

Narrative Proposal - Village of Valley Falls NY Thompson Mill Site Hazardous Substance Site Specific Assessment, \$200,000 Request

1. Community Need [50 Points]

The Thompson Mill represented the soul of the Village of Valley Falls. For over 100 years, ending in 1992, the mill defined the town – employing most of its residents. “The Thompson Mill was the heartbeat of the small Village of Valley Falls, and even if you did not work there you were aware of the morning, noon, and evening whistles. Keeping the whistles on time was extremely important, and woe be it to whoever pulled the chain, if it was off by several minutes. Most workers lived close by in the village and walked to work in the morning, home for lunch, and home again at night. It was the one common thread that tied most folks together.”¹ When James Thompson & Company moved its textile operation to Mexico, the old mill sat derelict for 25 years, and then in 2009, it went up in arson-created flames. Condemned and a shell of its former glory, the site sits neglected and waiting. However, its location on a remarkably scenic bend of the Hoosic River, at a significant entry point to the Village, where Native American artifacts and Revolutionary War history abound, provides hope for a different future. The first step in creating a site that improves the quality of life in this village of less than 500 residents – the anchor of transformation if you will - is to assess the hazardous materials left behind when the mill was abandoned and plan for its productive reuse.

a. Targeted Community and Brownfields [25 points]

i. Targeted Community Description (5 points)

The Village of Valley Falls is a rural community of 179 households, whose residents value living in a historic village. The Village is small (0.5 square miles), divided by the Hoosic River. The Village was founded at the turn of the 20th century initially due to the water the river supplied, the convenience of the river to carry off waste, rail line access, and the availability of water power for several mills, the largest of which was the Thompson Textile Mill. There have been mills, mill dams, and people living in this location since Colonial times. A \$5,500 Preserve NY Grant was recently awarded to support a National Register Historic District nomination for the village to enable residents to utilize historic rehabilitation tax credits to revitalize the housing stock. The Village today is a bedroom community without any non-residential tax base. There are **no** retail establishments remaining in the Village. The closest senior center is in Hoosick Falls, sixteen miles away.

There is no public transportation in the Village, although senior transportation is provided on a limited basis. The housing stock is dominated by houses dating back to or before the turn of the century². Village life centers on the Free Library, the Fire Hall, and the Community Hall. The Village is this project’s targeted community.

ii. Demographic Information (5 points)

As of the census of 2010³, there were 466 people in 179 households in the Village of Valley Falls, continuing a downward trend in population while the number of households has remained the same. The racial makeup of the village was 95.71% Non-Minority. Of the 179 households, 36.9% had children under the age of 18 living with them and 51.9% were married couples living together.

¹ Pittstown Historical Society Newsletter, Issue XVI, Fall 2009

² See: <https://www.loc.gov/item/75694858/> for an 1887 map in the Library of Congress archives that shows many of the current houses – and the fully-active mill site.

³ 2010 Census

12.3% had a female householder with no husband present. 22.9% of all households were made up of individuals and 5.0% had someone living alone who was 65 years of age or older. The average household size was 2.6.

In the village, the population includes 28.5% under the age of 18 and 15.0% who were 65 years of age or older. The median income for a household in the village was \$56,250. The per capita income for the village was \$39,504. 16.67% of children 5 and under and 5.3% of the population were below the poverty line. 172/219, or 78% of the housing stock is single family homes with a median value for owner-occupied units of \$155,800. Median monthly rent is \$850.

Demographic Information	Village of Valley Falls	Rensselaer County	New York State	National
Population:	466 ⁴	159,429 ³	19,378,10 ³	311,536,594 ³
Unemployment:	N/A	5.3% ³	5.1% ³	5.3% ⁵
Poverty Rate:	9.90% ³	13.21% ³	15.3% ³	11.3 % ³
Percent Minority:	4.29% ³	14.35% ³	34.25% ³	36.7% ³
Median Household Income:	\$56,250 ³	\$59,432 ³	\$58,003 ³	\$53,046 ³
Vacancy Rate	7.22%	11.87%	11.09%	12.47%

The Bureau of Economic Analysis data on Personal Income provides data that shows that personal income in Rensselaer County on a per capita basis is dropping relative to the rest of New York State, dropping from 19th in 2012 to 27th in 2013.⁶ Please see discussion on Economic Impacts for discussion of impact of the mill site on property values (and local tax collection) and the limits to growth in the Village. Please see also the Times Unions article from 7/25/2016 included in the attachments for further discussion of the impact of this abandoned mill on the village.

iii. Description of Brownfields (10 points)

This is a site-specific application for the old Thompson Mill site, located in the center of the village. This 23-acre site was an active textile mill for over 100 years until operations ceased in 1992 and the site was abandoned. Mill activities on the site included fabric dyeing and manufacturing processes capable of generating contaminants such as heavy metals (cadmium, lead, mercury and others) from chemical dyes and refractory bricks, polycyclic aromatic hydrocarbons (PAHs) from coal combustion, polychlorinated biphenyls (PCBs) from electrical transformers, and friable asbestos in building materials and piping insulation. A major fire in 2009 exacerbated the extent and comingling of contaminants and significantly damaged the remaining buildings, which are now a magnet for vandalism and a safety hazard, leaving the entire site in ruins. It is unknown how widespread hazardous materials are on the site, or whether there was dumping of industrial products on the land. There was known dumping of mill wastes and dye residues into the river in the early years of the mill operations. The mortar used in the brick construction of the mill, given its age, may contain asbestos. There are piles of debris of unknown composition in the area around the former mill building due to building collapses after the fire. Since the petroleum storage and heating sources were co-located with other mill operations, and because of the fire in 2009, there may be residual petroleum compound comingling with hazardous compounds at this site.

⁴ Data are from the 2009 – 2013 American Community Survey and are available on American Factfinder at <http://factfinder.census.gov/>

⁵ Data are from the Bureau of Labor Statistics and are available at www.bls.gov.

⁶ http://www.bea.gov/newsreleases/regional/lapi/lapi_newsrelease.htm

The negative hazardous materials impacts associated with the old Thompson Mill are largely unknown (hence this application for Assessment) but perceived to be potentially significant due to the historic nature of the manufacturing activity that occurred on the site. The mill's peak production years were prior to the advent of environmental regulation. In fact, environmental requirements were a reason that the James Thompson Company cited when it abandoned operations in Valley Falls and moved manufacturing to Mexico and other locations in 1992.

This section of the Hoosic River is a productive fishery, capable of hosting bass and other sensitive fish and wildlife species in which the types of contaminants released from this site have the potential for bioaccumulation. This is also an area where there are known prehistoric artifacts and is in the flood plain of the Hoosic River. If the site remains unmediated, in the event of a flood the contaminants will be spread downstream to other communities.

iv. Cumulative Environmental Issues (5 points)

The Village of Valley Falls is a historic location where water power and rail lines led to the siting of industry around the turn of the 20th Century. Cumulative negative environmental impacts in addition to the Thompson Mill site come from other abandoned mill sites in the vicinity, and from other dumping into the Hoosic River. As documented elsewhere, the Village has taken proactive steps and addressed raw sewage dumping from Village residents, but combined storm water and sewage overflows (See Environmental Impact section) during major storm events remain a watershed wide issue. There are no air quality issues in this community because there are no operating factories, no major highways, and little traffic relative to an urban area. There is evidence from the USGS ⁷ that the bedrock well tested (200' deep) closest to the community exceeded clean water standards for color, Ph, Sodium Aluminum, Iron and Manganese, which are likely related to historic industrial uses. Specific health data for sensitive populations in the Village is not available due to the small rural nature of the community, but there are well documented water quality issues in this watershed, including PCB and perfluorooctanoic acid (PFOA)/perfluorooctane sulfonic acid (PFOS) contamination that the EPA is involved in and aware of.

b. Impacts on Targeted Community [10 points]

The major environmental impact on the Village of Valley Falls is the possibility of human exposure to unknown contaminants, including the potential for spread of materials contained in the building materials to the soil, the air, groundwater, and adjacent river. Sensitive populations would be most impacted. This is exacerbated by its presence in the flood plain, which portends the likelihood of the spread of these contaminants to other communities.

The abandoned mill presents a significant safety hazard in the form of an attractive nuisance (see letter from Fire Department). The Village has no ability to prohibit access to the property and the absentee owner has taken no measures to secure the site. With a Village size of less than ½ square mile, all homes are within walking distance of the site.

Given the very small size of the Valley Falls community, data on health conditions are simply not available from reliable public information databases. There is evidence at www.statecancerprofiles.gov that Rensselaer County has a higher rate of cancer incidence (536.3 per 100,000) than New York State (487.7) or the US (453.8) which translates into higher mortality from cancer (187.9 per 100,000 vs. 162.3 for NYS). Data on a more fine-grained level is not readily available.

⁷ Nystrom, E.A., 2009, Groundwater quality in the Upper Hudson River Basin, New York, 2007: U.S. Geological Survey Open-File Report 2009-1240, 37 p., available only at <http://pubs.usgs.gov/of/2009/1240/>

c. Financial Need [15 points]

i. Economic Conditions (5 points)

The Village of Valley Falls does not have the financial capacity to undertake the brownfields assessment requested in this grant. The projected cost of the assessment, \$200,000, is more than the entire annual operating budget of the Village (\$168,200). In addition, a fee is levied on some Village properties to cover the \$104,500 annual debt service and maintenance costs of a small sewage treatment plant and sewer system built in 2004 to serve some of the Village's residential units. This \$2.1 million project was a significant undertaking for a Village this small; but was done to address raw sewage being dumped into the Hoosic River by a couple dozen properties attached to an ancient sewer line. Public loan funding was secured for much of the project, but debt service costs alone currently being borne by the users of the system are projected to continue for the next 20 years or so. While offering evidence of the Village's willingness and capability to handle projects such as this, the existing debt obligations for the sewer system is added financial strain on a Village with extremely limited revenue options.

The Village's small size (466 people; 179 households) clearly limits its ability to leverage the needed capital from its residents, as does the fact that virtually no non-residential components exist in the Village since the mills ceased operations and those industries died. Other than 15 residents who worked from home or walked to work, all remaining 253 workers commuted to their place of employment, with an average commute time of 40 minutes, 43 percent longer than the average commute time for the metropolitan area of 28 minutes.

ii. Economic Effects of Brownfields (10 points)

There are significant socio-economic impacts on the Valley Falls community from the abandoned Thompson Mill. Its derelict state contributes to the low tax base for the Village, whose annual budget is approximately \$168,200⁸. The annual property tax levy is \$52,290. The ability of the Village to leverage funds to assess, clean up and redevelop the site is limited by its small size. The current owner of the property has been delinquent on property taxes since 2002 and has been absent from the Village for just as long. The Village is reluctant to take control of the site without knowing the level of contamination that it would be inheriting.

The economic effects on the Village of Valley Falls of the potential brownfield site presented by the old Thompson Mill are significant particularly for a municipality this small. Without an assessment of potential environmental hazards at the site, at least two prospective commercial employers (including a custom window manufacturer and an auto salvage business) initially interested in the site decided against establishing operations in the Village. This represented a significant loss both in terms of potential commercial tax revenue and in long-term employment opportunities for many Village residents. The lost tax base from such a significant property now simply standing abandoned and delinquent is immediately evident, too. That the mill was a victim of arson shows its attractiveness as a nuisance, and both its abandoned state and its current partially collapsed state has required additional and specialized training for the Village's fire department, requiring resource allocation. The fire department undergoes specialized training in the handling of various hazardous materials and hazardous situations because the conditions and substances at the mill site are not yet known. The Village cannot secure the site and does not have its own police force, so the site remains a dangerous and accessible place for vandals and others. Any additional security measures if the site is not remediated and transformed as envisioned will be costs too large for the Village to encumber.

⁸ Source: Village of Valley Falls, 2015-2016 Budget, May 2015
Page 4 of 15

The economic effect on the Village of the ongoing deterioration and potential hazards of the mill site are at least partially reflected in the below-average property value growth and below-average household income of the Village relative to its county as shown in the table in Section 1.a.ii. Currently, the most visible part of the otherwise attractive village from the main road (Route 67) is a derelict, burned out building, which could turn away a potential homebuyer or business person.

2. Project Description and Feasibility of Success [50 Points]

The Village of Valley Falls would like to reclaim its riverfront to build a park, but there is a hulking skeleton of a burned out old mill occupying the southern bank of the river. A vision for a park-like passive recreational green space that will provide for river access and incorporate the history of the site can only be realized if the mill remnants are cleaned up. Village Board discussions on alternate uses of the site, including community forums, which intensified after the 2009 fire, have led to a vision for the riverfront park includes walking trails, benches by the river, fishing and boat access, and historical displays of the significance of the site in the Village's history. This first step is to gauge the degree and type of contamination left behind, which is the subject of this project proposal. This will set the parameters for seeking clean-up funds from New York State, the EPA, and other sources. Once the cleanup is complete, the New York State program for park development through the Environmental Protection Fund, paired with other fundraising, will build the park according to plan developed in this assessment. With community involvement at every step in this tight-knit community, success is guaranteed. With a 23-acre waterfront park, the Village of Valley Falls will be to retain a stable population and solidify housing values. It will be an attraction for visitors that could be a stimulus for the establishment of park-related businesses. Quality of life will be enhanced.

a. Project Description, Project Timing and Site Selection [25 points]

i. Project Description (15 points)

This grant will fund the assessment of hazardous materials at the old Thompson Mill site and perform site planning for its future use as recreational parkland. This preferred reuse of the property is in line with the Village's land use planning and with the sentiments expressed by the citizenry at the public information meeting held on November 12, 2015 regarding the project.

Specifically, the assessment task will include two phases. The Phase I Property Assessment (PA) will be performed in accordance with the USEPA-approved American Society of Testing and Materials (ASTM) Standard E1597-13 for Environmental Site Assessments that satisfy the "All Appropriate Inquiry" rule. The Phase I PA will identify and fill information gaps (to the extent practicable with readily ascertainable information) relating to potential environmental contaminants used at the site, and document both the historical and current recognized environmental conditions. The Phase I PA results will be used to scope the Site Investigation, which will include:

- A site-specific Health and Safety Plan (HASP) to ensure the safety of assessment workers (especially in and near the former mill building that is under different stages of disrepair and collapse) and a Quality Assurance Project Plan (QAPP) to ensure that data is collected, analyzed, and documented to meet the UESPA-required standard of quality.
- Asbestos and building materials assessments to evaluate potential exposure and the fate of the former mill building materials. This will include a thorough feasibility assessment of reusing certain materials such as bricks and large wooden support beams for the proposed park (see park planning section).
- Multi-media (soil, groundwater and sediment) sampling to assess the occurrence and

concentration of potential hazardous contaminants including asbestos, heavy metals, and chemical solvents and dyes. Areas of former petroleum use, such as the boilers and former oil storage tanks, will also be targeted for potential petroleum-related compounds. Since the petroleum storage and heating sources were co-located with other mill operations, and because of the fire in 2009, any residual petroleum compounds are likely comingled with hazardous compounds at this site.

The Phase I PA and Site Investigation will provide a site-wide, comprehensive, data-driven evaluation that will form the basis for environmental cleanup and reuse strategies.

The Village and all the stakeholders identified in this proposal are committed to revitalizing this property. They understand that this full commitment will be needed not only for the site assessment, but into the clean-up phase and through the reuse stage to make their visions for the site, and its value to the citizens, a reality. To show this commitment, the Village will include with its assessment a remedial action scope for evaluating, selecting, and executing a clean-up strategy for the site. This strategy will form the basis for supplemental grants and funding, and will solidify the partnership with the EPA and the NY Department of Environmental Conservation (NYSDEC) on this project.

Consistent with this commitment, the Village will also prepare and submit plans for a waterfront park. Because of the Village’s sustainable approach of reusing as many of the historic mill materials as possible for the park, the assessment and cleanup phases of this project are directly tied to how the future park will be designed and constructed. This site planning task will use the community engagement plan included in this proposal to include the public on the park design so that access and recreational benefits to the community are maximized.

ii. Project Timing (5 points)

The following milestone based timeline will guide the implementation of this project.

Task	Responsible Party	Timing	Duration
County Transfer of Property to Village after Foreclosure	County/Village Board	Winter/Spring 2017	6 months
Grant Announcement	EPA		
Contract Execution	EPA/Village Board	Clock Starts	
Competitive Procurement for Qualified Professionals	Village Board	Upon Contract Execution	3 -6 months
Contract Award to QEP	Village Board	When Procurement Procedure is complete	1 month
Phase 1 Investigation	Consultant	As detailed in Section 2.b.i.	3 months
Site Investigation	Consultant	As detailed in Section 2.b.i.	1 year
Clean up Strategy Development	Consultant	As detailed in Section 2.b.i.	3 months
Site Planning	Consultant/Community Partners	As detailed in Section 2.b.i.	3 months
Final Report	Consultant/Village Board	Upon completion of above tasks	1 month

Task	Responsible Party	Timing	Duration
Grant Close Out	Village Board	No later than 3 Years after Contract Execution	

iii. Site Selection (5 points)

The 23-acre Thompson Mill site is characterized at one end by the burned-out infrastructure of the mill, where most the contamination is anticipated. The structures remaining have been condemned and are crumbling. There may have been dumping on other areas of the site, as the peak of the mill’s production was prior to 1970 and the advent of significant environmental regulation of its activities. In early days, the river was used to carry off waste.

Because of the tax-delinquent status of the site, the county is willing to obtain legal ownership of the property via foreclosure, and has begun the process of doing so. Concurrently, a Memorandum of Agreement to transfer the property to the Village upon completion of foreclosure proceedings is being developed. The Village will retain legal counsel to ensure that sufficient and ongoing access to the site is maintained for the Brownfield Assessment.

b. Task Descriptions and Budget Table [20 points]

i. Task Descriptions (15 points)

Task 0: Programmatic Activities and Outreach: The Village will contract for program support activities following federal procurement guidelines. Programmatic support includes assistance in completing EPA quarterly reports, MBE/WBE forms, and EPA ACRES database. Other activities include completion of EPA work plans and other programmatic support necessary to maintain compliance with EPA cooperative agreement terms and conditions. Outreach activities throughout the project include: Cultivation of new and established strategic partnerships and community involvement; dissemination of information and comments to/from the community and stakeholders, as well as community meetings. Budget for these activities is incorporated into the specific tasks listed below. Outcomes will be incorporated into required reporting.

Task 1: Phase I Property Assessment: This task includes hiring an environmental consultant, completing a Site Eligibility Profile and completing a Phase I PA in accordance with the EPA-approved ASTM E1527-13 Environmental Site Assessment for All Appropriate Inquiry. The Phase I Property Assessment will cost \$8,000 and will include a thorough site inspection of the entire 23-acre property, a detailed historical and regulatory records search, and interviews with local officials with knowledge of current and historical environmental conditions. The “Contractual” line item addresses the cost of contracting the selected environmental consultant to complete the Site Eligibility Profile, and Phase I PAs and generate the final written reports. Legal services will be contracted to obtain required written site access for testing purposes if needed at the fixed fee shown in the budget table. As noted above, the County foreclosure on the property and transfer to the Village should be completed by the time of project inception, and the inclusion of legal fees is a contingency to guarantee the project schedule. Output is a completed Phase 1 report.

Task 2: Site Specific Sampling Plans and Site Investigation: The consultant will be responsible for providing U.S. EPA the necessary QAPP, Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP). In addition, this task addresses the completion of a Site Investigation, including a geophysical survey to characterize subsurface conditions, sampling and analytical testing of soil, sediment, groundwater, surface water, and building materials for volatile organic compounds, semi-volatile organic compounds, polychlorinated biphenyls, heavy metal and asbestos.

The cost of preparing the draft and final HASP, QAPP, and SAP, conducting the building materials and multi-media sampling investigation, and preparing draft and final assessment reports will be \$150,000. These costs include \$60,000 for analytical testing, \$15,000 for a drilling subcontractor, \$5,000 for a geophysical survey, \$5,000 for a site and elevation survey, \$3,000 for third-party data validation, \$2,000 for disposal of investigation derived waste, and \$60,000 for field sampling, subcontractor coordination, field oversight, data analysis, and reporting. The “Contractual” line item for Task 2 includes the cost of contracting the selected environmental consultant to complete the Site Investigation and generate the final written reports, which are the output of this task.

Task 3: Cleanup Strategy Development: This task includes completing a Remedial Action Plan and/or Risk Assessment Report to plan for site remediation. Depending on the nature and extent of contamination present at the property, and the type of the cleanup required, the cost for developing and writing draft and final Remedial Action Plans is estimated at \$15,000. These plans will be used to leverage cleanup funds from either the U.S. EPA or the Restore New York Communities Initiative.

Task 4: Site Planning: As discussed above, the future planned development of the site as a public park and recreational asset is intimately tied to the assessment and ultimate environmental cleanup of the site. Many of the historic building materials, after verifying that they are uncontaminated, can be reused to build walkways, benches, and monuments. The Village’s vision is that this park will be a beacon of both environmental sustainability and historical significance. This waterfront park will foster education of heritage and the environment as well as recreational health and happiness. This Site Planning task will include a sustainability assessment and conceptual design plans park. It will also include a geotechnical engineering assessment of the shoreline area to ensure safe access to the Hoosic River shoreline. The estimated cost of this Site Planning Task is \$27,000, and will include drawings and visual renderings of the park and waterfront. Tracking and measuring of progress toward task completion will be done in quarterly reports.

ii. Budget Table (5 points)

The Village is requesting an assessment grant in the amount of \$200,000. The Village and/or its non-profit partners will provide in-kind services for personnel to allow more funds to be spent directly on assessment and outreach.

Budget Categories	Task 1: Phase I PAs	Task 2: Sampling Plans and Site Investigation	Task 3: Clean- up Strategy	Task 4: Site Planning	Total
Hazardous Substances Assessment Budget					
Personnel	\$1,500			\$3,000	\$4,500
Fringe Benefits					
Travel				\$2,000	\$2,000
Equipment					
Supplies				\$2,000	\$2,000
Contractual - QEP	\$4,000	\$150,000	\$15,000	\$19,000	\$188,000
Contractual – Legal	\$2,500				\$2,500
Other (Printing/Postage)				\$1,000	\$1,000
Total	\$8,000	\$150,000	\$15,000	\$27,000	\$200,000

c. Ability to Leverage [5 points]

The Village of Valley Falls obtained pro bono assistance in preparing this application that demonstrates our ability to leverage community resources. As documented in the Community Partnership portion of this application, the Village has partners who are prepared to help us every step of the way. The Village has committed the necessary staff time for grant tracking, monitoring, and reporting activities.

There are fund sources at the state and regional level to support clean-up efforts and park development. These include US EPA Cleanup Grants, the NYS Brownfields Program, the NYS Environmental Protection Fund, the Hudson River Foundation Hudson River Improvement Fund, the Hudson River Greenway, and the Restoration Fund administered by the Hudson River Natural Resource Trustees. The project’s location on a major tributary to the Hudson River opens up potential fund sources. While it is premature to seek commitments of these funds or other potential clean up and park development funds prior to knowing how bad the contamination is, it is the intent of the Village and its partners to do so at the appropriate time. The team that came together to advance this grant application is ready and willing to seek out and obtain further funding.

The Village’s implementation of a comprehensive sewage treatment project demonstrates our ability to leverage resources, where a combination of grants (\$800,00 from USDA Rural Development), low interest loans (\$2.1 M from the NYS Environmental Facilities Corporation) , and bonding (To meet the \$71,769 annual loan payment) accomplished the project.

3. Community Engagement and Partnerships [35 Points]

The Village of Valley Falls is committed to involving and informing the community and other stakeholders during the planning and implementation of this project. We have developed a community engagement plan to meet the needs of Village residents (the targeted community). We think this plan will help us to achieve the benefits discussed in Project Benefits (Section V.B.4).

The Village is a small tight-knit community, and essentially everyone in the Village is affected by the blight of the abandoned mill site and the real or perceived threat of environmental contamination from it. Therefore, the engagement plan uses a village-wide strategy.

a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress [15 points]

i. Community Involvement Plan (10 points)

The Community Engagement Plan will use the resources of our partner organizations extensively. The Village Board, together with its panel of citizen advisors drawn from community organizations making partnership commitments to this project will use three basic strategies in our tool kit – public meetings and workshops, web-based publication, and smaller meetings and consultations. The following table outlines the plan.

Target Group/Stakeholders	Means of Engagement	Means of Communicating Progress	Frequency/Timing of Interaction
Village Residents (62% of housing stock is owner- occupied ⁷)	Public Meetings and Public Workshops	Presentations Project Newsletter Media Outreach Social Media	At major project milestones, including release of draft reports on Contamination Assessment Clean Up Strategy Recommendations Site Reuse Proposals

Target Group/Stakeholders	Means of Engagement	Means of Communicating Progress	Frequency/Timing of Interaction
Community Organizations	Public Meetings and Workshops Attendance at Organization Meetings	Presentations Meetings Project Newsletter	At major project milestones (see above).
Non-Resident Property Owners	Letters Media Outreach	Letters Project Newsletter Media Outreach Small Meetings	At major project milestones (see above).
Renters	Letters Media Outreach	Letters Project Newsletter Media Outreach	At major project milestones (see above).
Hoosic River and Conservation Organizations	Public Meetings and Workshops Attendance at Organization Meetings	Presentations Meetings Project Newsletter	At major project milestones (see above).

There are no business organizations in the Village because commercial activity is minimal. Because the desired future use for the property is public green space, realtor involvement would come into play as there are several properties currently for sale, where the burned-out mill at the major entrance to the Village is an obstacle to housing sales and a downward influence on price. The Village will collaborate with area realtors to present and promote plans to remediate and improve the mill site to improve the overall real estate market in the Village.

ii. Communicating Progress (5 points)

The consultant engaged for the Assessment will be contractually required to produce a project newsletter suitable for distribution to the public at three milestones – completion of the contamination assessment, draft clean-up strategy recommendations, and when a site reuse proposal is available. This newsletter, which will be subject to Village review and approval prior to distribution will be in both paper and electronic formats. Electronic versions will be distributed through our community organization partners, as the Village does not have a website. Paper copies will be made available at Town Hall, the Free Library, the Fire Hall and the Community Hall – the hubs of Village life. Additional printed copies will be made available to partner organizations. The Village population is a mixture of education levels, with 45% holding a high school diploma or less, 35% holding college degrees.⁸ As a rural area, internet service is via satellite or phone lines and is not universally subscribed in residences, which is why the village is prioritizing the use of paper-based communication in addition to electronic communication. There is a local paper covering the area – the Express – and this media outlet will be used. Inclusion of flyers in sewer bills will also be considered if warranted.

b. Partnerships with Government Agencies [10 points]

This grant application was initiated with the encouragement of the New York State Department of Environmental Conservation’s Regional Hazardous Materials Engineer, who informed the Village

of the program. He pointed us towards resources, such as prior grant recipients, engineering firms specializing in this field, and research leads to effectuate the project. This valuable partnership will be key to the project success.

i. Local/State/Tribal Environmental Authority (5 points)

The New York State Department of Environmental Conservation runs the brownfields, voluntary cleanup or other remediation programs at the state level. A letter acknowledging their awareness of the project is included in the attachments. They are also a potential funding source for the clean-up phase of the project. The NYS Department of Health may also have a role in project implementation, depending upon the results of the assessment. The NYS Department of Parks and Recreation and the Regional Economic Development Council would have a partnership role in funding park development after the site is cleaned up. The State Office of Historic Preservation will also be a reviewing agency, given the historic nature of the site.

ii. Other Governmental Partnerships (5 points)

It is hoped that the Environmental Protection Agency will be a partner during the assessment project. The Village of Valley Falls has reached out to the Town of Schaghticoke, Town of Pittstown, within whose borders the Village is situated, and the Rensselaer County Executive’s Office to inform them of the intent to submit this grant application. All were willing to support the effort and have committed to help with public outreach and planning for the project. Letters indicating such are included in the Attachments.

c. Partnerships with Community Organizations [10 points]

The Village of Valley Falls is actively developing partnerships with community organizations to encourage involvement in the planning and implementation of this project, as demonstrated in the table below. A Public Information Meeting regarding this project application was held by the Village Board of Trustees on Thursday, November 12 at 6 PM at the Community Hall. It was attended by 17 people.

i. Community Organization Description & Role (5 points)

Community Organization	Organization Description	Role in Project			Commitment		
		Community involvement	Planning	Technical Assistance	Inform membership	Participate	Site Work, Grant Writing
Rensselaer Land Trust, Inc.	Conserve open space, watersheds, and natural habitats in Rensselaer County	X	X	X	X	X	X
Hoosic River Watershed Association	Protection and Enhancement of the Hoosic Watershed	X	X	X	X	X	X
Historic Hudson & Hoosic Partnership	Preserve and enhance the resources and waterways of the region	X	X		X	X	

Community Organization	Organization Description	Role in Project			Commitment		
		Community involvement	Planning	Technical Assistance	Inform membership	Participate	Site Work, Grant Writing
Hoosic Valley Athletic Association	Local youth sports organization, owning property abutting the site	X	X		X	X	
Lakes to Locks	New York State Byway designated by the Federal Highway Administration for its historic, natural, cultural and recreational resources	X	X		X	X	
Town of Pittstown	Adjoining Town containing 2/3 of Village land area	X	X		X	X	
Rensselaer County Executive	County project is located within	X	X		X	X	
Town of Schaghticoke	Adjoining Town containing 1/3 of Village land area	X	X		X	X	
Trout Unlimited #586	Local chapter of national conservation organization dedicated to preserving cold water fisheries	X	X	X	X	X	X
Valley Falls Free Library	Village Public Library, hub of community activities	X	X		X	X	
Valley Falls United Methodist Church	Active congregation hosting summer youth programs, food pantry	X	X	X	X	X	X
Pittstown Historian	Local History Research	X	X			X	
Pittstown Historical Society	Preserving Pittstown History	X	X		X	X	
Village of Valley Falls Fire Department	Volunteer Fire Company	X	X	X	X	X	X
Valley Falls VFW	Veterans of Foreign Wars	X	X		X	X	X

ii. Letters of Commitment (5 points)

Letters of Commitment from the organizations in the table above can be found as an attachment to this narrative.

The sign in sheet and a summary of public comment received at the 11/12/15 Public Information meeting is also attached.

4. Project Benefits [25 Points]

The glory days of a mill-based economy are over. The future of the Village of Valley Falls lies in the quality of its housing stock and attractiveness as a historic village. Addressing the abandoned burned out mill at the main village entrance is a key strategic need that will have many benefits for the Village.

a. Health and/or Welfare and Environmental Benefits [10 points]

i. Health and/or Welfare Benefits (5 points)

The derelict mill is an attractive nuisance and a magnet for vandals. Its clean-up, demolition and transition to green space will remove a major safety hazard and reuse it for the benefit of the community. Exposure to a variety of potential contaminants that might be at the site, leaking into groundwater and into the river will be reduced significantly. The welfare of the target community will be improved by increased access to nature and an improved real estate market for homes in the community. The walking trails will provide an inexpensive way to exercise in fresh air, and other passive recreation features, such as picnic areas provide for quality family interactions.

ii. Environmental Benefits (5 points)

The location of the site adjacent to the Hoosic River is of concern in times of high water – such as extreme weather events. If the site remains unmediated, the contaminants now contained within the site could be spread downstream to other communities if/when the site floods. With the increase in the number and severity of major storm events due to climate change, the removal of this risk is a significant benefit.

The removal of hazardous materials from the site will improve health conditions and allow the site to be open to the public. New river access will increase river awareness and care of that natural resource. Reuse as green space will provide environmental benefits in terms of flood resiliency, increased wildlife habitat, and improved water quality. Return of the site to vegetation will mitigate climate change.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse [8 points]

i. Policies, Planning, and Other Tools (5 points)

The Village Board will use the local policy tools at its disposal to develop the site into green space that will benefit the community. These tools include the village budget, planning and zoning actions, and designation as a historic hamlet. The park will be an extension of the already good walkability of the Village. As a parallel to the development of the wastewater treatment plant, the reclamation of the mill site will provide significant storm water runoff benefits that will support sustainable development in the Village.

ii. Integrating Equitable Development or Livability Principles (3 points)

The old Thompson Mill site is in the floodplain. Re-building on the site to modern day standards is cost prohibitive, and the best reuse of the land is to return it to nature. The conversion of the land to a public park will be done in such a way to honor the historic use of the site – reusing structural elements and bricks into part infrastructure. Those that can't be repurposed, will be recycled.

Addressing the blight in the center of the Village will support and value the existing historic community in the Village – a key Livability Principle. Its reuse as a public park will increase residence access to not just greenspace – but the riverfront. With the virtually the entire southern riverfront in the Village being contained in this single site, the clearing of hazardous conditions and public ownership will open recreational opportunities to support healthy lifestyles.

Retaining residents – and attracting new residents that will value that kind of asset – will be a result. This shows adherence to principle #6, where communities are valued by enhancing their unique characteristics.

c. Economic and Community Benefits (long-term benefits) [7 points]

i. Economic or Other Benefits (5 points)

Ensuring quality of life for Village residents will help keep vacancy rates low, increase village pride, and provide for a stable population. Providing a 23-acre riverfront park – the vision for this parcel after clean-up – is a key component for the long-term health of the village community. It will reduce the burden on the Fire Department, and potentially create new revenues from park visitors.

ii. Job Creation Potential: Partnerships with Workforce Development Programs (2 points)

The Village of Valley Falls advertises all contracting opportunities locally, and will do so with this project. Job creation potential lies in both the demolition/remediation jobs and during the park development phase. The Village will seek opportunities to partner with regional workforce development programs.

5. Programmatic Capability and Past Performance [40 Points]

The Village of Valley Falls has the experience, knowledge, resources, and ability to obtain those resources it lacks in house to ensure successful completion of all required aspects of this project and grant. It successfully completed a sewer project that included the construction of a wastewater collection system and the construction of a sewage treatment plant. The project was handled very effectively and efficiently over the course of more than a decade and involved substantial public outreach and education, eminent domain proceedings, municipal bonding, and leveraging grant funds. Project management is accomplished by deploying consultant resources strategically.

a. Programmatic Capability [28 points]

The Village of Valley Falls will use consultant resources (Qualified Engineering Professionals (QEP)) overseen by the Village Board of Trustees to accomplish the assessment of hazardous materials at the old Thompson Mill and to perform site planning for its future use as recreational parkland. This is the model successfully deployed for the Village-wide sewer project.

The QEP will act as project manager and be contractually responsible for ensuring compliance with all applicable federal and state requirements of the project and the funding sources. This will explicitly include reporting, community outreach, and safety tasks. The solicitation for a QEP will be a two-step process of submission of qualifications first, and with only qualified firms being asked to submit full proposals. After grant award, two tasks will be undertaken immediately:

- The competitive procurement of the engineering and planning professional services to complete the program of work.
- The negotiation of access agreements with the landowner.

Legal services required, including solidifying access to the site, will be arranged through contract, as the Village does not employ an attorney. This is consistent with past legal services for the Village, including the eminent domain proceedings required for the sewage treatment plant.

Project financial oversight will be provided by the Village Treasurer, with progress reports to the Board of Trustees. Sue Craver is the incumbent in the position. She has experience in the management of grant programs and is responsible for the Village Sewer District billings and the

Loan Program payments. Annual trainings on accounting, legal, and regulatory matters for Continuing Education Credits are a requirement of the position.

Mayor Richard Andrew will directly oversee the QEP, a role he has played on other projects. He has decades of experience and an Associate's degree in Construction Management.

b. Audit Findings [2 points]

The Village of Valley Falls has had no adverse audit findings (see below).

c. Past Performance and Accomplishments [10 points]

The Village of Valley Falls successfully completed a \$2.1M project for a Village-wide sewer and sewage treatment program in the period from 1992 to 2002, using a combination of grant funds and municipal bonding as described below. There were minor project delays, but all grant requirements were fulfilled and the grant closed with all required reporting complete.

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

1. Purpose and Accomplishments (5 points)

The only other project that the Village of Valley Falls has received federal funding for was from the US Department of Agriculture (USDA) Rural Water and Waste Disposal fund. This grant provided \$1 million towards the construction of a \$2.1M Village-wide sewer system. The remainder of the cost was provided through municipal bonding at 0% interest provided by the NYS Environmental Facilities Corporation, which is being paid off by user fees. This system was required by NYDEC and NYSDOH to counteract direct sewage dumping into the Hoosic River. The sewer treatment plant was built in 2004, after environmental reviews, permitting, and land acquisition through eminent domain were accomplished. The project successfully eliminated all raw sewage dumping, and converted the entire Village off septic systems.

2. Compliance with Grant Requirements (5 points)

The Village complied with the work plan, schedule and terms and conditions of the USDA grant, with revisions for schedule delays relating to land acquisition by eminent domain. The grant was applied for in 1993, awarded in 1994, and closed out in 2004. A post project completion audit had no findings. The Village, using consultants, completed timely and acceptable reporting, as required by the USDA.

Considerations and Other Factors

The following additional considerations apply to this proposal:

- *The proposed project at the old Thompson Mill advances Region's regional priorities (Pages 13, 14).*
- *The proposed project at the old Thompson Mill is located in a rural area in a "micro" community (Page 2).*
- *The proposed project at the old Thompson Mill is primarily focused on investigation the full nature and extent of environmental contamination (Pages 5-7.)*
- *The proposed assessment project at the old Thompson Mill has the potential to leverage state funding for clean-up and park development (Pages 7-8).*