

Chapter 15. Brownfields/ Redevelopment Potential

A brownfield is defined by Connecticut General Statutes §32-9kk(a)(1) as “any abandoned or underutilized site where redevelopment, reuse or expansion has not occurred due to the presence or potential presence of pollution in the buildings, soil or groundwater that requires investigation or remediation before or in conjunction with the restoration, redevelopment, reuse and expansion of the property.”

Brownfields can create blighted conditions and bring down property values for surrounding properties. They can also create environmental and health hazards for the surrounding community

In the past, Connecticut environmental laws have hampered attempts to redevelop these properties because of liability issues. The 2006 Brownfield Act created the Office of Brownfield Remediation and Development. The agency is designed to accelerate the remediation process and get these properties productively back on the tax rolls. The 2006 Brownfield Act also contains provisions that exempt third party owner(s) from any liability following an approved remediation of the property.



15.1 Overview

The Town of Stratford has a long history of industrial manufacturing, some of which have left the Town with areas of known and suspected contamination. The most notorious contributor to the brownfields in Stratford was Raymark Industries. Raymark was a manufacturer of brake products. From 1919 to July 1984, Raymark used a system of lagoons to capture waste lead and asbestos dust produced by its manufacturing process. Dredged materials from the lagoons were landfilled at numerous other locations in the Town. The Stratford Army Engine Plant is another large brownfield in the Town. Because the facility is federally owned, the Town is not eligible for clean up funding to address environmental issues there and the SAEP does not appear in the Town's inventory of brownfields. However, a purchaser and developer of the property, working with the federal government on remediation of the site would be eligible for funding.

In a town that is nearly built out like Stratford, brownfields offer the only locations for new development or additional open space. The problem is that the sites first need to be identified and properly investigated and, if necessary, remediated before they can fulfill that function.

Generally, The State of Connecticut's current policy towards brownfields is that redevelopment of brownfield sites has social and economic benefits, as well as benefits to human health and the environment, such as:

- reducing or eliminating public exposure to pollutants,
- cleaning up sites that otherwise would not be cleaned up for decades,
- reducing environmental impacts associated with industrial sprawl by returning abandoned and underutilized sites to productive use,
- creating the potential for new tax revenue for municipalities and the State,

- utilizing existing infrastructure, thereby minimizing the expansion of new infrastructure into undeveloped areas,
- reversing urban decay and revitalizing our cities, and
- creating short-term construction and longer-term jobs.

The 2006 Brownfield Act promotes brownfield development by:

- (1) establishing a sub-agency dedicated to brownfields;
- (2) funding a pilot program to remediate brownfield sites;
- (3) creating liability exemptions; and
- (4) establishing a financial assistance program.

In 2011, the State adopted Public Act 11-141 amending the 2006 Brownfield Act and further promoting the redevelopment of brownfields.

The following programs were created by state agencies and the US Environmental Protection Agency to provide funding for the examination and remediation of brownfield sites:

Abandoned Brownfield Clean-up Program – Provides funding for the investigation and clean-up for potential buyers of brownfield properties for which the redevelopment of such property will have a regional or municipal economic development benefit.

- Brownfields and Urban Sites
- State Superfund Program
- Federal Superfund Program

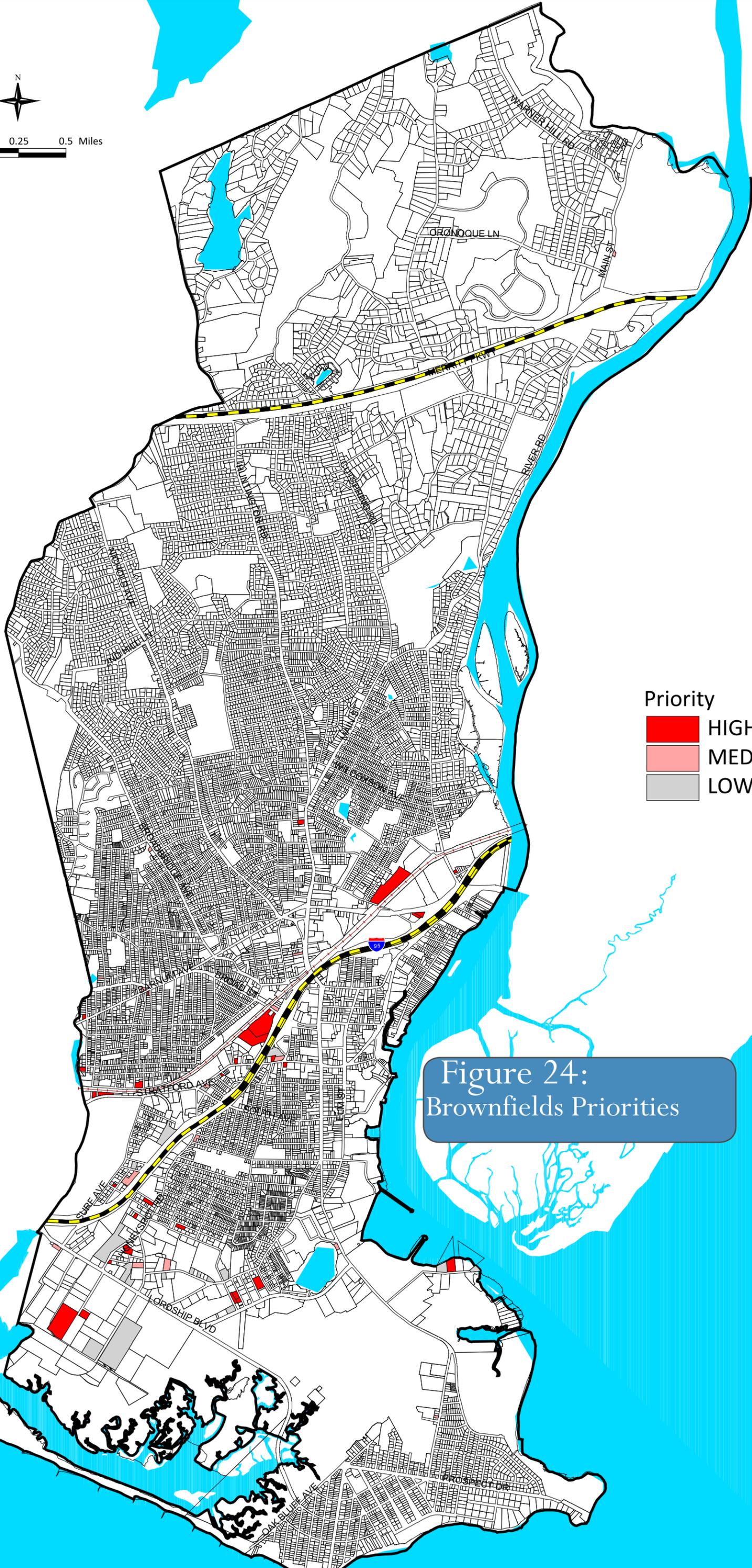
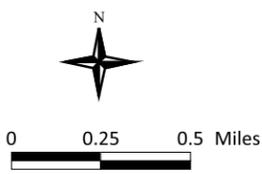


Figure 24:
Brownfields Priorities



15.2 Types and Locations of Brownfields

Brownfields are a considerable issue in the Town of Stratford. In 2012, an inventory of potential brownfield sites was conducted by Weston and Sampson using funding acquired by the Town from a 2011 EPA Brownfields Assessment Grant. The Town of Stratford received its first Brownfields Assessment Grant in June 2011. A second EPA Brownfields Grant was received by the town in 2013 for \$400,000 to allow for a more detailed examination of site-specific environmental issues. The Greater Bridgeport Regional Council received the same grant from the EPA, which will be partially used for environmental assessment and planning in and around the Transit Oriented Development Area in Stratford. The summary of the findings from Weston and Sampson is documented in a letter report to the Town entitled, "Town of Stratford – Brownfields Inventory and Prioritization Project" dated September 18th, 2013. By working in concert with the Town of Stratford, Weston & Sampson was able to develop a thorough database of approximately 400 potential brownfields sites located within the Town. The inventory also included preliminary, publicly available information about each parcel of interest, including zoning, acreage and current land use. The scope of Town wide assessment project did not allow for a more detailed examination of site-specific environmental records for each property and inclusion on one of these databases did not necessarily indicate that there are any specific and/or unresolved environmental issues associated with the 400 properties that were identified.

After eliminating residential properties in tax foreclosure, there were 74 potential brownfield properties identified that were determined could meet the eligibility requirements for funding under the EPA Brownfields program. The properties were further prioritized based on the following criteria:

- Proximity to sensitive receptors and targeted development areas;
- Ownership and property status, including easements and tax liens;
- Existing infrastructure;
- Redevelopment potential;
- Property size, location, and access;
- Potential contamination extent and existing known environmental issues;
- Marketability and community master plans;
- Historic and current property use and conditions;
- Adjoining/abutting property uses;
- Developer interest; and
- Hazardous material usage, where known.

Of the 74 properties, 31 were ranked as high priority and 15 as medium based on their potential for meeting the EPA Brownfield Program eligibility requirements. At the conclusion of the Town wide inventory, 5 properties were identified as being the highest priority sites due mainly to their positive brownfield eligibility determinations and final redevelopment potential. These properties are :

- 993 Honeyspot Road (Peasely Products)
- 94 East Main Road (Petrol Plus)
- 2370 Stratford Avenue (Wade's Garage)
- 1297 West Broad Street (Ross & Roberts)
- 300 Old South Avenue / 11 Old South Avenue / Sunset Avenue

15.3 Remediation History

In 1995 Raymark Properties were listed on the National Priorities List (NPL). The site was divided into 9 Operational Units (OU's). Since then, extensive remediation has taken place to address the Raymark contamination.

The Raymark facility itself (OU1) has been capped and the site has been redeveloped into Stratford Crossing Shopping Center.

Residential properties that were land filled with Raymark waste have been dug up and restored. Waste from these sites was dumped at the original Raymark site before it was capped. In a 500-acre area surrounding OU1, called OU2, ground water tests were completed. Sub-slab ventilation systems were installed in 109 homes in the area to prevent contamination.

At the Shore Road Site (OU5), an interim removal action was performed that included:

- installation of a revetment along the unprotected southeastern tidal areas,
- restoration of existing riverside revetments to limit exposure to underlying contaminated soils,



- capping of excavated soils, paving of driven surfaces and capped soils, and
- installation/restoration of utilities to allow maintenance without the threat of exposure to contaminated soils.

At Short Beach (OU9), a temporary cap has been placed over areas where Raymark waste was found to be present. A remedial investigation report was completed in 2005 which found no risk to workers and users of the park.

Another brownfield in Town, Stratford Point, was once used by the Remington Gun Club. Over the years the club accumulated large amounts of lead shot. Large-scale remediation of the property was undertaken by DuPont in 2000-2001. Subsequent spot removal of residual lead shot and environmental monitoring is ongoing. Connecticut Audubon Society functions as a caretaker for the site, oversees habitat management practices and carries out biological monitoring studies and coastal habitat restoration studies for DuPont. In 2011 DuPont also contracted for 900 feet of sand dune to be constructed, which created a new habitat for birds and other wildlife.

15.4 Ongoing Remediation initiatives

Additional remediation of Raymark waste is still being carried out by the EPA. Monitoring of remediated sites is an ongoing process. The EPA works closely with the state, Town and Save Stratford to determine solutions for the remaining Raymark waste. Ongoing measures still to be completed for the Raymark sites include:

- Groundwater (OU2) – Long term maintenance of sub-slab ventilation systems.
- Ferry Creek (OU3) – Clean-up approaches are currently under consideration.
- Raybestos Memorial Field (OU4) – Clean-up approaches are currently under consideration.
- Additional Properties (OU6) – Clean-up of 4 of the 24 additional properties where agreement has been made. Reach agreement and clean-up of remaining 20 properties.
- Ferry Creek w/ wetlands (OU7) - Clean-up approaches are currently under consideration.
- Short Beach & Landfill (OU9) – Find long term solution for the site

15.5 Future Brownfield Concerns

Clean up of Raymark waste is progressing under EPA supervision as solutions and money becomes available. The Army Engine Plant is a large facility in a key location that currently sits idle. However, clean-up of the property and subsequent sale and reuse of the land is dependent on the US Army. The Army is currently working with a developer on a solution for the site. These two concerns are significant and solutions will take time.

The Town has recently inventoried and identified 74 other properties as brownfields. Many of them have gone into tax foreclosure. Returning these properties to active reuse in the future is a concern that the Town of Stratford can take a more active role in addressing.

15.6 Brownfield Recommendations

The Town of Stratford should continue to work towards solutions and eventual clean-up of the Raymark waste. Ultimately, the reuse of these properties is the long term goal. In many cases, converting some of these properties into safe green spaces will have to be an acceptable solution for the Town.

The Town should continue to work with the Army and members Point Stratford Development team to develop a plan for the site that will bring jobs and economic growth to the Town. The Town should be flexible with regard to reuse in order for the site to remain profitable in light of remediation costs. The Town should consider an incremental tax exemption provided that the property is generating a significant number of jobs. The Town is currently not receiving any property tax from the facility.

The Town of Stratford should continue to seek State and Federal funding to evaluate and potential remediate other existing brownfields with Town. Properties with the highest priority and largest area should be targeted first. The Town should also incentivize profitable redevelopment of abandoned brownfield properties through increased densities proposed in the zoning changes. Higher densities are proposed for both the TOD area and the Employment Development Area. Most of the identified brownfields are located within these areas. In cases where extensive clean-up cost are necessary, Incremental tax exemption should be considered for prospective redevelopments. The newly Mayoral-appointed Redevelopment Agency (RDA) is commissioned with the development and redevelopment of Town foreclosed properties. These properties will bring substantial tax revenues to the Town.

The following are the largest brownfield properties with a high priority as well as their redevelopment potential.

- D'Addario Property – This property is in tax foreclosure. While this property is the largest it is also remotely located. The property is in the Employment Development area. Substantial redevelopment of surrounding properties may be necessary before this property gets addressed.
- Contract Plating – The Town foreclosed on the Contract Plating property in March 2013. The site is actively being investigated for future remediation and development by the Town using grant funding obtained from the EPA Brownfield Program. The site has been investigated and is not part of the Raymark Superfund Site. Any future development of the site will include a public notice process as required by the Connecticut Department of Energy and Environmental Protection.
- Ross & Roberts – This property is in tax foreclosure. This company just recently closed and has been operating under an EPA permit without violation. The parcel is also located in the Transit Oriented Development area where high densities could encourage redevelopment.
- Stratmar/Boise Cascade – This property is in the Transit Oriented Development Area. It is also adjacent to the Ross & Roberts Property. These properties could be redeveloped jointly.

