

VERMONT BROWNFIELDS REDEVELOPMENT HANDBOOK



A GUIDE
FOR COMMUNITIES,
DEVELOPERS AND
PROPERTY OWNERS

This handbook is a primer on brownfields redevelopment in Vermont. It provides an overview of the process and partners involved in identifying, investigating, cleaning up and redeveloping brownfields.

Each brownfield property is, to a certain extent, unique. However, the process that results in a successful redevelopment is similar from one project to the next and is not overly complicated. A project that may seem daunting at first can move from start to finish in a coordinated manner when stakeholders are engaged early. With brownfields, collaboration is critical to success.

This handbook is a joint effort of the following partners.

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Cover Photo: Formerly a brownfield, the Burlington Bus Barns in Burlington, Vermont, is now home to several businesses including a laundry, café, and the non-profit Good News Garage. Housing has also been developed on the property.

WHAT ARE BROWNFIELDS?

Brownfields are properties for which expansion, redevelopment or reuse may be complicated due to the presence, or potential presence, of hazardous substances, pollutants or contaminants.



*Jones & Lamson site,
Springfield, Vermont*

*The term
brownfield is used
in contrast to the term
greenfield, which
refers to previously
undeveloped land.*

Most people associate brownfields with large industrial complexes located in densely developed cities and towns. Such sites can certainly be found in Vermont. Examples include manufacturing facilities, rail yards, coal gasification plants and assorted other “heavy” industry sites located in our cities and downtowns.



Former furniture manufacturer, Richford, Vermont

However, less obvious brownfields can be found throughout Vermont's rural countryside. Byproducts of early and small-scale industrial operations, many of which were not known to be hazardous at the time, could be present at a number of sites. These sites present challenges, and offer opportunities, that are not typically found in other parts of the country.

Finally, many of the most common brownfields are those that we walk, cycle or drive past every day. These include former gas stations, automotive repair shops, schools and institutions, dry cleaners, print shops and other service oriented businesses.



The contamination is often the result of the way solid or liquid materials were previously handled or disposed of at the site, or at a neighboring site. These materials may not have been considered hazardous, and handling procedures were not as established as they are today.

With some sites, the level of contamination may be very minor and the cleanup very simple. For others, cleanup and ongoing monitoring requirements may be more involved. Some sites may even be free of contamination. Site investigation removes ambiguities, allows for informed decision-making and lays the groundwork for returning brownfields to productive use.

*The majority of the nearly **one million** brownfield sites in the U.S. are small properties such as gas stations or dry cleaners.*

BENEFITS OF BROWNFIELDS REDEVELOPMENT

Brownfields redevelopment revitalizes and strengthens Vermont's towns and communities. Cleanup and redevelopment of brownfields spurs economic growth, builds community pride and protects public health and the environment. Redevelopment in cities and town centers promotes "smart growth" and helps preserve our unique rural countryside. Remediated sites in prime locations can again serve and strengthen villages and downtowns.



Other direct benefits of brownfields redevelopment include increased jobs and tax base; new housing units; expanded industrial, retail and commercial facilities; and new open space. Many brownfields offer developers the advantages of access to existing transportation, electric, telecommunications,

water and sewer infrastructure. This eliminates costs associated with extending these services and reduces the taxpayer burden of maintaining expanded infrastructure in the future.

STEP-BY-STEP REDEVELOPMENT GUIDE

Redevelopment goals may vary depending on who is undertaking a project. Most projects, however, will involve many of the same steps, regardless of what the redevelopment goals may be.

The following guide outlines the steps that lead to brownfields redevelopment success.

STEP ONE: Identify an End Use

When approaching a contaminated property it is easy to focus on the need to clean it up without giving sufficient thought to what the end use will be. This can make it challenging to achieve an economically sound outcome. Approaching a project with a clearly defined end use can save time and money by enabling utilization of creative and cost effective remedial solutions.

- **Community Factors**

Understanding a community's needs and vision helps identify an end use that will be supported by the community. Geographic and economic factors will favor certain uses over others. Identify the region's strengths. An end use that capitalizes on these strengths and serves community needs will be more likely to attract business, investors and occupants – and be more likely to succeed.

- **Exposure Risk**

Various end uses, such as residential, commercial, industrial or recreational, can result in different levels of contaminant exposure risk. The level of exposure risk may affect remediation requirements. Identifying an appropriate use will positively impact cleanup and redevelopment options.

STEP TWO: Encourage Stakeholder Participation

Brownfields redevelopment projects affect many stakeholders. Engaging stakeholders early helps solidify support and increases the likelihood of a project proceeding as planned.

- **Seek Input**

Successful projects go beyond just keeping stakeholders informed. Instead, stakeholder input is sought and ideas and concerns are incorporated into the plans at the early stages of the project.

- **Neighbors and Beyond**

Businesses and residents in the neighborhood are directly affected by a project. Additional stakeholders include Vermont state agencies such as the Department of Environmental Conservation and the Agency of Commerce and Community Development. Regional planning commissions, local officials, developers, lenders and community groups are stakeholders too.

STEP THREE: Investigate Assistance Programs

A number of funding and technical assistance programs are available to encourage brownfields redevelopment in Vermont. Several sources are highlighted below. A more complete listing can be found later on in this guide.

- **State Resources**

Vermont's Department of Environmental Conservation offers technical and financial assistance with site assessments, investigations, remediation planning and cleanup. Vermont's Agency of Commerce and Community Development also offers grants and loans for these activities, and for redevelopment as well.

- **Regional Resources**

Regional planning commissions in Vermont utilize federal grants to assist with the costs of brownfields site assessments, investigations and cleanup planning.

STEP FOUR: Conduct Phase I Site Assessment

A Phase I site assessment evaluates the potential for environmental contamination at a property. The U.S. Environmental Protection Agency recently revised its site assessment standards. An assessment that meets these standards is a prerequisite for certain liability protections and funding assistance.

- **Site Evaluation**

The assessment is performed by an environmental professional and will identify the following conditions:

- o Potential contaminants in and around the property.
- o Likely pathways for movement of the contaminants.
- o Potential risks to human health and the environment.

- **Site History**

The assessment also includes review of records that relate to the property and surrounding area and interviews with people familiar with current and past activities on and around the property.

A Phase I site assessment will take approximate two weeks to a month to complete. Costs typically range from \$2,000 to more than \$5,000 for complex sites. In most cases the Phase I site assessment will conclude that the potential for contamination is possible. The report will recommend further investigation (see Phase II below) to determine the degree and extent of any contamination.

STEP FIVE: Consider Vermont's Liability Protection Program

Vermont's Redevelopment of Contaminated Properties Program is a voluntary cleanup program that provides state liability protection in exchange for site cleanup. The program is open to parties who did not cause the contamination.

- **Liability Protection**

The program allows owners and prospective purchasers of contaminated properties to obtain liability protection from state cleanup enforcement actions and from contribution claims. The liability protections are transferable to successor owners and enhance a property's marketability. This program is described in more detail later in this guide.

STEP SIX: Conduct Phase II Site Investigation

The Phase II site investigation is intended to gather and evaluate more detailed data in order to develop a remediation strategy. Tasks include identification of:

- o Types and levels of contamination present at the site.
- o Cleanup goals.
- o Time needed to attain cleanup goals.

Phase II site investigations are conducted by environmental professionals who will gather and analyze soil, water and air samples taken from the site. Samples analysis will help identify the type,

quantity and extent of contamination. Sampling may also show that there is no contamination present, or that contamination levels are low. This information can then be used to develop a comprehensive cleanup plan for the site.



STEP SEVEN: Cleanup Planning and Implementation

The selection of appropriate cleanup and contaminant management options can begin once the types and levels of contaminants have been identified. Site use and budgetary factors will assist with the selection process.

- **Use and Design of the Site**

Each site presents its own unique challenges and opportunities for remediation and contaminant management approaches. Site use and contaminant pathways will influence the project design and cleanup plan.

- **Cleanup and Contaminant Management Alternatives**

Cleanup and contaminant management alternatives generally fall within three categories: institutional controls; containment technologies; and cleanup technologies. A comprehensive cleanup plan will likely combine various alternatives.

Institutional Controls. These control the use of, and access to, a site. Institutional controls can include physical barriers, such as fencing around a portion of a site. They may also include legal measures, such as deed restrictions concerning future use of a site. These types of controls are useful when complete cleanup is not necessary or feasible.

Containment Technologies. Containment technologies reduce the potential for contaminants to migrate off of a site or come into contact with people and the environment. These types of controls typically involve a physical barrier. Barriers may also double as end use components, such as an asphalt parking lot that eliminates contact with contaminated soil.

Cleanup Technologies. These are used when institutional controls and containment technologies are insufficient to contain exposure risks; when levels of contamination are unacceptable; or when deed restrictions and physical barriers are not desirable.

STEP EIGHT: Redevelopment

It is possible for redevelopment to take place simultaneously with cleanup and contaminant management activities. When appropriate, redevelopment may begin as early as the conclusion of the Phase I site assessment. Again, this is where having a clearly identified end use is critical to efficient project implementation. Once areas of concern are identified, redevelopment can take place on the “clean” portions of the site. Containment technologies that double as redevelopment features can be implemented as a project proceeds.



*Waypoint
Visitor's Center,
Bellows Falls,
Vermont*

FREQUENTLY ASKED QUESTIONS

What Do Brownfields Cleanups Cost?

As with any development project, overall cost is affected by many variables. The type, volume, and concentration of contaminants are particularly relevant factors at brownfields sites. Completing a thorough environmental assessment and site investigation will provide most of the information needed to establish a cleanup cost estimate and assess a project's feasibility. In Vermont, technical and financial assistance is available for site assessment, investigation and cleanup.

Are Brownfields Superfund Sites?

No. The U.S. Environmental Protection Agency designates a site as a Superfund site when severe contamination poses an imminent and substantial threat. Brownfields may or may not have contamination present. When contamination is present, it is typically well below the levels, and doesn't give rise to the threat, required for Superfund designation.

Will I Be Able to Obtain Financing for a Redevelopment Project?

Commercial lenders are becoming more familiar with brownfields redevelopment and are increasingly willing to finance these projects. In Vermont, there are a growing number of public funding sources to assist with the costs of assessment, investigation, remediation planning, and cleanup. These sources can be combined with commercial loans. Further information on available grants and loans is provided later on in this guide.

Will I be Liable for Contamination at the Site?

Typically, ownership of a contaminated property will give rise to liability under state and federal environmental laws. However, both federal and Vermont state laws provide a level of liability protection to purchasers of contaminated property when appropriate procedures are followed. Protection may also be made available to “innocent owners” of contaminated property.

How Long Will the Cleanup and Redevelopment Take?

Once the cleanup plan is approved, a brownfields project will not take significantly more time than a standard development project. In some cases, redevelopment can take place simultaneously with cleanup activities. Consulting with the Department of Environmental Conservation at the outset will reduce the potential for delays related to the cleanup portion of the project.

TECHNICAL AND FINANCIAL RESOURCES VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION

The mission of the Department of Environmental Conservation’s Brownfields Program is to protect human health and the environment while encouraging redevelopment of brownfields as a sound land use management policy. The Program recognizes that effective remediation and management of individual brownfields is a fact sensitive process that considers, among other things, types and levels of contaminants and exposure risks based on future land use scenarios. The Program encourages appropriate use of containment technologies and institutional controls as a means of achieving practical and economical results.

For more information, visit the Department’s brownfields website at <http://www.anr.state.vt.us/dec/wastediv/SMS/brownfields-home.htm>. The website also contains a listing of active brownfield sites in Vermont.

Vermont Liability Protection Program

The Vermont Redevelopment of Contaminated Properties Program (RCP Program) is Vermont's voluntary cleanup program for brownfields. This program allows owners and prospective purchasers of contaminated properties to obtain liability protection from state cleanup enforcement actions and contribution claims. The liability protection provided under this program may be transferred to successor owners, enhancing a property's marketability. Participation in the program is limited to parties who did not cause the contamination.

Participation in the RCP Program is voluntary. Eligible parties are encouraged to take advantage of the many benefits offered by this program. In addition to the liability protections, benefits include: access to grants and loans to cover cleanup costs; elimination of the adversarial nature of a "forced" regulatory cleanup; a comprehensive and collaborative approach to site investigation and cleanup; and sharing of the Department's expertise and knowledge of remediation approaches.

Parties that enter into this program will develop a corrective action plan for approval by the Department. The Department will issue a certificate of completion when all activities required by the plan are complete. The liability protections granted through this program will extend to future owners and will also provide protection from: more stringent cleanup standards that may become effective in the future; required cleanup of materials that were not regulated as hazardous materials until after the cleanup; and required cleanup of contamination that may be discovered in the future by sampling methods that were not standard at the time the cleanup plan was approved. The benefits afforded by these liability protections can positively impact a property's marketability and a project's financing opportunities.

Petroleum Cleanup Fund (\$)

Vermont's Petroleum Cleanup Fund provides financial assistance for costs incurred in connection with cleanup of accidental releases from underground storage tanks. The Petroleum Cleanup Fund provides limited coverage for releases from aboveground storage tanks as well. For more information, visit the Department's website at <http://www.anr.state.vt.us/dec/wastediv/ust/home.htm>.

VERMONT AGENCY OF COMMERCE AND COMMUNITY DEVELOPMENT

The Agency of Commerce and Community Development helps locate brownfields sites with development potential and provides financial assistance for cleanup and reuse to provide economic growth, housing, and open space, thereby strengthening our Vermont communities. Two specific brownfields financing resources are administered by the Agency.

Brownfields Revitalization Fund (\$)

The Brownfields Revitalization Fund (BRF) is administered by the Agency of Commerce and Community Development in consultation with the Department of Environmental Conservation. The BRF provides eligible applicants with grants and loans for assessment, characterization, and cleanup of contaminated sites. Additional information about the BRF, and an application, can be found at the Vermont Brownfields Initiative website at: <http://www.thinkvermont.com/brownfieldsforum/index.cfm>.

Vermont's Community Development Block Grant (\$)

A portion of Vermont's Community Development Block Grant has been set aside to promote brownfields redevelopment. Vermont municipalities are eligible to apply for grants. These grants can also be sub-granted by a municipality to a non-profit corporation or loaned to a for-profit business. Additional information can be found at: <http://www.dhca.state.vt.us/VCDP/GrantTypes.htm>

Tax credits for Downtowns and Village Centers

Vermont provides for several tax credits for redevelopment projects in "designated" downtowns and village centers. A credit is available for code-related work, including up to \$25,000 for hazardous materials abatement and contaminated sites redevelopment. The state also provides a 10% credit – as an add-on to the 20% federal historic tax credit – for the substantial rehabilitation of historic buildings. This work could include hazardous materials abatement. These projects must meet federal rehabilitation standards. Additional information may be found at: www.HistoricVermont.org.

Tax Increment Financing (TIF)

TIF is a form of subsidy intended to aid downtown redevelopment. A city may designate a TIF district that meets state criteria for such districts. TIFs are based on the assumption that property tax revenues will go up following redevelopment. When that increase

happens, the property tax revenue from the TIF district gets split into two streams. The first stream, based on the property values before the redevelopment, continues to go to the city, county, school district and other taxing bodies as before. The second stream consists of the increase in taxes resulting from the new development and gets paid into a special fund used to subsidize some portion of the redevelopment in the TIF district. This diversion of tax payments continues until the TIF district expires (7 to 30 years).

VERMONT REGIONAL PLANNING COMMISSIONS

Environmental Assessment Grants (\$)

Vermont has eleven regional planning districts. Each district is served by a regional planning commission. The commissions can provide assistance with brownfields redevelopment projects through assessment and investigation grants and other services. The geographic boundaries of each district and links to each district's planning commission can be found at the following website: <http://www.vapda.org>

UNITED STATES EPA ASSESSMENT GRANTS

EPA awards grants for brownfields assessments to state, local, and tribal governments, land clearance authorities, and regional council or redevelopment agencies. Property owners or potential purchasers may access these funds to cover costs related to environmental assessments. EPA also awards cleanup grants, including revolving loan funds. For more information visit the EPA's brownfields website at: <http://www.epa.gov/brownfields/pilot.htm>.

US HUD BROWNFIELD ECONOMIC DEVELOPMENT INITIATIVE

Funds are targeted for uses that emphasize the redevelopment of brownfields sites in economic development projects. The initiative is aimed at increasing economic opportunities for low-and moderate-income persons as part of the creation or retention of businesses, jobs and increases in the local tax base. Funds can be used to enhance the security or to improve the viability of a specific project financed with a new Section 108 guaranteed loan commitment. Additional information is available on HUD's website at: <http://www.hud.gov/offices/cpd/economicdevelopment/programs/bedi/>.

BROWNFIELDS TAX INCENTIVE (FEDERAL)

The brownfields tax incentive, which previously expired on December 31, 2005, was recently extended to be effective until December 31, 2007. The incentive allows the deduction of brownfields cleanup costs. The scope of the tax incentive has also been expanded to allow deduction of expenses incurred for cleanup of petroleum products. Further information on the incentive is available at <http://www.epa.gov/brownfields/bftaxinc.htm>.

FEDERAL HISTORIC REHABILITATION INVESTMENT TAX CREDIT

A 20% credit is available to historic properties rehabilitated for income-producing purposes, including commercial, industrial, agricultural, rental residential or apartment use. To be eligible to receive the tax credits the rehabilitation project must be consistent with the historic character of the property. The National Park Service and the IRS administer this program. Additional information is available on the National Park Service website at: <http://www.cr.nps.gov/hps/TPS/tax/>.

SUSTAINABLE DEVELOPMENT RESOURCES

Brownfields redevelopment presents excellent opportunities for implementation of sustainable development practices and for LEED green building certification. Information is available from a number of sources, including the following.

Efficiency Vermont at www.efficiencyvermont.org

U.S. EPA's Energy Star Program at www.energystar.gov

U.S. Green Building Council at www.usgbc.org

Vermont Green Building Network at www.vgbn.org

Smart Growth Network at www.smartgrowth.org

ENVIRONMENTAL INSURANCE

A growing number of environmental insurance products are available to help address liability and remediation cost issues associated with brownfields redevelopment projects. An internet search will yield numerous resources concerning environmental insurance.

CASE STUDIES

Salisbury Square - Randolph, Vermont

Smart Growth and Redevelopment of Contaminated Properties Program

A derelict property is returning to productive use through the application of smart growth principles in the Town of Randolph. Following a series of fires in the early 1990s, Randolph initiated revitalization efforts to attract residents and businesses to its downtown. The Randolph Area Community Development Corporation has played an integral role in this process. The Development Corporation recently acquired a brownfield site on which it intends to construct twenty or more affordable homeownership units.

The four-acre property was used for furniture manufacturing since the late 1880s. The site was abandoned in 1991, when Ethan Allen, Inc. closed its operations there. The Development Corporation, while considering the acquisition, performed a feasibility study with assistance from the Vermont Housing and Conservation Board. The Two Rivers-Ottawquechee Regional Commission helped with environmental assessment costs through a grant from the U.S. EPA.

Environmental testing revealed minor levels of contamination. Defining the level of contamination allowed the Development Corporation to close on the purchase and enroll the property in Vermont's Redevelopment of Contaminated Properties Program. A cleanup plan for the property is being developed with oversight and assistance from the Vermont Department of Environmental Conservation's Brownfields Program. Cleanup will proceed once the plan has been finalized. Completing the cleanup will enable the Development Corporation to obtain liability protection from the state.

The multiple stakeholders in this project are looking forward to construction and occupancy. This brown-field redevelopment project implements the smart growth principles described in Randolph's town plan. The homes will be served by existing municipal infrastructure, be in close proximity to the downtown and fit with the character of the surrounding neighborhood.



Leader Evaporator – St. Albans, Vermont Maple Syrup Equipment to Multi-Unit Housing



As a brownfield redevelopment site, the former Leader Evaporator property will continue to play an integral role in the vitality of downtown St. Albans. For more than 120 years, the site hosted a variety of industrial and commercial uses, including woodworking, fuel oil storage and sales, clothing manufacturing, and most recently, manufacturing of maple syrup equipment. When Leader Evaporator needed to expand its facility, the historic two-story mill building did not lend itself to re-configuration for current day manufacturing processes. However, its downtown location proved to be a perfect location for housing.

The Northwest Regional Planning Commission invested \$83,853 in EPA grant funds to conduct environmental assessments, monitor groundwater, and develop a plan for addressing contamination confirmed at the site. Assessments were conducted while the developer moved forward with permitting the site for housing. All of the identified contamination predated Leader's use of the site. Corrective action planning identified alternate remedial options with cost estimates so project partners could evaluate which strategies worked best for the redevelopment project.

Contamination levels were relatively low, but protecting the safety of construction workers and future residents was a primary concern. Petroleum contamination to groundwater will remain in place to naturally degrade. Lead and petroleum-contaminated soils will be capped under parking areas. Asbestos-containing materials will be removed. The City of St. Albans is providing funding to the redevelopment partnership for all remediation activities through a Brownfields Grant from the Vermont Community Development Program.

Housing Vermont purchased the property from Leader Evaporator in early 2006 and plans to transfer ownership to the redevelopment partnership, which includes Champlain Housing Trust and Housing Vermont as general partners. All funding is in place, and a \$6.7 million redevelopment effort is expected to begin in December 2006. Twenty-seven units of rental housing will be created, 23 of which will be affordable units. In northwestern Vermont, where a severe housing shortage is a limiting factor on economic growth, redevelopment of downtown sites such as this will help assure the area's economic vitality.

Boccelli's Café & Specialty Products - Bellows Falls, Vermont **Garage to Gourmet Foods**

In downtown Bellows Falls, a 1920's era truck maintenance garage on Canal Street is now a popular Italian specialty foods shop. Boccelli's Café opened in early 2006 and offers the community a wide assortment of local and imported specialty products.

The Café occupies a building that was used for many years by White Brothers Milk Company to maintain a fleet of milk trucks. The five distinctive arched bay openings of the building's brick façade have been preserved and enhanced by attractive French doors, double hung windows and tongue and groove detailing.



The Windham Regional Commission assisted with the redevelopment of this brownfield site by covering the cost of an environmental investigation with funds received through a U.S. EPA brownfields assessment grant. The environmental investigation included soil and groundwater sampling, following protocols approved by the Vermont Department of Environmental Conservation and EPA.

Site investigation revealed the existence of an old underground storage tank in the area in front of the building. The tank was removed. It was determined that the tank had leaked, causing soil contamination. Contaminated soil was removed and properly disposed of. The DEC approved the use of an asphalt parking area as an appropriate containment technology for lower level contaminated soil that was left in place. Another remedial action involved the sealing of old floor drains inside the building.

The investigation determined that additional past uses of the site included a machine shop, a woodworking shop and a warehouse for nut and bolt storage. Today, these nuts and bolts have been replaced by a fine assortment of breads, cheeses and other delights thanks to a visionary owner and collaboration by the Windham Regional Commission, Vermont DEC and the EPA.

VERMONT STATE AND REGIONAL CONTACTS

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<http://www.thinkvermont.com/brownfieldsforum/index.cfm>

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VERMONT REGIONAL PLANNING COMMISSIONS

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Central Vermont	802-229-0389
Chittenden County	802-846-4490
Northwest Region	802-524-5958
Lamoille County	802-888-4548
Northeast Kingdom	802-748-5181
Rutland County	802-775-0871
Southern Windsor	802-674-9201
Two Rivers – Ottauquechee	802-457-3188
Windham Region	802-257-4547

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