

**DRAFT**  
**THRESHOLD CRITERIA FOR CLEANUP GRANTS – 114 MANHATTAN STREET**

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A. Applicant Eligibility

The City of Stamford is a general purpose unit of local government.

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B. Community Notification

The targeted communities were notified of the preparation and intended submission of this grant proposal through a notice of public meeting published in the local newspaper. The notice was also reproduced on the City's website and copies of the notice were mailed directly to affected property owners and other relevant parties. Copies of the draft proposal were made available at municipal offices and public library branches.

A public meeting was held on

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C. Letter from State Authority

A letter notifying the Connecticut Department of Environmental Protection (DEP) of the City's intent to file this application was sent on October 22, 2004.

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D. Site Eligibility

The subject site is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody or control of the United States government. The property will be purchased in part with grant funds from the Federal Transit Administration, however title will remain with the City of Stamford.

The site is located at 114 Manhattan Street in Stamford. The site is contaminated by hazardous substance, most notably Volatile Organic Compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), arsenic, mercury and extractable total petroleum hydrocarbon (ETPH) in the soil.

3. A property-specific determination is not required.
4. A gasoline underground storage tank was noted to be located on the site. A previous occupant, Tri-Chem, was identified as a Connecticut Hazardous Waste site.
5. A Phase I assessment was completed in August 2001. The assessment included visual inspections, site walkovers and file reviews conducted earlier that year. Phase II and Phase II supplemental assessments including soil borings,

field observations, groundwater sampling and analysis were conducted between April and December 2003. The report was issued in February 2004.

The city has contracted with TRC Environmental Corporation to conduct a Phase III Site Assessment at the property. The Phase III tasks will include:

- development of an investigation work plan
- obtaining soil and water samples
- completing a Phase III reports
- developing a remedial action plan

The estimated cost for the Phase III assessment is \$23,000. The work will be funded through a grant from the Federal Transit Administration (80%) and the City of Stamford (20%). The assessments are scheduled to begin in November 2004 and be completed in January 2005.

6. A Phase II assessment conducted on the site concluded that there were no previous environmental investigations and no known ongoing or anticipated environmental enforcement actions related to the property. There have been no inquiries or orders from federal, state or local authorities regarding the responsibility for any party for contamination or hazardous waste at the site.

7. a) The City of Stamford does not currently own the subject site. We have hired a contractor to conduct appraisals and negotiations with the property owners. Letters of offer to purchase are expected to go out in December 2004. Ownership of the property is scheduled to be obtained in July 2005.
- b) The site is currently the site of an office building. As the City does not yet own the property, all disposal of hazardous substances will have occurred prior to our purchase of the site.
- c) Phase I, Phase II and Phase II supplemental site assessments were performed at the subject site. The Phase I assessment included visual observations, walkovers and file reviews. The Phase II and supplemental assessments included analyzing soil and water samples, analyzing data, and preparing an assessment report detailing the findings.
- d) Not applicable --the City of Stamford has not taken ownership of the site.
- e) The City of Stamford is not potentially liable or affiliated with any other person who is potentially liable for contamination at the site.
- f) There are no known parties who may be considered potentially liable for the contamination at the site.
- g) The City of Stamford contracted for the environmental assessments at the site to determine if any contamination existed, and therefore, to be able to contain any hazardous materials that may affect workers or residents during the subsequent construction of the Stamford Urban Transitway. Continued or future releases are not anticipated. The City will take all necessary steps to remediate the contaminated soil in a safe and responsible manner.
- h) The City of Stamford hereby confirms its commitment to:
- Comply with all land use restrictions and institutional controls

- Assist and cooperate with those performing the cleanup and to provide access to the property
- Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property
- Provide all legally required notices.

E. Cleanup Authority and Oversight Structure

The Project Coordinator for the Stamford Urban Transitway will be responsible for overall management of the cleanup project. Stamford will participate in the Connecticut Department of Environmental Protection Voluntary Remediation Program. Under this program, the City of Stamford will be required to obtain review and approval of all project components by the DEP Commissioner. Documentation to be reviewed by the DEP includes a proposed schedule of investigation and remediation, and a project schedule for submitting technical plans and reports for review.

The City will also retain the services of an environmental contractor that has a Licensed Environmental Professional to ensure that the cleanup is performed in compliance with all applicable state and federal laws.

2. The City of Stamford intends to acquire the adjacent parcels by the time of the cleanup work. If for some reason this does not happen, owners of neighboring properties will be sent a “Right to Enter” letter explaining why the city will need access and requesting permission for the activities needed. Owners are requested to sign the letter indicating their assent and return it to the SUT office. Based on past experience, no refusals are anticipated.

F. Cost Share

The City of Stamford is requesting \$200,000 in EPA Cleanup Grant funds for 114 Manhattan Street. The \$40,000 cost share will come from the City’s capital budget.

**RANKING CRITERIA FOR CLEANUP GRANTS**

A. Budget

BUDGET CATEGORIES	TASK 1: Remove Contaminated Soil	TASK 2: Project Administration	TOTAL
Personnel		\$ 10,000	\$ 10,000
Fringe		\$ -	\$ -
Travel		\$ -	\$ -
Equipment		\$ -	\$ -
Supplies		\$ 5,000	\$ 5,000
Contractual	\$ 180,000	\$ 40,000*	\$ 220,000
Other		\$ 5,000	\$ 5,000
TOTAL	\$ 180,000	\$ 60,000	\$240,000
COST SHARE		*\$40,000	

## B. Community Need

### 1. Description of the Target Community

Stamford is located in the southwestern corner of Connecticut, along the Long Island Sound. Situated 45 miles from midtown Manhattan, it is home to approximately 118,000 residents and the daily destination of 50,000 commuters. Here you can find both urban and suburban elements ranging from multi-acre homes in wooded North Stamford, to our bustling downtown center, to the beautiful shoreline areas that envelop our parks and beaches. The people who live here are a diverse mix of ethnic backgrounds and income levels.

According to the 2000 U.S. Census, 71.9% of Stamford's population reported themselves as White, 16.5% were Black/African American, and 16.8% were Hispanic/Latino. Currently 30 percent of the Stamford population was born abroad, more than half of those in Latin America. Thirty-five percent of the population is bilingual, compared to 15 percent statewide.

Although Stamford is located in a region of Connecticut frequently considered among the wealthiest in the nation, Stamford's demographics are more reflective of the state's larger urban cities, with 20% of households earning less than \$25,000. Stamford's poverty rate is 5.4%, and the 2000 Census shows that the median household income dropped by 10.6% when adjusted for inflation. At the same time, per-capita income also fell about 1%, reflecting a growing disparity between our city's richest and poorest neighborhoods.

Brownfields policy in Stamford focuses on the South End and Waterside neighborhoods. This area lies to the south of Interstate-95, which for years has been the unofficial dividing line between the "two Stamfords". North of the highway are the downtown office buildings and most of the more affluent retailers and residences. To the south lie vacant, neglected factories, utility plants, and the deteriorated and sometimes crowded housing of the City's poorer families. These neighborhoods contain numerous brownfields and have the city's highest rates of poverty, unemployment and crime. The 3,100 residents here are at higher risk for exposure to contaminants from former factory and industrial sites. Stamford's priority is to remediate the brownfields south of I-95, reclaim these corrupted sites, and reuse them for purposes that will directly benefit the economic and social redevelopment of this area. The property proposed for the Brownfields cleanup grant lies within the South End historic district, in Census Tract 222.

Stamford has had a long tradition as an important business center. In the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, the target area was home to numerous commercial and manufacturing facilities. When Stamford transformed from a manufacturing center into a corporate hub, there remained behind neglected factories, abandoned utility sites, and other deteriorating remnants of its industrial heyday. Over time, it

became an “inner-city” neighborhood, with a concentration of impoverished minority families and subsidized housing. According the 2000 Census, 5% of families in Stamford live at or below the poverty level, yet in the South End that rate rises to 24%. The unemployment rate for Stamford in July 2004 was 3.6%<sup>1</sup>; the estimate for the South End was 11.9%.

## 2. Benefits to the Target Community

There are numerous positive impacts anticipated for residents and businesses within the target area. Threats to human health will be reduced through the removal of pollutants and contaminated soil. Pursuant to the cleanup, the site will become part of the Stamford Urban Transitway (SUT) a new four-lane facility providing an east-west link from I-95 and the Stamford Intermodal Transportation Center (SITC) to the southern part of Stamford. Construction of the SUT is integral to a comprehensive revitalization strategy planned for the area. Residents will benefit from a reduced crime rate, increased vehicular and pedestrian safety, improved traffic circulation, increased access to public transportation facilities, and improved environmental conditions. Business owners, employees and customers will benefit from easier access to commercial establishments in the target area, as well as between the South End and the Central Business District.

## 3. Impact of Brownfields on the Target Community

The South End, together with the adjacent Waterside neighborhood, contains an estimated 230 total acres of Brownfields. In 2001, funds from an EPA Brownfields Site Assessment grant were used to conduct Phase I Assessments of eighty-four of these properties that were likely to be impacted by construction of the Stamford Urban Transitway. Of these, nineteen were recommended for Phase II assessments. ACREAGE? Based on that recommendation, we can estimate a total of ----- acres of Brownfields located within a 1-mile radius of the project area.

In the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, the target area was home to numerous commercial and manufacturing facilities. When Stamford transformed from a manufacturing center into a corporate hub, the South End was left with neglected factories, abandoned utility sites, and other deteriorating remnants of its industrial heyday. The concentration of Brownfields contributed to the setting of urban blight that largely excluded this area from the economic and development resurgence Stamford has experienced in recent years.

Some of the old industrial sites evolved to more modern businesses that added to the pollution—dry cleaners, chemical plants, gas stations, etc. A file review done by TRC Environmental Corporation during the Phase I assessments indicated “areas of environmental concern” due to releases of fuel oil, gasoline, sulfuric acid and ammonia, lead paint contamination, and historical coal tar contamination.

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<sup>1</sup> Source: Connecticut Department of Labor, Office of Research, September 2004.

Using GIS mapping, the Stamford Health Department has identified the South End as one of six census tracts in Stamford with the highest rates of pediatric asthma. A study is being conducted to determine if environmental factors have contributed to this troubling development.

Some of the identified Brownfields sites remained idle and encouraged criminal activity such as drug dealing and illegal dumping. These factors, combined with the restricted traffic flow in and out of the area, can create serious impediments to attracting business investment to this community. However, these barriers are not insurmountable. Stamford's strategic east coast location, affluent population, business infrastructure and high property values have provided enough incentive for construction of luxury apartments, a motorcycle dealership and other businesses on former brownfields in the area. The construction of the Urban Transitway will improve access and create the better transportation patterns integral to continuing the redevelopment within this community.

### C. Sustainable Reuse of Brownfields

#### 1. Preventing pollution and reducing resource consumption

##### *Air*

The property at 114 Manhattan Street will be cleaned up and will become part of the Stamford Urban Transitway. The Transitway will be a vital link between I-95 and the Stamford Transportation Center, the nation's busiest commuter rail station. At the request of the Connecticut Department of Environmental Protection, a microscale air quality analysis of the project was performed. The analysis concluded that the SUT project will result in a net reduction in air pollution due to an increased number of new rail passengers and increased usage of bus transportation to the train station and the Central Business District. Pollutants to be reduced include Carbon Monoxide and other greenhouse gas emissions, Particulate Matter 10 microns or less, and Nitrogen Oxides. Additionally, it will not cause any other transportation-related pollutant emissions. A reduction of 18.72 million vehicle miles of travel is projected, resulting in an energy savings of 116,724 MMBTU per year.

##### *Water*

Newly engineered street drainage that will accommodate the addition of impervious surfaces will be incorporated into the Transitway design. General street flooding in some portions of the project corridor with the existing subsurface drainage system are known to occur. A new drainage and sewer facility design based on the proposed land use in the vicinity of the new roadway is proposed in conjunction with the Stamford Urban Transitway, and is designed to improve existing conditions. Based on current and future requirements of the drainage and sewer facilities, street flooding will be minimized, including that of downstream drainage systems associated with the Transitway. Existing groundwater

conditions in the corridor or in the City as a whole will not be affected as a result of the construction.

### *Soils and Geology*

Contamination currently exists at 114 Manhattan Street and within the Transitway Project area. EPA cleanup funds will be used to remediate the soil here and remove threats to the public health. All cleanup work shall be in accordance with US Environmental Protection Agency and Connecticut Department of Environmental Protection protocols. Appropriate and necessary actions will be taken to contain all contamination encountered and appropriate remediation measures will be implemented to ensure the safety of all Stamford residents.

### **ENVIRONMENTALLY BENEFICIAL LANDSCAPING ?**

## 2. Economic Benefits

Stamford was designated as a Brownfields Showcase Community in 1998. Our Showcase application outlined three goals for the city's Brownfields strategy:

1. Redevelopment of a series of Brownfields sites
2. Creation of better transportation patterns and facilities
3. Development of strong community involvement in and knowledge about brownfields properties.

The cleanup of 114 Manhattan Street and subsequent construction of the Transitway will help us to reach two of the three goals. The new facility, in conjunction with the improvements at the Stamford Transportation Center, will allow redevelopment opportunities contingent on transit infrastructure come to fruition and will in turn increase population and employment growth. The twenty-year forecast for the Corridor area suggests a 38.6% growth in population and 142% growth in employment. The improvements resulting from the SUT project will be a significant part of that growth.

The completed Transitway will enhance employment opportunities for low-income and minority residents in a number of ways. Easier access to the South End, in conjunction with the other redevelopment efforts, will provide incentive for businesses to locate offices in this part of town. Customers throughout the region will be encouraged to patronize these businesses since it will take less time to drive, ride, walk either from in-town or off of I-95. **Of the 1,105 low-income households in Stamford, 20% (224) are within a ½ mile radius of the project area.** It can be speculated that this population will benefit from a wider choice of employment opportunities due to the proximity of businesses in the South End as well as the enhanced bus and train transportation to employers in the City and the region.

### A Plan for the Stamford Enterprise Zone: Waterside and South End

Neighborhoods considered the Transitway project, then known as the Dock Street Connector, a significant part of its vision to create strong vibrant communities in

Stamford's poorest and most neglected neighborhoods. The Plan was developed by a committee comprised of neighborhood residents, property owners and businesspeople, as well as representatives of City agencies, civic organizations and service providers. The South End Plan recommends that the "long-proposed, 4-lane Dock Street Connector should be built—not just to improve traffic conditions, but also to revitalize the most blighted portion of the Enterprise Zone." The community stakeholders agreed that construction of this project would simplify the commutation process for many employees and provide a means to revitalize the area through the creation of a new real estate dynamic. The Plan goes on to say that elimination of narrow streets within the neighborhood that combine "proximity to the downtown and Transportation Center, with the anonymity of back alleys, may help reduce the proliferation of chop shops, drug dealing, prostitution, and abandoned buildings. Instead, "office, retail, and housing development can be expected along what would promise to be one of the most visible and highly-traveled routes in the city."

### 3. Promoting a vibrant community

The Stamford Urban Transitway will literally "pave the way" for a series of improvements in the South End that will lead to a more vibrant community. Residents will find it much easier to use public transportation and improved street quality and reduced traffic congestion will make it safer for pedestrians. This critical transportation facility will help establish a mixed-use framework needed to accommodate the redevelopment and rehabilitation in this area. Without a route that allowed access by cars, buses, bicycles and pedestrians, there would be no one to use the new housing, businesses, and restaurants and entertainment venues now in the planning stages.

### 4. Reuse existing infrastructure

Construction of the Transitway will provide a vital link between I-95, the East Coast's major highway, and the Stamford Intermodal Transportation Center, the busiest train station outside of Grand Central. Here travelers have access to Metro-North commuter rail, Amtrak, Connecticut Transit bus service, regional and interstate buses and taxi service.

### 5. Promoting transportation choices

Numerous transportation benefits promoted by the Transitway will include:

- Providing direct access to and from the train station
- Providing CT-Transit with bus re-routing opportunities
- Improving bus service connections to and from train station
- Increasing ridership on both rail and bus system
- Providing travel time savings for Buses, Vehicles, Cyclists, and Pedestrians

- Facilitating passenger park-and-ride by providing parking set-asides for high occupancy vehicles (HOV's) in new Transportation Center garage
- Constructing new bus shelters and stops along Transitway
- HOV lane for bus, business shuttles, and car/vanpools during peak period
- Travel time savings for business shuttles
- Improving pedestrian and bicycle access to train station and within South End
- Offers opportunity to implement real time information using ITS (Intelligent Transportation Systems) Variable Message Signs, Automatic Vehicle Location (buses), Bus Priority at intersections, Traffic Surveillance

## 6. Preventing future Brownfields

The cleanup of 114 Manhattan Street and construction of the Urban Transitway will spur redevelopment in the South End that will continue to attract private investment into the area and reduce the number of neglected and/or abandoned properties. Any proposed re-use of existing sites will be carefully monitored and subject to approval by the City of Stamford and the NRZ committee.

### D. Creation and/or Preservation of Greenspace/Open Space of Nonprofit Purpose

Not applicable.

### E. Community Involvement

#### 1. Involving the targeted community

Public participation concerning the Stamford Urban Transitway has been ongoing for several years, both in neighborhood-based plans for revitalization of the project corridor, and as part of planning specifically for the Dock Street Connector and/or SUT. The process of providing information to residents, businesses, agencies, and other interested parties will continue throughout the lifespan of the project.

The City of Stamford will carry out a fully integrated program of public information and outreach to ensure that issues raised by the project are communicated and addressed responsibly. The outreach efforts are coordinated through the Stamford Engineering Department. Components will include the following:

Project Office: Offering the public a one-stop location for project information through printed material and/or conversation with staff.

Public Participation: Activities will include presentations, open houses, participation in community events, business outreach, and other informational meetings as needed.

Public Information Telephone: A direct telephone line to the SUT Project Manager will allow the public to inquire about any aspect of the project.

Media Relations and Communications: The SUT Project Manager will develop a strategic program media campaign to meet the print and broadcast needs of the project.

Public Presentations: A well publicized series of presentations to stakeholders will take place at easy accessible locations. Presentations to specific groups can be scheduled by contacting the Project Manager. The City will exhibit detailed drawings of the SUT for public viewing. Sessions will include discussion of the need for the Transitway, how the work will be carried out, and the anticipated benefits of the project.

Listed below are the meetings held to date regarding the scope of the Stamford Urban Transitway project and the type of publicity used to encourage public participation.

<b>Date</b>	<b>Meeting Name</b>	<b>Publicity Tactic</b>
4-28-98 5-19-98	Jefferson - Dock Street Connector	Stamford Advocate, Greenwich Time, letter sent to property owners within project limits
6-15-98	Showcase Communities Kick-Off Event	
8-23-99	Public Information Meeting	Advocate, Greenwich Times, letter sent to property owners within project limits
1-9-00	Neighborhood Revitalization Zone (SouthEnd)	
12-20-00	SouthEnd	
10-09-01	SUT Public Information Meeting	Advocate, Norwalk Hour, La Voz Hispana, flyers distributed to community centers, letter sent to property owners within project limits
7-9-02	Public Hearing to review draft Environmental Assessment (EA) report, address potential environmental issues, update on City's preferred plans	
6/10/03	Public Information Meeting to update on the current project status on the design and acquisition activities	
4/15/04	Public Hearing for Right-of-Way acquisition and relocation assistance	

The proposed project will include a community meeting to discuss the cleanup as well as public access to the draft proposals to solicit comments on cleanup alternatives.

## 2. Partnerships with other stakeholders

The City of Stamford will continue to work with the South End Neighborhood Revitalization Zone (NRZ) committee on appropriate cleanup and redevelopment of Brownfields in the area. The NRZ committee is comprised of residents and other stakeholders at the local level and is instrumental in all phases of the revitalization of their neighborhood. The City is also working with the EPA and the Connecticut Department of Environmental Protection on with regard to this and other Brownfields

projects. The Federal Transit Administration is the lead agency for funding and development of the Stamford Urban Transitway.

### 3. Communicating progress of the project

Information on the progress on this project will continue to be available through newspaper, City website, and various public meetings. The Stamford Urban Transitway has its own page on the City's website as well as a repository of information available to the public. Notices are posted in English and Spanish and translators are available if necessary.

### 4. Community-based organizations involved in this project

South End Neighborhood Revitalization Zone, Sheila Barney (203) 356-6258  
Historic Neighborhood Preservation Program, Renee Kahn (203) 322-6671

## F. Reduction of Threats to Human Health and the Environment

1. Funds from the cleanup grant will be used to reduce threats to health and the human environment by removing existing contaminants in a densely populated area. Contaminants identified at the subject property include Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs) and extractable total petroleum hydrocarbons (EPTH), which may be carcinogenic. As noted previously, construction of the Urban Transitway will also result in reduced air pollution in an area with higher than average rates of asthma.
2. The Connecticut DEP will have review and approve all plans for cleanup at the project site. The City of Stamford will work with the Connecticut Department of Public Health and the Stamford Health Department to ensure the consideration of public health issues and compliance with public health laws.
3. The proposed cleanup plan includes:
  - Phase III site assessment to determine extent of contamination
  - Excavation and removal of contaminated soils
  - Project administration and reporting
4. The Connecticut Department of Environmental Protection will have review and approval oversight for all remediation plans for the site. The City of Stamford will also hire a Licensed Environmental Professional (LEP) to ensure all work is protective of human health and the environment.
5. During the cleanup process, the site will be secured to prevent non-essential personnel from entering the site. The completed project will be a four-lane asphalt roadway with sidewalks, which will be maintained by the City of Stamford Department of Operations.

## G. Leveraging of Additional Resources

1. Cleanup of 114 Manhattan Street is estimated at \$60,000. The construction of the entire Urban Transitway, of which this property will be a small part, is currently estimated at \$46 million.

2. The City of Stamford will contribute \$10,000 to the project in the form of staff time and cash from the general revenues budget. The Federal Transit Administration is providing \$26 million for construction of the Transitway, the remainder will come from the City of Stamford capital budget.
3. **OTHER FUNDING SOURCES?**

#### H. Ability to Manage Grants

The City of Stamford is committed to revitalizing its Brownfields and the neighborhoods they are located in. Our track record includes successful cleanup of properties that are now the sites of large corporations, small businesses and residential units. The remediations were funded through EPA assistance and significant private investments. In 1998, the City was involved in the cleanup of the current UBS Headquarters site. The project consisted of the complete cleanup of a 12 acre site with extensive petrochemical contamination and construction of a one million square foot, \$250 million office building. Various board approvals, condemnation, relocation, environmental assessment, cleanup, state DEP approvals, and construction all were completed in just over two years. This experience will come to bear on the 114 Manhattan Street cleanup as well.

As part of the Urban Transitway project, the cleanup of 114 Manhattan Street will be overseen by the SUT Project Coordinator. She is supported by the staff of the Stamford's Engineering Division as well as the Project Management Oversight Contractor hired by the Federal Transit Administration. This team also works closely with other relevant municipal departments such as Legal Affairs, Health, and Finance.

A Phase III assessment for the subject property has been subcontracted to TRC Environmental Corporation, a company with extensive experience in complying with EPA's Brownfields programs. The Phase III will help us to determine the extent and type of remediation needed and guide us in the selection of a qualified contractor for cleanup activities.

#### 2. History of managing federal funds

As a municipality that provides a high level of service to its residents, Stamford receives many State and Federal grants which assist it to meet its obligations. At this writing, the City is administering 130 grant programs, each with its own set of regulations, record-keeping requirements, and allowable activities. At the end of each fiscal year, every grant is audited by an independent agency in conformance with OMB Circular A-133. The City has consistently been found to be in compliance by these auditors and is not presently suspended, debarred, or otherwise ineligible to receive federal funding. Stamford is not, nor has previously been, required to comply with special "high-risk" terms and conditions under agency regulations implementing OMB Circular A-102.

### 3. Previous EPA Brownfields Cooperative Agreements

1998 IPA: Stamford Harbor Redevelopment	\$50,000
1998: Brownfields Assessment Pilot	\$200,000
1999: Brownfields Job Training	\$200,000
1999: Brownfields Revolving Loan Fund	\$747,000