NARRATIVE INFORMATION SHEET

1. Applicant Identification:
   Sustainable Valley Group, Inc. (SGV)
   50 Depot Street
   PO Box 406
   Bellows Falls, Vermont 05151

2. Website URL:
   https://www.sustainablevalleygroup.org/

3. Funding Requested:
   a. *Grant type:* Single Site Cleanup
   b. *Federal Funds Requested:* $3,601,558

4. Location:
   Village of Bellows Falls, Town of Rockingham, Windham County, State of Vermont

5. Property Information:
   The Former Robertson Paper Mill (TLR) Complex
   10 & 16 Mill Street, Bellows Falls, VT 05101
6. Contacts:
   a. *Project Director*: Dave Bonta, 802-376-3838, *DGBonta@gmail.com*
      30 Island Street, Bellows Falls, VT 05101

   b. *Chief Executive:* Dave Bonta, President, 802-376-3838, *DGBonta@gmail.com*
      30 Island Street, Bellows Falls, VT 05101

7. Population:
   Town of Rockingham, Vermont has a population of 4,832 (US Census, 2020 Decennial Census)

8. Other Factors:

Other Factors	**Page #**
Community population is 15,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is	3

identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

9. Releasing Copies of Applications/Confidential Business Information:
   No portions of this application are confidential, privileged, or sensitive in nature.

NARRATIVE

1. PROJECT AREA DESCRTIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The proposed Target Area is located within a federally designated Opportunity Zone along the Connecticut River in the Village of Bellows Falls, Vermont. The Target Area consists of the Bellows Fall Island and Under the Hill District; the area was once of historical importance due to transportation and industrial capacity garnered from the Connecticut River, which spurred the development of large-scale paper manufacturers and associated rail infrastructure. At the time, the area was heavily manipulated to support the industry - canals to support mill activities, power generation, and transportation, led to the creation of the Island, physically separating the area from downtown Bellows Falls.

For more than a century, the Target Area was a regional employment center and contributed significantly to the prosperity of Bellows Falls. However, with the closure of major mills in the 1980s, the area entered a period of prolonged economic decline. Today, the legacy of these historic industrial uses has resulted in a high density of contaminated, underutilized properties, greatly exceeding other parts of town or the region. Within a 47-acre area, there are 14 Vermont Department of Environmental Conservation listed hazardous/brownfield sites, including three with institutional controls or environmental restrictions, representing approximately one-third of all parcels. The corridor also contains six active or inactive RCRA sites, and the portion of the Connecticut River bordering the Target Area is classified as Integrated Reporting Category 5, indicating that at least one designated use is impaired or threatened (EnviroAtlas). Nearly 50% of the land area is dedicated to rail and hydroelectric operations, underscoring the intensity of industrial modification. Across the Target Area, properties have documented contamination from petroleum compounds, chlorinated solvents, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals.

These brownfield conditions have a substantial and lasting impact on the Bellows Falls community. Vacant and blighted mill buildings, many of which contain asbestos, lead-based paint, and PCBs, pose safety hazards and contribute to visual blight. Structural deterioration, exacerbated by deferred maintenance, further limits access and redevelopment potential. The combination of contamination, aging infrastructure, and uncertainty surrounding environmental conditions has suppressed private investment and hindered economic mobility, contributing to broader demographic and fiscal challenges in the community including low household median income and outmigration. The Village of Bellows Falls experienced a 1.3% population decline between 2010 and 2020; declining school enrollment in the Rockingham School District, has resulted in school closures and revenue shortfalls. The physical isolation of the Island, combined with limited riverfront access, has constrained community use, business growth, recreation, and tourism opportunities; it also has led to greater impacts on the downtown district due to decreased traffic and employment.

The EPA Brownfield Cleanup Grant proposed herein will directly address these longstanding challenges by enabling remediation of a key contaminated site identified as a catalytic opportunity in multiple planning efforts. Cleanup will remove significant barriers to investment, protect public health, stabilize historic buildings, and support the revitalization goals in the EPA-supported Bellows Falls Area-Wide Plan (AWP). This investment will advance the transformation of the Bellows Falls Island and Under the Hill District into a vibrant, connected neighborhood supporting economic growth, tourism, housing, education, cultural interpretation, preservation of historic structures central to the community's identity, and public access to the Connecticut River.

b. Description of the Proposed Brownfield Site

The Proposed Brownfield Site is the 0.66-acre Former TLR Complex, located at 10 and 16 Mill Street, within in the Target Area. The Site was used for industrial paper manufacturing by several owners from the early 1800s until 1986. Three structures remain onsite: the Russell Building (formerly a carpentry and repair shop located at 10 Mill Street), the Moore Building (formerly used for shipping, office, and storage functions and containing a covered canal segment located at 16 Mill Street), and a small brick outbuilding historically used as a pump house.

All buildings are currently vacant and in deteriorated condition due to decades of deferred maintenance. Former structures on-Site included a pulp mill and paper manufacturing building that were demolished in 2003 during an EPA removal action.

Extensive environmental assessments, including the most recent 2023 Supplemental Phase II ESA and a Supplemental Site Investigation and Evaluation of Corrective Action Alternatives in 2025, document contamination across multiple media:

- Soil gas beneath and adjacent to both buildings contains benzene, naphthalene, TCE, and PCE at concentrations exceeding Vermont's resident and non-resident Vapor Intrusion Standards, with the highest concentrations present beneath both the Russell and Moore buildings. These conditions create a significant vapor intrusion risk for any future building use. Moreover, data indicates that PCE in soil gas is migrating onto the abutting Adam's Grist Mill property. Historic paper mill operations are the likely source of the chlorinated and petroleum VOCs.
- Surface and subsurface soil contain contaminants consistent with long-term industrial fill, including PAHs above the Vermont Soil Standards (VSS), low-level dioxins/furans, and metals such as arsenic and lead, along with petroleum-related staining near a former 13,500-gallon fuel oil UST location. In the former building footprints and proposed amphitheater area, PAHs and VOCs exceed the resident VSS in surface soil.
- Groundwater contains low levels of VOCs and PFAS below VGES, with evidence of natural attenuation and reductive dechlorination.
- Floor tiles and window glazing contain asbestos in the 16 Mill Street building, and lead-based paint was identified on multiple interior and exterior surfaces throughout both buildings, including leachable lead in building materials. Hydraulic oil splashed on the elevator pulley system at 16 Mill Street contains PCBs and another pulley system in 10 Mill Street may be contaminated with PCBs however it could not be assessed due to deteriorated flooring beneath the system. These materials will require abatement or controlled management during redevelopment.

The TLR Complex is identified as a Tier I Catalyst Site in the 2021 EPA-supported Bellows Falls Island and Under the Hill AWP. Its cleanup is essential not only to address documented environmental and structural hazards but also to address migrating contamination onto adjacent properties. This will enable the redevelopment vision for the Connecticut River Cultural Heritage Center (CRCHC) and surrounding district.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The Proposed Brownfield Site is central to the long-standing vision for the CRCHC, first conceived in a 2002 community-led architectural and feasibility study focused on the future of the TLR Complex and adjacent mill properties. The study established a unified vision to preserve and interpret the region's industrial heritage while activating the buildings with artist studios, gallery and retail space, workshops, markets, and programming reflecting the area's paper mill, rail, and river-based history. A subsequent 2009 strategic planning study led by a coalition of partners continued to focus on the TLR Complex and adjacent properties and further developed use scenarios, programs, and interconnected uses for the CRCHC. The study underscored the importance of preserving the mill buildings, including those at TLR, and based on community and stakeholder input, developed several possible visions for the site including concepts focused on the creative economy and supporting local arts and education; above-all, stakeholders all agreed on ensuring the TLR site is accessible and available to the public. This concept continues to guide community planning efforts as seen in the EPA-supported 2022 Bellows Falls Island and Under the Hill AWP, which reaffirms the TLR Complex as a Tier I Catalyst Site whose redevelopment is essential to revitalizing the Island and Under the Hill District. The AWP envisions the TLR Complex and adjacent properties functioning together as a cultural, economic, and recreational hub that strengthens multimodal connections, enhances public access to the Connecticut River, attracts visitors, and supports local businesses and artists. Each of these studies was deeply rooted in stakeholder engagement, including representatives from a diversity of organizations including the Bellows Falls Historical Society, Town of Rockingham, Preservation

Trust of Vermont, Bellows Falls Downtown Development Alliance, Windham Regional Commission (WRC), and the Vermont Arts Council as well as community engagement opportunities with the general public.

Consistent with community planning efforts and grounded in the extensive community engagement, including public meetings, stakeholder interviews, and collaboration with the diverse partners listed above, Sustainable Valley Group's (SVG's) reuse strategy for the TLR Complex includes heritage interpretation exhibits, artisan studios, gallery and retail space, classrooms and workshop areas, and flexible community meeting and event space. An outdoor amphitheater is planned for performances, educational programming, and cultural events. These uses will support storytelling, workforce and creative economic development, and intergenerational learning while preserving and reactivating historic architecture. The development will include upgrades to the building to promote energy efficiency including replacement of windows and doors and exploring the possibility of geothermal energy.

Cleanup is essential for enabling this reuse. Environmental assessments have documented vapor intrusion risks from chlorinated and petroleum VOCs, PAHs, VOCs and metals in soil, asbestos and lead-based paint, and PCBs in hydraulic oil, as well as structural deterioration and slab instability. These conditions prevent safe occupancy, hinder renovation, and limit public access. EPA Cleanup Grant funding will allow SVG to mitigate vapor intrusion, abate hazardous building materials, and manage impacted soil. Once cleanup is complete, the buildings will be suitable for the proposed use, which will help catalyze the broader revitalization of the Bellows Falls Island and Under the Hill District, advancing economic development, tourism, cultural preservation, housing, and riverfront access as envisioned in the AWP. Redevelopment of this historic site will reinvigorate an important community asset, create new opportunities for local artists and small businesses, and transform the district into a vibrant cultural and economic destination for residents and visitors.

d. Outcomes and Benefits of Reuse Strategy

Cleanup and redevelopment of the TLR Complex will generate significant public health, environmental, economic, and cultural benefits for the Target Area. Remediation of vapor intrusion risks, contaminated soil, and hazardous building materials will eliminate current exposure pathways to chlorinated and petroleum VOCs (Proposed Site and adjacent property), PAHs, metals, asbestos, lead-based paint, and PCBs. This will result in 0.66 acres cleaned, and two buildings equating to 11,200 square feet ready for revitalization.

Following cleanup, the TLR Complex will be activated as part of the CRCHC, creating space for artisan studios, gallery and retail areas, community workshops, and cultural programming. These uses will attract visitors, support local artists and small businesses, and stimulate economic activity consistent with the EPA-supported AWP. Redevelopment will also support job creation during construction and ongoing operation. The project will preserve and reuse historic mill buildings, strengthening community identity and providing space for heritage interpretation, education, and regional storytelling. Planned pedestrian and vehicle connections and an outdoor amphitheater will expand access to the riverfront, improve accessibility between downtown and the Island, and create inclusive public spaces for events and recreation. Cleanup also enables climate-resilient redevelopment through improved stormwater management, engineered barriers, and reuse of existing structures, reducing waste and supporting long-term environmental stewardship. Collectively, these outcomes will transform a blighted brownfield into a vibrant cultural and economic anchor that advances community priorities.

Strategy for Leveraging Resources

e-g. Resources Needed for Site Characterization, Remediation, and Reuse

The project has identified sufficient resources for characterization and remediation, with EPA Cleanup Grant funds expected to cover planned cleanup costs. Site characterization or additional cleanup funding is not anticipated to be a need, but if project needs arise, the VT DEC Brownfields Financial Assistance and WRC Brownfield Reuse Initiative, and the WRC RLF have been identified, respectively. SVG is developing a resource roadmap to support developing a funding stack for reuse; initial identified site reuse resources are included in the table below.

Name of Resource *(identified not secured)*	**Additional Details**
Northern Borders Regional Commission Catalyst Program	Community infrastructure and economic development; awards up to $1mil; fits CRCHC public access and connectivity improvements.
Vermont Community Development Program - Implementation Grant	Supports rehabilitation of community facilities and public infrastructure; up to $1mil for eligible projects.
Vermont Arts Council – Cultural Facilities Grants	Supports interior cultural space upgrades, accessibility, and energy improvements; awards up to $30,000.
Vermont Building Communities Facility Grant	Supports facility improvements in underinvested communities, aligned with CRCHC reuse.
USDA Rural Community Development Initiative Grant	Supports community facility improvements and economic development; awards up to $500,000.

h. Use of Existing Infrastructure

The reuse plan for the Proposed Site includes revitalizing and improving two historic buildings onsite, a 6,000 square foot, three story brick building known as the Russell/Carpenter Building and a 5,200 square foot brick building known as the Moore/TLR Building built in approximately 1869. The Proposed Site benefits from substantial existing infrastructure that supports efficient and cost-effective redevelopment including municipal water, public wastewater, and roadway access. Leveraging this existing capacity will facilitate adaptive reuse, reduce redevelopment costs, and support improved pedestrian and vehicle connections to downtown and the Island as envisioned in the AWP.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. The Community's Need for Funding.

The Target Area is located within a federally designated Opportunity Zone and within one of the most economically distressed communities in Vermont. Bellows Falls is a small, rural community with limited fiscal capacity, as demonstrated by the socio-economic indicators summarized below hindering the ability to address brownfield conditions.

Indicator (ACS, 2023 5-year estimates, unless noted)	**Bellows Falls**	**Vermont**	**United States**
Population (2020 Decennial Census)	2,747	643,077	331,449,281
Population change (2010 to 2020; 2010/2020 Decennial Census)	**-1.3%**	2.8%	7.4%
Senior Population (65+)	**20.9%**	22.9%	18.0%
Median Household Income	**$54,836**	$82,730	$81,604
Poverty Rate	**19.1%**	9.0%	12.1%
Cost Burdened Households (rent ≥30% income)	**57.1%**	49.8%	50.4%
Unemployment Rate	**2.9%**	1.7	2.9%
Education (bachelor's degree or higher)	**29.3%**	45.1%	36.8%
Occupied Housing Units Built Before 1980	**92.3%**	55.2%	47.7%
Vacancy Rate	**16.7%**	16.8%	5.7%

Bolded indicators notate distress factors above/below State or national averages.

The scale and complexity of contamination within the Target Area exceed local financial resources. The Village's limited tax base and long-standing economic challenges prevent it from undertaking costly brownfield remediation, and private-sector investment has been deterred by environmental uncertainty and cleanup liability. Without EPA Cleanup Grant funding, the TLR Complex will remain vacant and blighted, continuing to impede economic recovery and revitalization efforts. EPA funding is therefore essential to advance the community's vision in the AWP, demonstrate progress, and attract additional investment to the Target Area.

b. Health or Welfare of Sensitive Populations

As documented in the table above, nearly 20% of the population of Bellows Falls lives in poverty and the median household income is about two-thirds of Vermont's statewide average. According to ACS data, 19% of households receive food stamps/SNAP, indicating a high level of economic insecurity that limits a family's ability to absorb additional health or environmental burdens. According to EnviroAtlas, 90.3% of households in the Target Area are below the quality-of-life threshold income. Bellows Falls also has a high proportion of sensitive age groups: approximately 19.8% of residents are under 18, and over a quarter (27%) are over age 62. Children and older adults are more vulnerable to environmental exposures because of developing or compromised immune systems, higher respiratory sensitivity, and mobility limitations that may restrict their ability to avoid or respond to environmental hazards.

These vulnerabilities intersect with brownfield conditions in the Target Area. The Proposed Site contains documented vapor intrusion risks from chlorinated and petroleum VOCs. Children are particularly susceptible to these contaminants because of higher breathing rates and developmental sensitivities, while older adults, especially those with pre-existing respiratory or cardiovascular conditions, face elevated health risks from chronic exposure even at lower concentrations. Hazardous building materials, including asbestos and lead-based paint, present additional risks to these age groups if left unaddressed. Economic insecurity further amplifies sensitivity to environmental conditions.

The cleanup of the Proposed Site will directly reduce these exposure pathways by addressing vapor intrusion risks, removing hazardous materials, and stabilizing deteriorating structures. Remediation will also reduce blight-related stressors, improve safety, and create healthier public spaces that serve children, older adults, and low-income households disproportionately affected by current conditions. In doing so, the project will lessen cumulative environmental health burdens and support improved long-term health and welfare for the most vulnerable residents of Bellows Falls and the Target Area.

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

According to the CDC Places tool, the census tract encompassing the Target Area has higher prevalence of adult asthma, cancer, coronary heart disease, and depression than national averages (table below). Moreover, according to the Vermont Department of Health, an estimated 23% of blood level tests for 1- and two-year-olds are elevated, higher than statewide. Exposure to contamination from brownfield sites places an additional health burden on sensitive populations and may exacerbate conditions such as asthma, cancer, and other chronic diseases. Research also has shown the connection between poverty, economic opportunity, neighborhood blight, and mental health. The Proposed Brownfield Site presents an increased risk of exposure to the community through identified exposure pathways. The cleanup facilitated by this grant would remove exposure pathways to known contaminants and reduce the risk of disease and adverse health conditions.

Disease	Target Area Prevalence	National Average
Adult Asthma	**11.8%**	10.5%
Cancer (except skin)	**9.5%**	7.8%
Coronary Heart Disease	**7.0%**	6.5%
Depression	**28.8%**	22.1%

Bolded indicators notate distress factors above national averages.

d. Economically Impoverished/Disproportionately Impacted Populations

As described above, the Target Area experiences high rates of people living in poverty and significantly lower median incomes. The Target Area once hosted numerous paper mill companies that physically altered the environment to promote operational efficiencies and productivity. As the industry shuttered, the Target Area and many historic buildings have deteriorated with little private investment, leading to unsafe structures, blight, and widespread environmental contamination such as VOCs, metals, and petroleum. These challenges have greatly impacted businesses in downtown Bellows Falls, leading to cascade effects such as outmigration, increased vacancy rates, and aging infrastructure and homes.

This EPA Cleanup Grant will directly help to reduce these challenges by cleaning up an identified catalyst site in the Target Area. The Proposed Brownfield Site is envisioned as an integral part of the CRCHC and will celebrate

and share the rich history of the Target Area through experiential learning and hands-on displays and an on-site amphitheater which will host educational programming and community performances. The Proposed Brownfield Site will also support local artists and businesses by creating a marketplace designed to attract people of all ages and tourists from the region. This is expected to have ripple effects on the greater Bellows Falls community.

e-g. Project Involvement & Project Roles

Organization/Contact	Mission/Role in Project
WRC: Sue Westa, Associate Director / Brownfields Program Manager swesta@windhamregional.org 802-257-4547 ext. 108.	**Mission**: Assist towns in Southeastern VT in providing effective local governance and collaboratively addressing regional issues. **Role**: Lead entity responsible for grant administration, including EPA coordination, ACRES reporting, financial management, contracting, recordkeeping, and oversight of assessment and cleanup activities.
VT DEC: Lynda Provencher, Sites Manager lynda.provencher@vermont.gov 802-249-5562	**Mission**: Preserve, enhance, restore, and conserve VT's natural resources and protect human health for current and future generations. **Role**: State regulatory authority providing environmental review, technical assistance, and regulatory guidance and oversight to ensure compliance with state and federal requirements.
Town of Rockingham: Alex Torpey, Interim Municipal Manager: manager@rockbf.org 802-376-9780	**Mission**: Provide municipal services and governance to support the health, safety, and economic well-being of the community. **Role:** Local regulatory coordination, support with community outreach efforts, and integration with land use, permitting, and redevelopment planning.
Bellows Falls Historical Society: Cathy Bergmann, bfhistoricalsociety@gmail.com 802-376-9876	**Mission**: Preserve and promote the history of the Village of Bellows Falls. **Role:** Historical documentation and guidance to support culturally appropriate redevelopment and identification of historic resources.
Bellows Falls Downtown Development Alliance: Casey Griffin, bfdda1@gmail.com 802-460-2333	**Mission**: Promote and support revitalization initiatives and economic development within the Bellows Falls Designated Downtown through collaboration with community organizations and municipal leadership. **Role:** Support community engagement, redevelopment advocacy, and coordination with downtown revitalization initiatives.
Vermont Arts Council: Zon Eastes,	**Mission**: Build a VT where artists thrive and everyone has access to creativity in their lives, education, and communities. **Role:** Support integration of arts, culture, and heritage into reuse strategy to promote placemaking and equitable outcomes.

g. Incorporating Community Input

The vision for the Priority Brownfield Site has been deeply built upon a shared community vision for decades and is reliant on collaboration amongst a diversity of organizations, institutions, and businesses to be successful. SVG plans to implement this cleanup grant under the same guiding values of collaboration and transparency. SVG will leverage established relationships with community-based organizations, the Town of Rockingham, and community leaders to understand community concerns, ideas, and questions. To do so, SVG will invite relevant representatives from community-based organizations, many previously involved in the reuse visioning efforts, to participate in a stakeholder coalition. The stakeholder coalition will meet at least three times during the grant period to support integration of community concerns and priorities into the ABCA/cleanup plan, inform the development and implementation of a reuse resource roadmap, build consensus on next steps and opportunities, and celebrate the successful cleanup effort. SVG will regularly address community questions and provide timely updates. These updates will be at least quarterly and will be provided on a dedicated project page on SVG's website and SVG's established newsletter. At project kick-off, a public meeting will be held to discuss the ABCA and redevelopment vision integrated with historic preservation with an opportunity to better understand

community ideas, concerns, and questions. Updates will be given at Town Selectboard meetings on at least an annual basis. Major milestones and updates will be published in popular local channels such as the local newspaper.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The buildings at the Proposed Brownfield Site are at risk of vapor intrusion of chlorinated and petroleum VOCs. In 2025, high volume sampling and sub-slab depressurization (SSD) pilot testing were conducted to assess the feasibility and inform the design of either an SSD or soil vapor extraction system. Based on cumulative results of this testing and previous site investigation results, the Proposed Cleanup Plan will include installation of an SVE system to conduct source area removal. This will not only help to eliminate the vapor intrusion risk to site users as well as reduce the toxicity, mobility and volume of contamination in sub-slab soil gas. Source area remediation will also prevent offsite migration of PCE to the adjacent Adams Grist Mill property.

In addition, the Proposed Cleanup will include asbestos abatement prior to redevelopment including all friable asbestos or asbestos containing building materials. Exterior and interior surfaces with deteriorating lead-based paint will be abated or encapsulated to mitigate direct exposure risk and potential migration of exterior flaking paint to soil. Moreover, the Proposed Cleanup Plan will include the decontamination of the elevator and pulley systems that are contaminated or are assumed to be contaminated with hydraulic oil containing PCBs. Lastly, soil management and the installation of engineered barriers will mitigate direct contract risk to contaminated soil across the site. Engineered barriers will consist of green space and landscaping around the exterior of the buildings, including an earthen amphitheater designed to accommodate the current topographic relief at the Site. Hardscaping will include a pedestrian walkway and a road connecting the Island to Under the Hill.

Description of Tasks/Activities and Outputs

b-e. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs

Task 1: Project Management	**Lead:** SVG **Assistance:** WRC, QEP
SVG will execute a cooperative agreement with WRC to manage the grant and oversee grant administration (Oct ‘26). WRC will prepare an RFP to identify and retain a QEP in accordance with applicable procurement policies (Dec ‘26- Jan ‘27). WRC will coordinate meetings at least quarterly with SVG, the QEP, VT DEC, and EPA (Jan ‘27- June ‘29). WRC, with support from the QEP, will prepare quarterly progress reports and closeout documents within ACRES (Jan ‘27 – June ‘29).	
Anticipated Project Schedule: October 2026 – June 2029	
Outputs: 1 executed cooperative agreement, bid document for QEP services, 1 QEP contract, project team meeting minutes and agendas, 11 quarterly reports, 11 ACRES database updates, and EPA closeout documents.	
Task 2: Community Outreach	**Lead:** SVG **Assistance:** QEP, WRC
SVG, with support from WRC and the selected QEP, will develop a Community Involvement Plan (Feb. ‘27). The CIP will be implemented throughout the grant and will include project updates/response to community concerns (min. quarterly) (Feb. ’27 – June ‘29). SVG will host a public meeting and comment period for the ABCA, CAP, and Historic Preservation Measures (March ‘27); responses to public comment will be posted on the project webpage. Annual presentations to the selectboard will highlight major milestones. SVG, with support from QEP and WRC, will facilitate three stakeholder coalition meetings.	
Anticipated Project Schedule: February 2027 – June 2029	
Outputs: One Community Involvement Plan; public meeting sign-in sheet and minutes; project webpage, six public updates, three selectboard updates, public comments received and responses, agendas and meeting minutes from stakeholder coalition meetings.	
Task 3: Cleanup Planning	**Lead:** QEP **Assistance:** WRC

Conduct applicable historical assessments and submit to EPA for review and submission to State Historic Pres. Office. Update the ABCA following public comment and finalization of reuse plans (April '27). The QEP will prepare and submit a CAP to the VT DEC and EPA (April'27). The QEP, with support from WRC, will develop a SSQAPP (May - June '27) for data collection efforts anticipated during CAP implementation and bid documents in compliance with organizational, state, and federal regulations. The QEP will hold a competitive bid process in accordance with EPA policies to identify appropriate subcontractors (June - July '27). Contracts will be executed for cleanup implementation (July '27).
Anticipated Project Schedule: April 2027 – July 2027
Outputs: Archeological Resource Assessment, Historic Structure Assessment, Final ABCA; approved CAP; bid documents; site walk; subcontractor contracts.

Task 4: Cleanup Implementation	iii. **Lead:** QEP **Assistance:** WRC, SVG
The QEP will oversee the implementation of the CAP. The QEP, with support from WRC, will ensure the corrective actions meet state and federal standards August '27 – March '29. Upon completion a CACCR will be prepared by the QEP April '29 – June '29.	
Anticipated Project Schedule: August 2027 – June 2029	
Outputs: As-built drawing for engineered barriers; data from SVE monitoring efforts, waste manifests for construction debris/soil disposal/asbestos and lead abatement/PCB decontamination; one Corrective Action Construction Completion Report.	

a. Cost Estimates

Budget Categories		**Activity**				
		Task 1	Task 2	Task 3	Task 4	**Total**
Direct Costs	Personnel	$8,700	$6,120		--	**--**
	Fringe Benefits	--	--		--	**--**
	Travel	--	--		--	**--**
	Equipment	--	--		--	**--**
	Supplies	--	--		--	
	Contractual	$29,760	$7,600	$44,800	$233,610	**$**
	Construction	--	--	--	$1,456,089	**$**
Total Direct Costs		$29,760	$7,600	$44,800	$1,689,699	**$**
Total Indirect Costs		--	--	--	--	**--**
Total Budget						**$**

Task 1 – Project Management: Personnel (SVG): assumes $60/hr*145 hours = $8,700 (MOU development, meetings, review QEP proposals, project oversight); Contractual (WRC): assumes $65/hour*300 hours (administration of one cooperative agreement, one QEP contract, assistance with procurement and contracting, Davis Bacon oversight, grant reporting, meetings) = $19,500; Contractual (QEP): assumes two staff virtually attend 11 project team meetings (assumes rate $190/hour*22 hours) + support with 11 ACRES updates/quarterly reports and closeout docs ($190*30 hrs.) = $14,060

Task 2 Community Outreach: Personnel (SVG): facilitation of stakeholder coalition, including initial engagement, three meetings, and regular updates (assumes $60/hr*48 hrs); 3 selectboard updates ($60/hr*6); monthly newsletter updates ($60/hr*36); 3 public meetings ($60/hr*12) = $6,120; Contractual (QEP): CIP preparation ($190*10 hrs) = $1,600; public meeting preparation and attendance, assumes 4 public meetings, two staff attending in person ($2,000/meeting = $8,000); Support with three stakeholder coalition meetings including prep and facilitation ($2,000/meeting = $8,000)

Task 3 -- Cleanup Planning: Contractual (QEP): conduct historical and structural assessments ($20,000); finalize ABCA and prepare CAP (assumes $10,000); prepare a Health and Safety Plan and SSQAPP = $5,000 (estimated

from like reports); contractor procurement including development of bid documents, site walk, evaluation of bids, subcontracting ($190/hr.*160 hrs.= $30,400) = $65,400

Task 4 -- Cleanup Implementation: Construction (Subcontractors): Asbestos abatement –2,800 sf @ $35/sf = $98,000; Lead abatement –5,520 sf @ $25/sf = $138,000; SVE = $131,400; Site Clearing = $41,525; Installation of Engineered Barriers: landscape – 21,300 sf @ $5.5/sf = $117,150, amphitheater – 7,000 sf @ $10/sf = $70,000, hardscape – 4,200 sf @ $15/sf = $63,000; Soil excavation – 1000 cy @ 24.68/cy= $24,680; Soil Management – 1,500 tons @ $154/ton = $231,000; Decon of Pulley Systems = 2 @ $30,000/each = $60,000; Foundation reinforcement – Northern Building – 3,100 sf @ $20/sf = $62,000; C&D waste – 1,500 tons @ $20/ton = $30,000; Canal wall reinforcement – 4 @ $51,261 = $205,044, Mobilization/Demob = $127,180; Contingency (20%) = $254,360; BABAA compliance (10%) = $127,180; Contractual (QEP): Permitting - $60,000; Construction Oversight - $45,600; CACCR - $10,000; Project Management (assumes 10% of budget) - $182,374, Contractor Markup (assumes 10%) = $127,180.

g. Plan to Measure and Evaluate Environmental Progress and Results

WRC will track, measure, and report project outputs and performance through quarterly reports and timely updates to the ACRES database. The project team will meet at least quarterly to track the project's progress towards completing tasks and outputs described in the table above. Quarterly reports submitted to the EPA will include project expenditures and progress on the approved work plan. If necessary, the project team will take corrective actions to ensure the project is meeting budget, schedule, and scope requirements as dictated in the work plan. With support from the QEP, other outcomes such as elimination of health and environmental hazards and square footage of remediated property will also be tracked.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

The Sustainable Valley Group, Inc is a VT Incorporated Nonprofit, IRS 501(c)3 Local Development Corporation operated by its volunteer Board of Directors, and local volunteer staff members led by an executive director. This team supports operating a local business incubator, develops projects, applies for funding, manages operations and finances, grant administration, and assists the local area with sustainable redevelopment and job creation. The executive director performs or guides the management and administration, and the Board assists and holds accountability.

b. Description of Key Staff

The Founding Director is President, and a serial entrepreneur starting many successful energy businesses including Solar wholesale, Equipment Fabrication, and franchise USA Solar Stores retail, as well as Design and Installation. The other board members have experience in website creation and maintenance, hardware systems, local history, Design and the Arts. The executive director will work closely with WRC on the procurement, project development and implementation to ensure the team, scope, and work will most closely meet the community redevelopment goals with the team's best aligned and like-minded with the community.

The executive director worked extensively with the State of VT Agency of Commerce and Community Development in the clean-up of the Robertson Papermill (RPM) Site, being hired as an executive director by Bellows Falls Area Development Corporation in 2017 to take over the RPM project. RPM, as a VT Agency of Commerce and Community Development Brownfield Economic Revitalization Alliance (BERA) Project, had a mix of state and federal grants and the director managed all 5 through closeout, with initial coaching, training and direct assistance from the Brattleboro Development Credit Corporation in the grant administration and ACRES requisition/submissions; the 5 grants consisting of a Community Development Block Grant, VT Brownfield Revolving Loan Fund grant, Windham Regional Commission Brownfield Revolving Loan Fund grant, EPA direct grant, and a Windham County Economic Development Program grant, including the proper proration and allocation of various costs and activities to each different grant program.

c. Acquiring Additional Resources

SVG plans to collaborate directly with WRC to administer this grant. Sue Westa, WRC's Associate Director, has over seven years' experience managing EPA Community-Wide Assessment Grants and EPA Brownfields RLF and over 35 years working in community development and planning. Over this time, she has overseen a roster of QEPs conducting site-specific assessment and remedial planning efforts across the region, including the Proposed Brownfield Site. WRC will help to create a work plan and financial workflows to ensure project completion. From past EPA grant experience, Sue is well-versed in the procurement of QEPs and all applicable State and Federal requirements, including Davis Bacon and BABA. Through WRC's Brownfield Program, Sue has established relationships with the VT DEC and EPA; this will help to ensure proper administration of EPA brownfields funding. She is also familiar with ACRES and EPA reporting requirements.

Where applicable, we will work with the VT DEC and EPA to identify expertise and resource gaps. We plan to procure a QEP early in the grant process to support technical needs and compliance will applicable state and federal regulations. Apart from cost, experience implementing cleanups at brownfield sites within the state of Vermont will be a key criterion of the bid review. We anticipate the QEP playing a large role in identifying and proper procurement of qualified, experienced, and professional subcontractors to implement the Proposed Cleanup Plan.

Past Performance and Accomplishments

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

(1) Purpose and Accomplishments

SVG has not previously received an EPA Brownfields Grant**,** but has successfully managed multiple federal, state, and non-profit funding sources for community redevelopment, economic development, and infrastructure projects. SVG is a Vermont-incorporated 501(c)(3) Local Development Corporation with a mission to advance a local green economy through workforce development, energy efficiency, renewable energy, and sustainable business incubation. Since 2001, SVG has implemented redevelopment projects in post-industrial communities, including Springfield and Bellows Falls, Vermont. In Bellows Falls, SVG identified the Island and Under the Hill District as a strategic opportunity for community-scale brownfield revitalization and has led redevelopment initiatives at multiple formerly contaminated or underutilized mill properties. Notably, SVG redeveloped 30 Island Street, converting a vacant industrial building into an energy-efficient community facility through collaborations with the Vermont Department of Vocational Rehabilitation and the Vermont Department of Corrections' non-violent offender workforce training program. That project resulted in long-term community uses, including the Bellows Falls Community Bike Project, Southeast Vermont Community Action textile recycling operations, and, most recently, the Great Falls Food Hub, a shared commercial kitchen and business incubator. SVG has administered and supported projects funded by the USDA Rural Business Development Program**,** USDA Community Facilities Program, and the Community Development Block Grant Program, as well as state grants and private foundation funding. SVG leadership also has experience working with Federal Transit Administration grants and state economic development programs. These efforts demonstrate SVG's capacity to translate public investment into lasting community and economic outcomes.

(2) Compliance with Grant Requirements

SVG has a strong track record of complying with grant workplans, schedules, reporting requirements, and financial oversight standards. SVG routinely implements federally funded projects in communities with high proportions of low- and moderate-income residents and complex environmental conditions. Grant compliance practices include timely reporting, transparent financial management, community engagement documentation, outcome tracking, and coordination with state and federal partners. SVG's experience managing multi-partner, multi-funding-source projects directly supports its ability to successfully administer an EPA Brownfields Cleanup Grant and ensure compliance with all applicable requirements.