BAY STREET AREA MARKET ASSESSMENT AND REUSE PLAN

195 BAY STREET, ST. JOHNSBURY, VERMONT



MARCH 2023
U.S. EPA OFFICE OF BROWNFIELDS AND LAND REVITALIZATION (OBLR)
TECHNICAL ASSISTANCE

REGIONALLY DIRECTED TECHNICAL ASSISTANCE

This project was performed through regionally directed technical assistance provided by ICF, Vita Nuova LLC, and U.S. Environmental Protection Agency (EPA) Region 1 through the EPA Office of Brownfields and Land Revitalization (OBLR) Program.

The project was supported by the Town of St. Johnsbury, Vermont, and the Northeastern Vermont Development Association. Successful brownfields reuse and redevelopment often depends on early consideration of the range of potential future uses for each brownfield site. Local community priorities, market conditions, infrastructure availability, environmental contamination, public health issues, and local ordinances shape brownfield site reuse opportunities. Having this conceptual reuse plan and market assessment grounded in these local conditions will directly influence how that site is characterized, assessed, and cleaned up.



TA Recipient: Town of St. Johnsbury, VERMONT

Site Address: Bay Street Area including properties around 195 Bay Street, Saint Johnsbury, Vermont

Draft February 2023

Previous Grants:

CLEANUP GRANT(S)

Town of St. Johnsbury - BF00A01034, 1249 Main Street St. Johnsbury, VT 05819

ASSESSMENT GRANT(S)

Town of St. Johnsbury - BF96133401, 195 Bay Street St. Johnsbury, VT 05819 Northeastern Vermont Development Association – BF00A01042 Northeastern Vermont Development Association – BF00A00480

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PROJECT BACKGROUND AND SCOPE

The technical assistance (TA) team (ICF/Vita Nuova), in coordination with the Town of St. Johnsbury and the Northeastern Vermont Development Association (NVDA), developed conceptual design options and a market assessment for the Bay Street Project Area that will assist St. Johnsbury and NVDA in the next phase of redevelopment. The goal is to redevelop the corridor from its current vacant/dilapidated state into productive use that fits into the neighborhood context and move forward with brownfield revitalization activities and redevelopment of the Bay Street area.

The TA contractors reviewed its work during four webinars held with the Town of Saint Johnsbury and U.S. EPA Region 1 as described below.

- **Webinar Project Status Review (August 24, 2022):** This webinar focused on the Stakeholder Interview Overview, the Site Visit Summary, and a review of Opportunities and Constraints.
- Webinar 1 (September 22, 2022): The TA contractors presented a Summary of the Market, an
 update on Opportunity and Constraints, Developable and Buildable Area Constraints, and an
 analysis of FEMA Mapping
- Webinar 2 (October 20, 2022): The TA contractors presented the Constraints and Regulatory Requirements, Environmental Issues, Development Opportunities, Brownfield Conceptual Reuse Plan, and Future Considerations.
- Webinar 3 (November 29, 2022): Discussion and Response to Submitted Comments from the Conceptual Reuse Plan previously presented on October 20.

Electronic copies of each webinar presentation were previously provided to the Town and U.S. EPA. The final summary, analysis, and conceptual reuse plan are included in this report. Maps in AutoCAD format will be provided to the Town under separate cover.

The attachments provided with this report include the following:

- Attachment 1: Webinar #1 PowerPoint- Initial Findings: September 22, 2022
- Attachment 2: Webinar #2 PowerPoint- Market Assessment Overview and Initial Conceptual Plan: October 28, 2022
- Attachment 3: Webinar #3 PowerPoint- Response to Questions and Comments from the Initial Conceptual Plan: November 29, 2022
- Attachment 4: High Resolution .jpg of Site Plan, formatted 24"x 36"
- Attachment 5: LVRT Impact Analysis SE Group, December 13, 2022

EXECUTIVE SUMMARY

The Town of Saint Johnsbury, Vermont requested technical assistance (TA) from the U.S. Environmental Protection Agency (EPA) Office of Brownfields and Land Revitalization (OBLR) and EPA Region 1 to identify conceptual reuse options for the Bay Street Project Area adjacent to 195 Bay Street, Saint Johnsbury. The Bay Street Project Area site includes approximately 100.97 acres and 24 parcels of property. The Project Area is in an existing flood plain that is vulnerable to potentially more frequent and intense storm events that are forecasted for the Northeast.

The Project Area is characterized primarily by light industrial uses and a rail yard. It is located adjacent to the historic downtown with limited pedestrian and vehicle access. The Passumpsic River straddles the area on the east, and the Lamoille Valley River Trail (LVRT), a new 94-mile multi-use linear recreational trail connects to the site area. The Town and the Northeastern Vermont Development Association (NVDA) have been active in recent years to create a new trail called the Three Rivers Trail that connects the LVRT trail to the Downtown. These efforts are intended to capitalize on the thousands of new trail users expected to visit Downtown and create development opportunities on properties within the Project Area.

TA is intended to assist in developing a community consensus on how the area could be redeveloped given its history of industrial, riverfront, and rail use and its location in a flood plain and river corridor. Historical uses in the area have created known and suspected environmental conditions on many of the properties. While several of the properties have had environmental assessments completed and others have undergone remediation, many have no public record of any environmental assessment or cleanup activities.

The market research and stakeholder interviews conducted as part of the TA reinforced the importance of tourism and recreational activities to the Town and region. While winter sports including skiing, snowshoeing, snowmobiling, ice skating, and hockey continue to be an economic driver in the region, the use of trails for hiking and biking have increased significantly during non-winter months. The "Northeast Kingdom," a term used to describe northeastern Vermont, has become a key destination for trail and mountain biking, drawing locals, Vermont residents, and out of state visitors. The State of Vermont, the Town of St. Johnsbury, the NVDA, and other regional economic development organizations have identified the economic benefits resulting from these recreational activities. The Town understands the value of marketing the historic downtown to these recreational users and building infrastructure and amenities that create a user-friendly environment.

The TA team conducted a Site Reuse Analysis using the market information to identify potential uses, opportunities, and constraints associated with potential reuse scenarios. Based on the Site Reuse Analysis the TA team developed a Conceptual Brownfield Site Reuse Plan focusing on additional recreational trails, related infrastructure and amenities, and likely development opportunities in the Project Area. The Site Reuse Plan identified several regulatory requirements that may impact future development scenarios.

The Site Reuse Plan recognizes a need to create partnerships between the public and private sector including existing property owners, potential businesses, developers and utilities, the Vermont Agency of Transportation (VTrans) Rail Program and the Department of Environmental Conservation (DEC).

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Project Background

The Technical Assistance Scope of Work charged the TA Team to initially review existing information/documentation on the site area, to conduct interviews with key stakeholders, conduct a site visit, and use market information to identify potential uses and opportunities and constraints associated with potential reuse scenarios. These tasks and findings are summarized below resulting in a Brownfield Conceptual Site Reuse Plan.

Open communication and shared materials enabled the Technical Assistance Team to learn about the community and listen to stakeholders. The Town of Saint Johnsbury and the NVDA provided multiple reports and background information including, but not limited to:

- 1. Connecting Downtowns & Trails, University of VT Extension March 2019
- 2. LVRT Traffic Counter from 8/1/2015 to 9/4/2016
- 3. Area-Wide Assessment Bay Street Area, Stone Environmental, December 2011
- 4. Saint Johnsbury Riverfront Conceptual Access Study, GPI 2017
- 5. Limited Phase II Environmental Site Assessment Report, 483 Bay Street, January 2020
- 6. Saint Johnsbury Sportsplex Feasibility Study, Cognitive Edge, July 2018
- 7. Comprehensive Economic Development Strategy 2021-2025
- 8. Lamoille Valley Rail Trail Management Plan, VT Agency of Transportation, August 2022
- 9. Vermont Department of Tourism & Marketing Benchmark Study, 2017
- 10. LVRT Trail User Projections and Economic Impact Analysis, SE Group, Dec. 2022
- 11. LVRT Assessment Infographic Final Package, SE Group, Dec. 2022
- 12. NVDA access to Base Mapping

Saint Johnsbury Location and Access

Saint Johnsbury is located in Caledonia County in the "Northeast Kingdom" of Vermont. It is the largest town by population in the Northeast Kingdom and has long served as a commercial center for the region. It's 2020 population was 7,364 and encompasses approximately 36.8 sq. miles. The Town is situated at the confluence of the Passumpsic, Moose and Sleeper's Rivers at the heart of the Passumpsic River Basin, one of the largest of the upper Connecticut River Watershed.

The Town is located along Interstate I-91 and the northern terminus of Interstate I-93. In addition, U.S. Route 2, Route 2B and U.S. Route 5 serve the Town. Saint Johnsbury is located 40 miles south of the Canadian

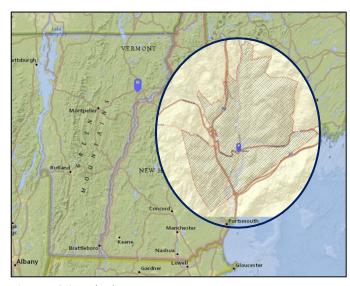


Figure 1: Saint Johnsbury, VT

border, 172 miles to Boston and 12 miles to the New Hampshire state border.

Parcel Identification

The Bay Street Area comprises 24 properties. Several are active light industrial or commercial businesses, others are vacant, some are town or state-owned, and one is an electrical substation. Together, the properties total 100.97 acres. The largest is 515 Bay Street at 11.9 acres. The list below numbers each parcel by address, ownership, acreage, and current use. Please note #16 in the table below has no numerical address, but the tax parcel number is 026-002-057-000.

Address	Owner	Acreage	Current Use	
Northern Parcels				
1. 25 Depot Street	D&D Holdings	.25 Acres	Vacant (Restaurant)	
2. 292 Bay St.	VT Rail	52.0 Acres	VT Rail Yard	
3. 256 Bay St.	FHS Holdings LLC	.16 Acres	Commercial warehouse	
4. 259 Bay St.	FHS Holdings LLC	1.32 Acres	Warehouse/retail	
5. 299 Bay St.	Green Mountain Power	9.6 Acres	Electrical Substation	
6. 145 Bay St.	FHS Holdings LLC	.27 Acres	Commercial warehouse	
7. 202 Bay St.	Zion Corp.	.98 Acres	Vacant Commercial Bldgs. (Proposed Hemp Processing)	
8. 195 Bay St.	Saint Johnsbury	.21 Acres	Trail Pavilion	
9. 136 Bay St.	Wild Blue Yonder LLC	.52 Acres	Commercial Warehouse	
10. 119 Bay St.	Waste Management	.32 Acres	Vacant Industrial Land	
11. Bay St.	Waste Management	.34 Acres	Vacant Industrial Land	
12. 258 Bay St.	FHS Holdings LLC	.07 Acres	Commercial Bldg.	
Southern Parcels				
13. Main St (LVRT Trail)	State of VT	3.3 Acres	Portion LVRT Trail	
14. Bay St.	Vermont Rail	2.7 Acres	Portion Vermont Rail Yard	
15. 799 Bay St. Ext.	Saint Johnsbury	5.3 Acres	Wastewater Treatment Plant	
16. Bay St.	Vermont Rail	2.5 Acres	Vermont Rail - Vacant	
17. 493 Main St	Saint Johnsbury	.32 Acres	Vacant -adjacent to LVRT Trail Head	
18. Bay St. Ext.	Saint Johnsbury	.47 Acres	Vacant	
19. 659 Bay St.	Bay St. LLC	4.0 Acres	Vacant	
20. 515 Bay St.	L&R Inc.	11.9 Acres	Portion Vacant Bldg. & Offices	
21. 521 Bay St.	Lumpsie LLC	1.4 Acres	Vacant Land	
22. 507 Bay St.	507 Bay St. LLC	1.91 Acres	Containers/Office/Shop	
23. 492 Bay St.	Bay St. Property LLC	.66 Acres	Storage/Warehouse	
24. 483 Bay St.	CN Brown Co.	.47 Acres	Vacant	

Brownfield mapping

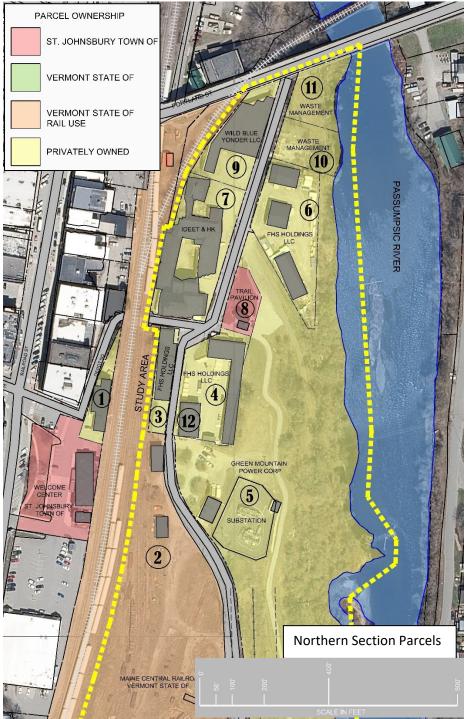


Figure 2: Brownfield mapping and ownership of northern parcels

Base mapping of the site was prepared using existing site information and publicly available geographic information system (GIS) data. Base maps of the parcels (northern section and southern section) are shown below.

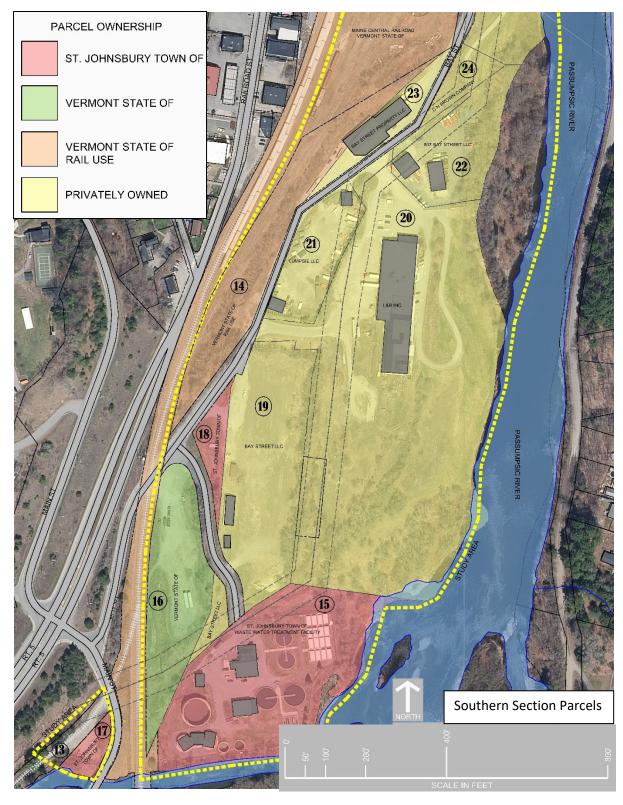


Figure 3: Brownfield mapping and ownership of southern parcels

Stakeholder/Community Engagement

The TA contractors spent significant time throughout the project to engage stakeholders from several sectors to identify and confirm the project boundaries, discuss area strengths and weaknesses, identify and discuss potential development constraints, and identify potential areas for site improvements. Community engagement was conducted through in person and online meetings, at a site tour that was held in July 2022 (see Attachment 2, site visit summary), and at an online meeting held in September 2022. Community input was used by the TA contractors to inform its site reuse planning. Stakeholders that participated in the community engagement process are listed below.

Organization	Stakeholder Market	Name
Developer	Developer	Josh Oakley
Real Estate	Developer	Tim Scott
Myer's - 507 Bay Street LLC	Economic Development	Nick Rivers
Northeastern Vermont Regional Hospital	Economic Development	Shawn Tester
St. Johnsbury Development Fund	Economic Development	Daniel Kimbell
Kingdom Taproom	Economic Development	James Murphy
Lumpsie LLC - 521 Bay Street	Economic Development	Bruce Ralston
Passumpsic Savings Bank	Economic Development	Jim Kitsch
State of Vermont	Local Official	Scott Beck
Vermont	Local Official	Tim Tierney
White and Burke, town consultant	Local Official	Stephanie Clarke
Northeastern Vermont Development Association (NVDA)	Local Official	Doug Morton
VT Transportation	Local Official	Kevin Clairmont
VT Transportation	Local Official	Mark Fitzgerald
St. Johnsbury, VT	Local Official	Tracy Zschau
Planning Commission Chair	Local Official	Jim Brown
Catamounts arts	Quality of Life	Jody Fried
St. Johnsbury Chamber of Commerce -	Quality of Life	Gillian Sewake

Figure 4: Community Stakeholders













Choosing Health

NORTHEASTERN VERMONT REGIONAL HOSPITAL





The highlights of the stakeholder engagement feedback is summarized in the table below.

Economic Development

Strengths:

- Proximity to Downtown Business District
- LVRT and River front access
- Potential synergy with the redevelopment of Ralston Mills
- Potential Tax Increment Financing district
- Political will and influence of key partners in the neighborhood

Constraints:

- Need better connection between downtown and Bay Street
- Public improvements to sidewalks, lighting, etc.
- Current industrial orientation is not appropriate for residential use
- Shortage of labor for building
- Difficult to attract professionals to area
- No public transportation

Local Government/Local Officials

Strengths:

- Potential synergy with the riverfront redevelopment
- Housing prices have increased
- Grand list growing modestly
- Grants and funding incentives available

Constraints:

- Struggle to get companies to locate in Bay Street
- Prime properties have issues to redevelopment
- Differences between state and local visions for redevelopment

<u>Developer/Real Estate</u>

Strengths:

- Potential synergy with the redevelopment LVRT and other investments in neighborhood
- Investments planned or underway
- Opportunity for multifamily, adaptive reuse
- Opportunity to improve pedestrian environment and connection to downtown

Constraints:

- Limited number of developers
- Lack of housing options single-family, apartments, multi-family, and condos.
- Vehicles dominant form of transportation

Quality of Life

Strengths:

- Art and culture have a large reach to other towns and are intertwined with community
- Health and Wellness
- Opportunity for more murals and performing arts
- Public art
- Recreation

Constraints:

- Conflict between cars and pedestrians
- Flooding
- Conflict between uses
- Lack of wayfinding

Market Assessment

A Market Assessment was completed to gain insight into market conditions, the market area, and the opportunities for brownfield site reuse. The information was shared with the local stakeholders on a webinar held on September 22, 2022. The following is a summary of the market research and analysis that was presented at the meeting.

The Market Assessment includes a high-level assessment of the real estate market within the Bay Street Area in Saint Johnsbury, VT. Key data includes demographic characteristics, commutation patterns, and employment trends relative to the 10, 20 and 30-minute drive times from the center of the Town of Saint Johnsbury. The market assessment also considers the preferred site boundaries that were discussed during the stakeholder engagement process. The preferred site boundaries include the Bay Street Area, generally defined as the known brownfield, vacant, and/or otherwise underutilized properties in and around Bay Street (located to the south and east of Downtown Saint Johnsbury). Finally, the Market Assessment considers the potential for increased tourism resulting from investments made by the State of Vermont, by the Town, and by the NVDA to he recreational trail system. Local stakeholders have the expectation that the improvements to the LVRT recreational trail, the completion of the LVRT and other ongoing trail improvements, may result in an increase of visitors to the area once the State-wide trail is completed.

Population

According to the U.S. Census Bureau, a ten-minute drive radius encompasses most of the Town of Saint Johnsbury. The population in 2020 was 7,364. The area has a median household income of \$43,256 and a median net worth of \$79,367. The population within a twenty-minute drive radius of the subject property was 18,414 in 2020. The twenty-minute drive radius has an 18% higher median household income of \$51,097 and significantly larger median net worth of \$140,043.

The population within a thirty-minute drive radius of the subject property was 36,280 in 2020, representing approximately 483% increase over the ten-minute drive radius. The thirty-minute drive radius has a similar median household and median net worth as the twenty-minute drive time radius.

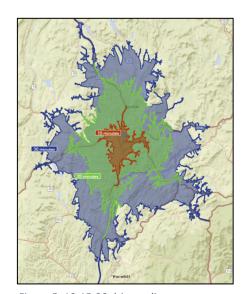


Figure 5: 10-15-20 drive radius

Key Facts within 10 Minute Drive



Income Facts within 10 Minute Drive



Key Facts within 20 Minute Drive



Income Facts within 20 Minute Drive



Key Facts within 30 Minute Drive



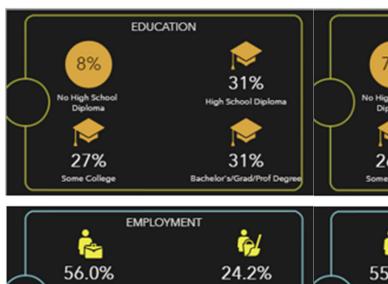
Income Facts within 30 Minute Drive

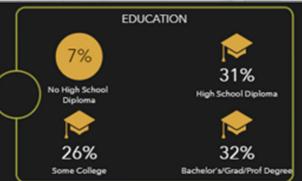


Educational Attainment

St. Johnsbury CDP

Caledonia County, VT

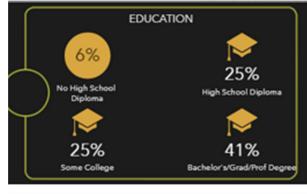


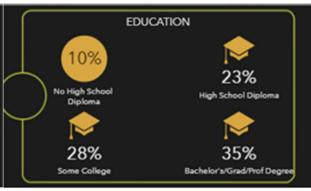






Vermont USA









Educational attainment is important to understanding workforce opportunities. A majority of the population age 25 and over in the Saint Johnsbury Census Designated Place (CDP) have a high school diploma or GED. An estimated 31% of the population within Saint Johnsbury CDP has some college education or has achieved an associate degree or higher. Within Caledonia County, the percentage of the population age 25 and over that has some college education or higher is 32%. The percentage of college participation increases to 41% in the State of Vermont and 35% in the U.S.A. There is an extremely low unemployment rate in Saint Johnsbury, which may indicate a lack of available employees.

Workforce and Employment

According to the Vermont Department of Labor¹, the total employment for the Saint Johnsbury Labor Market Area (LMA) as of 2021 was 9,565, with the following breakdown:

- There are 7,878 jobs in the public sector, which accounts for 82% of jobs. The public sector is made up of the following industries:
 - Goods producing industries, including manufacturing and construction accounted for 2,133
 jobs or 27% of public sector jobs.
 - Service industries are the largest private employment sector at 5,745 jobs or 60% of total jobs
 - The largest subset of service industry jobs is in Educational and Health Services with 2,155 jobs or 37% of service industry jobs.
- Government employment sector has 1,687 jobs or 17.7% of total jobs.

According to the recent LVRT Economic Impact Study (SE GROUP 2022-commissioned by NVDA) assuming "Significant Growth", the future economic impact potential for Caledonia County include:

- Approximately 163,499 annual visitors with 75% in the summer and 25% in the winter.
- Average Daily Spending is highest for overnight visitors spending approximately \$160.23/day, followed by a non-local day visitor spending \$70.52/day.
- The key sales by sector from trail users are retail, recreation, and entertainment and the most impacted are restaurants and bars.

Development Opportunities

Lamoille Valley Rail Trail (LVRT) and Three Rivers Trail

The LVRT, when completed in early 2023 will be a 93-mile recreational trail with a trailhead beginning on Saint Johnsbury's Main Street that runs across northern Vermont to Swanton, VT. Portions of the LVRT are currently in use and final work is almost complete including connections to other existing trails. The trail is owned and in large part managed by the State of Vermont Agency of Transportation. It is primarily a gravel pathway intended for hikers, bicyclists and snowmobile enthusiasts who will have the

¹ http://www.vtlmi.info/regionlma.cfm?lmacode=000019#crc

opportunity to use trail heads along the pathway to begin and end at different sections. The NVDA commissioned an economic impact study to determine the benefits anticipated from local, state residents and out of state users. The study, prepared by the SE Group, identifies significant numbers of trail users who are expected to utilize the Saint Johnsbury trailhead and the beneficial impact as users expend funds for a variety of services in the Town and specifically within their historic downtown which is immediately adjacent to the Bay Street Project Area. The study emphasizes that to achieve the full economic potential of the trail it must be widely promoted, there must be substantial investments in community connectivity and amenities and significant efforts around tourism/camping and lodging development. Figure 6 indicates various growth of visitors in the Caledonia County section of the trail in part depending upon "Trail Investment".

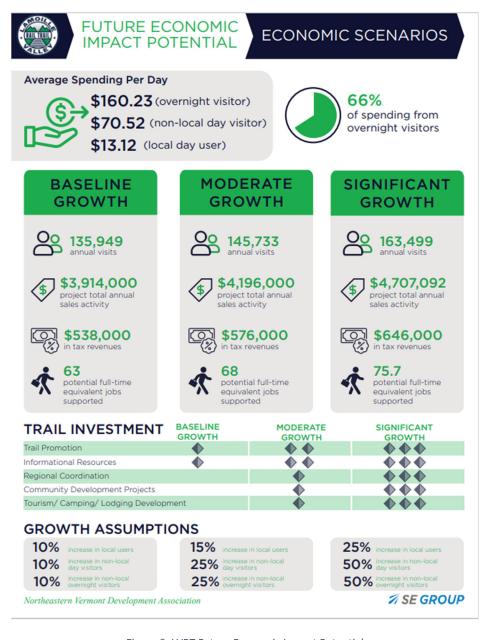


Figure 6: LVRT Future Economic Impact Potential

The Town has already taken numerous steps to facilitate the ability of expected trail users to end or begin their use of the LVRT Trail at the trailhead and come into the downtown. These include the beginning of a connecting trail near the entryway on Bay Street to the downtown partially along the Passumpsic River. A trail pavilion was built at 195 Bay Street, a former brownfield, as an amenity for trail users where a vacant building once stood. Thousands of expected LVRT trail users could create demand for additional amenities and the development of vacant and brownfield properties in the Project Area.

Historic Downtown/Designated Downtown

Saint Johnsbury's downtown is a vibrant historic commercial area within a short walking distance to the Bay Street Area. A significant portion of the downtown and a small section of the Bay Street area is classified as a "Designated Downtown" by the State of Vermont. This designation provides significant economic incentives to the Town and property owners to further commercial development and rental housing.



Figure 7: Historic Downtown, July 2022

While the retail and commercial activity in

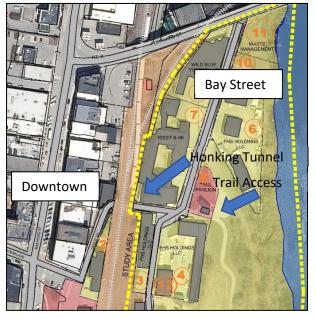
the historic downtown is significant, many of the upper levels of historic buildings are vacant. The Town is aware of the potential for residential development on the upper floors and is actively seeking developers and partners who could add to the downtown housing stock.

Vehicles, pedestrians, and bicyclists access the Bay Street area from downtown by using a small, single-lane roadway that travels under railroad tracks. The roadway is known locally as the "Honking Tunnel" given a curve one must negotiate without being able to see oncoming traffic. The Honking Tunnel is an



Figure 8: Honking Tunnel, July 2022

important asset given the lack of other easy access alternatives to the downtown from Bay Street. Improvements to the tunnel, or the development of transportation alternatives for



motorized and non-motorized transportation modes, would likely benefit the Bay Street area by opening opportunities for new commercial development and retail uses along Bay Street.

Development Constraints

Brownfields & Unknown Environmental Conditions

The Bay Street area is, and historically has been, primarily an industrial area with a wide variety of uses that are suspected to have contaminated properties. In 2011 the Vermont Department of Environmental Conservation retained Stone Environmental, Inc. to perform an Area-Wide Assessment (AWA) of an area that included a portion of the Bay Street area. The AWA study included 41 properties while the current Bay Street Project Area includes 24 properties. Funding was provided by a Technical Assistance Grant from the U.S. EPA. A section of the report summarized the historical uses of the study area:

"Historical uses within Project Area include saw mills, woodworking facilities – including wood treatment and preservation, grain milling and storage, a coal gasification plant, electrical power generation, granite and marble manufacturing, automotive maintenance, print shops, bulk petroleum fuel storage, and an extensive rail yard with associated ancillary support (such as machine shops, painting sheds, and blacksmiths), a turn table, warehousing, coal and petroleum fuel storage......Based on the historical uses within and adjacent to the Project Area, contaminants of concern (COC) are numerous." - 2011 Area Wide Assessment, Bay Street Area, Stone Environmental

The AWA was intended to be used as the basis for follow up work on properties in the project area including Phase I ESAs for redevelopers and Phase II ESAs across the project area. The report further stated that "...Prior investigations of environmental sites within the Project Area, including, the former Northern Petroleum properties, former Lewis Oil, Lewis-Sangravco, the former Ralston Purina Mill, Central Vermont Public Service (CVPS), and the Saint Johnsbury Rail Yard have demonstrated widespread petroleum contamination in soil and ground water within the middle third of the Project Area...Further investigation is necessary to assess the REC's and data gaps identified within the Project Area"

Based on known reporting from USEPA ACRES and CIMC online search and properties that the NVDA have included in its Brownfield programming, the following properties in the Bay Street Project Area are known to have undertaken environmental investigations; cleanup activities have also been conducted on several sites. The status of Brownfield sites in the Bay Street area is summarized below.

Address	Brownfield Status
1. 25 Depot St -D & D Holdings, Inc	Unknown
2. 292 Bay St. – VT Rail	Unknown
3. 256 Bay St. – FHS Holdings, LLC	Unknown
4. 259 Bay St. – FHS Holdings, LLC	Unknown
5. 299 Bay Street – Green Mountain	Unknown
Power	
6. 145 Bay St. – FHS Holdings, LLC	Unknown
7. 202 Bay St. – Zion Corp.	Phase II 2021, Partial Corrective Action Plan, Remedial
	Design Investigation, 2022, Cleanup – request for bids
	early 2023
8. 195 Bay St Town	Phase I 2012, Phase II 2013, Cleanup complete 2019
9. 136 Bay St. Wild Blue Yonder LLC	Unknown
10. 119 Bay St. – Waste Management	Unknown – see Property #11
11. Bay St. – Waste Management	Phase I Completed
12. 258 Bay St. – FHS Holdings, LLC	Unknown
13. Main St. (LVRT Trail)	Unknown
14. Bay St. – VT Rail	Unknown
15. 799 Bay St. Ext Town	Unknown
16. Bay St. – VT Rail	Unknown
17. 493 Main St Town	Unknown
18. Bay Street Ext Town	Phase I Completed 2009 for ROW and Roadway
19. 659 Bay Street – Bay St. LLC	Phase I Completed 2009
20. 515 Bay St. L & R Inc.	Phase I Completed 2009
21. 521 Bay St. – Lumpsie, LLC	Phase I Completed 2009
22. 507 Bay St. – 507 Bay Street LLC	Unknown
23. 492 Bay St. – Bay Street Property LLC	Phase I Completed 2009
24. 483 Bay St. – CN Brown Co.	Phase I & Limited Phase II, March 2020, VT DEC Notification