

City of Trenton

**Better Environmental Solutions for Trenton (BEST)
Advisory Committee**



Brownfields Program Action Plan

June 2018

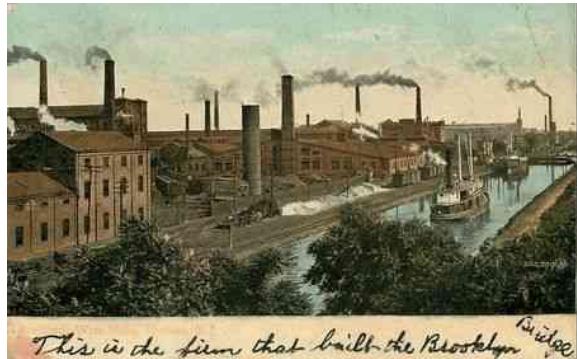




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Above: Vintage postcard of John A. Roebling Sons Co.

Below: Community day at Greg Grant Park

Cover: Birds-eye view of Trenton, 1912, Historical Society of Riverton.



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Brownfields Program Action Plan

June 2018

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Executive Summary



Assumpink Daylighting Project Site

The City of Trenton's Brownfields Program was established in 1994 in response to the difficulty in funding and implementing the environmental assessment, investigation and remediation necessary to safely and successfully redevelop the City's numerous brownfield sites. This difficulty was exacerbated by low property values and lack of private-sector interest. In order to support the efforts of the new Brownfields Program, the Better Environmental Solutions for Trenton (BEST) Committee was established to provide support and guidance, and to be a connection to the community through outreach and education. The City of Trenton's Brownfields Program now has a 24-year record of success through performance and integrity, and has maintained a high level of support from the City's leadership, a necessary component for success. City administrations have come to depend on the Brownfields Program, often being the "first in" and "last out" of many of the City's revitalization projects.

Brownfields Program accomplishments have included:

- Redevelopment of 60 brownfields sites in the City that together represent 190.3 acres of land, or approximately 4 percent of the

entire City;

- Leveraging over \$48.5 million dollars in funding for the assessment, investigation and remediation of numerous sites, and for open-space development;
- The receipt of seven prestigious, national Phoenix Awards for Brownfields Development; more than any other city in the U.S.; and
- Individual and Programmatic Awards for brownfields leadership at national and state levels.

The Brownfields Program will continue to be managed in order to:

- Leverage additional funding for remediation and redevelopment;
- Advocate for continued aid to municipal brownfields programs;
- Educate and serve the public;
- Develop and maintain relationships with public and private partners;
- Maintain databases and lists of city brownfield sites for program metrics, property marketing and other purposes;
- Be a leader at state and national levels for brownfields program management and policy development; and
- Promote site-specific, area-wide and city-wide redevelopment strategies.

The Brownfields Program will also continue to support the revitalization efforts of the Department of Housing & Economic Development, the vision of the City's leadership, and will work with other internal and external partners for the benefit of the City of Trenton.

1.0 Introduction

Brownfields are former or current properties that are currently vacant or underutilized and on which there has been, or there is suspected to have been, a discharge of a contaminant. Brownfields include, but are not limited to: old commercial (e.g., dry cleaners, gas stations) and industrial sites common to post-industrial Trenton. Despite being confronted with the challenges that come along with the redevelopment of potentially contaminated properties in an urban setting, Trenton's award-winning Brownfields Program has successfully led to the establishment of new residential, public use, open space, commercial and industrial uses throughout the city. Further, the city has leveraged tens of millions of dollars for redevelopment since its inception and has successfully redeveloped over 60 sites.

Central to the success of Trenton's program was the establishment of the Better Environmental Solutions for Trenton (BEST) Advisory Council in 1996. The Council, a broad-based group of government officials, attorneys, realtors, developers, community representatives, engineering professionals, lenders, and academia, functions to provide integrated and expert advice on a variety of issues related to brownfields cleanup and redevelopment. BEST has been providing advice and assistance to the Trenton Brownfields Program for nearly 25 years, essentially through the entire lifespan of the brownfields program. Its involvement in assisting the city has covered a wide variety of aspects of the Trenton Brownfields Program ranging from legislative to site-specific issues. BEST has undertaken a continuing effort to provide recommendations through this "Brownfields Action Plan" for the City of Trenton.



Assunpink Creek looking toward Hetzel Field Park

Purpose of the Brownfields Action Plan

This Brownfields Action Plan (BAP) is intended to provide the City of Trenton with a blueprint for action to maintain a successful, sustainable Brownfields Program, by setting forth program components and associated metrics. The BAP allows the City to monitor progress and accomplishments relating to funding, remediation and redevelopment. The BAP provides a policy framework and articulates those components associated with implementation that is believed to be essential to its continued success. These components consist of: financing and economic sustainability; partnerships and outreach; site identification and brownfields inventory; brownfields leadership; brownfields marketing; area-wide brownfields programs; and regulatory matters. This framework is intended to represent the City's commitment to redevelopment and includes several important policy goals. Program components, detailed in Section 5, include a description of significant implementation activities along with specific recommendations for City consideration.

2.0 Trenton Brownfields Program Goal Statement

The Brownfields Program of the City of Trenton will serve as a nexus for the redevelopment of blighted property in the city, by assisting the Department of Housing & Economic Development in bringing needed public space, services, housing, jobs and tax revenue. The Brownfields Program will be managed and staffed with technical professionals who are looked to as national leaders in municipal brownfields redevelopment programs, and will utilize innovative financing programs to the extent possible to achieve redevelopment goals.



Concept Plan, Assunpink Daylighting Project Site

Brownfield site redevelopment is a key component in the revitalization of Trenton and is crucial to the overall economic development of the City. Redevelopment of underutilized brownfield sites can be used to enhance Trenton's neighborhoods and improve the quality of life for all of its citizens, in addition

to increasing tax revenues in the long term. This BAP helps move the Brownfields Program and the City toward this goal of city-wide brownfields revitalization.

An engaged Trenton municipal government must remain committed to the development

and support of a visible, active, and effective Brownfields Program. This program should be staffed with qualified personnel and funded to take full advantage of available local, state and federal resources necessary to facilitate the restoration and redevelopment of the City's brownfield sites. Trenton's Brownfields Program values the grassroots participation of its citizens, its neighborhoods, and its communities in the establishment of site redevelopment priorities and goals and in the implementation of its actions.

Key program components and policies that have contributed to the overall success of the Brownfields Programs include:

- Instilling a high level commitment and support of Trenton's brownfield goals through performance and track record
- Successfully assessing over 100 sites, of which 60 have been redeveloped
- Maintain broad-based representative support among the members of the City Administration and Trenton City Council; maintained, in part, by providing high quality work product, efficient and ethical project management, and technical expertise
- Inclusion of community leaders and neighborhood residents
- Partnerships that form the basis for strong, long-term relationships with key stakeholders at the local, county, state and federal levels, as well as local private-sector developers, landowners and the business community
- Performing activities in-house wherever possible as a means to save capital funding (by reducing reliance on professional

subcontractors) and implementation time, such as: work scope preparation, environmental task delivery, historic research and regulatory negotiations and compliance. Through this approach, precious resources are preserved for site remediation

- Funding a full-time Brownfields Coordinator for 20 years with support from a largely grant-funded contractor for 15 years
- Integrating federal and state brownfield initiatives and free technical assistance when available into the Trenton Brownfields Program to maximize opportunities for restoration projects
- Successfully seeking out and employing a multitude of funding sources, including more than \$48.5 million in federal, state, county, municipal and private funding



Community Day at new Greg Grant Park

- Contributing to State and Federal policy directly relating to the sustainability of municipal brownfields programs.

3.0 Accomplishments

The Trenton Brownfields Program has been successfully supporting the redevelopment of contaminated sites in the City for nearly 25 years. Key achievements over this time period have included the receipt of seven Phoenix Awards for excellence in brownfields redevelopment for various projects in the city. Trenton has the distinction of winning more Phoenix Awards than any other community in the country, an important metric supporting our role as a national leader.

The Trenton Brownfields Program has received awards and recognition from other sources including the US Environmental Protection Agency (EPA), NJ Department of Environmental Protection (NJDEP), and the International City/County Management Association. Additional key milestones in the history of Trenton's Brownfields Program are listed in **Attachment 1**.

Over the years, Trenton has leveraged its initial \$200,000 in EPA Brownfield Assessment Demonstration Pilot funding to more than \$48.5 million in funding from state and federal sources. A list of funding leveraged for the Trenton Brownfields Program, including State and Federal environmental grants for assessment, investigation, cleanup and parkland acquisition is provided in **Attachment 2**.

Trenton has also contributed to the Brownfields literature and technical community through

The City's Brownfields Coordinator received a Brownfields Leadership Award "for dedication to successful brownfields cleanup and community revitalization" from the National Association of Local Government Professionals (NALGEP) at the national brownfields conference in 2013

publications and presentations - A list of publications and presentations involving the Trenton Brownfields Program and prepared by the Program's technical professionals is provided in **Attachment 3**.

Highlights of recent projects include:

Assunpink Creek Greenway Project

This major project will convert multiple brownfield sites into a 99-acre park and



greenway in the floodway of the Assunpink Creek. This effort will remove the flood hazard in the area, and provide a recreational amenity and alternative transportation link to community residents. Comprised of approximately 18 distinct brownfield sites, the planned greenway is the subject of a State designated Brownfield Development Area and a US EPA Area Wide Planning grant award. The City's Brownfield Program has successfully acquired the majority of the sites targeted for inclusion in the greenway, and has initiated investigation on all of them. The Crescent Wire site at the corner of Lawrence and N Olden Avenue has been fully remediated,

and several other sites are being actively remediated, to include the three sites at the intersection of Nottingham Way, Mulberry Street, and Lawrence Ave; and the two sites along the creek at Hart Avenue and Oak Avenue. Remediation and construction will begin in summer, 2018 at the Hetzel pool site, as well as at the Powerhouse building directly across the street. The Brownfields program has brought in millions in acquisition, assessment, remediation, and construction funds to this project, and has worked cooperatively with DEP's CCI program and the East Trenton Collaborative to ensure that the project moves forward in a manner which will benefit the community.

Capital City Farm

The Capital City Farm started as a partnership between the Delaware & Raritan Canal Trust, the City of Trenton, and local non-profit groups



in 2010. By 2014, the D&R Canal Trust, the City, the County and the non-profit Cityworks reached an agreement to acquire the site, complete environmental remediation and construct the first phase of the existing farm. These activities were completed in 2015 and 2016, and the farm, located on North Clinton Avenue near the Police Headquarters, has been an important location for agricultural



and educational activities, local community outreach and volunteerism. The project received a Smart Growth Award from NJ Future in 2016.

The City, through the Brownfields Program, provided technical support for the design and implementation of the engineering and institutional controls needed to render the site safe for raised bed agriculture and other activities. The D&R Canal Trust continues to manage the farm, which continues to be

owned by the City. Funding for the project included County Open Space Funds and Neighborhood Revitalization Tax Credits.

Roebling Block 3

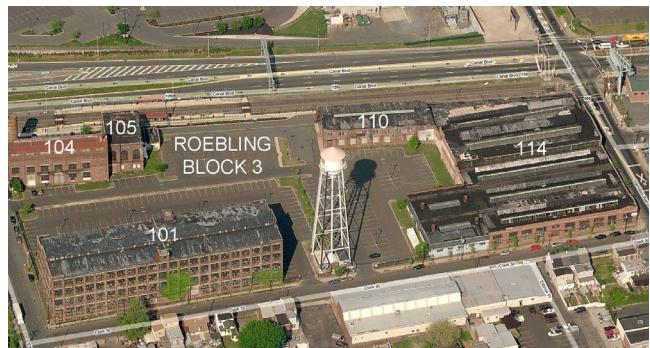
The Roebling Complex has been recognized as a major planning node in the City since the early 1980s. Redevelopment in the area

included several projects in the 1990s and early 2000s (Pelletieri Homes, Roebling Market and the Roebling Machine Shop) followed by a sustained period of low activity in terms of development.

The Brownfields Program has provided technical support, resources and project management at all of the Roebling sites throughout this time period. This included

ongoing work on Roebling Block 3, where several projects were designed over the years and none came to fruition. Local developer, HHG, began planning for the Roebling Wire Works development circa 2010. The City's Brownfields Program was able to obtain Response Action Outcomes and other closure documents from NJDEP to coincide with the kickoff of construction in 2015/2016, and continues to provide support to the Mercer County Improvement Authority, who will transfer ownership to HHG in phases to coincide with construction. HHG completed the first phase of development, at 71 Clark Street, in 2017, receiving Smart Growth Award in 2018.

Brief descriptions of other completed brownfield site redevelopment projects and case studies are provided in **Attachment 4**.



Policy Paper

The BEST Committee was instrumental in effecting important changes to the Site Remediation Reform Act (SRRA), which established the Licensed Site Remediation Professional (LSRP) program. These changes stemmed directly from a policy paper developed by the BEST committee in 2010, and included the exemption of non-spill act liable remediating parties from the mandatory timeframes, and the ability of municipalities to stop the annual remediation fees for properties that were not being actively addressed. Now that the LSRP program has been active for several years, the BEST committee felt it important to revisit the impact that the program has had on municipal brownfield programs. A new policy paper was developed, which was shared with other public sector brownfield programs throughout the state. Currently the BEST committee is working to get additional public sector brownfield coordinators to sign on to the recommendations contained in the policy paper to effect legislative and policy change.

These recommendations are:

1. Waive annual fees for sites where the public sector is the remediating party but not the responsible party (that is, no Spill Act liability). Consider city-wide or multi-site remedial permit fee for sites that have been remediated for public use projects. Exemption from fees associated with long-term remediation permits, especially for public use sites such as open space, affordable housing and other public or non-profit developments.
2. Replace the Remediation Permit system with tracking programs, at least for non-liable parties, innocent landowners/
3. Eliminate the requirement for a soil permit for historic fill.
4. Reevaluate the presumptive remedies to determine if they are unnecessarily conservative, and include flexibility for certain reuse scenarios. Consider adding additional reuse types to the presumptive remedies, with reduced remedial requirements.
5. Allow for a city-wide CEA for areas where groundwater use is limited or non-existent.
6. Reevaluate cleanup standards.
Incorporate cost-benefit analyses and realistic standards based on knowledge of historic fill contaminants and diffuse anthropogenic impacts.
7. Create a phased signoff of documents to provide more comfort to LSRPs needing to rely on prior data or allow for a codified “phased” RAO approach, sanctioned by the NJDEP, where an LSRP certifies that the work was conducted in accordance with applicable standards and can be relied upon by subsequent LSRPs.
8. Codify the Exemption from Mandatory Timeframes.
9. Develop a mediation process for municipalities.
10. Expand the Community Collaboration Initiative.
11. The voluntary cleanup program should be reinstated for specific cases, such as public sector brownfields program sites with: no Spill Act liability; redevelopment potential; and federal and state grant requirements.

developers, and for sites with only historic fill contamination.

4.0 Measuring Success

The grants leveraged by the Trenton Brownfields Program have funded a variety of components that allow the program to remain viable, particularly technical and management consulting that are vital to the success of the program. It has been more than 20 years since the first full-time Trenton Brownfields Coordinator started working in Trenton, and since this time, the amount of grant funds brought into the program through this position, combined with the cost savings from reducing the need for outside professionals, dwarfs the small salary cost to the City. Other than grant cost share obligations, the Brownfields Program rarely requires any funding from the capital budget, although the City Administration has provided substantial capital funding for future brownfields projects and emergencies.

In order to measure the success of the Brownfields Program, Trenton maintains an ever evolving listing of brownfield sites, currently numbering 115. Of these, 60 have been redeveloped. These success stories are located in every City Ward.

Development of a comprehensive, city-wide case analysis of the social, environmental, and economic benefits of Trenton's brownfields development to date will provide a more complete understanding of the overall contribution of the program.

A variety of sites have been revitalized by the Brownfields Program for a variety of end uses, which are listed in [Attachment 5](#). To date, out of the approximately 4,800 acres comprising the city of Trenton, the Brownfields Program has cleaned up over 190, or about 4% of the total city acreage. An additional 17 acres are currently under development.

Measuring the results of the Trenton Brownfields Program is the key to understanding the overall success of the program. It is through such measurements that the program can report back to funders, promote the program to interested parties, and understand the impact of its efforts. Some of the brownfields-related metrics currently tracked by the city include acres assessed and

The current metrics for the Trenton Brownfield Program are indicated in the table below:

Reuse	Number of Sites Redeveloped	Acreage Remediated and Redeveloped
Commercial/Retail	11	29.7
Housing	14 (537 units constructed)	19.9
Industrial	10	58.9
Public Use	14	32.2
Mixed Use	2	12.7
Recreation/Open Space	12	36.9
TOTAL	60 (3 sites were redeveloped with two separate uses)	190.3



cleaned up and funding leveraged per site. There are additional metrics that should ideally be tracked, including tax revenue generated per site, the carbon footprint of a brownfield site redevelopment project, and private developer investment. In 2005, the Trenton Brownfields Program initiated a study to determine the tax benefits of the program. At that time, the sites that had been redeveloped were contributing over \$2 million per year in tax revenues. The program is in the process of re-evaluating these and other benefits of the program's first 25 years and staff will continue to work toward the development of these key metrics.

One lesson the Trenton Brownfields Program has learned over the past 25 years is to anticipate the discovery of future brownfield sites. Despite how successful Trenton has been at cleaning up and redeveloping existing sites, new brownfield sites are always being identified. Future regulatory changes, including

changes to soil and groundwater standards, could mean that sites currently considered "clean" may not be considered clean in the future. New regulations that impact the Brownfields Program address public notification, vapor intrusion, soil remediation including presumptive remedies, and other changes to environmental contaminant standards. The Brownfields Program staff is aware of this and monitors the regulatory changes to evaluate and address any impact on Trenton sites. More importantly, the state's LSRP program has increased costs, resulting in an ongoing streamlining of the brownfields program.

In addition to reevaluating priorities and seeking to streamline the program to control costs, the BEST Committee has, as described above, provided a series of recommendations to the State to reduce the disincentives faced by voluntary public brownfield programs.

5.0 Trenton Brownfield Program Objectives

Financing and Economic Sustainability

Brownfield funding has brought millions of dollars into Trenton, and the Brownfield Program's success has been used to leverage funding for the redevelopment aspects of projects. Redevelopment of brownfield sites can be a catalyst for bringing new jobs and tax revenues into the City.

Financing of brownfields involves obtaining funds from various sources to cover the cost of redevelopment, which includes the investigation, remediation, and ultimately development of the property. The sources of funds can come from government programs in the form of low interest loans and grants, tax incentives and private financing. High caliber developers should be pursued on sites throughout the City, and sites should be widely advertised to gain the broadest possible audience. Trenton briefly engaged a private lobbying firm with ties to both state and federal lawmakers, which resulted in \$5 million in federal funds, which was later increased to \$10 million for the daylighting of a creek in a downtown brownfield site. The City should consider re-establishing a relationship with a lobbying firm to maximize federal grant dollars. Key to the success of this strategy is an open dialogue between staff and lobbyists of funding and project needs.

Currently, the City takes advantage of a variety of available financing to redevelop brownfield sites. State Hazardous Discharge Site Remediation Fund (HDSRF) monies are used to conduct pre-remedial assessments of city-owned properties, as well as remediation on qualified sites. USEPA Cleanup and Assessment grants have been widely used throughout the City. The Trenton Brownfields

Cleanup Revolving Loan Fund has been used effectively to clean up the Warren Balderston site, and that loan was the first in the region to be repaid. These funds have also been put to effective use at the Magic Marker and Kramer sites. This revolving loan program has now been closed. The USEDA, the NJ Green Acres Program and NJ DEP Watershed grants have all provided significant funding to brownfield projects within Trenton.

Economic sustainability goes hand-in-hand with financing brownfields revitalization. For the Trenton Brownfields Program, sustainability includes three aspects:

- Economic sustainability, both on a site-level and for the city overall;
- Social sustainability, meaning that the site will fill a community need, and not contribute to disproportionate impacts on any sector of the population;
- Environmental sustainability, resulting in a cleanup that is protective of human health and the environment, and a reuse that is unlikely to generate a new brownfield site in the future.

Recommendations:

- To the extent that matching funds are required for state or federal grants, include a line item in the city budget for the Brownfields Program, when needed.
- Conduct routine auctions of city-owned brownfield sites and partner with real estate brokers to successfully transfer city-owned properties to private ownership, thereby increasing city revenue and reducing long-term liabilities.
- Increase Trenton's tax base by redeveloping abandoned, idled, or underutilized

properties and ensuring a balance of redevelopment reuses.

- Be an advocate for the use and expansion of state HDSRF refunding and for the expansion of other state brownfield programs.
- Be an advocate for the use and expansion of federal brownfields funding sources.
- Seek out opportunities to attract private funding into Trenton for brownfield redevelopment and site restoration. Partner with private developers to assist in utilizing state and city financial incentives.
- Tap into other potential sources of funding, such as Congressional earmarks, Department of Transportation grants, and private foundations utilizing the assistance of a paid lobbying firm, where beneficial.
- Continue to advocate for State level changes to SRRA and its implementation to better reflect the goals, constraints, and realities of public sector brownfield programs.

Partnerships and Outreach

Strong partnerships make successful brownfield projects possible, and bring funds to City projects. Partnerships provide vital reciprocal relationships whereby organizations and agencies support the Trenton Brownfields Program and vice versa. Focusing on common goals make it more likely that projects will succeed, to everyone's benefit. Notable partners of the Brownfields Program include many groups, without which the successes of the program would not be possible. Following is a non-comprehensive list of groups with whom we work with on a regular basis:

Community and non-profit organizations:

The active involvement of community and non-profit organizations has impacted redevelopment decisions throughout Trenton. The City's Department of Housing and Economic Development conveys information to the community by attending meetings and providing an explanation of technical aspects and current status of the projects. These have included working closely with NJ Future, East Trenton Collaborative, Green Team, Isles, the Trenton Downtown Association, Greater Trenton, and the D&R Greenway Trust. The city will continue to actively reach out to community groups and to respond to their requests and their needs.

Mercer County: Mercer County, and in particular the Planning Division, has provided invaluable technical assistance in the form of Geographic Information Systems (GIS). The County's Open Space Preservation Trust Fund has also assisted many park projects in Trenton. We recently partnered with the County and local non-profit organizations to establish an urban farm on a local brownfields site.

State agencies: The Trenton Brownfields Program partners with several state agencies, such as NJEDA, DCA, and we have a particularly close relationship with NJDEP, which has been a primary supporter of the Brownfields Program since its inception. Through HDSRF funding, Green Acres funding, and Section 319 Watershed funding, NJDEP has been a continued source of support for the Trenton program. The Department's Community Collaborative Initiative (CCI) has proven to be a valuable resource to the brownfields program in navigating multiple DEP programs and focusing resources on priority City projects.

Federal agencies: Federal agencies have provided funding and technical assistance that not only allowed for the establishment of the Trenton Brownfields Program but that also sustained the program for more than 20 years. The EPA in particular has provided millions of dollars in grants and loan programs that have helped to investigate and clean up dozens of brownfield sites throughout Trenton. The US Economic Development Administration has also provided extensive grant funding for the Enterprise Avenue Industrial Park project and the Assunpink Creek Greenway Project. Other Federal agencies, such as HUD and DOT, are also available to provide support individually and through collaborative efforts with USEPA.

Private interests: Without the support of private developers, many brownfield sites would not be successfully revitalized. Brownfields developers have a willing partner in the City of Trenton, and the Department of Housing and Economic Development in particular goes to great lengths to coordinate with developers on brownfields projects. In addition, real estate brokers have served as a valuable conduit between the city and parties interested in purchasing city-owned properties.

Recommendations:

- The City should continue to successfully leverage partnerships on the local, regional, state, federal and private levels. The City should especially work to establish more relationships with parties who have an interest in the economic development of Trenton, including business leaders and professionals, financiers and real estate professionals.
- The city should hold periodic meetings with leaders of the various community groups to disseminate information on all of the city's environmental activities and to

Community Outreach: the East Trenton Collaborative

The East Trenton Collaborative is a group of non-profit organizations, the City, and other stakeholders working to improve the North Clinton Avenue Redevelopment area in East Trenton. This area contains a substantial underserved population known for high poverty and higher-than-normal unemployment rates. This area is adjacent to many of the City's Assunpink Greenway sites (over 18 properties presently). The geographic and cultural relationship of the future Greenway to the North Clinton Avenue Redevelopment Area has created an opportunity to work together for the common good of the area.

The Brownfields Program is a partner in Isles Inc.'s USEPA Brownfields Area-Wide Planning Grant, producing a stand-alone brownfields inventory of the area. The City is poised to address high-priority sites in this area, to be determined through a community-based process, by managing and funding new investigatory work. The City is also supporting other community outreach activities and educational/informational materials for the neighborhood. USEPA and NJDEP are also partners in this outreach activity, with USEPA providing free technical assistance in the form of a Recreational Needs Assessment for the area.

The Brownfields Program maintains an environmental hotline (609-989-3537) to provide information to residents and other stakeholders, in part to meet the NJDEP's Public Notification requirements. The hotline number is displayed on signs at brownfields sites throughout the city.

discuss related redevelopment plans, where applicable.

- Community involvement and education should be proactive and started as soon as practical in the redevelopment process.

Site Identification and Brownfields Inventory

A comprehensive inventory will serve as a marketing and planning tool to promote revitalization and to attract redevelopment that will bring jobs and taxes into the City.

Developing priorities regarding which brownfield sites to address is critical to maintaining a momentum of success in brownfields redevelopment. Trenton lacks large sites which typically attract larger developers and ironically, is hampered by both the number of surface parking lots in the City and the lack of adequate public parking. The development of a searchable database which will assist both Trenton and perspective developers in identifying appropriate sites will help to facilitate prioritization and development. Priorities and desired reuses should be established based on both the market for development and the redevelopment vision for the neighborhood.

A strong effort to market brownfield sites is also dependent on the City maintaining an accurate, up-to-date inventory of brownfield properties, both public and private, as a subset of an inventory which includes all available industrial properties. Such an inventory provides for a listing and a tracking mechanism for all industrial sites, those that are highly marketable and those that are not. The City currently maintains a database of brownfield sites on Microsoft Excel. This database

should be strengthened so that it serves as a tool to market brownfield sites, track the progress of sites currently under remediation or redevelopment, and to document the completion and status of sites that have been restored and redeveloped. In order to be competitive in funding applications, Trenton must have a functional database linked with a GIS system. Efforts to tie a Microsoft Access property database into both the GIS system and the Tax Assessor's database were a strong beginning to an important marketing tool, but the downsizing of the planning department staff with GIS expertise put this project on hold. This effort should be reinvigorated. The use of interns to assist with research and updating the inventory and GIS maps are excellent ways to increase the number of sites covered.

The completion of an inventory of former service stations and former dry cleaner sites throughout the City is an important step in identifying and addressing these ubiquitous sites which are sometimes hidden by subsequent development. These efforts are a good start toward a comprehensive, city-wide industrial sites inventory, but the City should take the next step toward the creation of a cohesive, user-friendly database.

Recommendations:

- Maintain current brownfields inventory to provide continued program metrics, and to meet brownfields program criteria of the "Sustainable Jersey" program requirements;
- Establish and maintain a comprehensive, city-wide industrial sites database, based on a thorough site inventory, which includes all brownfield sites. Link this database to a GIS mapping tool, make it searchable by attributes to serve as a marketing tool as well as a mechanism for prioritizing economic development efforts

and responding to developer inquires, and make it publically available.

Brownfield Leadership

Trenton is acknowledged as a national leader in brownfields, resulting in funding opportunities and developer interest. Trenton received one of the first USEPA Assessment Demonstration Pilot grants in 1995. Since that time, the city has established itself as a leader in this field. Strong local leadership has contributed to the overall sustainability of the program and has also brought attention to the program on a national level.

The city's list of accomplishments testify to the approach and effort put forth by the specialized professionals who staff the City's Brownfields Program. Trenton's brownfield professionals have been highly active in participating in local, state, and national forums and meetings, and are a respected force within the brownfields community. This includes presentations throughout this country and abroad, and commitments to such professional groups as the Interstate Technology & Regulatory Council (ITRC), and the Brownfields Coalition of the Northeast (BCONE). Their recognition by others as leaders in the field reflects positively on the Trenton Brownfields Program and brings the City opportunities for funding and program assistance from multiple sources in state and national agencies.

Recommendations:

- Brownfields Program staff will engage all future incoming mayors and administrations to ensure awareness of the program's successes to date and the benefit

of the program to the city's revitalization efforts.

- Professionals in Trenton's Brownfields Program office should continue their capacity building efforts through participation with EPA and NJDEP sponsored activities as well as other brownfields forums.
- Trenton should continue to seek opportunities for its Brownfields Program staff to make presentations and prepare papers for professional and trade meetings, particularly focusing on real estate and economic development.
- Thought should also be given to the development of a separate environmental division which would house the Brownfields



EPA Region 2 Environmental Champion Award Capacity Building

The Brownfields Program continues to build capacity for its program, demonstrating leadership in grant management, policy development and mentor to other communities at the State and Federal level. In 2017, the City's Brownfields Coordinator, J.R. Capasso, received an Environmental Champion Award from USEPA Region 2 for our program's "ongoing reputation of meeting important public health, environmental and economic goals". EPA Region 2 also indicated that the "City of Trenton has produced more Brownfields cleanups than all other EPA Region 2 grantees combined". Region 2 grantees include all municipal and non-profit brownfields grantees in the states of New Jersey and New York, plus Puerto Rico and the U.S. Virgin Islands.

Program and would conduct all environmental work for the City, including work currently disbursed across the city in Public Works, Recreation, Natural Resources and Culture, and Inspection departments. This would result in efficiencies and cost savings for the city.

Brownfields Marketing

A strong marketing component can build on the availability of brownfield sites for redevelopment while promoting the Greater Trenton Area overall. While the BEST Advisory Council continues to recognize the accomplishments and successes of the Trenton Brownfields Program, marketing efforts are required to educate interested parties. Marketing in Trenton must occur at various levels. First, there is an ongoing need to market the City as a whole to many audiences, including potential residents, potential businesses, and visitors. Second, the Brownfields Program overall should be marketed and promoted to a variety of audiences. Finally, individual brownfield sites must be marketed to target groups as needed. Brownfields marketing must be conducted by the City to attract purchasers to redevelop Trenton's abandoned, idled, or underutilized properties where redevelopment is complicated by the perceived or confirmed existence of contamination.

While the City's current marketing efforts involve the Division of Economic Development establishing and maintaining relationships with developers, consultants, and realtors who actively sell industrial/commercial properties within the city, the intent of the BEST Advisory Council's recommendations are focused on enhancing Trenton's marketing as a place to live, a place to work, and a place to grow.

Recommendations:

- To promote the City as a whole, Trenton should initiate a major marketing campaign that highlights the City's many assets, including its walkability, historic housing, heritage tourism and the arts. This campaign should include a notable slogan that differentiates the Greater Trenton Area from other metropolitan areas.
- Trenton should initiate conversations with potential county, state, and federal agencies that would fund a large-scale and sustained local and regional marketing campaign.
- The City of Trenton should publicize, within its own ranks and throughout the city, the many accomplishments of its Brownfields Program, including the contributions to the redevelopment of numerous sites, and its role as a national leader in municipal brownfields redevelopment and contributor to state and national brownfields policies.
- The Department of Housing and Economic Development should actively market individual brownfield sites and should include brownfield sites in City-owned property auctions. Standardized fact sheets should be developed for each brownfield property owned by the City, and should be posted on the website.
- The Trenton Brownfields Program should improve and enlarge its current webpage, which should be part of the City's website. This webpage should include information on sites available for purchase, success stories regarding previous brownfields accomplishments, and links to related resources.
- Utilize other existing databases, such as the State's "Choose New Jersey" and "Site

“Mart” programs for brownfields property marketing.

Area-wide Brownfields Programs

Brownfield redevelopment should be a key component to thoughtful revitalization and can support good planning efforts. A shotgun, opportunistic approach to brownfields redevelopment can be effective in adding to the tax base and improving individual sites. However, the impact of brownfields redevelopment can be multiplied if a concerted effort is made to address multiple sites in a priority neighborhood. NJ DEP has recognized the value of this approach through the establishment of the Brownfield Development Area (BDA) program. Trenton has had two priority neighborhoods designated as BDAs, the Magic Marker BDA and the Assunpink Greenway BDA, making these sites eligible for additional state funds. In addition to these two State-designated areas, the US EPA has provided a \$200,000 grant to Isles, Inc. for the East Trenton Community as a Brownfields Area-Wide Planning Grant. This area overlaps somewhat with the Assunpink Greenway BDA. However, there are additional priority areas that would benefit from a comprehensive approach.

Recommendations:

- Focus on the redevelopment of the waterfront as a means of revitalizing the urban areas, a technique recognized and promoted by the Urban Land Institute.
- Build upon the train station renovation to spur development in the neighborhood surrounding the station.
- Continue the focus on the downtown and the Canal Banks area.

- Conduct a demand survey to determine what the market will support and what the community needs.
- Work toward the extension of the light rail into the downtown area to stimulate spinoff development and reduce the need for parking.
- Encourage the reuse of surface parking lots as mixed-use development with structured parking.
- Identify and prioritize specific problem sites which cause blight in Trenton’s neighborhoods.
- Identify the highest and best use of properties, and advocate for smart growth and green buildings. These should be incorporated into the design guidelines of each redevelopment area.



Regulatory Matters

As a leader in local municipal brownfields, Trenton has taken an active role in advocating for municipalities as the State of New Jersey has transitioned to a licensed site remedial professional (LSRP) program under the Site Remediation Reform Act (SRRA). This program removes the Voluntary Cleanup

Program around which Trenton's brownfield program was founded, and replaces it with a private-sector led compliance program with mandatory timeframes for completing cleanups. In 2010 BEST presented a White Paper to the NJ DEP, detailing our concerns with the chilling effect we predicted this program would have on municipal brownfield programs. As a result of this work, DEP inserted clarification language that asserted the rights of a municipality as protected under the Spill Act as a non-responsible party, and exempted such parties from the mandatory compliance timeframes. In addition, DEP allowed for non-responsible parties to declare inactive status during the remediation period. If no active remediation is occurring, such parties are able to claim exemption from annual fee requirements.

However, problems with the program continue to plague the Trenton brownfields program, including difficulties with complying with the intent of the LSRP requirements while adhering to State procurement requirements; the lack of a mediator to determine disagreements between the city and the LSRP over technical issues; increased oversight by EPA for grant funded projects, which delays these projects and results in additional work to comply with federal QAQC requirements; concern when projects reach a new stage and have to be re-bid, that a new LSRP may decide they cannot rely on work done by a prior LSRP, thus creating additional work, expense, and delay; and high fees that are charged regularly on properties that have no source of revenue. To advocate for change, the BEST Committee developed the policy paper discussed in Section 3.0.

Recommendations:

- Continue to advocate for changes to the program to benefit municipal programs, to include the addition of a mediator at NJDEP and waiving of fees in certain instances.
- Continue to nurture a group of like-minded municipalities to form a committee to press for change in the program.
- Continue to follow regulatory changes and evaluate the impacts these have on Trenton Brownfields Program, and serve as a voice for change.

6.0 Five-Year Outlook



Assumpink Daylighting Project as construction begins

In light of a new incoming administration in Trenton, the following is the vision of the BEST Advisory Council and for the Trenton Brownfields Program for the next five years:

- Continued role as a catalyst for Brownfields redevelopment.
- Continued role as a champion for innovative solutions.
- Continued role as a forum for multi-stakeholder views.
- Continued role as a voice for the municipal perspective of regulatory oversight.
- Continued support of the program by the State of New Jersey.
- Continued high-level commitment to Trenton's brownfield goals by the Mayor and City Council.
- Sustained financial support from various sources, including from federal and state agencies and from a line item for the program in the city's annual budget.
- Continued active involvement of community leaders and neighborhood residents.

- Expanded partnerships among stakeholders in the public and private sectors.
- Continued staffing of the Brownfields Coordinator supported by consultants.
- Continued leveraging of federal and state brownfield initiatives for restoration projects.
- Development of a balanced portfolio of commercial, industrial, and residential brownfield redevelopment projects.
- Development of program matrices to showcase the positive impact the Trenton Brownfield program has had over the past 25 years.

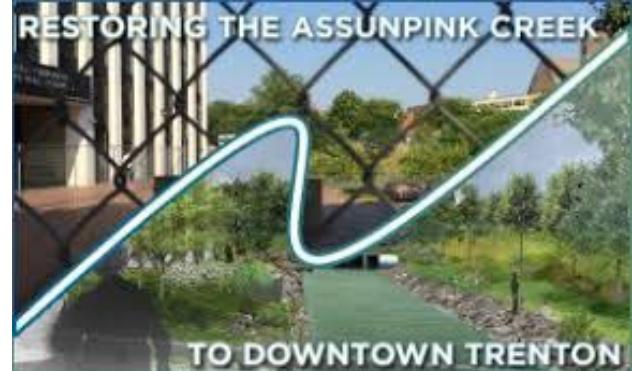
Sites for the Future

The City of Trenton's Brownfields Inventory currently includes about 23 active sites and about 15 additional sites that are either new, pending or may require additional work. These, and other, sites have been prioritized to meet the Brownfields Program requirements and the requirements for Sustainable Jersey compliance. Some of the important sites that the program will be concentrating on include:

- **Former New Method Cleaners** – this highly contaminated site on Prospect Street contains significant contamination to soil and groundwater by tetrachloroethylene (PCE) from historic dry cleaning operations. This site will require new funding from state HDSRF grants and USEPA Cleanup grants. Both the USEPA and NJDEP have assisted the City in monitoring for potential environmental issues associated with this site.

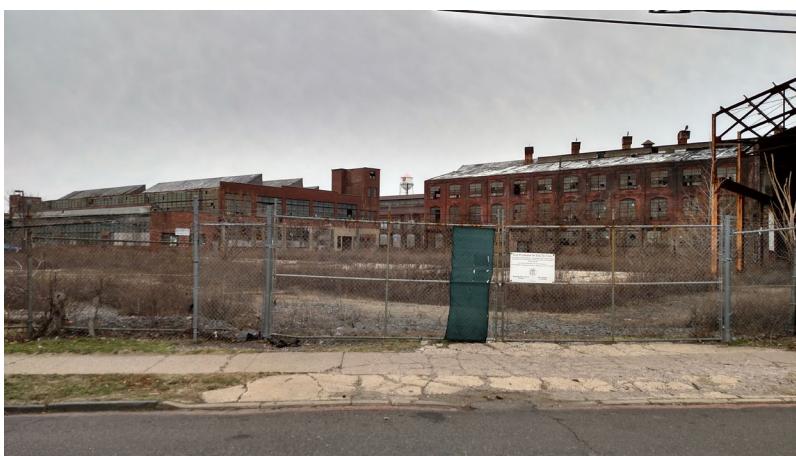
- **Roebling Block 2** – this next phase of brownfields redevelopment in the Roebling Complex Redevelopment Area contains seven historic buildings on approximately seven acres that offers a great opportunity for mixed use development, job creation and loft-style residential redevelopment. The Brownfields Program expects to conduct additional site characterization and hotspot remediation in 2018 and 2019. We are ready to assist in marketing efforts now in the form of a Request for Expression of Interest and Request for Proposal for redevelopment.

- **Assunpink Greenway sites** – this long-term open space project has made substantial progress but requires additional work at several key sites. New state



HDSRF grants have been applied for or received to complete remediation at the former Clinton Commerce Center and Storcella sites (Nottingham Way), the Freightyards and Powerhouse (North Olden Ave.) and the Fischer site (Hart Ave.). Funds are also in escrow to start cleanup on the Amtico site (Amtico Square) as soon as the site can be acquired. 104-108 Taylor St. is a key site where fire-damaged buildings were recently demolished with assistance from a FEMA grant. This site requires a comprehensive site investigation and community planning before we can design a formal plan for redevelopment for open space.

- **Assunpink Daylighting Project** – After 19 years of obstacles in design, permitting, funding and threatened litigation, this project has finally been implemented and is scheduled for completion in 2018. The Brownfields Program negotiated a \$3.2M supplemental grant from NJDEP to fund the funding gap estimated by the U.S. Army Corps of Engineers. We continue to negotiate with NJDEP to provide funding for additional park design and construction. USEPA has already provided free technical assistance to create a 30% conceptual design of a new park.



Roebling Block 2

7.0 Conclusion



A rendering of the completed Assunpink Daylighting Project

The City of Trenton is a leader in municipal brownfields revitalization. With continued support of the City's leadership, the Trenton Brownfields Program will continue to support the City of Trenton's redevelopment goals. To continue to receive the support that it needs, the Brownfields Program will continue to demonstrate leadership, provide integrated technical and project management, achieve and measure success, and meet its short-term to long-term programmatic goals. This Brownfields Program Action Plan has highlighted the accomplishments of the program to date and has provided recommendations from the BEST Advisory Council that will encourage the program to continue to grow and prosper in the future.

Attachment 1

TRENTON BROWNFIELDS PROGRAM KEY MILESTONES

- 1995 Initial EPA Brownfield Assessment Demonstration Pilot Grant
- 1997 Initial Brownfield Cleanup Revolving Loan Fund (BCRLF) grant award from EPA
- 1998 Trenton hires the first full-time Brownfields Coordinator
- 1998 EPA Brownfield Showcase Award Designation
- 1999 Supplemental BCRLF Grant (increasing to \$1M)
- 1999 Assignment of a full-time EPA/Trenton Brownfields Coordinator under Intergovernmental Personnel Act
- 1999 Phoenix Award: Waterfront Park
- 2000 Supplemental BCRLF Grant
- 2000 EPA Brownfield Assessment Supplemental Award
- 2001 UST Field Demonstrations Pilot, EPA
- 2001 ICMA Best Practices Selection
- 2001 NJDEP Environmental Excellence Award
- 2001 Phoenix Community Impact Award: Crane Site
- 2002 Roebling redevelopment selected to be part of Fit Cities Exhibit at the Winter Olympics
- 2002 Phoenix Award: Marriott hotel redevelopment project
- 2002 NJDEP Brownfield Development Area pilot
- 2003 Magic Marker one of first state-designated Brownfield Development Areas in New Jersey
- 2003 Regional Planning Partnership Award
- 2003 EPA Brownfield Assessment Grant
- 2003 EPA Brownfield Cleanup Grants: Magic Marker, Fischer, and Freightyards sites
- 2003 Designation of Magic Marker neighborhood as a National Environmental Justice Community
- 2004 Phoenix Community Impact Award for Battle Monument Area
- 2004 EPA Cleanup Grant for Oxford Street Site
- 2004 Repayment of Warren Balderston Brownfields Cleanup Revolving Loan Fund loan

- 2005 EPA Cleanup Grants for the Pukala and Canal Plaza sites
- 2006 EPA Cleanup Grant for the Thropp site
- 2006 Received grant funds to complete remediation at Magic Marker site
- 2007 Award of additional \$1 million for EPA BCRLF (total award: \$2M)
- 2007 Completed cleanup at the Magic Marker site and received No Further Action Letter
- 2007 Received funding for the restoration of the drainage swale at Magic Marker
- 2007 Received funding for the cleanup at Crescent Wire
- 2008 Received funding for additional Assessment of gas station sites
- 2008 Began construction of 22 residences at Canal Plaza site (completed 2009)
- 2009 Began construction of Catherine S. Graham project of 42 residences at Magic Marker site (completed 2010)
- 2009 Phoenix Award: Hutchinson Worldwide (three sites, including Aratex, Lewis Brothers Ceramics, and Mercer Bus Garage)
- 2010 EPA Grant Cleanup Grants for the Greg Grant Park, Storcella, and 678 North Clinton Avenue sites
- 2011 EPA Cleanup Grants for Clinton Commerce Center and Pattern Machine and Foundry
- 2011 EPA Assessment Grants for Hazardous Substances, Petroleum, and Federated Metals
- 2011 Phoenix Award: Magic Marker site
- 2013 Brownfields Coordinator received a Brownfields Leadership Award from NALGEP
- 2013 EPA Cleanup Grant for Scarpati
- 2015 Phoenix Award: Greg Grant/East Trenton Homes
- 2016 NJ Future Smart Growth Award: Capitol City Farm
- 2017 EPA Cleanup Grant for Federated Metals
- 2017 EPA Region 2 Environmental Champion Award
- 2018 NJ Future Smart Growth Award: Roebling Lofts (Block 3)

Attachment 2

FUNDS LEVERAGED BY THE TRENTON BROWNFIELDS PROGRAM

EPA Assessment Demonstration Pilot 1995		\$ 200,000
EPA Showcase Pilot 1998		\$ 300,000
EPA Assessment Supplemental 2000		\$ 300,000
IPA Supplemental 2002		\$ 120,000
EPA Cleanup Grants 2003		\$ 600,000
EPA Cleanup Grant 2004		\$ 200,000
EPA Assessment Grant 2003		\$ 400,000
EPA Cleanup Grants 2005		\$ 400,000
EPA Cleanup Grant 2006		\$ 200,000
EPA Care Grant		\$ 100,000
EPA Petroleum Assessment Grant 2007		\$ 200,000
EPA Cleanup Grants 2010		\$ 500,000
EPA Cleanup Grants 2011		\$ 400,000
EPA Assessment Grants 2011		\$ 600,000
EPA Cleanup Grant 2012		\$ 200,000
EPA Brownfields Cleanup Revolving Loan Fund 1998, 1999		\$ 1,000,000
EPA Brownfields Cleanup Revolving Loan Fund 2007		\$ 1,000,000
EPA cleanup Grant 2017		\$ 200,000
EPA UST Fields Grant		\$ 100,000
EPA Smart Growth Brownfields Grant		\$ 45,000
US EDA Flood Study		\$ 40,000
US EDA Construction Grant		\$ 6,093,115
US EDA Planning Grants		\$ 159,154
NJ HDSRF Grants		\$ 10,822,670
NJ Redevelopment Authority		\$ 289,000
NJDEP Non-Point Source Grants Petty's Run		\$ 1,473,563
NJDEP Non-Point Source Grant: Crescent Wire		\$ 175,000
NJDEP Green Acres Acquisition Grants		\$ 3,900,000
NJDEP Green Acres Redevelopment Grants		\$ 5,367,750
NJDEP Non-Point Source Grants Lower Assunpink		\$ 3,200,000
US Army Corps of Engineers		\$ 10,000,000
Total Grant Funds		\$ 48,585,252

Attachment 3

SELECTED PUBLICATIONS AND PRESENTATIONS REGARDING THE TRENTON BROWNFIELDS PROGRAM

The Trenton Brownfields Program is a model of successful brownfield programs locally, nationally, and internationally. Samples of the presentations which have highlighted Trenton's brownfield program are listed below:

Technical Papers/Magazine Articles

Capasso, J. featured in: Regional Report – Tristates: people, by Steve Dwyer; Brownfields Renewal Magazine, v. 14, issue 3; June- July 2010.

Capasso, J. and Opper, R., Application of the U.S. Sustainable Management Approaches and Revitalization Tools - electronic Re- source (SMARTe), Cabernet – The International Conference on Managing Urban Land, Belfast, UK, April 13-15, 2005.

Librizzi, William, and James Mack and Leah Yasenchak, "An Innovative Approach to the Characterization of Brownfields Properties." ECOSUD Conference Proceedings; June, 2003.

Pressing for Change: The Ongoing Impact of Brownfields Remediation in Trenton, NJ League of Municipalities Magazine, April 2001 Smith, Terri and Yasenchak, Leah. "USTFields – An Innovative Approach to Reuse." Brownfields News. Vol 6, No 4. Chicago: (July/August, 2002) p.18.

Trenton's Brownfields Program – A Key Component of Trenton's Revitalization Strategy, Mercer Business Magazine, September 2005.

Yasenchak, Leah Benedict. "What We Know about the Ubiquitous Brownfield: A Case Study of Two New Jersey Cities and Their Gas Stations." Environmental Practice 11(3) September, 2009.

Yasenchak, Leah and Michele Christina. "Grants: One Piece of the Puzzle." Brownfield News, Volume 9, Issue 1, February, 2005. Yasenchak, Leah and Renee P. Killian. "Trenton: Making a Capital Comeback." The Trenton Times, Downtowner March 2002, pp.10+.

Yasenchak, Leah and Renee P. Killian. "Trenton Stages a Capital Comeback." New Jersey Municipalities. Vol 79, No 3, March, 2002.

Publications – Contributors/Authors

LNAPL Site Management: LCSM Evolution, Decision Process and Remedial Technologies; Interstate Technology & Regulatory Council (ITRC) LNAPL Team; March 2018.

Petroleum Vapor Intrusion (web-based technical document), Interstate Technology & Regulatory Council (ITRC) Petroleum Vapor Intrusion Team, October, 2014.

Development of Performance Specifications for Solidification/Stabilization, Technical Document ITRC Solidification Stabilization Team, July 2011.

An Overview of Land Use Control Management Systems, Technology Overview, ITRC, ITRC Brownfields Team, December 2008 "Brownfields / Community Redevelopment, Trenton NJ." Best Practices. ICMA University: Newport RI, April 26-28, 2001.

National Association of Local Government Environmental Professionals (NALGEP)., Lessons Learned from NALGEP's Brownfield Grants Task Force., May 2008.

Property Revitalization – Lessons Learned from BRAC and Brownfields, Technology Overview, ITRC Brownfields Team, January 2006.

Unlocking Brownfields – Keys to Community Revitalization, National Association of Local Government Environmental Professionals (NALGEP)/Northeast-Midwest Institute, 2004.

Vapor Intrusion Issues at Brownfield Sites, Background Document, ITRC Brownfields Team, December 2003.

Recycling America's Gas Stations – The Value and Promise of Revitalizing Petroleum Contaminated Properties, Northeast-Midwest Institute/NALGEP, 2002.

Presentations

First Timers Presentation; USEPA Brownfields Conference, Pittsburgh PA; December 2017.

Roebling Block 2 site; NJ Interagency Work Group Meeting; June 22, 2017.

Trenton Brownfields Program as Example for Redevelopment Support, Emerging Issues in Brownfields; Rutgers Eco Complex; October 18, 2016.

Capitol City Farm Project; Agriculture in the City Conference, Rutgers University; March 13, 2015.

Trenton Brownfields Program: 20 Years Transforming Contaminated Properties into Productive Uses, Rutgers University; April 2014.

Transforming Contaminated Properties into new Productive Uses and the Future of Brownfields Development; Keynote Address at NJIT Brownfields Conference (October 11, 2011); Funding and Financing the Redevelopment of the Brownfields: Finding Resources in these Challenging Economic Times.

SRRA: Impact on Municipal Brownfields Programs at Brownfields: Emerging Issues in Redevelopment; Rutgers University, New Brunswick. October 4, 2011.

Magic Marker site, 2011 Phoenix Award (Region 2), Brownfields 2011, Philadelphia, April 2011 Regenerative Design Conference, "Redevelopment on Brownfields." Morrisville, NJ, June 18, 2010 Brownfields – Measuring Success, Brownfields 2010, New Orleans, November 2009.

Hutchinson Industries, 2008 Phoenix Award (Region 2), Brownfields 2010, New Orleans, November 2009.

Hutchinson Industries, Trenton Small Business Week, October 2009.

How Community and Local Government work with State and Federal Partners in Brownfields Redevelopment, Magic Marker Case Study, Camden Empowerment Zone Brownfields Forum, Camden, NJ, June 2009.

How Community and Local Government work with State and Federal Partners in Brownfields Redevelopment - Magic Marker Case Study, April 2009.

2009 National Planning Conference "Restoring Open Space in Urban Settings: A Case Study of the Creation of the Assumpink Creek Greenway, Trenton, NJ" Minneapolis, MN, April 26, 2009.

Brownfields 2009, "Creation of the Assumpink Creek Greenway in Trenton, NJ" New Orleans, LA; November 18, 2009.

"Restoring Open Space in Urban Settings: A Case Study of the Creation of the Assumpink Creek Greenway, Trenton, NJ" April 23, 2009.

Environmental Justice in New Jersey Symposium "A Case Study of the Creation of the Assumpink Creek Greenway, Trenton, NJ" TCNJ, March 17, 2009.

Land Trust Rally, "A Case Study of the Creation of the Assumpink Creek Greenway in Trenton, NJ" New Brunswick, NJ, March 7, 2009.

Trenton's Brownfield Program, Leadership Trenton, January 2009.

Brownfields – Local Government Role, NJ Department of Community Affairs, November 2008.

Trenton's Brownfield Successes - Presentation to the Brownfield Environmental Solutions for Trenton (BEST) Advisory Committee, October 15, 2008.

Trenton's Brownfields Development Areas, NJDEP Municipal Roundtable Session, Camden, NJ, September 9, 2008.

Land Use Controls and Long-Term Stewardship – Municipal Experience, Brownfields 2008, Detroit, May 5, 2008 Brownfields – Local Government Role, Leadership Trenton, January 2008.

Brownfields – Local Government Role, December 2007 Leadership Trenton, January 2007.

Building Strong Neighborhoods: Brownfields Redevelopment in Undercapitalized Communities conference, " Who can help? Working with the Private Sector" Trenton NJ, December 10, 2007 How to Work with Consultants, NJDEP, June 2006.

Environmental Requirements for Business, Trenton Small Business Week, Trenton, NJ 2005.

Application of the U.S. SMARTe Resource - Preliminary Beta Test, Cabernet 2005, Belfast, UK, April 2005.

User-Specific Tools for Sustainable Brownfield Development Projects in USA providing information on Planning, Funding and Communication (Smarted = Sustainable Management Approaches and Revitalization Tools), US-German Bilateral Working Group. Berlin, Germany, April 19, 2005.

Case Study: Sustainable Development Obstacles and Solutions, Magic Marker Site - Trenton, New Jersey, US-German Bilateral Working Group Meeting, Washington, D.C., December 2004.

The City of Trenton's Brownfields Program and the Battle Monument Area-Wide Brownfields Redevelopment, 2004 Phoenix Award (Community Impact), Mid-Atlantic Sustainability Conference 2004.

Inventory of Gas Stations in Urban Areas, Brownfields 2004 - St. Louis, Missouri.

Battle Monument Area-Wide Brownfields Redevelopment, 2004 Phoenix Award (Community Impact), Brownfields 2004, St. Louis, MO.

Trenton's Brownfields Program, New Jersey Brownfields Task Force - February 2004.

Data Day "Trenton Brownfield Inventories" Perth Amboy, NJ, June 22, 2004.

Citizen Participation and Empowerment, US-German Bilateral Working Group, Leipzig, Germany, June, 2004.

Examples of Interim Use in Trenton, New Jersey, US-German Bilateral Working Group, Leipzig, Germany, June 2004.

How Community and Local Government Work with NJDEP: Magic Marker Case Study, NJDEP, Trenton, NJ, July 27, 2004.

Mid-Atlantic Sustainability Conference "Trenton Brownfields" September 30, 2004.

Reusing Gas Stations, Brownfields 2003, Portland, Oregon Life After the Grant: A Trenton Case Study, November 2003.

Trenton's Approach to Brownfields Redevelopment, Leadership Trenton, 2003.

Trenton's Approach to Brownfields Redevelopment, DVRPC: Building from Strength, Strategies for Older Suburbs and Boroughs, April 30, 2002.

"Trenton's Approach to Brownfields Redevelopment" Brownfields 2002 Conference, May 16, 2002 US German bilateral group "Assunpink Greenway Case Study" May 15, 2002.

Trenton case study and exhibit presentation at Deal Flow conference, June 6, 2002.

ITRC US/German Bilateral Working Group, "Trenton's Approach to Brownfields Redevelopment" November 12, 2002.

2001 FitCities Exhibit at the Salt Lake City Olympics on Trenton Brownfields.

ICMA Best Practices University; "Trenton Brownfields Program" April 2001 Providence, RI .

Reusing Brownfields for Housing – A New Frontier, Brownfields 2000, Atlantic City, NJ.

Presentation on Roebling redevelopment at The 5th International Symposium on Environmental Contamination and Remediation in Central and Eastern Europe; Prague September 12, 2000.

Attachment 4

SELECTED BROWNFIELD REDEVELOPMENT PROJECTS IN TRENTON



Before: Magic Marker site

Magic Marker Redevelopment Area

The cornerstone of this neighborhood is a 7-acre brownfield site whose redevelopment is the galvanizing point of the neighborhood. This community-driven effort has resulted in the remediation of a 4.4-acre portion of the site for housing, funding for the installation of new public streets, and funding for the restoration of the stream on the remaining three acres. In 2009, the construction of 42 market-rate townhomes began. Construction was completed by 2010-2011.

The Magic Marker site has been the subject of combined multi-stakeholder efforts to redevelop this site since the late 1980s. For some, the struggle began as far back as the early 1950s, when those migrating from the south were largely segregated into specific neighborhoods as was the case around National Battery, a 7-acre lead-acid battery manufacturing plant.

Community efforts to revitalize the site began soon after the Magic Marker plant shut down in 1989: Isles, Inc., a local non-profit organization concerned about community health, worked with the local community to call attention to the blight, inherent dangers and potential health threats. The partnership between Isles and local concerned citizens, and their subsequent outreach efforts, drew the attention of the local, state and federal governments. In 1992, the NJDEP conducted the first investigation, identifying lead and many other contaminants in soil, surface water, groundwater and sediments.

The Northwest Community Improvement Association was formed in 1995 and mobilized additional residents in the local area, conducting monthly meetings to address issues and monitor progress. The resulting community, local government, state and federal governmental partnership formed by this time maintained significant momentum, raised awareness and conducted community outreach programs with the goal of educating and empowering the community. The City of Trenton foreclosed on the site in 1997, for site control and to ultimately allow for significant state and federal resources to be accessed for assessment, investigation and remediation. The City engaged with community to plan for the future development of the site, resulting in a community-based plan for redevelopment for residential and open space. The site gained a national reputation.



After: 42 Units of Mixed-income Townhouses

From 2002 to 2008, the City of Trenton managed the remediation of the site, especially since a Chapter 11 bankruptcy filing relieved Exide, the last viable responsible party (RP), of its liability. In 2003, the neighborhood was designated as a USEPA Environmental Justice Community, and also designated as one of the first Brownfields Development Areas by the NJDEP. Over a 15-month period starting in late 2004, three phases of soil excavation and disposal removed 18,000 tons of contaminated soil, mostly as hazardous waste due to soluble lead impact. The NJDEP issued a No Further Action letter allowing for unrestricted use of the site in 2007. A total of \$3.1 million was spent on remediation of the portion of the site designated for residential development. Over \$3.6 million was spent in total, including prior demolition events, assessments and investigations. In addition to Magic Marker, a total of 8,213 tons of contaminated soil and sediment were excavated and disposed from the swale and adjacent floodway as part of the adjacent stream restoration project.

There were many challenges associated with this site: land acquisition; redevelopment planning; remediation funding; regulatory compliance; and construction issues. The greatest challenge was accumulating sufficient remediation funding. Funding from numerous sources were used for this project: two USEPA BCRLF loans (\$575,000); USEPA Cleanup grant (\$200,000); three New Jersey HDSRF grants (>\$222,000); a NJ HDSRF Cleanup Grant (\$2,522,651); capital funds (>\$400,000) and 319H grant funds (\$1,370,000). Designation of the site as a “Brownfields Development Area” by the State of New Jersey allowed for the final grant of over \$2.5 million for hazardous soil disposal.

This project ultimately resulted in the construction of 42 new mixed-income residences on 4.4 acres of land meeting stringent state residential soil cleanup criteria (Catherine S. Graham Square). Approximately 2 acres of clean, revegetated open space and floodway was created that will reduce local flooding by increasing the holding capacity of a new, well-designed Petty's Run. Total project costs for construction (\$11.52M), remediation (\$3.65M) and stream restoration (\$1.37M) totaled \$16,540,000. The economic development created by the project is further enhanced by new tax ratables for the 44 new houses. The site won the USEPA Region 2 Phoenix Award in 2011. As part of this long process, we recognized the value of partnerships, and how the motivation of local residents in a low-income neighborhood can generate momentum that can accomplish great things. The events that led to the cleanup and redevelopment of this site provide an excellent case study in patience and perseverance. The partnership between community and local, state and federal government agencies made a lasting and positive difference.



Before: Thropp Brothers Machine Shop

park that was partially obscured by the abandoned homes and a magnet for criminal activities. By working with the East Trenton Collaborative, the City of Trenton formed a valuable partnership with Martin House-BCTC; CityWorks; Isles Inc.; Habitat for Humanity – Trenton Area; and HomeFront, non-profit organizations that work closely with the community. Together the city and the nonprofits were able to jointly redevelop the former Thropp site and the derelict park / housing sites. Working with the State, the city secured approval to remove the existing park and replace it with a larger park on the former Thropp site; allowing for the demolition of the derelict housing and construction of a significant new housing development to include the former park property. This set the stage for a large new state of the art recreational center, complete with play- grounds for differing age levels, a picnic pavilion and restroom, a spray pool that also serves as an amphitheater, basketball courts, park lighting and an 'iconic' park sign. These features combined with extensive landscaping, large open lawn areas and a pathway system allowing for easy access to PJ Hill elementary school provide for a much broader range of active and passive recreational opportunities then were previously available. Funding was committed through the NJ Green Acres program, the NJ HDSRF program, two separate EPA cleanup grants, EPA assessment grant funds, NJHMFA, and Mercer County Open Space.

Greg Grant Park/East State Street Homes:

The Greg Grant Park and East State Street Homes sites have been the subject of redevelopment efforts among many stakeholders and community members for years. Historic site operations at the former Thropp Brothers Machine Shop dated prior to 1890. The site was abandoned and the city foreclosed on it in 1988. The site lies in a particularly distressed area in Trenton, next to an elementary school and directly across the street from vacant homes and a small city



After: Greg Grant Park

Community efforts to revitalize the neighborhood, and these sites in particular began when the Martin House/Better Community Housing of Trenton (BCHT), a non-profit group with a successful track record of providing safe, clean affordable housing in Trenton, proposed low-income housing as an end use for the redevelopment of the site. The former Greg Grant Park site is located in the State Street Redevelopment Area, a redevelopment area established under the State of New Jersey's Redevelopment and Housing Law, and was a large part of BCHT's campaign of "100 Homes for 100 Families."

Attachment 5

CITY OF TRENTON BROWNFIELD PROPERTIES

CITY BROWNFIELDS PROPERTIES		Site Status				Type of Use								Development status	Environmental Status		
		Acreage	Acreage Developed	Being Developed			Open Space		Residential		Retail	Mixed	Commerce.	Industrial	Public		
Site Name	Address			No. developed	No. NFRAP	NFA, RAO	Acres	No. of Projects	No. of Units	No. of Projects							
Addiction Science Center	250 N. Broad St.	1.45	1.45	1											1	Developed - City Health Dept.	NFA - DN
Amtico	3 Amtico Sq.	2.7														Acquisition for Greenway in progress	PA/Sl and partial RI completed. EC&IC req.
Aratex	250 Ewing St.	2.58	2.58	1											1	Developed - Hutchinson Ind.	NFA with DN
Arena Parking	104 Hamilton	0.3														Interim surface parking or light rail???	PA; NFRAP
Midak (Former)	Hamilton Ave.	0.6														vacant industrial building	PA; Deed notice placed by former owner
Arena Parking (Nucera)	S. Broad St.	0.5	0.5											1		part of NJ Assoc. of Realtors site	PA; NFRAP; EC&IC by MCA?
Blakely Laundry	Brunswick	1.6	1.6	1					*	1						Developed - Monument Crossing	NFA
Canal Plaza	N. Broad St.	1.6	1.6	1			0.6	1	22	1						Developed - Canal Plaza	NFA Pending ???(DN required on open space)
Capital City Farm	N. Clinton Ave.	2.336	2.336	1			2.336	1								Developed - Urban Farm	RAO with EC & IC
Champale Brewery	Lamberton St.	2	2	1					84	1						Developed - residential	NFA
Champale Warehouse	Lamberton St.	3.5	3.5	1										1		Developed - warehouse	NFA-DN
Cheyney Flashing	Prospect St.	1.4														not acquired - remains industrial	DN required. Soil RI phase. NFRAP
Circle F	Chestnut Ave.	1.8	1.8	1					70	1						Developed for residential; Rehabbed	nfrap
Clinton Commerce Center	780 N. Clinton	9.64														planned for open space/recreation	RAW phase. EC &IC req.
Commons lot	E. Front St.	0.27	0.27	1									1			Developed - office	NFA - AOC
Cooper Pool Expansion	Union St.	1.5														remains as public pool	PA/Sl completed; NFRAP
Crane (including P&G Seafood)	Muirhead/Ott	9.95	9.95	1										1		Developed - Route 1 Ind. Park	NFA (most of site)-RA required (P&G)
Crescent Wire	200 N. Olden	2	2	1			2	1								Developed - Open Space	RA completed. NFA 2012
CV Hill (24 acres - 0.21 [res])	Pennington Ave.	24	24	1					52	1				1		Developed - industrial/residential	NFA-CEA
CV Hill Lot (Pennington Shp. Vill.)	Pennington Ave.	13	13	1									1			Developed - Commercial	NFA-DN
Father Rocco Park	Calhoun St.	7.3	7.3	1			7.3	1								Developed - Athletic Field	NFA pending
Federated Metals	Enterprise Ave.	4.65														Available after 2018-19 RI/RA	Additional RI/RA, EC & IC required
Ferry St. Mews I	Ferry St.	0.4	0.4	1					12	1						Developed	??? - nfrap
Ferry St. Mews II	Ferry St.	1														inactive	
Fire HQ	244 Perry St	1.94	1.94	1										1		Developed - Fire HQ	USTs removed - gw issue remains (Spill fnd)
Fischer	125 Hart Ave.	1.6														planned for open space/recreation	Additional RA required
former limo garage: 31 Morris	31 Morris Ave.	0.21														Available; demo required	PA/Sl required; possible UST; demo reqd.
former Palmere s/s: 678 N. Clinton	678 N. Clinton	0.06	0.06	1			0.06	1								Community Garden	remediated (RAO)
former ESSO s/s: 193 Brunswick	193 Brunswick	0.36														available - possible recreation space	Additional RI required (GW)
former s/s: 80 Oakland	80 Oakland	0.2														available	DN required
former s/s: 902 Calhoun	902 Calhoun	0.16														sold (auction) - not developed	NFA (UST); DN required (hist. fill)
former Texaco s/s: 700 Calhoun	700 Calhoun	0.29	0.29	1									1			sold (auction) - developed (auto)	DN required
former s/s: Front/Montgomery	168 Front St	0.3072	0.3072	1									1			sold -surface parking for adj. building	PA/geophysics - nfrap
former Gulf s/s: 502 MLK	502-504 MLK	0.2														available	PA. evidence of USTs; "Gulf Refining"
former s/s: 1011 S. Broad	1011 S. Broad St	0.2252														sold (auction) - not developed	PA/geophysics. NFRAP
former s/s: 421 Bridge St.	421 Bridge St.	0.09														available	NFA
former s/s: 364 Greenwood	364 Greenwood	0.1														in right-of-way	UST in ground???
former s/s: 398 N. Olden	398 N. Olden	0.1														vacant former s/s	active - publicly funded - RI complete
former s/s: 1225 E. State St.	1225 East State	0.2	0.2	1									1			sold (auction) - developed (auto)	PA/Sl. NFRAP
former s/s: N. Olden 302	302 N. Olden	0.05														vacant (planned for Assumpink G'way)	active - publicly funded - RI complete
former Johnson's Welding: 23 Garfield	23 Garfield	0.4	0.4	1										1		sold (auction) - developed (metal shop)	PA/Sl. NFRAP
S. Warren 102 (frmr. s/s)	102 S. Warren	0.13	0.13	1									1			Developed - commercial/office	NFA
S. Warren 110 (former Kwik-Kleen)	110 S. Warren	0.1														Sale/Development planned	RA in progress
Powerhouse	191 N. Olden Ave.	0.75														planned for open space/recreation	final EC&IC in progress
Freightyards	163 N. Olden Ave.	35														planned for open space/recreation	partial RI completed
George Page Park	Mulberry/Lawrence	5	5				5	1								Developed - Park	RA completed; soil permit and RAO needed
Glen Cairn Arms	301 W. State	0.95	0.95	1		0.95								1		Developed - Nursing School	NFRAP
Greg Grant Park (former)	831-929 E. State	1.7	1.7	1					32	1						Developed - Residential	NFA - DN/RAP

CITY BROWNFIELDS PROPERTIES		Site Status				Type of Use								Development status	Environmental Status		
		Acreage	Acreage Developed	Being Developed			Open Space		Residential		Retail	Mixed	Commerce.	Industrial	Public		
Site Name	Address			No. developed	No. NFRAP	NFA, RAO	Acres	No. of Projects	No. of Units	No. of Projects							
Hanover Place	W. Hanover/Willow	3.6														interim use (surface parking)	SI complete (no impacts found)
Head Start/Ringold (Monument Medical Arts)	N. Warren/Pennington	1.45														available	Transferred to SCC (DN; RI/RW phase??)
Hermitage Ave (230)	230 Hermitage	0.28	0.28	1											1	Developed - W. Ward Police Precinct.	RI phase for GW; DN required
Hermitage Plaza	213-223 S. Hermitage	0.34	0.34	1							1					Developed - Commercial	no known SI/RI after AOC NFA
Hetzl Field	140 N. Olden	9.28				9.28										Development in Progress (pool/fields)	expanded RI needed
Hollywood Auto	186-190 N. Olden	1.4														planned for open space/recreation	updated PA/SI/RI/RA in progress
Homeless Shelter	Perry St	0.34	0.34	1					17						1	Developed - Women's Shelter	DN
Hotel/Garage	Lafayette St	3.0842	3.0842	1								1				Developed - sold	CEA/DN - vapor inv. Required
Kramer	637 N. Olden Ave.	6.5	6.5	1									1			Developed - Industrial (storage)	RA phase completed (DN req)
Lewis Bros. Ceramics (Hutchinson)	106 Mulberry	3.859	3.859	1									1			Developed (Hutchinson Ind.)	active - KCS
Light Rail (Camden & Amboy RR)		2	2	1										1		Developed - Light Rail Line	PA - NFRAP
Light Rail (100-102 Hamilton)	100-102 Hamilton	1.35	1.35	1										1		Developed - Light Rail Train Shed	PA - NFRAP
Light Rail (United NJ RR)		0.11	0.11	1										1		Developed - Light Rail Line	PA - NFRAP
Luzerne Rubber (Penninox)	Muirhead Ave.	3.3	3.3	1									1			Developed	NFA (1994) - DN
Magic Marker (4.4) + Louise Lane (?)	Calhoun St.	7.296	7.296	1			2.896	1	42	1						Residential Devel. 2009	NFA soil - GW mon. requirement
Massaro	186-190 N. Olden	2														planned for open space/recreation	updated PA/SI/RI/RA in progress
Mercer Bus Garage	1132 E. State	4.539	4.539	1									1			Developed - Industrial	RAO with RAP soil
Milner	102 N. Olden	1														planned for open space/recreation	EC & IC required
MLK (667)	667 MLK Blvd	0.13	0.13	1									1			Developed - comm/ind	NFA (AOC)
MLK-Jefferson School	MLK Blvd	9.63	9.63	1										1		Developed - School	NFA
Monument Crossing 1	N. Broad St	1.6	1.6	1				84	1							Developed (may be 1.6 to 1.9) check	NFA
Monument Crossing 2 (Block 41)	N. Broad St	0.845	0.845	1				*	1							Developed	NFA
Monument Crossing 2 (Block 42)	N. Broad St	0.75	0.75	1				*	1							Developed	NFA
National Ceramic	500 Southard St.	1.08														Foreclosed. Leased to Hutchinson	Existing gw impact. Probable CEA
New Method Cleaners	300 - 310 Prospect St.	1.6														Foreclosed ~2015. Vacant	RI/RW in progress (18)
Old Water Works 1	Calhoun St.	0.5	0.5	1				18	1							Developed	NFA
Old Water Works 2	Calhoun St.	0.5	0.5	1		0.5							1			developed - Clean Tex parking	NFA
Oxford Street (frmr Al's Autobody)	Oxford St	3.66														vacant; available	RI required (soil and GW)
Pattern Machine & Foundry	Third/Schenck	0.46														vacant; available	demo and RA in progress
Pennington (99)	99 Pennington	0.14	0.14	1			0.14	1								Redeveloped - open space	NFA - AOC (UST)
Princeton Commerce (frmr. Cordey China)	Enterprise Ave.	4.4														available - Industrial	RAO with E&IC
PSE&G Substation (N. Olden Ave.)	N. Olden	0.17														vacant	PA/SI completed. NFRAP
Pukala	121 Poplar	1														planned for open space/recreation	partial RA completed (2012)
Recycling Center	Brunswick Ave.	1.07														vacant	NFA - AOC
Roebling PAC	Hudson St.	0.931														available	EC&IC required
Roebling Block 2	S. Clinton/Mott	6.574														acquired ~2016, vacant	additional RI/RA required
Roebling Block 3	Clark St.	6.17			6.17											Development in progress (resid.)	RAO with EC&IC; bldg 104: RA required
Roebling Inv. Factory (Apex Warehouse)	Dye St.	1.159	1.159	1									1			available. Temporary lease	NFA
Roebling Market/HMFA	S. Clinton/Elmer	12.533	12.533	1								1				Developed - Commercial	Probable site-wide deed notice. Nfrap
Roebling Pellettieri Homes	S. Clinton/Elmer	0.85	0.85	1				69	1							Developed - Sr. housing	NFA
Scarpati (incl. former s/s)	26 Mulberry	2														planned for open space/recreation	PA/SI completed. Addl. RI/RA required
Schofield Cleaners (former)	1472 W. State St.	0.1354														foreclosed; vacant; available	UST removed. Case still open. PA/SI req.
Sinclair Terminal (former)	Calhoun @ Petty's Run	0.6														Flood prone - wetl. Restore.	SI completed. NFRAP
Storcella	21 Nottingham Way	2.18														planned for open space/recreation	RI complete. Hotspot RA with EC&IC (18)
Street Yard	Brunswick Ave.	1.64														City DPW yard.	RI required - gw; DN required
Starscreen Printing (former)	101 Mulberry	0.3064														foreclosed; vacant; available	PA/SI in progress (18)
Suds Brothers Cleaners (former)	W. Ingham Ave.	0.23					0.17									foreclosed; vacant; available	UST removed. Case still open. PA/SI req.
Sweeney	S. Broad/Dye	0.17														Land Swap w/HMFA in progress	NFA - DN

CITY BROWNFIELDS PROPERTIES		Site Status				Type of Use								Development status		Environmental Status	
		Acreage	Acreage Developed	Being Developed			Open Space		Residential		Retail	Mixed	Commerce.	Industrial	Public		
Site Name	Address			No. developed	No. NFRAP	NFA, RAO	Acres	No. of Projects	No. of Units	No. of Projects							
104 Taylor (former Stokes Rubber)	104-108 Taylor	4.8														planned for open space/recreation	PA/SI completed. Additional SI required
Thropp - Thropp Site (Greg Grant Pk.)	E. State St.	1.45	1.45	1			1.45	1								Developed - Open Space	RAO pending??
Thropp - V&S (Greg Grant Pk.)	E. State St.	1.1	1.1	1			1.1	1								Developed - Open Space	RAO pending??
Thropp - Standard Roofing (Greg Grant)	E. State St.	0.21	0.21	1			0.21	1								Developed - Open Space	RAO pending??
Trent House Square	New Market St.	11.3														interim use (surface parking)	RA required (hot spots)
Warren Balderston	Willow/Pennington	2.18	2.18	1					35	1						Developed - North Willow Green	NFA
Wellington - Mott St./Sunset Lamp	Jersey St?	2.9	2.9	1									1			Developed - Self Storage	nfrap
West Hanover (482)	482 W. Hanover	0.13														sold (auction) - vacant	NFA
WW Firehouse	W. State St.	1.5	1.5	1										1		Developed - public	NFA
WW Senior Center	Prospect St.	0.09	0.09	1										1		Developed - public	RI required - gw
Wilkins Parcel (Locust Hill cemetery)	Hart Ave.	0.5														existing open space for Greenway	possible historic fill
Youngs Rubber	Enterprise Ave.	6.338														available (ind.)	RAO with EC&IC
Zieger property	Prospect St.	2.95	2.95	1										1		Developed - School Board bldg.	RI/RAW required
Subtotals		296.39	159.28	55.00	0.00	17.07	23.09	11.00	537.00	14.00	2.00	2.00	8.00	10.00	13.00		
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OTHER BROWNFIELDS PROPERTIES																	
Roebling Block 1		8.68															Active - DN???
Sovereign Bank Arena		8.49	8.49	1				1						1		Sovereign Bank Arena	??? nfrap
Waterfront Park		13.85	13.85	1			13.85	1								Waterfront Park	??? nfrap
YMCA (Apex and County prop.)		8						1								planned for new YMCA	DN in progress - MCIA
Subtotals		39.02	22.34	2	0	0	13.85	3	0	0	0	0	0	0	1		
Totals for Trenton Brownfields program		335.4	181.6	57	59	17.1	36.9	12	537	14	2	2	8	10	14		
Average size		3													62		
Percentage of total land		6.99%	3.78%														

NFRAP = no further remedial action planned

EC/IC = engineering/institutional controls

*considered part of Monument Crossing (84 units total)