Reuse and Redevelopment Planning

Overview

Superfund redevelopment is an important component of the Environmental Protection Agency's (EPA) commitment to returning formerly contaminated sites to sustainable and productive use. Superfund site reuses range widely, from commercial, industrial and residential land uses to sports fields, parks and wildlife habitat. As of December 2018, there are 730 Superfund sites with actual, continued or planned commercial, industrial, recreational or ecological uses. Some sites host innovative mixed-use developments; others support agriculture and renewable energy facilities.

This tool explains how EPA can help communities with reuse and redevelopment planning and integrate it across community involvement activities. It also identifies tools and resources available to support reuse and redevelopment planning activities at Superfund sites.

Why This Is Important

It is EPA policy to support, whenever practicable, the reuse of Superfund sites where EPA has lead responsibility, as stated in the Agency's 2010 Directive, *Considering Reasonably Anticipated Future Land Use and Reducing Barriers to Reuse at EPA-lead Superfund Remedial Sites (OSWER Directive 9355.7-19)*. This guidance document explains that understanding a site's reasonably anticipated future land use informs the entire Superfund remedial process.

Considering site reuse can:

- Inform the land use scenarios needed to perform risk assessments.
- Result in the selection and implementation of remedies that are consistent with reasonable future uses envisioned by communities.
- Help ensure long-term protectiveness by establishing site stewards who discourage inappropriate activities and assist with implementing and enforcing institutional controls needed to protect remedies, human health and the environment.

*This and all tools in the Community Involvement Toolkit should be used in conjunction with the **Community Involvement Handbook**, which provides guidance to EPA staff on how EPA typically plans and implements community involvement activities at Superfund sites.*

Reuse planning also can improve relations between EPA and communities, help establish realistic stakeholder expectations and result in remedial cost savings in some cases.

Reuse and redevelopment of Superfund sites can turn once-blighted sites into community assets, encourage land uses that address local priorities, and spur revitalization that can result in new jobs, increase tax revenues, and create ecological or recreational amenities that support healthier lifestyles.

Implementation

Superfund reuse and redevelopment planning is a community-based process undertaken in close coordination with EPA. The process is built on meaningful community engagement and effective information gathering. EPA site teams often serve as advisors and reviewers who provide the community with technical expertise and site-focused input and feedback. EPA's participation in the process ensures that reuse planning outcomes are thoroughly grounded in an understanding of the Superfund process and a site's characteristics. EPA's involvement also encourages realistic community expectations for a site's reuse and ensures that EPA has the information about the anticipated future land use needed to inform a site's cleanup and long-term stewardship.

This section describes several activities that incorporate reuse and redevelopment planning into Superfund community involvement activities. EPA also can help communities plan for reuse by providing ***technical assistance*** on a site-specific basis, including activi-

ties that enable the community to explore future land uses that EPA can use to inform its response action. Planning for future land reuse is important when considering, designing and implementing a remedy, to ensure that the remedy is consistent with the anticipated use and protective of human health and the environment.

Reuse and redevelopment planning can begin during any stage of a cleanup but starting prior to remedy selection offers the greatest opportunity to integrate anticipated future land use with cleanup decisions. Once a remedy is selected, reuse planning typically focuses on ensuring the compatibility of the planned use with the remedy, addressing potential redevelopment obstacles and developing long-term stewardship strategies. (See Attachment 1, *Examples of Successful Community Involvement in Reuse Planning at Superfund Sites*.) Of course, the activities undertaken when considering reuse and redevelopment planning as part

Superfund Redevelopment Initiative

The Superfund Redevelopment Initiative (SRI) is EPA's national reuse planning resource for Superfund sites. SRI's mission is to ensure that EPA and its partners have an effective process and the tools and information needed to return every Superfund site to productive use. SRI works closely with EPA's regional offices to identify Superfund sites that can benefit from reuse-related engagement and assistance. At these sites, SRI provides initial investments that help move sites toward reuse. SRI sets aside a limited number of resources each year to provide in-kind reuse planning services and assistance delivered through a national contractor with expertise in the reuse of contaminated sites. These services can include creating reuse assessments and reuse plans. The program does not provide funding for environmental assessment, cleanup or redevelopment.

Reuse Planning Services Include:

Situation Assessment: Gather preliminary information to determine initial site reuse potential and identify further reuse planning assistance, if deemed valuable.

Activities: Typically includes visiting the site and community; convening the key players including EPA, the state, tribes, the local government, the site owner and community representatives; conducting stakeholder interviews to determine reuse goals and considerations; and conducting a preliminary review of site documents and planning documents.

Outcome: A situation assessment report that outlines preliminary reuse considerations and recommendations for additional reuse planning activities.

Reuse Assessment: Determine a range of suitable potential future uses for the site to inform the cleanup process and local planning efforts.

Activities: Typically includes refining future use goals in discussion with the site owner, local government and community; analyzing the site and surrounding neighborhood to evaluate the suitability of potential future uses; integrating the reuse goals and site analysis into a reuse framework that outlines a range of potential suitable uses; and sharing with stakeholders for review and input.

Outcome: A final report summarizing reuse goals, the site analysis, a reuse framework, remedy considerations and recommended next steps.

Reuse Plan: Outline specific locations and uses for the site based on additional stakeholder discussion and analysis.

Activities: This phase may include developing several scenarios for consideration or outlining more detailed considerations for a single scenario for stakeholder review, discussion and refinement.

Outcome: A final report summarizing reuse goals, the site analysis, the reuse plan or scenarios, remedy and reuse considerations and recommended next steps.

For more information: Visit the SRI website or contact a Regional Superfund Redevelopment Coordinator.

of the community involvement approach will vary according to the needs of each community. Generally, it is a good idea to undertake some or all the activities described below.

Gather and analyze site and community information: The first step is to gather information about the site and the needs of the community. Questions can be included in ***community interviews*** conducted when preparing the ***community involvement plan*** (CIP). Include questions to gauge the community's interest in reuse and redevelopment planning and capture their thoughts about potential reuses for the site. If appropriate, reuse and redevelopment planning can be addressed in the CIP. (See Attachment 2, *Gathering Information about Reuse from Community Members Through Community Interviews*, for suggestions regarding the kind of information that can be collected during community interviews and incorporated into the CIP.)

Define the scope of community involvement and design a decision-making process and goals: Reuse and redevelopment planning involves significant planning and design. There are many options for incorporating community input when an active community role is warranted. If the community is interested in reuse and redevelopment planning, reach out to your Regional Superfund Redevelopment Coordinator. Fellow EPA community involvement staff with experience at other sites also might be able to help you design an effective process for considering a community's reuse and redevelopment needs and preferences in the overall community involvement approach at a site.

Consider whether the community could benefit from access to the technical assistance and other resources available through EPA's Superfund Redevelopment Initiative (SRI). SRI offers a limited number of resources to communities in the form of in-kind reuse planning services provided through the assistance of a national contractor with expertise in the reuse of contaminated sites. These include situation and reuse assessments, as well as the creation of reuse plans. (See Superfund Redevelopment Initiative box on page 2.)

Engage stakeholders and partners: Reuse planning works best when it is inclusive and consensus-based: stakeholders working together to identify reuse opportunities, address challenges, and build common ground around shared decisions and preferred outcomes. Stakeholder groups to involve will vary by site. They might include community residents, business owners, community organizations, site owners, responsible parties and local government representatives. Members of EPA-supported ***community advisory groups*** (CAGs), ***technical assistance grant*** (TAG) recipients, or groups receiving assistance through EPA's Technical Assistance Services for Communities (TASC) program, and their technical advisors can be key participants. At sites with complex issues or potential conflict between stakeholders, it may be useful to contact EPA's Conflict Prevention and Resolution Center (CPRC). CPRC can offer a range of assistance with stakeholder engagement, from training, facilitation and mediation services to assistance with designing your CIP and stakeholder engagement process.

Reuse planning processes are scalable and flexible to address specific community needs. EPA can encourage the community to conduct reuse and redevelopment planning activities and can help them conduct a community visioning process and/or design charrette (see box below). Contractor resources for technical assistance for these activities and others are available through EPA's TASC contract or the SRI. Under certain circumstances, a technical advisor for a TAG recipient group also can help a community develop reuse scenarios for a site.

> ***Community visioning*** *is the process of developing consensus about the future the community wants and then deciding what is necessary to achieve it.*
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> *A* ***design charrette*** *is an inclusive collaborative meeting during which a diverse group of stakeholders collaborates and shares a broad range of design ideas. The charrette sometimes allows participants to work with design professionals to sketch out how a site might look after redevelopment.*

Help the community develop reuse scenarios, optimally through public involvement: EPA can help stakeholders identify potential future uses for the site in many ways, starting with providing site characteristics and potential scenarios for cleanup and long-term stewardship. The community also should educate itself about existing comprehensive or neighborhood land use plans and review community documents and zoning ordinances to ensure that potential future uses are in line with local plans or can be adapted to do so. EPA also can provide information about existing or potential institutional or engineering controls that could impact reuse plans.

Reuse planning activities can be hosted by local governments, redevelopment authorities, community organizations and property owners, or they can be coordinated among stakeholder groups. CAGs and TAG recipient groups also can host or sponsor these activities. Local governments are well-suited to take a lead role in reuse planning projects, in part because they employ planning and economic development professionals with knowledge and expertise in local zoning and ordinances, infrastructure and land use plans. Local governments also can facilitate the process of working with EPA, site owners and responsible parties to develop and enforce institutional controls and long-term stewardship strategies.

There often are questions and concerns about reusing current or former Superfund sites. EPA staff should be prepared to answer questions about the site's history and any known risks, as well as potential liability issues that might be faced by the current or future owners of the site. The community involvement coordinator (CIC) can serve as a link to site or regional attorneys who can answer the site-specific questions about liability-related issues and regulatory requirements. The Regional Superfund Redevelopment Coordinator can help navigate these issues, suggest possible ways to address such concerns at the site, and link interested parties to additional resources and sources of information or assistance.

> ***Questions about Liability?***
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> *For additional general information about liability issues related to site reuse at a Superfund site, consult the Brownfields and Land Revitalization Cleanup Enforcement website and The Revitalization Handbook, which addresses liability issues.*

EPA can provide more clarity and encourage awareness about the site and its potential for reuse by producing fact sheets and other written or digital materials about the site. EPA staff should think about the following questions when developing such materials:

- What assistance, information materials or other resources would best address the community's reuse questions and concerns?
- How can those resources also help address related community needs and priorities?
- What are potential connections between reuse and related topics such as environmental justice, economic concerns, public service needs and quality-of-life issues?

It is important to make sure that these documents stay up to date and accurately reflect community goals and priorities.

Tips

- Define EPA's role and responsibilities to help establish realistic community expectations for site reuse.
- Involve stakeholders early and often.
- Communicate openly with the community.
- Recognize conflict and complexity as opportunities as well as challenges.
- Learn from others who have been involved in successful reuse planning.
- Offer appropriate technical assistance and other resources for reuse planning to the community.
- Work closely with the regional Superfund Redevelopment Coordinator and act as a link to regional attorneys and others who may be able to help navigate liability and regulatory questions when they arise.

Attachments

- Attachment 1: *Examples of Successful Community Involvement in Reuse Planning at Superfund Sites*
- Attachment 2: *Gathering Information about Reuse from Community Members Through Community Interviews*

Attachment 1: Examples of Successful Community Involvement in Reuse Planning at Superfund Sites

The Woolfolk Chemical Works Site, Fort Valley, Georgia
Community Involvement is Key in Reuse Planning Throughout the Superfund Process

The Woolfolk Chemical Works Superfund site is a 31-acre former pesticide manufacturing and packaging facility placed on EPA's National Priorities List (NPL) in 1988. Because the site is located in the center of town, residents worried about its potential impact on their health and on the local economy. To address these concerns, citizens, elected officials, state legislators, EPA site staff, state and county health representatives, and local business owners formed a multi-stakeholder land use committee known as the Woolfolk Restoration Alliance to regularly discuss the site's status and disseminate information to the community.

The Woolfolk Restoration Alliance, which acted as a community advisory group (CAG), focused on reuse of the site throughout the Superfund process. The community wanted a say in how the site would be reused, so the Alliance started discussing site reuse before the proposed plan was developed. The Alliance also administered a technical assistance grant (TAG) and used some of its TAG funding for a technical advisor to help the community consider potential options for future use of the site. As a result, the community was able to tell EPA that they wanted to redevelop a portion of the site, Operating Unit 2 (OU-2), into a public library, adult education center, and city government office space. EPA took the community's wishes into account when it developed the proposed plan for OU-2, which was issued in June 1995. This portion of the cleanup was completed in 1998 and is now the site of the Peach County Public Library and the Fort Valley Welcome Center.

EPA also worked with the Alliance to engage in an extensive dialogue with community members about future reuse of Operating Unit 3 (OU-3). Although this dialogue occurred after the proposed plan for OU-3 was issued, cleanup was not yet completed. The Agency worked with the community, land-use planners and local government officials to ensure that the reasonably anticipated future land use for the site reflected the community's vision as well as the cleanup standards that EPA established in the 1998 Record of Decision (ROD) for OU-3. The Superfund remedy selection process enabled community members to voice their views and concerns and their hopes about how the site would be reused once the cleanup was complete.

In 2006 and 2007, the group engaged in a Superfund Reuse Initiative (SRI)-supported reuse planning process. Through the SRI reuse planning process, the Woolfolk Restoration Alliance integrated the site's cleanup with redevelopment, enabling reuse outcomes that are protective of human health and the environment. Representatives from the Woolfolk Citizens Response Group (WCRG), the site's TAG recipient, served as members of the Alliance and played a critical role helping to shape project outcomes. WCRG members' institutional knowledge and local expertise proved invaluable in developing a detailed realistic vision for the site's reuse. Today, several properties have been transformed into office space, in addition to the welcome center and the 15,000-square-foot public library.

The community continued to work with EPA to integrate local reuse priorities as part of the cleanup for remaining areas of the site. A 2007 final report described three potential scenarios combining commercial, recreational and public use for this portion of the site. This part of the cleanup was completed in 2009.

As a result of its efforts on behalf of the community, EPA Region 4 presented the community of Fort Valley, Georgia its "Excellence in Site Reuse" award. In 2009, on the 10th anniversary of the SRI, the Woolfolk Restoration Alliance won EPA's Citizen Excellence in Community Involvement Award.

For more information, see the SRI fact sheet on the *Woolfolk Chemical Works Site* and the video documenting the site's reuse.

Eastland Woolen Mill Site, Corinna, Maine
A Testament to the Success of Partnerships and the Critical Role of Reuse Planning and SRI Planning Grants

Faced with a significant loss of jobs and a contaminated property when the 21-acre Eastland Woolen Mill closed in 1996, the Town of Corinna sought assistance from EPA and the State of Maine to address the contamination left behind by the mill. The town wanted to integrate cleanup with local planning for the revitalization of downtown Corinna, where the mill dominated the landscape. The site was placed on the NPL in 1999.

The proposed relocation and reconstruction of Main Street as part of the remedy sparked tremendous local interest in redevelopment planning at the site. EPA made it a priority to work with stakeholders to achieve cleanup objectives in a manner that supported this vision. EPA provided an SRI reuse planning grant to the community. The planning process was guided by the Corinna New Beginning Committee, which included citizens, business representatives and town officials. The committee met monthly to discuss the site's progress and ensure that residents were kept informed. Corinna residents were committed to revitalizing their community and completed the Reuse Plan for Corinna Village Center in 2002.

Today, a 20-unit senior housing facility occupies part of the site. A country store and restaurant were built on the former site of an historic building that was moved elsewhere. A subdivision plan for a village-style development and green space along the river was approved in 2006. In 2008, a public bandstand was built in the green space and a recreational boardwalk now extends through downtown Corinna. The transformed site is a testament to the success of close partnerships and the critical role that reuse planning and planning grants can have on the revitalization of a community.

For more information, see SRI's *Eastland Woolen Mill Site Fact Sheet*.

Avtex Fibers, Inc. Site, Front Royal, Virginia
EPA Plays an Advisory Role in a Multi-Stakeholder Planning Forum That Continues to Yield Results

For almost 50 years, the 440-acre Avtex Fibers plant manufactured rayon, polyester and polypropylene fibers for commercial, defense and space industries. Improper waste disposal practices contaminated groundwater, nearby water wells and the Shenandoah River. EPA listed the site on the NPL in June 1986. The company ceased operations and abandoned the site in 1989.

To facilitate public participation and ensure that the site was cleaned up and redeveloped in a manner consistent with local needs, EPA, state agencies, the local economic development authority and the site owner convened a multi-stakeholder group. Members of the group included local officials, community members, environmental and business group representatives, and municipal planners. EPA served in an advisory capacity. Site stakeholders included the Front Royal-Warren County Economic Development Authority (EDA), the U.S. Soccer Foundation and FMC Corporation.

Using an SRI reuse planning grant, the group provided a forum where diverse parties could consider site-related issues critical to the future of the area. Participants prepared a redevelopment plan that divided the site into three areas: a 240-acre river conservancy park; a 35-acre soccer field complex with a skate park, picnic pavilion and playground; and a 162-acre eco-business park called the Royal Phoenix. Fully returning the site to reuse requires ongoing collaboration. In 2014, EPA and the local EDA worked together to update land use agreements originally signed in 1999. The new agreements allow for mixed use of the property, which will assist Front Royal in future redevelopment efforts.

In September 2014, EPA Region 3 presented FMC Corporation, Warren County and the EDA with an "Excellence in Site Reuse" award for enabling the site's productive reuse. EPA will continue to support ongoing redevelopment at the site. For more information, see the Avtex Fibers SRI Reuse Spotlight and Region 3's Avtex Fibers Site Success Story.

Attachment 2: Gathering Information about Reuse from Community Members Through Community Interviews

Community needs, concerns and interest in reuse and redevelopment planning can be identified through ***community interviews*** conducted during development of the ***community involvement plan*** (CIP). At some sites, community stakeholders may be as concerned about what will happen after cleanup as they are about site-related public health and environmental issues. They may wonder: Will the area be fenced off? Could the site benefit the community in the future? Who will own the site? Who will have a say in the reuse of the site? Giving community members an opportunity to voice their site reuse-related needs and concerns can help identify opportunities to address reuse in the overall community involvement approach outlined in the CIP.

1. First, decide whether CIP interviews should include questions about site reuse and reuse planning.

Talk with members of your site team and ask the Regional Superfund Redevelopment Coordinator these questions:

- What are the potential reuse scenarios under consideration for this site?
- Are you aware of any site-related reuse activities? Please describe them.
- Has a reuse plan or reuse assessment been prepared? If so, who was involved in its creation? Was it adopted by the community/local government? Has it been revised/updated over time?

Next, review any materials provided and use the questions below to help identify potential community needs and concerns.

- What are the next steps and timeframes for considering reuse options for the site?
- Does the site have an owner who will likely maintain it long-term after cleanup?
- What do we know about community perspectives on the reuse? Does site reuse appear to have broad local support? Should we ask the community about their interest in reuse and redevelopment planning in our interviews for this site?
- Are there particular reuse goals or concerns that the CIP's Action Plan could address?

Decide whether the CIP interviews should address reuse specifically.

Consider including one of the sets of questions below in your interview protocol. Asking questions of local officials and representatives of community and neighborhood organizations about existing land use plans for the site or surrounding area, or about their ideas for the future can yield helpful information for the site team.

2. If so, determine the reuse-related questions you'll ask in CIP interviews.

Consider asking some questions along these lines if you choose to ask community members about their thoughts on reuse and redevelopment planning:

For Sites in Continued Use

- Do you have any thoughts about the current land uses (industrial, commercial, residential) on the site?
- Do you anticipate that this site will be used for the same purpose for the foreseeable future?
- Do you have any thoughts to share regarding the land uses currently located on site?

For Sites in Planned Use

- Are you aware of any site reuse plans? Do you perceive any barriers to reuse at the site?
- Do you have any thoughts to share on the land uses planned for the site?
- Would the community benefit from a discussion of the planned reuse of the site?

For Sites Not in Use

- Are you aware of any interest/discussion in the reuse of the site? Do you perceive any barriers to reuse?
- How would you like to see this site used in the future? Are there any future uses you think would be suitable?
- Do you think the community would benefit from a discussion of reuse options for the site?
- Are there people or organizations who should be part of any future planning discussions?

3. Review interviewee responses to your questions and share with the site team.

Look for connections between reuse and related topics, such as environmental justice concerns, economic development priorities, and other community needs and quality-of-life issues.

Follow up with your site team and the Regional Superfund Reuse Initiative (SRI) Coordinator to discuss the questions below and obtain additional feedback and suggestions.

- Do you think it would be helpful and appropriate to engage the community in a discussion of reuse and redevelopment planning for this site?
- What assistance, information materials or other resources could be offered to help the community address their site reuse plans and concerns?

4. Finally, identify the tools and resources you will use to address the community's reuse and redevelopment questions and include these in the CIP's Action Plan.

Consider whether to use one or more of the tools and resources below as part of the CIP's Action Plan.

Reuse Tools and General Information Resources for CIP Action Plans		
Community Interest and Involvement to Date in Reuse Planning	**Reuse Tools and Assistance Resources**	**General Information Resources**
Community is interested in site reuse – little or no consideration of site reuse to date	• Propose to the community, Community Advisory Group and/or Technical Assistance Grant (TAG) recipient group (if appropriate) that they consider addressing site reuse and redevelopment planning. • Offer sitewide reuse planning assistance • Offer technical assistance for reuse and redevelopment planning (Technical Assistance Services for Communities, Conflict Prevention and Resolution Center, SRI, TAG, or others)	• SRI website • Targeted fact sheets focusing on reuse issues • Reuse updates in site mailings, newsletter updates and local media • Outreach at community events and door to door
Community is interested in site reuse – significant consideration of site reuse to date	• Consider facilitated discussions or trainings to address high-priority concerns • Offer technical assistance focused on specific site features or issues • Conduct reuse assessment with next-step recommendations	