

Town of Sprague Mukluk Preserve, Brownfields Cleanup Grant Proposal Narrative

Cleanup Grant Threshold Criteria

A. **Applicant Eligibility:** The Town of Sprague is a recognized Municipality as defined by the General Statutes of the State of Connecticut. Its Federal tax ID number is 06-6002096; its State Tax ID number is 6609481-000.

B. **Community Notification:** The Community Notification process began in 2004 prior to and during a Town Meeting and Referendum in which over 200 citizens, the largest referendum turnout, voted in overwhelming majority to allow the Selectmen to expend funds to purchase the site in question for preservation as Open Space. The property and its former use as a skeet/rifle range had been familiar to most community members; they approved, therefore, a portion of the funds to be used for assessments to determine the amount and methods of cleanup of hazardous materials (mainly lead shot) from the property.

After the meeting, the twelve-member Mukluk Property Committee was formed and conducted with CLA Engineers of Norwich an exhaustive evaluation of the property. The function of this committee was to provide the community with as comprehensive a set of data about this property as possible prior to applying to the State DEP for an Open Space and Watershed Land Acquisition Grant, which it was awarded in late 2004. Data in this report included not only potential contaminant locations but an inventory of plant, animal and fish species, geographical and topographical features, soil analyses, and an investigation into the potential uses for the property and economic/social benefits to the community. A copy of this report was filed with the Connecticut DEP and is also on file at the Town offices for review. After the Property Committee completed its objectives, the First Selectman ordered the establishment of a permanent Conservation Commission, comprised of members of the Committee as well as additional community representatives. One of the charges of the Commission under state regulations is to educate the public about the Open Space inventory of Sprague and its importance to the community, and the Mukluk Property became its first priority. Solicitation of public comment on the Brownfields application and a notice of an informational meeting was advertised in the local newspaper on November 22, 2005. *(Please see Attachment I: Public Notice)*. An additional community service notice appeared in the newspaper the following day. Abutting property owners were contacted by phone; more than half attended the meeting. Email copies of the draft application were sent to appropriate town officials, committee members, and the general public.

Members of the Conservation Commission were present on December 1 to help facilitate the informational meeting; citizens were given an opportunity to comment on the draft proposal, which had been available at the Town offices since November 28 for review. An article reporting on the meeting appeared in one of the area's two large newspapers on December 3. *(Please see Attachment V: New London Day article)*

C. **Letter from Connecticut Department of Environmental protection:** attached *(Please see Attachment II: Letter from Connecticut DEP)*

D. Site Eligibility and Property Ownership Eligibility

1.Site background information

a.**Site name:** Mukluk Preserve

b.**Site Address:** 239 Pautipaug Hill Rd. Sprague, CT 06330 *(Please see Attachment III: Site Location Map)*

c. **Contaminants:** The soil on the site is contaminated with antimony, arsenic and lead components from shotgun pellets; concentrations of lead in soils are classified as a hazardous waste.

d. **Operation history and current uses:** The Mukluk Sportsmen's Club purchased the approximately 280-acre property from Baltic Mill Company on August 4, 1966 after leasing it since 1955. They have used the property for hunting, skeet shooting, and a rifle range. According to the Phase III Site Assessment (on file at the Town Offices) the land, formerly known as River Farm, had been previously acquired for water rights in 1899 and there appears to have been no industrial use of the property during the consecutive ownership of Ponemah Mills and the Baltic Mills Company. The property consists of generally wooded and undeveloped and with approximately 5,000 feet of access along the Shetucket River. In 1992, the Mukluk Sportsmen's Club transferred the property to the club owners. The site's current use is minimal, as the majority of the owners are deceased or aging, and individual permission is given to hunt the property. A small inactive gravel excavation area with an abandoned gravel screen in the pit area exists off a gated, gravel road that extends from the site access road to the northern portion of the site just south of an abandoned rifle range. The rifle range was investigated and no contamination was identified (Phase I and II Environmental Site Assessment dated June 3, 2004).

The clubhouse/lodge on the property is no longer in use, having been vandalized in 2004. It consists of a main floor and basement with two oil storage tanks. A septic system is on the western side of the building, and there is an on-site water supply well.

e. **Environmental Concerns:** GEI previously completed a Phase I and II Environmental Site Assessment for this property, as summarized in a report dated June 3, 2004 and referenced in the Phase III Assessment, completed in December 2004. (Copies of all these Assessments are on file at the Sprague Town Offices.) Included in this report was the information that the contamination to this property was concentrated within the 12-acre trajectory of the skeet range, containing a 2.3 acre wetland/pond system. The contaminated soil and sediments are generally classified as a hazardous waste due to elevated lead levels. The initial environmental concern is the contaminated sediments within the pond and the potential for migrating into the Shetucket River, harming the watercourse and wildlife downstream. The Shetucket River is a significant fisheries resource and significant funds have been expended to construct fish ladders on three downstream dams. The river abutting the site is now available to anadromous fish that migrate upstream from Long Island Sound for spawning. The construction of a stone check dam in the pond/wetlands area, and removal of lead contaminants in the leaf litter within the twelve-acre site, is a vital first step in the environmental cleanup necessary at this site.

2. Affirmations: The Phase I Environmental Site Assessment and other legal research confirmed that the site is not on the NPL, not subject to any orders under CERCLA, nor is it subject to jurisdiction or control of the United States Government.

3. CERCLA and other actions: The Phase I Environmental Site Assessment and other legal research confirmed that the site a) is not subject to a CERCLA planned or ongoing removal action b) not subject to any legal action, or regulated by a permit, under the Solid Waste Disposal Act (SWDA), federal Water Pollution Control Act (WPCA), Toxic Substance Control Act (TSCA) or the Safe Drinking Water Act c) not subject to corrective action under the SWDA, d) does not contain a land disposal unit under subtitle C of SWDA, e) no release of PCBs have occurred subject to TSCA and no release from USTs have occurred.

4. How the Site became contaminated; extent of contamination: As outlined in Section 1e, above, the forty-year discharge of shotguns in a 12-acre trajectory comprising the skeet range of the Mukluk Preserve has caused the area to be contaminated with lead pellets, shell casings, and

targets. The lead shot “fell” on approximately 12 acres of land. The lead shot “chemical breakdown” over the years has resulted in surface soil and sediment contamination.

Phase II and III Investigations have defined the nature and extent of contamination. Surface soils are generally contaminated to a depth of approximately 4 inches or 10,000 tons of soil. Lead concentrations in soils exceed 10,000 ppm in some locations. The wetland/pond sediments are on the average of 24 inches thick. Sediment lead concentrations range from approximately 14,000 parts per million (ppm) to 21,000 ppm. Several tons of shell and target debris exist onsite. Surface water quality in the wetland/pond system has been impacted while ground water quality has not been impacted.

The laboratory analysis reports that are part of the Phase I Assessment comprise approximately twenty-four pages; a 2-page summary of soil results is included in *Attachment IV*.

5. Phases of Assessment: GEI Consultants, Inc. performed a Phase I and II Assessment of the entire property in June of 2004, followed up by a Phase III Field Assessment and Remediation Plan in December 2004. The cost of these assessments, approximately \$45,400, was borne by the Town of Sprague who, in a referendum authorizing the purchase of the property in June 2004, also authorized the use of funds from the General Fund for conducting appropriate assessments.

All reports and assessments are complete and have been submitted to the CT Department of Environmental Protection (CTDEP); the Town has met with the CTDEP about phasing the cleanup once the Town obtains title to the property. A Phase I Assessment update will be compiled prior to the final purchase of the property, to comply with all appropriate inquiry requirements. No other assessment work is required. Wetlands permitting work is required for the implementation for this project and the cost is included in this application.

6. Affirmation of non-liability under CERCLA for contamination: The Applicant has performed all due inquiry and will comply with the provisions of Section 107. The Applicant is a "bona fide prospective purchaser." Appropriate inquiry regarding hazardous substances has been made of the previous owners prior to acquisition; the applicant will provide all legally required notices and take such reasonable steps to stop continuing releases, prevent future and to prevent or limit human, environmental or natural resource exposure to the previously released hazardous substances; the applicant will provide full cooperation with the state, federal and local authorities responding to the site conditions and provide access and assistance with all of those who are properly authorized to conduct a response action or a natural resource restoration; the applicant will comply with information requests and administrative subpoenas under CERCLA and is not liable for response costs nor affiliated with a PRP through a family or financial relationship.

7. Ongoing or anticipated environmental enforcement actions related to the site: The Phase I Environmental Site Assessment and other investigations have not identified any ongoing or anticipated environmental enforcement actions.

8. Property Ownership Eligibility

a. How Sprague will take ownership prior to June 30, 2006

Prior to drawing up a purchase agreement, the Town's attorney conducted a title search which was included as Attachment C of the 2004 DEP Land Acquisition Grant Application. The final purchase agreement, signed by all parties, was executed prior to October 2005. The closing has been delayed due to the death of one of the sellers, whose estate is encumbered by a state conveyance tax lien which attaches to estate assets including the subject land. The applicant is working to resolve this with the Probate Court and the state tax authorities. We are anticipating a

closing date of December 12, 2005, at which time an A2 survey of the property will be conducted with funds previously allocated from the Town's General Fund.

b. Presence of hazardous substances: All contamination to the property occurred before the Town of Sprague took/will take ownership of the property. The hazardous substances on the property as defined by DEP are confined to the 12-acre target area and a Plan of Remediation has been outlined in the Phase III Site Analysis. Due to the nature of the contaminant (lead pellets from shotguns) the property will be safe to use even during the remaining phases of the cleanup. The 12-acre target site will be heavily posted and patrolled regularly by the Resident State Trooper and community groups such as the Conservation Commission.

c. Inquiries into previous ownership of the property; assessments: Complete due diligence was conducted for the Town of Sprague as referenced under item 5 above. The Phase I Assessment of the property as well as the Mukluk Committee's 200-odd page report/application for Land Acquisition grant funds outlines the ownership and use of the property, as described in D1d, above, and was further verified by a title search conducted by Richard Cody, Town Attorney, prior to the sale of the property. Additionally, further searches will be conducted as part of the A2 survey mentioned earlier.

Environmental Assessments, as described previously in this application, were performed by Paul Burgess of GEI Consultants. Mr. Burgess is a Connecticut Licensed Professional Engineer and a Connecticut Licensed Environmental Professional with over twenty-five years experience in conducting assessments and remedial design of contaminated properties. All assessments were performed specifically for the Town of Sprague as part of its plan to acquire and preserve the Mukluk property for Open Space.

d. Use of site since ownership began: The Town of Sprague is planning to purchase the property on December 12, 2005. Its reason for acquisition is to protect it from development and preserve it for use as Open Space/recreation.

e. Parties potentially liable for contamination: The past gun club owners may be responsible for the deposition of the lead upon the site, but the town makes no allegations of this nor means by this statement to be filing a complaint or filing a notice.

f. Steps to be taken upon ownership regarding hazardous substances: As outlined previously, cleanup of the site is the Town's priority upon ownership, and will begin with the cessation of skeet shooting. The Town has already designed an Interim Remedial Measure to mitigate the potential migration of contaminated sediment to the Shetucket River. This will include a "stone check dam" above the wetland/pond outlet to "filter" and contain suspended sediments. The town will also remove and properly dispose of accumulated lead shot and target/shell debris onsite. The 12-acre contaminated site will be heavily posted, and regular patrols will be made by the Resident State Trooper and Conservation Commission members/other volunteers to provide public education on why the area is restricted until cleanup is complete. Ongoing monitoring of the site for erosion/migration of contaminated soils/sediments will also be conducted.

g. Confirmation of Commitment: The Town of Sprague affirms its commitment to compliance with all state and federal bodies involved in both land use restrictions and the regulation of hazardous wastes and their respective treatments if awarded the contract to oversee this \$200,000 cleanup grant. The Town will 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, and provide all legally required notices.

Periodic reports of the cleanup process will be available to the community as part of the Community Involvement portion of the project, and the Conservation Commission will also take part in the (administrative) oversight of the project, providing regular updates to community members. A LEP (Licensed Engineering Professional) will prepare a Health and Safety Plan (HASP) to meet the Occupational Safety and Health Administration (OSHA) requirements for the site remediation

activities. Soil and groundwater chemicals present at this site will be summarized in this report. Emergency contact information will be detailed in the HASP and a list of these contacts will be posted at the site.

E. Cleanup Authority and Oversight Structure

1. Oversight of Cleanup Activity; description of technical expertise: The technical and regulatory aspects of the project will be overseen by an LEP whose services will be solicited through the required bidding process that meets the procurement provisions of 40 CFR 31.36 for government entities. The requirements of the LEP and the specifications of the project will be outlined in the bid announcement in the local newspaper. This contractor will develop a remediation plan and specifications, building on the Phase III Assessment already completed. He/she will provide a timeline, designated personnel and specific chronological tasks for project completion.

The Public Works Foreman will oversee the construction of the stone check dam and the personnel involved, under the supervision of the LEP.

All personnel and all phases of the project will be overseen by the First Selectman, who is the CEO and administrator of the Town, and who will receive regular reports from the LEP and Public Works Foreman. The First Selectman will also oversee the administration of the funds for the project and receive appropriate financial reports from the Treasurer in accordance with the standard accounting practices of the municipality.

Additionally, Connecticut's Voluntary Remediation Program, for which Sprague will apply upon receipt of this award, requires DEP review and approval of all project documents including the scope of work, and will coordinate with the project's LEP regarding project oversight.

2. Access to property for cleanup activities: The property is easily accessible from a gravel road that connects it to the main Town road; all necessary equipment and personnel may pass this way without disturbing adjacent property. All abutters will be notified prior to the start of the cleanup; they are currently aware of the Town's application and several participated in the Public informational meeting regarding this application on December 1, 2005.

F. Cost Share: Total cleanup costs, as estimated by the Environmental consultant and discussed elsewhere in this application, are approximately \$4,000,000. The source of funding for cost-share in this Brownfields Cleanup grant project comes in part from Town personnel who will assist in two specific tasks: the construction of the stone check dam, and the excavation of lead shot and shell casings/targets from the 12-acre target site. They will be overseen by the LEP and the Public Works Foreman. It is estimated that the total cost for the dam project, including personnel, equipment, and machinery is \$30,000. The cost of partial cleanup for the shell casings corresponding to the disposal fees covered by the Brownfields grant (see Budget), is \$6,500. The First Selectman, Public Works Foreman, Fiscal Director and Grants Manager will also be devoting their time to program services as allowed as an eligible expense per the regional EPA Remediation representative.

Ranking Criteria for Cleanup Grant

A. Budget (10 points) As mentioned earlier, the Brownfields Grant will be used to address the top priority: containment activities in the pond/wetland area to prevent downstream contamination, and the initial removal of lead pellets and shells/targets throughout the 12-acre target area. When possible the Town will utilize the resources of the Public Works Department. Additionally, the First Selectman's office and fiscal department will devote a portion of their time to the project's fiscal and programmatic oversight. The majority of remediation efforts, however, must be completed by contracted professionals.

Budget Categories	Project Tasks						
	Task I Permits/ Signage	Task II Professional Services/ Project Oversight	Task III Repair & Containment	Task IV Vegetation Removal	Task V: lead pellet, shell/target removal and disposal (preliminary)	Task VI Project Mgmnt	Total
Personnel/ Fringe; Equipment & Supplies*			30,000		6,500	3,500	
Contractual/ Fees	5,000	15,000		50,000	130,000		
Total EPA	5,000	15,000		50,000	130,000		200,000
Total Cost Share			30,000		6,500	3,500	40,000

*This line item reflects the Town’s cost share and includes salaries, machines, gravel/stone, dam construction materials, supplies, gas, etc. Upon acceptance of the proposal and approval by CT DEP regarding material quantity, project implementation, etc. the Town will compile a detailed budget broken down into specific line items.

Task I: Permitting/Signage: The following is a list of permits or approvals that will be obtained prior to the start of remedial actions:

- Submission of an environmental conditions assessment form (ECAAF) to CTDEP by the Town of Sprague regarding notification of a Voluntary Remediation under Connecticut General Statutes 22a-133x.
- Town of Sprague Inland Wetlands Commission permit for activities in and adjacent to wetlands.
- US Army Corps of Engineers Wetland Permit (as required).
- CTDEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters associated with Construction Activities (Contractor responsibility).
- Notification as generator of hazardous waste/temporary EPA ID number.

Signage: Due to the prohibitive expense of fencing the 12 acre target site (\$95,000), the Town will post the restricted area in such a manner as to completely outline the perimeter. In addition, the Resident State Trooper, members of the Public Works Department, the Conservation Commission, and Joshua’s Trust will be patrolling the area frequently and providing frequent community education workshops on-site regarding the necessity of (and reasons for) remaining out of the target area.

Task II: Professional Services: Project Oversight (Engineering): The LEP, in conjunction with Connecticut DEP as outlined in Section E1, will provide technical oversight of the entire project until its termination, providing written and oral reports on a regular basis and coordinating with the First Selectman’s office regarding specific phases of work, concerns, issues, etc. He/she will also be responsible, with the Public Works Foreman, for oversight of the Town Personnel and their specific duties related to the project.

Task III: Construction of Sediment Control/Stone Check Dam: This comprises the bulk of the Town’s Cost Share and includes creation of a temporary wetland/pond silt control berm/dam for sediment migration control; it will be constructed by Town personnel with the oversight of the Project Manager (LEP) and the Pubic Works Foreman. This task can be conducted concurrently with the vegetation removal.

Task IV: Tree and Vegetation Removal: In order to successfully remove all lead shot, shells, targets and eventually four inches of contaminated soil in the 12-acre target site, the majority of all trees and the vegetation understory will be removed. Stumps will not be removed below grade because that operation could cause lead contamination to extend below the contaminated 4-inch

depth. Lead shot is visible in the leaf litter throughout the area of contamination. Removing this ongoing source of contamination will help stabilize site conditions and prevent further contamination.

Task V: Lead pellet, shell/target removal and disposal (preliminary): Cost share for this item will be the actual removal by the Town's Public Works crew of the shells and targets embedded in the leaf litter. The disposal of all collected contaminants will be contracted by licensed professionals. Prior to being transported off site, all materials will be properly characterized and profiled for disposal.

Task VI: Project Management (in addition to Project Oversight): Involvement of First Selectman, Assistant, Treasurer, Grant Writer, and Conservation Commission. The grant funds will be overseen by the office of the treasurer (the fiduciary), through a system of billing to the First Selectman's office, review by the LEP, and submittal by the First Selectman to the Treasurer for payment. The First Selectman will be responsible for assuring the implementation of institutional controls including the awarding of contracts and deployment of Town personnel over the eighteen-month estimated project period.

B. Community Need (15 points)

1. Description of Target Community

Sprague was established in 1861 and is comprised of three villages: Baltic, Hanover and Versailles. With a population of approximately 2,900 and a land mass of 8,448 acres it is classified as a suburban town with land uses ranging from very intensive to largely undeveloped. Baltic has the town's highest-density development, and is the site of a former Baltic Mill complex, now abandoned, that from the 1800's to 1970 was the largest employer in the Town, along with several other thread and cotton mills in Hanover and Versailles. Although three other mills still survive and employ approximately 400 individuals from Sprague and elsewhere, the first mill closures resulted in the economic decline and social needs issues that faced similar ex-mill towns in the region, from Willimantic to Norwich to Rockville. Unlike these towns, however, Sprague's geographic position has always rendered it less-than-accessible to major highways and places of industry or interest. Its primary population has consistently been comprised of low to middle-income factory/mill workers, the majority of whose families have lived in the area for several generations. In terms of median family income, Sprague ranks in the lower one-third of Connecticut's towns and has had the lowest population growth rate of any town in Southeastern Connecticut. The three existing mill complexes provide the town with 26 per cent of its total tax revenue, an indication of the low income base of its citizens. The majority of citizens are underemployed, working in minimum wage jobs such as those at the local casinos, and the lack of adequate public transportation combined with relative geographic isolation has contributed to the community's status as a Distressed Municipality. Its small size, however, has precluded it in the past from receiving much financial assistance for local social services programs for youth, single-parent services, health/nutrition programs, etc. Instead, residents must depend on the services of the larger towns, which are already overtaxed and for which transportation does not exist. Still, the citizens of Sprague have shown remarkable resilience in the face of adversity, and it is a testament to their collective interest in the future of their community that they have established with little or not funding some community programs that address the specific needs of different groups such as senior services, sporting events, cultural/historical activities, and conservation/sustainable development initiatives. It's therefore doubly important to note that the citizens of a distressed community, with little or no resources to spare, felt strongly enough to set aside what few resources they did have to purchase the Mukluk Preserve for Open Space, rather than bending to pressure from outside interests that would have produced a short-term gain but long-term environmental disaster.

Sprague is now challenged by the dramatic increase over the past five years in development in the surrounding area, caused by the expansion of the casinos (twenty miles to the south) and the collateral industry and entertainment venues attached to them. This sudden and unchecked growth has contributed to a rise in crime and safety issues in town, and a new (and not necessarily healthy) interest in Sprague by developers and industry entrepreneurs eager to accommodate the growth arising out of development to the south. Sprague is facing the need to make decisions in the immediate regarding responsible growth and conservation, in order to avoid the fate of surrounding towns whose plans of conservation and development could not forestall unwise, unhealthy and economically dangerous development.

2. How will the Target Community benefit from this grant?

With the implementation of the Brownfields cleanup grant, the Mukluk property will be available for the first time to a public that has known of it and cared about its future for several generations. It will provide a much-needed area for hiking, fishing, sightseeing, and waterfront access. The unique location on the outside boundary of the town allows low-income individuals and families living in high-density areas to in effect take a “vacation” while remaining in their own community. The benefits to the community are educational as well as recreational: the Conservation Commission, Scouts and Recreation Department will have the opportunity to offer workshops on site, explaining not only the natural diversity on the site but the cleanup process as well, informing residents and groups of the limits of the remediation site and why it is temporarily restricted.

Although a Distressed Municipality with a population still recovering from the after-effects of the withdrawal of industry, Sprague has worked hard to educate itself regarding the economic advantages of planned development that provides immediate benefits and positive long-term effects. The cleanup and preservation of the Mukluk property is listed in the Sprague Economic Development Commission’s (SECD) Ten-Year Strategic Plan as one of the Town’s four Priority and Regional Development Projects, and is closely connected to the Baltic Mills Redevelopment Project and the Outdoor Recreation and Tourist Initiative, that aims to eliminate Brownfields sites throughout the community while at the same time rehabilitating existing resources that preserve and enhance the town’s unique character.

3. Economic, Health, and/or environmental impact of Brownfields on the community, and extent of Brownfields community-wide: The SECD’s Strategic Plan notes both the positive and negative impacts of the many mills that have been responsible for the town’s viability and identity. Along with the acquisition and preservation of Open Space, the existing mills’ restoration is the cornerstone of “rejuvenating economic life . . . and preserv[ing] the unique qualities of a 19th Century New England Community.” These sites also represent, however, a significant challenge in terms of burdening Sprague with a host of potential environmental and health hazards that it is attempting, beginning with the Mukluk cleanup and the Phase II Assessment at Baltic Mills, to systematically address. In addition to the identified cleanup activities on the Mukluk property and the Baltic Mills’ identification as a Brownfields site, nine additional sites in Sprague have been identified and published in 2005 on the DEP website as “potentially contaminated sites” according to the CT General Statutes’ definition of Hazardous Waste. The Town also is compiling an inventory of additional sites that need to be evaluated and monitored. The economic revitalization of the community depends on Sprague’s being able to address these environmental concerns. These former/current mills sites, located as they are near the river and central to other town services, represent potential sites for affordable housing, new retail/commercial space, and community recreation activities. Eliminating Brownfields sites from our community, thus greatly improving health and safety conditions at these locations, would represent a giant step towards the revitalization that the Economic Development Commission envisions.

C. Sustainable Reuse of Brownfields (12 points), through:

1.Preventing pollution and reducing resource consumption

The elimination of shooting from the Mukluk property, combined with the proposed cleanup activities and the public education campaigns planned by the Town and the community organizations listed in this application, will prevent future pollution of the site, and contribute to the improvement of water quality in the downstream portion of the Shetucket River. The Town's decision to purchase the property for Open Space insures that the reuse of the property will be free of harmful activity that could adversely affect the upland area, wetlands, and animal/aquatic life on the site.

The Town will reuse the existing gravel road, and not pave it, to minimize storm water runoff. The area to be cleared of vegetation will be allowed to rejuvenate naturally with native plants and trees.

2.Promoting economic benefits

Several surrounding towns have conducted cost of community service analyses (COCS) in which it is proven that the preservation of open space and agricultural-based industry significantly reduces the burden on a Town of providing related services (additional emergency, public works and maintenance personnel, school costs, etc.), thus contributing to a Town's lower mill rate and citizens' subsequent lower tax bills. Every dollar in taxes spent by a residence is equaled if not usually surpassed by the cost of services. Open space, agriculture and small businesses, on the other hand, require only one quarter of those services, thus saving the Town up to seventy-five cents per dollar of tax revenue.

The Strategic Plan for the Town of Sprague recognizes the necessity of preserving its natural resources, as they will add significantly to the economic prosperity of the Town, in the form of tourism, day visitors, and businesses attracted to the revitalized area. The cleanup of the Mukluk property is a step towards recognizing these long-term economic benefits.

With regard to the specific property, the Green Valley Institute has committed its forestry education service to help the Town develop a ten-year forest management program that is sustainable and profitable, whose proceeds can go into the Town's Open Space purchase or maintenance fund.

3.Promoting a vibrant community characterized by a mix of uses

The acquisition and cleanup of the Mukluk preserve will provide the Town with a mix of uses under the Open Space/recreation umbrella: fishing, hiking, bird watching, plant species identification, jogging/mountain biking, picnics, passive recreation, etc. The CLA/Mukluk Property Committee report notes that this property is indeed a multi-dimensional resource for water-based uses. The terrain and unique features of this property, plus its mile of river frontage, give residents a resource they do not yet have in town. The area will be patrolled by the Resident State Trooper with assistance from the Conservation Commission and Joshua's Trust, who monitor all conservation easements in the area. It cannot be stressed often enough how fortunate Sprague is to have citizens who have fought to preserve this property, and honoring this act is a large step in "promoting a vibrant community."

4.Reuse of existing infrastructure

We are planning to re-use the majority of the existing infrastructure on the property, with the exception of those buildings/areas that contributed to contamination (e.g. the skeet and rifle ranges). We will be reusing the existing gravel road to the site as well as other gravel roads and paths onsite. With the help of our Community Partners (see section D4) we can clear and improve the existing trails and create delineated parking areas in existing parking areas, that are careful not to "spill over" into non-gravel or wooded areas.

As mentioned in #6 of this section, the Town will evaluate the reuse of the existing lodge/meeting house structure to see if it can be used in some way to complement public use of the open space.

5. Prevent future Brownfields: By taking ownership of the property, prohibiting skeet shooting, and conducting cleanup activities as funds become available, the Town will prevent a future Brownfields site at the Mukluk preserve, as would have happened had the Town agreed to let a gravel mining concern take possession of the property. Similarly, the town is taking an active role in the Baltic Mill site by investigating ways in which it can acquire community redevelopment funds to renovate and restore a historic part of the city located in an environmentally sensitive area. The Town contracted to complete a Phase I Assessment of the property, and received an EPA Targeted Cleanup Assessment grant to conduct a Phase II Site Assessment of the Baltic Mills property. The Mukluk site represents the first in a series of conservation and community education efforts that the Town hopes will be replicated in future projects such as Baltic Mills.

6. Commitment to Green Building: The primary use of the Mukluk Property will be passive recreation, and there are no plans to construct new facilities on site. However, as we have mentioned, there is an existing meeting house on the property whose use the Town still has to determine, and whose character as a 1930's hunting/meeting lodge is well worth preserving. The Town will evaluate the structural integrity of the building and its reuse potential consistent with Green Building and energy efficiency standards, should it receive funding to do so. The renovation and use of the building in an environmentally conscious manner would further the Town's and the Conservation Commission's ongoing community education efforts regarding wise and strategic re-use of existing buildings, and dovetails with the Town's desire to pursue the Baltic Mills site development.

D Creation and/or Preservation of Greenspace/Open Space (5 points)

Preserving this property as Open Space is the driving force behind the project, as noted elsewhere in this application.

E Community Involvement (16 points)

1. Plan for involving affected community

As mentioned in Section B (Community Notification), this project is a community-wide effort that is not limited to a few individuals but rather has prompted a great number of citizens to become involved in its acquisition for use as Open Space. The Town plans to build upon already existing community resources and initiatives in order to continue to have the same high level of involvement in the project that has been demonstrated since 2004. First, of course, the entire community was solicited for assistance and input regarding this particular application, and offered its suggestions either in writing or at the December 1 informational meeting regarding the application and project update. Extra effort was made to solicit input from the community based organizations listed in Section E4, abutting property owners, current owners, all town employees and elected/appointed officials, respective local conservation and law enforcement representatives, elected officials from adjacent towns, etc. At the well-attended informational meeting, clarification was sought regarding the technical facets of the cleanup, the breakdown of the in-kind expenses, the involvement of DEP in the Voluntary Remediation program, and the potential sources of additional funding for further cleanup. Citizens were given additional contacts and offered the opportunity to submit further comments prior to the application's submission. (*Please see Attachment V: New London Day article covering meeting.*) Second, several key organizations including the Recreation Commission and Conservation Commission were contacted to coordinate the post-purchase activities including educational workshops, and schedules of volunteer and Town personnel/Resident State Trooper patrols of the property. Upon purchase of the property, all citizens will receive a survey form to complete via the Town newsletter, asking for their input on the specific type of open space use they

would like to see at the property, that will benefit the town from both a social and economic/tourist-based perspective.

2. Efforts to develop partnerships

For the specific Brownfields grant solicited through this application, significant partnerships have already been developed, and are discussed further in Section E4. The Town has a long-standing working relationship with an environmental consultant who has outlined the phases of cleanup and specifications/corresponding personnel for the initial cleanup activities. The Conservation Commission has agreed to take the “lead” role as community liaison group, and will be acting in an advisory capacity to this project until and beyond its completion, as noted elsewhere (*Please see Attachment VI: Letter of Support from the Sprague Conservation Commission*). The Public Works Department has developed a work plan whereby their specific commitment to the project will be coordinated with the regular DPW schedule in order to complete the project while attending to the other maintenance needs of the Town. Local DEP officials have worked continually with the First Selectman on this project since 2004, inspecting the property and acting as liaison with their main office; they will continue to act in an advisory capacity with the Town and the contracted LEP regarding specific permitting needs regarding this first phase of cleanup. The cleanup will indeed be sustainable due to the restrictions both the Town and State authorities place on the uses (and prohibited uses) of Open Space. No further skeet shooting will be permitted, eliminating the possibility of further lead contamination in either the soil or the river.

3. Specific plans for communicating progress

We have estimated the project timeframe to be eighteen months. As mentioned above, citizens will receive or review regular monthly reports and updates on the status of the project, via the First Selectman’s column in the *Our Town* newsletter, sent monthly to every household in Sprague. Hard copies of required reports filed by the LEP, contracted service professionals, and the Town to the EPA will be on file in the Town Clerk’s office for review. The First Selectman remains the contact person for the public on this project and as always he maintains an “open door” policy with regard to public questions concerning Town activities. Subsequent to purchase, the Mukluk Property Update will be a standing monthly agenda item at the Board of Selectmen’s meeting, in which the First Selectman will report on all activities and progress related to cleanup, preservation and education activities on the property.

4. List of Community-Based Organizations involved in the project

Organization Name: Sprague Conservation Commission. **Contact:** Donald Boushee, Chair, **Phone Number** (860) 822-9808. **Description of Activities:** The Sprague Conservation Commission has agreed to a) act as reviewers of this application and facilitators at the public hearing concerning it; b) act as the lead community organization in the community oversight of the Brownfields cleanup project, arranging visits to the site and collecting information regarding remediation progress for public education efforts; c) assisting the Town prepare a final plan of Open Space use for the property that includes those specific recreational and conservation-related uses, and limitations, previously discussed by the former Mukluk Committee. This plan will be presented to the Town for final approval subsequent to purchase of the property.

Organization Name: Joshua’s Tract Conservation and Historic Trust; **Contact:** Madge Manfred, President, (Hill Bullard, Chief Steward) **Phone:** (860) 429-9023 (office); (860) 423-8683 (residence); **Description of Activities:** Joshua’s Trust has been an enthusiastic community partner in the preservation of the Mukluk property. Founded in 1966, the Trust protects over 3,000 acres, and has extensive experience with stewardship. As the regional land trust serving 15 towns in Eastern Connecticut, it has been eager to help ensure that this 280 acre property will remain in its natural state. In 2004, the Trust sent a letter of support to the Town of Sprague agreeing to assist with stewardship, and remains committed to that end.

Organization Name: Green Valley Institute, University of Connecticut Cooperative Extension Service. **Contact:** Steve Broderick, Forester; (860) 774- 9600. **Description of Activities:** The GVI is the Continuing Education Arm of the Cooperative Extension Department at the University of Connecticut and is familiar with the Mukluk property and the proposed cleanup activities. They have committed to providing ongoing training to the Conservation Commission in the area of maintenance and restoration of natural resources. Primarily it will provide forestry guidance in the restoration of the 12-acre target area that would be cleared as part of the cleanup grant.

Organization Name: Thames Valley Trout Unlimited; **Contact:** Mike Goodwin, President, (860) 464-2685. **Description of Activities:** Trout Unlimited’s Thames Valley Chapter has maintained stewardship of the portion of the Shetucket River that flows through the Mukluk property for many years, and has agreed to continue to do so. It has committed volunteer time to do periodic cleanups of the riverbanks, as well as monitor stream and river conditions on the property. It will coordinate with the Sprague Conservation Commission with regard to public education campaigns and informational presentations regarding the riverfront portion of the property and the fishing/recreational activities associated with it. It has also agreed to provide the Conservation Commission with technical expertise regarding the spawning, migratory and trout stocking activities in the area.

Organization Name: Boy Scout Troop 19; Cub Scout Pack 19; **Contact:** Harry Segerstrom, Scoutmaster. Phone: 822-6235 Robin Izbicki, Pack leader. Phone: 822-6724. **Description of Activities:** The Sprague Scouts were instrumental in advocating for the purchase and use of the Mukluk Property as Open Space. They would be involved in a number of projects on-site including conservation education and trail clearing/maintenance.

Organization Name: Sprague Parks and Recreation Committee (SPARC); **Contact:** Tina Gromko, Chair, **Phone:** (860) 822-9196. **Description of Activities:** The Sprague Parks and Recreation Committee coordinates all sporting, recreational and cultural events in the town, maintains the various sports fields and venues, and also maintains an inventory of the recreational fishing areas in town. It has continually supported the acquisition of the Mukluk property and will receive regular reports on the cleanup activities. Future activities on the property, including Earth Day events such as guided hikes and outings, will be included in SPARC’s community offerings.

Organization Name: Eastern Regional Tourism District
Contact: Ellen Frost, Sprague Representative; **Phone:** (860) 822-1882
Description of Activities: Sprague is part of the “Mystic Country” area of the Eastern Regional Tourism District. This organization welcomes the opportunity to include the Mukluk property in its informational publications, distributed to individual homes, municipalities, chambers of commerce, and businesses both locally and New England-wide. Once the Mukluk property is open to the public, the Tourism District can connect it in their literature to other area features such as additional parks, B&B’s, historic sites, etc. The Tourism District can provide detailed information regarding the property’s significance from a conservation, recreation, and sportsmen’s perspective, and assist in helping the property contribute to the Town’ economic development.

F. Reduction of Threats to Human Health and the Environment (21 points)

1. Describe how the funds will be used to address/facilitate the reduction of threats to human health and the environment within the target area.

The funds will be used as the first step in mitigation exposure to lead associated with the “shot” from the skeet range. As we have noted, the prevention from contaminated sediment migrating from

the pond to the Shetucket River, an important water source for both humans and animals, is of primary concern. Insuring the integrity of this portion of the river provides protection to downstream communities from Norwich to New London and finally Long Island Sound.

The site currently provides a crucial forested, upland buffer to the onsite streams and the Shetucket River. Maintaining this buffer is a best management practice currently being used across the country and identified by the EPA and the Connecticut DEP as part of Phase II storm water management. The 12-acre target area was the drop range for more than forty years' worth of skeet shooting and has resulted in an inordinate amount of lead concentrated in an area currently accessible to humans and wildlife. According to the US EPA, lead poisoning can cause a host of physical illnesses that can result in nerve and reproductive damage, high blood pressure, and poor muscle coordination in adults. In children lead poisoning can cause developmental delays and difficulties, behavioral problems, organ damage, hearing loss, etc.

The Interim Remedial Measures proposed below will be undertaken to reduce the human health and environmental risk pending full site remediation as additional funds become available. Stated briefly, they are:

a. Installation of a Stone Check Dam (sediment migration control) at the outlet of the wetland/pond system: this measure will mitigate the potential migration of lead contaminated sediments to the downstream Shetucket River, a significant fisheries resource.

b. Lead pellet removal from Leaf Litter: this will mitigate human and wildlife exposure to lead shot and prevent further soil contamination to lead shot degradation.

c. Removal and disposal of shells and broken target debris: the removal and proper disposal of this solid waste from the site is an integral part of the project.

2. Describe how you are working with your state and/or local public health department to ensure the protectiveness of public health issues. The town has had meetings and discussions with the Connecticut DEP regarding the findings of the environmental assessments conducted at the site and the proposed remedial measures. We have also discussed a phase remedial approach with the Connecticut DEP. Upon acquisition of the property, the Town will enter the Connecticut DEP's Voluntary Remediation Program.

The Town of Sprague is an independent health authority, with a Town Sanitarian and part-time Director of Health. Dr. Robert Powitz, Ph.D., acts as Health Director for many municipalities in the area. He has been informed of this project and the cleanup process during the regular meetings he conducts with the Selectmen and the Sanitarian, and he fully supports this cleanup project. Copies of all remediation and monitoring reports will be forwarded to his office for review.

3. Proposed cleanup plan for the site and the total cost of cleanup: A Remedial Action Plan has been developed and is included in the previously referenced Phase III Evaluation. In addition to the Interim Remedial Measures outlined above, it includes:

- Temporarily dewatering the wetland/pond system to allow removal of contaminated sediments
- Excavation of 8,500 cubic yards of contaminated sediments
- Excavation of 7,000 cubic yards of contaminated soils
- Onsite stabilization of lead contaminated soils and sediments to render non-hazardous waste
- Dispose of 20,000 tons of treated soil/ sediments at an approved off site facility
- Restabilization of the site
- Wetland restoration
- Monitoring and Evaluation

The total estimate for the remediation is \$4,000,000 including the Interim Remedial Measures included in this application.

G. Leveraging of Additional Resources (10 points)

1. Funds identified to meet cleanup needs not covered through the grant: As mentioned previously, the Phase III Assessment and Remediation Plan estimated total cleanup costs to be approximately \$4 million (3,973,050). Subtracting the \$200,000 Brownfield's grant and approximately \$50-100,000 worth of activities that could be performed by Town staff, there remains about \$3.6 million in cleanup costs that will need to be funded from other sources. Of primary importance is the temporary draining of the pond in order to remove and dispose of all the lead shot, and the treatment and disposal of contaminated sediments in the area. This portion of the project requires approximately \$1.8 million to complete.

2. Ability to leverage funds, other funding sources committed: In 2004 after hearing of the Town's overwhelming majority vote to purchase the Mukluk preserve for Open Space, several legislators approached the First Selectman and told him that they would support the submission of a bill to fund part of the cleanup, provided the Town had taken ownership of the property. We therefore plan to leverage the \$200,000 Brownfields cleanup grant to obtain the priority \$1.8 million in additional funding from the legislature. Area Senators Edith Prague and Jack Malone, and State Representative Rob Simmons reaffirmed in recent conversations with the First Selectman their continued commitment and support of the project; the First Selectman will contact them as soon as the property has been purchased to begin drafting appropriate documentation for this legislative session.

H. Programmatic Capability (15 points)

1. Ability to manage the grant (7 points): As mentioned previously, the First Selectman will be the overall manager for the project, and has under him a full-time staff including fiscal and administrative support personnel with extensive experience in state and federal grants/contracts management. An implementation plan for this particular cleanup project has been developed by the Selectmen in conjunction with the Engineering Consultant and the Conservation Commission (former Mukluk Property Committee).

Upon receipt of the award, the Treasurer will be responsible for providing a periodic accounting of expenditures and will follow all standard bookkeeping and accounting practices in the tracking and reporting of the funding award expenditures. The Selectman's Office will be responsible for publishing in the appropriate newspapers a request for bids for Project Oversight Services from a licensed engineering professional/firm, and for lead pellet/shell casing removal services from a licensed contractor. The design for the sediment control dam has been completed and reviewed with the Public Works Foreman, and a list of materials compiled.

History of Managing Federal Funds (2 points): The Town of Sprague has an over fifteen-year history of managing federal funds totaling over \$7 million, and has never been the recipient of any adverse audit findings from any inspecting or auditing office, nor has it ever been required to comply with any "high risk" conditions regarding OMB Circular A-102. Additionally, the Town has been the recipient of several HUD Small Cities grants, and administers the funds through its own offices with the contracted assistance of L. Wagner and Associates of Waterbury, CT. Town responsibility has included project identification and approval, Board review, due diligence, fiduciary responsibilities, appropriate wage and affirmative action filing, etc. Federal grants received have included:

- A grant from the DEP, USDA and Small Cities that improved and expanded the Town's sewer system and resulted in the formation of the Town's autonomous Water and Sewer Authority
- A USDA grant to rebuild High Street, repair the water line on Main Street, and install sidewalks and curb cuts
- A Small Cities grant to construct a public playscape
- A DEP grant to construct a pump station, and a USDA water filtration grant

- Several EPA clean water grants
- A current \$600,000 Small Cities Grant to upgrade Baltic Heights Road
- A \$100,000 Phase II Assessment grant awarded by EPA for the Baltic Mills Project, currently in progress

Recipient of prior Brownfields Grants and significant accomplishments (6 points): The Town has enjoyed a long history of relationships with highly qualified environmental services firms, as evidenced by the three completed Mukluk assessments. Sprague received in 2005 an EPA Targeted Assessment grant award of \$100,000 to conduct a Phase II Site Assessment of the Baltic Mills Site on Bushnell Hollow Road in Sprague. EPA awarded the contract to an approved consultant, Tetrattech NUS, Inc. of Willington, MA, and they have completed 60% of the work plan, scheduled for finalization in December 30, 2005. The contractor reports that fieldwork will begin in January 2006 and a final report will be submitted to EPA by April 2006. A Phase I Assessment was completed in February 2005 by GEI Consultants of Glastonbury, CT, and was forwarded to EPA; a copy is on file in the Town Offices for review.

B. Other Factors

Designation as a Distressed Municipality: The Town of Sprague is one of twenty-five communities in Connecticut designated as Distressed Municipalities by the Department of Economic and Community Development, as referenced in a notification letter to the Office of Policy and Management dated July 2003. This designation was received based on the community's ranking in per capita income, change in per capita income, percentage of poverty, the change in population and employment between 1992 and 2002, the percentage of housing stock built before 1939, the adjusted net grand list, and the percent of adults over age 25 with a high school diploma or higher.

List of Attachments

Attachment I: Public Notice

Attachment II: Letter from Connecticut Department of Environmental Protection

Attachment III: Site Location Map

Attachment IV: Laboratory Analysis Report

Attachment V: New London Day article covering informational meeting

Attachment VI: Letter of Support from the Sprague Conservation Commission