment ~Fall/Winter 2022; 3) and Post-Cleanup ~Spring/Summer 2023).
Task / Activity Lead(s)	The City will lead community engagement activities. The City will be supported by the CET and Norwalk Redevelopment Agency's Neighborhood Improvement Coordinator, David Shockley. In addition, the QEP will be the City's partner and will support the City by providing technical expertise and other community outreach assistance.
iv. Output(s)	Three (3) public meetings to share information, collect feedback and describe next steps; Community Relations Plan (CRP) outreach and presentation materials, public notification advertisement and other media updates, establish administrative record.
Task / Activity	<b>TASK #3</b>
i. Proj Implementation	<b>SITE SPECIFIC CLEANUP ACTIVITIES</b>
Discussion of EPA-funded activities for the priority sites	Cleanup activities to be conducted at the Site include the excavation and off-site disposal of 1,400 tons of impacted soils. This approach has an estimated cost of approximately \$547,000. Major expenses include transportation and disposal of regulated soils, as well as backfill, dust & erosion controls/air monitoring and temporary fencing to secure site access.

	These activities will be conducted by qualified environmental cleanup contractor competitively procured by the City and overseen by the City's QEP. The site-specific cleanup activities are anticipated to be conducted over months 6 – 24 of the grant period, including generation of cleanup planning documents such as ABCA/Remedial Action Plan (RAP), Health & Safety Plan (HASP), Quality Assurance Project Plan (QAPP), response to public comments, generation of bids and specifications, procuring a remediation contractor, conducting remediation activities, confirmation sampling activities, and soil management and Disposal related activities and documentation.
Non-EPA grant resources needed to carry out task / activity, if applicable	The Agency/City's cost share of \$95,000 in cash contributions will support additional remediation contractor and/or QEP services, including but not limited to the generation of a final as-built survey (\$20,000) and post-remediation groundwater monitoring well installation and sampling activities (\$75,000). The City will provide additional in-kind services in the form of staff time, as needed, beyond those that have been budgeted for as part of this task to manage the cleanup process.
Anticipated Project Schedule	The site-specific cleanup activities are anticipated to be conducted over the months 6 – 24 (Winter/Spring 2022 – Fall 2023) of the grant period
iii. Task / Activity Lead(s)	The QEP will lead the generation of cleanup planning documents. Remediation will be carried out by a licensed, environmental contractor under the oversight of the QEP, so the QEP can ensure that cleanup meets applicable state standards and complies with EPA requirements. City personnel will review planning documents for accuracy/completeness and provide oversight of the QEP's activities.
Output(s)	Updated ABCA/RAP, QAPP, bid specifications, HASP, 1,400 tons of contaminated soil removed and properly disposed of, and three (3) acres ready for reuse on a remediated site that no longer poses a threat to the community.
Task / Activity	<b>TASK #4</b>
i. Proj Implementation	<b>OVERSEE SITE CLEANUP</b>
Discussion of EPA-funded activities for the priority sites	The QEP will work with the City to enter the Site into the CTDEEP Voluntary Cleanup Program (VCP) and prepare the required CTDEEP reports, as applicable, for the project. During the course of remedial activities, the QEP will perform oversight activities to ensure all remedial actions are completed in accordance with the EPA approved ABCA / RAP and meet applicable state standards and will document all activities in a Cleanup Completion and Closure Report.
Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time to oversee site cleanup activities (\$50/hour for 50 hours). If necessary, the City will provide in-kind services in the form of staff time for additional hours beyond those that have been budgeted for as part of this task.
ii. Anticipated Project Schedule	Commence Summer 2023 and complete by end of grant performance period. The city is confident all work can be completed within 3 years.
iii. Task / Activity Lead(s)	The QEP will lead these tasks to ensure all remedial actions are completed in accordance with the EPA approved ABCA / RAP and meet applicable standards and to be able to document activities in a Cleanup Completion and Closure Report. The City will oversee the QEP's activities and will review cleanup completion documents for accuracy/completeness. The City will enroll the Site into CT VCP with assistance from the QEP.
iv. Output(s)	Cleanup Completion & Closure Report, CTDEEP reports, as applicable, and letter of cleanup completion from Connecticut Office of Brownfield Remediation and Development

### C. Cost Estimates

**Norwalk seeks \$500,000 of Hazardous Substances federal funding. The budget was developed with input from environmental contractors and based upon past brownfields experience with similar projects: Task 1:** Personnel = \$5,000 (100hrs x \$50/hr – includes fringe); Brownfield Conference – 1 attendee (travel, lodging, per diem) = \$2,000; Contractual = 12 QRs (@ \$125 ea. = \$1,500) per plus general Programmatic Oversight Assistance (45 hours x \$100/hour = \$4,500) = \$6,000. **Task 2:** Personnel time = \$5,000 (100hrs x \$50/hr); Contractual = \$5,000 [(\$1,000/mtg x 3 public meetings) + \$2000/CRP]; **Task 3:** Contractual: \$452,000 [QEP = \$75,000 (750hrs @ \$100/hr average) + Remediation Contractor \$377,000 (\$157,375 in remediation

contractor costs plus soil transportation and disposal costs (\$140,000 for 1,400 tons of soil at \$100/ton); backfill (\$23,375 for 935 tons at \$25/cy); dust and erosion controls / air monitoring (\$46,250); and temporary site fencing (\$10,000)]. **Task 4:** Personnel = \$5,000 (100 hrs x \$50/hr); Contractual = Cleanup/Completion Reports = \$20,000.

Budget Categories	Project Tasks				TOTAL
	1.Cooperative Agreement Oversight	2.Community Outreach & Engagement	3.Site-Specific Cleanup Activities	4.Oversee Site Cleanup	
<b>Personnel</b>	\$5,000	\$5,000	\$0	\$5,000	<b>\$15,000</b>
<b>Travel</b>	\$2,000	\$0	\$0	\$0	<b>\$2,000</b>
<b>Equipment</b>	\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Supplies</b>	\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Contractual</b>	\$6,000	\$5,000	\$452,000	\$20,000	<b>\$483,000</b>
<b>Other</b>	\$0	\$0	\$0		<b>\$0</b>
<b>Total Direct Costs</b>	\$13,000	\$10,000	\$452,000	\$25,000	<b>\$500,000</b>
<b>Indirect Costs</b>	\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Total Federal Funding</b>	\$13,000	\$10,000	\$452,000	\$25,000	<b>\$500,000</b>
<b>Cost Share</b>	\$2,500	\$2,500	\$95,000	\$0	<b>\$100,000</b>
<b>Total Budget</b>	<b>\$15,500</b>	<b>\$12,500</b>	<b>\$547,000</b>	<b>\$25,000</b>	<b>\$600,000</b>

**Cost Share** – The Norwalk Redevelopment Agency and City of Norwalk will provide \$95,000 in cash match contributions to support cleanup activities [through additionally needed QEP and environmental contractor services, including but not limited to, the generation of a final as-built survey (\$20,000) and post-remediation groundwater monitoring activities, including re-establishing the groundwater monitoring network (\$75,000), plus \$5,000 (\$50/hr x 100 hrs) in in-kind staff time split evenly to administer cooperative agreement oversight and community involvement activities, for a total of \$100,000 in cost share / match.

**D. Measuring Environmental Results** – Norwalk will systematically track and measure progress. Quarterly reports and internal project management software will be used to help ensure that cleanup activities are moving along, and that project outputs and outcomes are being achieved. The project manager will be responsible for this performance measurement. Data will be regularly entered into ACRES. An established work plan, to be approved by EPA, will guide project results. The project manager will evaluate progress based upon milestones identified in the work plan. This will provide safeguards that grant funds are expended in a timely and efficient manner. This process has been followed in the past and has been both successful and effective. If the project is not on schedule, the reasons will be documented in the quarterly report and a corrective action plan will be implemented to get on track again.

**IV. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE**

**A. Programmatic Capability**

**i. Organizational Structure and ii. Description of Key Staff** – Norwalk has a long track record of successfully managing community projects. Key to this effort is the development of a detailed work plan with clear milestones and responsibilities. This will be developed at an initial meeting, including participation from the Redevelopment Agency’s Executive Director and other key staff. Mark Lewis, Connecticut’s Brownfields Coordinator, and other key state officials will be invited to participate. The meeting will identify goals and strategies, and responsibilities within the work plan will be delineated. Performance measures will be established in order to track progress. To ensure that the project is on schedule, status updates will be incorporated into the City’s existing reporting structure. The City has the staff expertise necessary to manage the project. *EPA project management duties will be assigned to Jonathan Hopkins, the Norwalk Redevelopment Agency’s Director of Program Development.* His areas of expertise include planning and design. Jonathan joined the Redevelopment Agency in 2020 after working in a municipal planning department

and a private architectural services practice for a total of seven years. He will serve as a liaison between EPA Region 1 and Norwalk, and will be responsible for ensuring compliance with the administrative and reporting requirements of the cooperative agreement. Jonathan will lead all of the community engagement activities associated with the grant and will be responsible for hiring and managing paid QEP and environmental contractors.

Jonathan will be supported by a qualified team of interdepartmental staff. Executive Director **Brian Bidolli** has over a decade of experience managing redevelopment initiatives, including Brownfields funding during his time as Planning Director of the Greater Bridgeport Regional Planning Agency. **David Shockley** has been the Norwalk Redevelopment Agency's Neighborhood Improvement Coordinator since 2007. He will support community outreach activities for the project. **Eugenia Lupinski** serves as the Norwalk Redevelopment Agency's Comptroller and has worked for the Agency since 2005. Eugenia's responsibilities include financial accounting and budgeting. **Mario Coppola** is Norwalk's Corporation Counsel. Mario will address any liability concerns. **A Steering Committee will also be formed, including representatives from the Project Partners.** It will meet regularly (initially and at least quarterly thereafter) to direct the project and assure that it will be completed with the 3-year timeframe.

**iii. Acquiring Additional Resources** – Norwalk will hire a QEP and qualified contractors to complete cleanup plans and conduct remedial actions at the 4-remaining remedial sites at the SoNo Train Station. These services will be solicited using competitive procurement practices and in accordance with all federal and state requirements. The City's established procedures include seeking statements of qualifications and price. Professionals with previous EPA Brownfields experience will be encouraged to compete. The Connecticut Office of Brownfield Remediation and Development will provide technical assistance, share best practices and review cleanup plans. The City will enroll the site into Connecticut's Voluntary Remediation Program. The Norwalk Health Department will provide risk communication assistance. In addition, Norwalk will coordinate with the New Jersey Institute of Technology (EPA Region 1's Technical Assistance to Brownfields provider).

## **B. Past Performance & Accomplishments**

### **i. Currently Has or Previously Received EPA Brownfields Grants**

**1. Accomplishments** – Norwalk's 2006 EPA Assessment funding was critical in establishing the City's brownfields program. The grant supported the development of an inventory that identified 261 brownfield sites. Assessments were conducted at 8 sites. This funding was able to leverage an additional \$300,000 from the state to remediate a surface parking lot to the east of the SoNo Train Station. Remediation efforts were completed in 2013. The City is considering conveying these sites to a private developer to support the SoNo Train Station. The 2014 Assessment grant (which closed on September 30, 2019) helped Norwalk build on its brownfields success. Project outputs included: public outreach materials, 2 public meetings, 7 Phase I assessments, 5 QAPPs, 2 Phase II assessments, 1 Phase III assessment, 1 cleanup/reuse plan, and a completed project which resulted in an EPA Success Story for Ryan Park. The City's brownfields inventory was also updated and prioritized within each targeted redevelopment district. The grant helped the City leverage over \$71 million in additional cleanup and redevelopment funding from private, state and/or federal partners. The outcomes of this work have included affordable housing, public recreational space, new jobs, increased tax revenues, and higher property values. ACRES is up to date.

**2. Compliance with Grant Requirements** – Norwalk has previously managed EPA funds. Work plans and schedules were developed and followed for 2006 and 2014, and proposed outputs and outcomes were achieved. Grant terms and conditions were satisfied, including the timely filing of quarterly reports, financial status reports, and the closeout report. All 2006 grant funds were expended on time and only \$9,085.04 of 2014 petroleum resources had to be returned due to an administrative error. The employee responsible for the error has retired from the Norwalk Redevelopment Agency and all financial matters were resolved by the City prior to grant closeout. Under Brian Bidolli, who became the Executive Director of the Norwalk Redevelopment Agency in December 2019, several new hires were brought in, including Director of Program Development Jonathan Hopkins to provide successful project management experience.