

**COMMUNITY RELATIONS PLAN
FY21 EPA LUDLOW MILLS BROWNFIELD CLEANUP GRANT
Westmass Area Development Corporation**

A. OVERVIEW

The purpose of this Community Relations Plan (CRP) is to delineate the communication strategy that will address the needs and concerns of the businesses located at Ludlow Mills who are directly or potentially affected by the proposed removal of hazardous substance, asbestos, and asbestos containing materials primarily associated with the demolition of mill buildings 109A/209A, 158/258, 160/260-169/269 and 171/271 and the cleanup of building 44, within the Ludlow Mills complex located at 100 State Street, Ludlow, MA 01056.

This CRP explains how Westmass Area Development Corporation (Westmass) has previously provided outreach to the community and will continue to involve affected businesses in the decision-making process regarding the proposed removal of hazardous substances in the form of asbestos-containing-materials present at the Ludlow Mills complex.

Westmass, through its staff and Qualified Environmental Professional (QEP) is primarily responsible for the coordination, facilitation and implementation of community outreach and community relations pertaining to the property.

Active businesses, particularly in the Ludlow Mills, nearby residents and organizations in the community are essential resources for the success of the CRP. Westmass perceives these businesses, citizens and organizations as key points of contact and communication. One measure of success of the redevelopment of the Ludlow Mills hinges on informed citizen and organization involvement in each step of the redevelopment process.

B. SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is:

Sarah la Cour
Vice President of Operations
Westmass Area Development Corporation

She may be contacted at Westmass' offices One Monarch Place, Suite 1350, Springfield, MA 01144 or by phone 413-386-3124 & e-mail s.lacour@westmassdevelopment.com

The Information Repository is located at Westmass' Ludlow Mills offices at the above address and on the Westmass website: <https://westmassdevelopment.com/ludlow-mills/epa-fy21-cleanup-grant/>

C. PREVIOUS SITE USES AND ANY PREVIOUS SITE CLEANUP / REMEDIATION

The Ludlow Mills complex is located on State Street in Ludlow, on the Chicopee River, and has been utilized for industry since the mid eighteenth century. Between 1812 and 1844 the site supported the operation of textile and cotton milling and gun barrels were manufactured at the site of the current Mill No. 8 building from 1840 to 1846. Jute products were produced on the property starting in the mid-late 19th century. The Ludlow Manufacturing Company was established in 1856 and jute manufacturing was the primary activity from the late 1800s well into the 20th century. Several historic mill buildings from the early twentieth century are still extant in the mill complex. Mill Number 8 (and historic clock tower) was constructed in 1901; Mill Number 9 in 1905; an annex to Mill Number 8 was built in 1906; Mill Number 10 in 1907; and Mill Number 11 in 1913. The property on which the primary mill buildings are

located is approximately 50 acres in size. Since the 1960s, the complex has been a multi-tenant industrial park and has contained a diverse array of commercial and industrial operations. The complex currently contains approximately 35 structures with a total floor space of approximately 600,000 square feet. Of the site's buildings, five are large multi-story structures (Mills No. 8, 9, 10 and 11, and the 300 series storage building along State Street). The remaining buildings are mostly small, single-story stockhouse buildings located in the central portion of the site and building 44 is located along the Chicopee River. The Ludlow Mills are included within the Ludlow Village National Historic District (LUD.F) listed in the State and National Registers of Historic Places.

Three previous US Environmental Protection Agency grants have been awarded to Westmass to assist with cleanup at the Ludlow Mills complex.

- A. EPA FY12 Brownfields Cleanup grant funds were used to abate and remove hazardous materials, including asbestos, for the decommissioned central steam heating system at the mills specifically located in Mill buildings numbered 101-132 and the basement of Mill #8.
- B. EPA FY13 Brownfield Cleanup grant funds were used for the abatement and removal of hazardous materials, including asbestos, on two multiple-unit Storehouse Buildings numbered 286-291 & 292-296.
- C. EPA FY15 Brownfield Cleanup grant funds were used for the abatement and removal of hazardous materials, including asbestos, in two connecting structures between Mill #8 and Mill #10 and between Mill #10 and Mill #11.

D. SITE DESCRIPTION AND HISTORY

In the fall of 2020, Westmass applied to the Federal Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant to remove hazardous substances and asbestos-containing materials from additional sites at the Ludlow Mills Complex. Westmass will utilize grant funding to the maximum extent possible to accomplish this removal. Westmass has developed a phased scope of work to allow total expenditure of the EPA grant funding.

The purpose of this project is to eliminate the potential exposure of the public, business employees, and contractors to these materials, and to facilitate the leasing and renovations of these buildings by lowering the cost of renovation to private party/enterprise(s).

In the spring of 2021, Westmass was awarded \$461,510 for this project. This Brownfields grant will be used to: (1) provide project coordination; (2) provide community outreach services; (3) secure an environmental engineering consultant to prepare the hazardous substances and asbestos-containing materials removal specifications and oversee and monitor the removals; and (4) pay for the removal work and disposal of the materials.

E. NATURE OF THREAT TO PUBLIC HEALTH

The current threat to public health is the exposure to hazardous substances and asbestos when the buildings are entered as well as when windows are broken, releasing contaminants. Certain asbestos-containing materials in the complex and buildings are in poor condition that could cause the release of asbestos fibers to the air and surfaces. In addition, increased vandalism has exacerbated the problem despite increased security by Westmass.

F. COMMUNITY BACKGROUND

The Town of Ludlow occupies approximately 28.2 square miles near the center of the State. Ludlow is bordered by Chicopee on the west, Granby on the north, Belchertown on the northeast, Palmer on the east, Wilbraham on the south, and Springfield on the southwest. As of the census of 2020, there were 21,002 people residing in the town. The population density was 772.1 people per square mile.

The northeast portion of Springfield, Massachusetts was settled in 1751 as Stony Hill. However, that area was later renamed Ludlow and incorporated as a separate entity in 1774, just before the breakout of the American Revolution. For much of its early history, the town was agrarian and was home to many sawmills and gristmills, utilizing the power from several sources of water nearby, including the Chicopee River, Broad Brook, Higher Brook, and Stony Brook. Before the Civil War, the town began to develop into a New England mill town. In 1868, the largest mill (the project site) was opened and operated by the Ludlow Manufacturing Company. The Clock Tower of Mill #8 is depicted on the town seal. Ludlow Manufacturing produced jute yarns, twine, and webbing. This company helped shape the town by providing housing, a library, schools, playgrounds, and a health center to serve the over 5,000 people working in the mills. By the mid-20th century, this company moved to India and is now known as Ludlow Jute and Specialties of Mumbai.

In the early 20th century, Ludlow started to develop from a mill town into a streetcar suburb of Springfield, Massachusetts, as a trolley line ran over the bridge from Indian Orchard. Two rail lines were built through Ludlow, the Springfield, Athol and North-eastern Railroad and the Hampden Railroad with the former having a branch line through the Ludlow Mills complex. Interstate 90 (the Massachusetts Turnpike) was constructed over the former tracks of the Hampden Railroad which was never used and the Springfield, Athol, and Northeastern Railroad was reduced in length in the late 1930s as a result of the creation of Quabbin Reservoir. The population of Ludlow however did not boom until the 1950s with the creation of the Massachusetts Turnpike.

G. COMMUNITY BENEFITS

One of the most significant Brownfield Mill Redevelopment Projects in New England, the Ludlow Mills, is located adjacent to the downtown and residential areas. This 130-acre site (including 81 acres of vacant land) contains 35 buildings with over 600,000 square feet. Westmass, with the support of Town, is undertaking the conversion of this 20th century mill complex to create a modern mixed-use development that will combine residential, office, retail, commercial, and industrial uses. It also provides much needed green space for residents and workers in the form of a Riverwalk along the Chicopee River and permanently protected open space including riparian areas. These amenities will further draw businesses and visitors to the Ludlow Mills, increasing its vibrancy and economic development activity.

The former Jute operation was once a major employment center in Ludlow and the State, and the downsizing and eventual closing of the Ludlow Mills caused an economic hardship in the community and region. Currently, the remaining buildings are underutilized at a 50% occupancy rate. This has led to the deterioration in the condition of vacant buildings which can rapidly lead to hazardous conditions in the interior of these buildings. Asbestos-containing materials are becoming deteriorated leading to the possible disbursement of asbestos fibers into the air.

The Ludlow community will benefit from this Brownfields Grant in five primary ways:

- 1) the removal of the hazardous substances and asbestos-containing materials from the buildings will halt the release and spreading of these substances within the buildings.
- 2) the removal of the hazardous substances and asbestos-containing materials from the buildings will reduce threats to human health in that the threat of exposure to individuals entering the building by authorized or illegal means will be eliminated.
- 3) the cleanup will facilitate the redevelopment of the Ludlow Mills as it will lower the cost threshold and financing requirement for those contemplating the establishment of an enterprise in the buildings.
- 4) the leasing of the buildings will provide funds to Westmass for the Preservation and redevelopment work including a River walk and other pedestrian and vehicular improvements that will enhance the property as a local and regional asset.
- 5) the cleanup and leasing of the buildings will advance the conversion of the site from a non-accessible underutilized facility into a community asset integrated into the neighborhood.

H. CHRONOLOGY OF COMMUNITY INVOLVEMENT

Prior to acquisition of the property, Westmass held two community wide open forums and informational meetings during the early planning stages to present the project. Westmass staff were appointed to Town of Ludlow's Master Plan Committee representing local business interests and fully participating in the planning process. Westmass worked extensively with the Ludlow Planning Board to develop a Zoning Bylaw amendment encompassing the entire Ludlow Mills complex. In the spring of 2011, with full support of the Planning Board and Select Board, seven zoning articles proposing a new "Mill Redevelopment" Zoning District were placed on the annual Town Meeting warrant and subsequently passed unanimously at Town meeting by the citizens of Ludlow.

Westmass representatives regularly appeared in front of local Boards and Committees to inform the community about the project through Public Hearings on the Local Comprehensive Plan approval process or to obtain required permits. Westmass held a public meeting on-site as part of the Massachusetts Environmental Policy Act (MEPA) process and met numerous times with members of an Interdisciplinary Task Force of comprised of staff from the Massachusetts Department of Environmental Protection.

Westmass continues to regularly updates the local Selectboard and other Town Committees and Boards on the status and key progress of the project. Many of these meetings at Town Hall are televised on the local public access channel. Westmass continues to receive strong support from the municipality and various community-based organizations such as the Economic Development Corporation of Western Mass (EDC) as the project unfolds.

I. KEY COMMUNITY CONCERNS

The identified community concerns currently based on previous public input include: the Town's goals of promoting mixed use development in the downtown area while redeveloping a large pre-existing site, encouraging residential housing production especially Senior Housing serving a mix of income levels, and promoting housing opportunities at locations frequently served by public transit.

The Ludlow Mills project will prevent the current downward spiral of the property due to the low occupancy rates and lack of private / commercial real estate funds. The project site has had a deleterious impact on the downtown and surrounding residential neighborhoods and poses health and safety risks if it is not redeveloped. The project addresses public safety from both undesirable activity (vandalism) as well as the threat of the property to damage by fire. The Town of Ludlow is unable to fund large capital costs to support the preservation and redevelopment of the site. Other expenses and the additional costs of public safety if the property deteriorates further would have potentially become a burden to the Town if Westmass had not become involved.

J. CONTINUED COMMUNITY INVOLVEMENT

The project is consistent with the Town of Ludlow Master Plan and the Ludlow Mills Comprehensive Plan for Preservation and Redevelopment prepared by Westmass in 2012. Through these processes, the public has had extensive input into the work being contemplated by the Brownfields Grant; in that the work is consistent with the approved Master Plan, the Massachusetts Environmental Policy Act (MEPA) process and the Local Comprehensive plan all of which had extensive public and regulatory input.

Because there is an established public participation framework and process for the redevelopment work at Ludlow Mills, the community outreach for the EPA Cleanup Grant work will be structured through this framework. This ensures that it has a greater likelihood of reaching and involving the organizations and individuals that have the most interest in redevelopment work.

The following activities are anticipated:

- 1) The public repository will be established that will initially contain an "Analysis of Brownfield Cleanup Alternatives (ABCA)" document and other cleanup documents as necessary.
- 2) Ludlow Mills individual, business and organization tenants will be notified directly by mailings and/or electronic correspondence of any meetings regarding the project.
- 3) The notice will also be posted on the Westmass Company website.
- 4) A public meeting regarding the Draft ABCA will be scheduled to obtain public input and comments.
- 5) Westmass will accept comments on the planned work during the comment period and during the public meeting and will provide written responses that will become a part of the administrative record.
- 6) The information repository will be updated with the inclusion of all meeting minutes, status reports, and other communications as they are generated. The information provided will be specific as it relates to meeting town, state and Federal requirements.
- 7) Information on the progress of the work will be disseminated via fact sheets and progress reports that will be sent to tenants and posted on the Westmass company website.