



Brownfields Cleanup Community Involvement Relations Plan

November 1, 2023

A handwritten signature in black ink, appearing to read "Brian Burk", written over a horizontal line.

Prepared by: Brian Burk

Leefort Terrace 1 and 2 Leefort Terrace Salem, Massachusetts

Prepared For:

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Reviewed by: N. Scott Buchanan

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1.0 Introduction

This Community Involvement Plan (CIP) has been prepared to describe the Salem Housing Authority (SHA) and BC Leefort Terrace, LLC's (BC Leefort Terrace) strategy to address the needs and concerns of residents potentially affected by the proposed cleanup (building abatement prior to demolition) at the Leefort Terrace property located at 1 and 2 Leefort Terrace in Salem, Massachusetts (the Site). This CIP outlines how the SHA and BC Leefort Terrace LLC will involve interested residents, Town officials, and local organizations in the decision-making process regarding the cleanup at the Site.

The Site is currently and has historically been used as a Chapter 667 50-unit, garden-style, state public housing development owned by the Salem Housing Authority. The SHA and BC Leefort Terrace intend to demolish the existing buildings and redevelop the Site with a new, single, flood and sea-level rise resilient, 3-and 4- story building containing 124 units of 100% affordable housing with a public open space to the west of the Site building along Collins Cove.

Between 2020 and 2022, several phases of environmental investigations were conducted at the Site. These investigations revealed the presence of asbestos containing materials (ACMs) and other hazardous building materials (HMBs) within the existing structures on the property.

The cleanup of the Site is to be funded, in part, by a loan from the Brownfields Revolving Loan Fund (RLF), which is given by the United States Environmental Protection Agency (USEPA) and is administered by the Cities of Salem and Peabody. The grant funds will be used by the SHA/BC Leefort Terrace to conduct abatement of ACMs and other HBMs throughout the existing Site structures in order to facilitate building demolition and Site redevelopment.

Environmental cleanup at the Site will be conducted in accordance with the applicable federal, state, and local regulations and conducted by a Massachusetts Department of Labor Standards licensed asbestos abatement contractor.

1.1 Spokesperson and Information Repository

The spokesperson for this project is Tom Devine, Senior Planner with the City of Salem Department of Planning & Community Development, who may be contacted at the following address and phone number:

Tom Devine, AICP, Senior Planner
City of Salem Department of Planning & Community Development
98 Washington Street, 2nd Floor
Salem, MA 01970
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An Information Repository has been established at the City of Salem Department of Planning & Community Development; (978) 619-5682. Persons wishing to review reports and/or other information relative to environmental conditions at the Site should visit the Department of Planning & Community Development's Office, located at 98 Washington Street, 2nd Floor, Salem, Massachusetts 01970, Monday through Thursday between 8:30 AM and 5 PM or visit <https://www.salemma.gov/planning-and-community-development/pages/salem-peabody-coalition-brownfields-revolving-loan-fund>.

Public meetings concerning the project Site will be held at the City Hall Annex in one of the first-floor conference rooms. The date and time of public meetings will be advertised 48 hours prior to the scheduled meeting 1) in the OFFICE LOCATION and 2) on the City of Salem website on the upcoming events page under the Calendars tab: <https://www.salemma.gov/>. A public meeting to discuss the proposed Cleanup Plan and ABCA is currently scheduled for Tuesday, November 28, 2023 at 5:30pm in the large first floor conference room at the City Hall Annex.

The co-spokesperson for this project is sub-grantee Rachel Powers, Senior Development Associate with BC Leefort Terrace LLC c/o Beacon Communities who may be contacted at the following address and phone number:

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2.0 Site Information

This section summarizes the Site location, history, and existing environmental conditions.

2.1 Site Location

The Site consists of two contiguous parcels totaling approximately 3.2-acres located at 1 and 2 Leefort Terrace in Salem, Essex County, Massachusetts within a mixed residential and industrial area. The City of Salem tax assessor describes the Site as Parcel ID# 41-0249-0 and 41-242-0, zoned as residential one family, and currently is used as a Chapter 667 state public housing development owned by the Salem Housing Authority. The Site is currently occupied by a Massachusetts public housing development made-up of eight (8) buildings including seven (7) single-story ranch style residential buildings including a total of fifty (50) single-bedroom, garden-style, age-restricted apartments for elderly and disable residents and one (1) community building containing a commercial laundry room and management office constructed in 1958.

The Site is located in a predominately residential and industrial area located in Salem, Massachusetts. To the northwest of the Site, across Szetela Lane, is Collins Cove. The Site is adjoined to the northeast by an open park area and the Bentley School. Adjoining to the northwest and west are residential properties with the Salem Harbor Point power station beyond. Adjoining to the south are several City of Salem owned parcels that are currently utilized as storage/laydown area for a construction company.

2.2 Site History

Based on information provided by McPhail's 2020 Phase I Environmental Site Assessment, the Site has been used as City of Salem housing since its construction in 1958. Prior to construction, the land was vacant and undeveloped. According to previous environmental reports, historic aerial photographs depict a portion of the Site as part of the now west-adjacent waterbody, Collins Cove, and being filled between 1938 and 1952.

2.3 Nature of Threat to Public Health and Environment

In November 2020, McPhail Associates, LLC (McPhail) conducted a Phase I Environmental Site Assessment for the Leefort Terrace parcels (41-0249-0 and 41-0242-0) and five City of Salem owned parcels to the west of the Site (41-0243-01, 41-244-0, 41-0245-0, 41-0235-0, and 41-0236-0). Based on the findings of McPhail Phase I ESA report dated November 9, 2020, two recognized environmental conditions (RECs) and one historic recognized environmental condition (HREC) were identified related to the five City of Salem owned parcels which are no longer included as part of the redevelopment plans.

In February 2021, Boston Environmental Corporation (BEC) performed an inspection for hazardous building materials for the eight existing on-Site buildings in. The purpose of this assessment was to evaluate the presence of asbestos-containing materials (ACM), lead-containing paint (LCP), polychlorinated biphenyls (PCBs), and other hazardous or regulated materials throughout the buildings that will require remediation and/or disposal prior to the planned demolition and Site redevelopment activities. Due to the residential buildings being occupied, BEC was granted access to the interior of nine out of fifty residential apartments as well as the building boiler/utility rooms and the community/office building.

BEC collected 327 bulk samples of building materials suspected to contain asbestos of which 298 were analyzed, and laboratory analyses determined that thirty-one samples contained greater than 1 percent asbestos. BEC collected seven samples of paint chips for laboratory analysis of LCP. LCP is present at the Site at variable concentrations and details can be reviewed in Appendix A of the summary report. Seven bulk samples of window and door caulking were collected for laboratory analysis for PCBs. The PCBs samples were all non-detect for PCBs.

The BEC report concluded that asbestos materials had been identified at the Site and must be removed by a licensed asbestos abatement contractor prior to the planned building demolition.

Also, LCP was identified throughout the Site buildings, BEC recommended that demolition work be conducted in accordance with the OSHA “Lead in Construction” standard and that TCLP testing for lead be conducted prior to material disposal.

In December 2021, McPhail conducted a limited Phase II Site Assessment including the completion of 9 soil borings along the western property boundary of the SHA property and the City of Salem vacant lots. Four samples along the western boundary were analyzed for total metals, polychlorinated biphenyls (PCBs), and extractable petroleum hydrocarbons (EPH) with target PAHs.

Benzo(a)anthracene, benzo(b)fluoranthene, and benzo(a)pyrene were detected in Boring B-108 above MassDEP RCS-1 reporting standards. These detections were consistent with MassDEP Background Levels for soil containing coal ash or wood ash and evidence of coal ash or wood ash was observed within fill material in the boring. Total lead was also detected in Boring B-108 above MassDEP RCS-1 reporting standards at a concentration of 722 mg/kg. The total lead concentration was also consistent with the MassDEP Background Levels for soil containing coal ash or wood ash.

McPhail concluded that upon review of available documentation and soil analytical results, the release related to RTN 3-20276 at the City of Salem parcels to the west is not considered to have impacted the subsurface conditions at the SHA property.

3.0 Community Involvement Plan

This section summarizes the community background, previous community involvement activities, and the plan for continued community involvement for the Site.

3.1 Community Profile

The City of Salem, incorporated 1836, has a total area of 18.30 square miles. According to the 2020 U.S. Census Bureau, the City is home to 44,480 year-round residents, 44.9 percent are male and 55.1 percent are female.

Census data further indicates that 80.9 percent are white, 5.2 percent are black or African-American, 17.7 percent are Hispanic, 3.0 percent are Asian, 0.2 percent are American Indian or Alaska Native, 5.9 percent are from two or more races, and 0.0 percent Pacific Islander. The median household income for Salem is \$72,884.

American Community Survey’s (ACS) 2021 5-year estimates indicate that 14.9% of Salem residents live below the poverty level. Approximately 24.2% of children under the age of 18 live in poverty. According to the Department of Economic Research of the Executive Office of Labor and Workforce Development, as of August 2023, Salem had an unemployment rate of 3.2%.

Salem's estimated vacancy rates per the 2018 ACS were 1.0 percent for homeowner units and 3.8 percent for rental units – these rates are very low, indicating a constrained housing supply that can result in inflated housing prices. A 2 percent vacancy rate for ownership and 6 percent for rental units are considered natural vacancy rates in a stable market.

Affordable housing is a critical and urgent need within the Salem community and one of the many challenges facing the City as outlined in Salem's Housing Needs Assessment and Imagine Salem initiative. As of the Housing Needs Assessment, about 49 percent (9,045 households) of total households in Salem have incomes below 80 percent AMI and may qualify for affordable housing as defined under the state's Chapter 40B law.

In terms of the housing stock, about 35 percent (6,450 households) of Salem's households are cost burdened, meaning they pay more than 30% of its income on rent and utilities. Most of Salem's cost burdened households, 92 percent or about 5,925 households, are low-to-moderate-income (LMI) households. Cost-burdened households, particularly lower-income households, are likely to struggle to pay for other basic needs, such as food, clothing, health care, and transportation costs.

Salem's LMI renter households have the highest levels of severe cost burden, meaning they spend more than 50% of its income on rent and utilities, indicating a high need for more affordable rental housing. Of all LMI households estimated to be severely cost burdened in Salem, 67 percent are renter households.

Salem's median income for all household types is \$65,565, significantly lower than the FY2020 Area Median Income (AMI) of \$119,000. About 40% of Salem's households have incomes less than \$50,000. The median income for renter households was \$37,776, whereas, the median income for owner households in Salem was \$95,414.

According to the County Health Rankings and Roadmaps, Essex County, where Salem is located, is ranked among the least healthy counties in Massachusetts. Essex County falls between 0%-25%, in terms of health factors impacting the length and quality of life. Factors include adult smoking, adult obesity, and physical inactivity, in addition to such health outcomes as premature death, poor physical health days and low birth weight, which all exceed Massachusetts' statewide percentage for each factor in terms of prevalence.

3.2 Chronology of Community Involvement

The SHA and BC Leefort Terrace are the primary stakeholders in the CIP for the cleanup and reuse planning for this Site. However, beginning in late 2020 and prior to creating a program and site plan for the new development at Leefort Terrace in Salem MA, the project team had taken a very deliberate and comprehensive approach to engaging existing Leefort residents, direct abutters, members of the Salem community and city and state elected and non-elected officials. From early engagement efforts on Leefort Terrace working with Regenesys Group to create a

“Story of Place”, Beacon, SHA and the project team at large, strived to facilitate open communications and find common ground among disparate viewpoints on appropriate use of the site, deepen the collective understanding of the social and ecological interrelationships that make Leefort Terrace, harmonize with those natural and social systems and through constructive conversations, design a project that is responsive to community feedback while balancing city, regional and statewide affordable housing production needs, all within the constraints of financial feasibility.

Engagement progressed as the project team brought on Desire Path Group to galvanize and communicate with supporters, implement a communication plan and improve the development’s website LeefortTerrace.com. Beacon Communities’ Community Engagement Department also sought and solicited connections and partnerships with Salem supportive service organizations.

The project’s overall community engagement and involvement process began in fall of 2020 and has continued on nearly three years later, as detailed in the timeline below:

Timeframe	Community Engagement Activity
December 2020 - ongoing	Engaged in one-one-one and small group conversations with well over 75 residents, abutters, residents, community members and City officials
October 2020, August 2022	Met with Leefort Terrace residents in person. Sent out letter updates periodically
February 2021	LeefortTerrace.com website launched on coUrbanize platform
May 2021, October 2021, February 2022, May 2022, July 2022, September 2022	Met with Leefort Tenant Organization board numerous times over several years.
October 2021-March 2022	Developed a Story of Place, aiming to harmonize with natural and social systems, moving from a place of understanding to inform the project.
March 1, 2021, December 16, 2021, February 15, 2022	Held three larger virtual community meetings with 75-150 in attendance at each
March 24, 2021	Presented at Salem Sustainability, Energy and Resiliency Committee’s Public Meeting
March 14, 2022	Presented at Salem Affordable Housing Trust Fund public meeting
May 10, 2022	Presented at the Salem Willows neighborhood association meetings
June 2022 (twice), July 2022	Convened a Publicly Accessible Open Space Working Group comprised of 8 community and resident volunteers
October 19, 2022	Presented at Council on Aging Meeting
May 16, June 15, July 27, September 14 & October 24, 2022	Presented at Zoning Board Public Hearings
May 17, June 19 & November 15, 2022	Presented at Conservation Commission Public Hearings

March 2021- November 2022	Plan Modification & Collaboration: Held onto the strong sustainability and resiliency techniques, and modified plans based on community feedback including: <ul style="list-style-type: none"> • converting from a mixed-income to 100% affordable development • lowering the unit count from 214 to 124 and number of stories from 4 and 5 stories to 3 and 4 stories • reducing the overall footprint of the building, pulling it away from the abutters • creating ample open space for residents and community
August 2022	Leefort Terrace Resident Needs Survey Distributed in 3 languages
August 2022	Leefort All Resident Meeting and Letter Distribution
September 2022	Leefort Resident Tour of Old Colony Phase 3C
September 2022	Massachusetts Environmental Policy Act (MEPA) Public Consultation Meeting
October 2022	Presented at Council on Aging Meeting
November 17, 2022, December 7, 2022, January 5, 2023, January 12, 2023	City Council Public Meetings on UCH-TIF Plan
March 22, 2023	Relocation Meeting with Leefort Terrace residents
April 13, 2023	Accessibility & Universal Design Review with Leefort Terrace residents
September 22, 2022 & June 14, 2023	Leefort Terrace residents were invited on two bus tours to visit a community newly built by Beacon in Boston and to converse with fellow Beacon residents
July 10, 2023	Salem Housing Authority Resident Meeting with Beacon Communities and Housing Opportunities Unlimited (HOU)

Ongoing engagement and community connections have been instrumental in adapting the project to best suit the needs of residents and community, and in achieving the milestones critical to the development process.

The outcomes of this process have included:

Design Changes Made -

- Converted from a mixed income to 100% affordable development
- Lowered the unit count from 214 to 124
- Reduced height from 4 and 5 stories to 3 and 4 stories
- Decreased overall footprint of the building, pulling it further away from the abutters

- Modified elevation material and aesthetic
- Created ample open space for residents and community
- Maintained strong commitment to climate resiliency and environmental stewardship

Milestones Achieved -

- Chapter 40B Comp Permit Zoning Approval
- Salem Conservation Commission ENF Approval
- Urban Center Housing-Tax Increment Financing request approved by City Council
- MEPA Certificate Issued
- City of Salem Community Preservation Act fund award approved by City Council
- Salem ARPA Funds Awarded

3.3 Key Community Concerns

Beginning in late 2020, and prior to creating a program and site plan for the new development at Leefort Terrace in Salem MA, our team has taken a very deliberate and comprehensive approach to engaging existing Leefort residents, direct abutters, members of the Salem community and city and state elected and non-elected officials. From the project's extensive engagement efforts, our team found that proponents were largely concerned about:

- Dangers concerning escalating flooding events.
- Creating safe, quality, and accessible affordable housing to replace the existing units which are small, aging, and outdated.
- Developing housing and surrounding open space that is cohesive with the neighborhood and natural environment, as well as sustainable and resilient to the changing climate.

The development team worked with Regenesi Group, Desire Path Group, and CoUrbanize to connect with existing Leefort Terrace residents, neighborhood stakeholders, community organizations, the Salem community at-large, and the City, to capture ideas and feedback which impacted the project's formation and design from conception to final design.

Key concerns around the Site cleanup include controlling potential exposure to contaminants by construction workers, pedestrians, residents, and others near the Site during the performance of the cleanup activities. Exposure to contaminants could potentially be experienced via ingestion, inhalation, or dermal exposure. Prior to initiation of cleanup activities, TRC will prepare an ABCA that will identify the most appropriate means to cleanup the Site. The appropriateness of the cleanup alternatives will be evaluated based on the anticipated success of the project to mitigate potential risks from exposure to Site contaminants by construction workers, nearby residents, trespassers, and future Site users. The Draft ABCA will be available for public review for 30 days. Site cleanup work cannot commence until after the completion of the 30-day comment period, response to all relevant comments and document approval.

The Site cleanup activities include the abatement of various ACMs and other HBMs from the Site buildings prior to building demolition and Site redevelopment. Following Site cleanup activities, visual inspections and air clearance testing will be conducted, as applicable, by a Massachusetts Department of Labor Standards licensed Asbestos Project Monitor to confirm that ACMs and other HBMs have been completely removed in compliance of the applicable federal, state, and local regulations. Analytical data from air clearance samples collected after asbestos abatement will be compared to air clearance criteria prior to the release of work area to the next Site redevelopment phase.

3.4 Continued Community Involvement

The SHA and BC Leefort Terrace will use its best efforts to engage members of community in the development of the cleanup plan and provide regular updates on the cleanup activities. Throughout the site's redevelopment, the project team will be responsible for reporting to the various awarding agencies and organizations, such as the City of Salem's Community Preservation Committee, the North Shore HOME Consortium, and the Salem-Peabody Brownfields Cleanup RLF Coalition, on development progress and project compliance. The project team will keep all such awarding agencies and representatives apprised of project updates, progress, changes and issues during the site's abatement and demolition, and throughout the development process.

Key dates surrounding the 30-day public comment period are listed below:

Task	Estimated Start Date	Estimated Completion Date
Publish Public Notice on the Town's website (which will announce public meeting, timing of 30-day public comment period, and availability of information repository)	November 17, 2023	November 17, 2023
30-day Public Comment Period for Draft ABCA	November 17, 2023	December 18, 2023
Public Meeting #1 - Discuss ABCA	November 28, 2023	November 28, 2023
End of Public Comment Period	December 18, 2023	December 18, 2023
Respond to Comments	November 17, 2023	December 22, 2023
Finalization of ABCA	December 2023	December 2023
Implementation of Remedial Alternative	January 2024	March 2024

Outlined is also an overview of the projected timeline covering the redevelopment of Leefort Terrace:

- January 2024 – Financial Closing / Begin hazard abatement, in conjunction with demo activities.

- February 2024 – Abatement and demolition approx. 50% complete.
- March 2024 – Abatement and demolition complete.
- February 2025 – Construction 50% complete.
- February 2026 - Construction complete/ Residents begin moving back.
- November 2026 - Building fully occupied.

As part of the site's abatement and demolition activities, the project team is working closely with the Salem & Peabody Brownfields Cleanup RLF Coalition and spokesperson, Tom Devine, Senior Planner with the City of Salem Department of Planning & Community Development. The City of Salem will act as the information repository for the project maintaining copies of the environmental assessments, risk assessments and other environmental information related to the Site. The information repository, located at <https://www.salemma.gov/planning-and-community-development/pages/salem-peabody-coalition-brownfields-revolving-loan-fund> will be updated with the inclusion of meeting materials, status reports, public comments, and other communications related to the Site.

In the event additional outreach is recommended and/or necessitated as it relates to the site's abatement and demolition activities, the project team will use multi-media including but not limited to, public meetings, website information updates, and informational literature. Information will be presented in concise, non-technical language that is understandable by a broad audience. Translators will be present at meetings, as necessary. When and if applicable, public notices would be developed to inform the community about dates, locations, and agendas of upcoming meetings where members of the public may obtain project updates. Throughout the cleanup process, the public may contact the spokesperson for this project for more information or to ask questions.

In conformance with the Brownfields Cleanup Grant requirements, the public notices will also announce that the City's Community Development Department has been established as the information repository for this project.

Per EPA's reporting requirements, once a draft ABCA has been completed, a legal notice will be printed in *The Salem News* announcing a 30-day public comment period on the report. During the comment period, the SHA and BC Leefort Terrace will provide written responses to comments received, and these written responses will become part of the administrative record. The SHA and BC Leefort Terrace will hold a community meeting, tentatively scheduled to be held in conjunction with a Board of Selectmen meeting, during the 30-day comment period, to inform residents of the proposed cleanup plan and answer questions regarding the project. The community is encouraged to ask questions during this public meeting and/or submit any comments or questions during the 30-day comment period on the proposed cleanup of the Site.