

Draft MEMORANDUM



Date: April 23, 2010

To: Fred Murry, Assistant City Administrator, City of Gainesville, Florida
Mitchell Brouman, Beazer East, Inc.
Scott Miller, Remedial Project Manager, EPA Region 4
Bill Denman, Reuse Coordinator, EPA Region 4
L'Tonya Spencer, Community Involvement Coordinator, EPA Region 4

From: Matt Robbie, E² Inc.

Re: Cabot-Koppers Site Community Reuse Goals Summary

Introduction

To support EPA Region 4 in identifying reasonably anticipated future land uses for the Koppers property at the Cabot/Koppers Superfund Site (Site) in Gainesville, Florida, contractor E² Inc. has been retained to conduct a reuse assessment to inform the remedial planning process. As part of the reuse assessment process, E² Inc. has gathered community stakeholder perspectives regarding site reuse to help identify potential future uses for the Site. The following memorandum summarizes reuse goals and related considerations discussed by community members during in-person meetings held on March 26, 2010 and in individual telephone interviews.

Meeting Overview

At the March 8th Community Development Commission Meeting, several community stakeholders requested that E² Inc. staff meet with community members directly to better understand their community and considerations for reuse. In response to these requests, E² Inc. staff participated in two in-person meetings on Friday, March 26, 2010.

A list of participants and a summary of reuse goals and considerations for the Site are provided below.

Participants

Robert Brinkman, Stephen Foster Neighborhood (SFN) resident
Deidre Bryan, SFN resident
Pat Cline, Consultant to City of Gainesville
Rick Hutton, Gainesville Regional Utility

Kaya Ideker, Protect Gainesville Citizens
Sandy Kennedy, SFN resident
Cheryl Krauth, Protect Gainesville Citizens
Claire Marcussen, resident
David Pais, SFN resident
Maria Parsons, SFN resident
Robert Pearce, SFN resident
Harriet Roth, SFN resident
Barbara Ruth, SFN resident
Sharon Sheets, SFN resident
Kayla Sosnow, SFN resident
Ewen Thomson, SFN resident
Kathleen Watson Pagan, resident

Telephone interviews were also conducted with the following individuals who were not able to attend discussions on March 26th.

Kate Ellison, resident
Joe Praeger, Bancca.org
Jennifer Muir, SFN resident

Reuse Goals

General Site Reuse Goals

Community participants identified the following potential future uses and reuse considerations for the Site.

- *Convert the CSX rail line located east of the site to a paved rail-trail for walking, biking and running.* The rail line stops at NW 23rd Avenue and greenway trail plans are underway for portions of the rail corridor south of the site. The rail corridor presents an opportunity connect the site to downtown and open space in the southern part of the city.
- *Establish open space areas including forestland, stormwater management features, recreation facilities and areas for children to play.* Stakeholders indicated that surrounding neighborhoods lack accessible parks and recreation facilities.
- *Integrate commercial retail, professional office space and residential uses in a mixed-use development.*
- *Consider appropriately scaled single-family or townhouse-style residential uses.*
- *Consider renewable energy opportunities at the site.* Several participants noted that the site could provide a suitable location for renewable energy generation, given its size, potential exposure, and the renewable energy incentives afforded by the City of Gainesville's Solar

Feed-In Tariff. Gainesville Regional Utility guarantees the purchase of electricity generated from solar installations in the city at an above-market rate of \$.35/kw for the next 20 years.

- *Pursue redevelopment that demonstrates sustainable use of the land.* Ideally, a reuse plan would demonstrate that the Gainesville community can overcome past industrial uses of the site that have been detrimental to the environment. The site's reuse should serve as an example of how economic development and environmental protection and restoration can work together. Sustainability elements suggested by community stakeholders include the following:
 - Building design and construction that incorporates energy efficiency and renewable energy generation and food production on roof top gardens.
 - Structures and open space that include exhibits documenting the site's history and describing the remedy in place at the site.
 - Landscaping and plantings that support remediation of surface soils.
 - Stormwater management systems that are designed to restore hydrology and improve conditions in the nearby Springstead Creek.

In addition, community participants identified potential uses that should be discouraged at the site, including:

- *Large-scale industrial uses such as outdoor processing operations or activities that generate dust, noise and pollution.* Community members are concerned that an industrial/commercial future use designation at the site would only allow for uses similar to a wood treating facility.
- *High-density renter-occupied residential complexes.* Community members envision that future site uses would ideally be designed for long-term occupancy and investment.

Adjacent Land Use Compatibility

Community participants outlined a preference for varying the intensity of development across the site to ensure compatibility with surrounding land uses. The following uses were discussed for different portions of the site.

Uses envisioned for eastern portions of the site include:

- Rail trail and greenway.
- Retail and commerce to support rail trail users.
- Vertically integrated mixed-use development, such as live-work structures, or first-floor retail/office space with residential units on upper levels. Mixed-use development on the eastern half of the site could benefit from visibility and frontage along 23rd Avenue.

Uses envisioned for western and northern portions of site include:

- Maintain existing forest buffer along edge of the site.

- Establish a network of parks and open space along the eastern border that links to the City's public works property and rail line to the north.
- Consider integrating single-family or townhouse-style residential uses with surrounding open space.
- Ideally, open space and residential uses would be accessible from existing neighborhoods to the east and structures would be oriented to complement existing development patterns.

Remedy Compatibility

Community members noted that the reuse of the site will need to be compatible with site remedy components, including remedial features that address source area contamination and a ground water remediation system, and noted the following considerations:

- Ensure that future use does not prevent future modification of source area or ground water remedies. Stakeholders suggested that reuse plans should avoid locating permanent structures on or in immediate vicinity of known source areas.
- Accommodate the long-term operation of the ground water extraction system and monitoring well network.
- Ensure that residential soils in adjacent neighborhoods affected by site contamination are cleaned up to support unlimited future use with unlimited exposure.
- Ensure that a stormwater management system at the site is capable of handling and treating runoff from anticipated future site uses and remedy components.

Groundwater Remediation and Restoration Goals

The Gainesville Regional Utility (GRU) is responsible for ensuring the long-term protection of ground water resources and provision of drinking water to Gainesville citizens. GRU staff outlined three primary goals for the site's cleanup.

- Contain the spread of ground water contamination in the Floridan (drinking water) aquifer.
- Establish a robust monitoring well network in the Floridan aquifer.
- Remove or immobilize source area impacts affecting surficial and Hawthorne aquifers.
- Ensure that future uses do not prevent future modification of source area or ground water remedies.
- Avoid locating permanent structures on or in immediate vicinity of known source areas.

Process Considerations

In addition to the site reuse goals and considerations discussed above, community stakeholders also identified several issues related to public outreach, site information and the Superfund remedial process.

- In general, community members are frustrated with the lack of information provided by EPA about human health risks from the site and, in particular, from off-site residential soils.

- City Commission meetings have been the primary venue for EPA discussions about the Cabot/Koppers site. Several stakeholders feel that these meetings have not served as effective information-sharing venues for public meetings regarding the remedial process.
- Community members suggested that future reuse assessment meeting(s) be held at the Stephen Foster Elementary School (various neighborhood associations indicated an interest in having a meeting hosted by the Stephen Foster Neighborhood as a unified area rather than by one particular association). Stakeholders suggested that the next reuse assessment meeting or workshop be publicized as an EPA meeting hosted by Stephen Foster Neighborhood.

Next Steps

The next steps for the reuse planning process include:

- *Site Reuse Assessment:* E² Inc. will develop a site reuse assessment that integrates stakeholder reuse goals with a site evaluation and land use analyses to identify potential physical and remedial constraints and potential reuse zones at the Koppers property.
- *Community Meeting:* E² Inc. will facilitate a community meeting or workshop to review the draft site reuse assessment with the community stakeholders, the CDC and the site owner. The goal of the meeting would be to develop a common understanding of the reasonable future use options and constraints for the site's reuse. This meeting time and location are to be determined.
- *Meeting Summary:* Based on discussions with the CDC, community stakeholders and the site owner, develop a summary of the reuse assessment findings that identifies a reasonably anticipated future land use to help inform EPA's remedy selection process and the City of Gainesville's land use petition.

Project Coordination and Schedule

The sequence of the remedial process, reuse assessment activities and city municipal planning meetings will need to be carefully coordinated to ensure that reuse considerations can inform remedy selection and city land use processes. Below is a tentative schedule of remedial process activities, reuse assessment activities and city planning meetings. This timeline is subject to change pending the release dates the Final Feasibility Study and ROD Amendment/Proposed Plan, as well as the scheduling of EPA's Public Comment Period and Public Hearing on the ROD Amendment/Proposed Plan.

Anticipated Dates	Activity
April 29	EPA Site Update at Commission Meeting
May 5	EPA / Beazer East Inc. release Final Feasibility Study
May 24	EPA / Beazer East Inc. release ROD Amendment/Proposed Plan
May 25-June 26	EPA Comment Period on ROD Amendment and Proposed Plan
May 2010 (TBD)	City Staff / CDC host Public Works Complex Charrette
Week of May 30 or Week of June 7 (TBD)	E ² Inc. holds Cabot/Koppers Site Reuse Assessment meeting
June (TBD)	EPA holds Public Hearing on Proposed Plan
Week of June 14	E ² Inc. distributes draft Reuse Assessment Memorandum
July 26	EPA signs ROD Amendment

Remedial process timeline: Approximate dates for remedial activities are based on the March 2010 Monthly Progress Report for the Cabot/Koppers Superfund Site (GeoTrans, April 19, 2010).

City of Gainesville Land Use Petition/Re-Zoning Considerations: E² Inc.'s reuse assessment memorandum will provide future land use considerations to inform the city's land use petition process. City staff will likely need to determine how best to incorporate reuse assessment findings into the re-zoning process with input from property owner Beazer East, Inc.

Phase II Reuse Assessment Activities: Additional reuse planning support may continue after the ROD Amendment is complete and could include developing reuse scenarios to inform remedial design activities for the Cabot/Koppers Site.