



Environmental Mitigation Narrative – Judson Trace

The Judson Trace property is located within the Judson Mill redevelopment area and is enrolled in the South Carolina Department of Environmental Services' (SCDES) Voluntary Cleanup Contract (VCC) program. The VCC for the Judson Mill site was executed on December 7, 2017 to facilitate the redevelopment of the former textile mill property for a mix of residential, commercial, and other compatible uses. As documented in the VCC, the property was specifically intended to be redeveloped with multifamily residential and other mixed-use components. The construction budget includes the cost of these measures. The construction cost addendum includes \$160,000 in the "Other Items Not Included" row which is the cost of abiding by the VCC, including ensuring there is a vapor barrier in place that meets SCDES requirements.

Environmental conditions associated with the site's historic textile manufacturing use have been investigated and are being addressed under the oversight of SCDES in accordance with the VCC. The VCC and associated Declaration of Covenants, Conditions, and Restrictions (DCR) establish site-specific requirements to ensure that redevelopment activities remain protective of human health and the environment.

As part of this program, a Department-approved framework is in place to manage identified environmental conditions. This includes implementation of a Media Management Plan (MMP), the use and maintenance of exposure barriers, and adherence to site-specific requirements governing soil disturbance and construction activities. These measures are designed to mitigate potential exposure pathways and support redevelopment of the site for residential and mixed-use purposes consistent with the uses contemplated and approved under the VCC.

The Phase I Environmental Site Assessment (ESA) prepared for the property identifies Recognized Environmental Conditions (RECs) associated with historical operations; however, these conditions are being managed under the VCC program and associated controls, which have been accepted by SCDES as protective for redevelopment when implemented in accordance with approved plans and restrictions. Prior investigations and regulatory oversight provide the basis for redevelopment of the property under these established conditions.

In advance of and during construction, the development team will comply with all applicable VCC requirements, including preparation and submission of any required Soil Disturbance Plans and adherence to the approved Media Management Plan. Any additional measures required by SCDES, such as vapor mitigation or monitoring, will be incorporated into the final design and construction process as directed.

Costs associated with environmental compliance and mitigation—including soil management, environmental oversight, engineering controls, and implementation of VCC requirements—have been incorporated into the project's development budget. Accordingly, the existing VCC

framework, together with these planned measures, serves as the site's mitigation plan and demonstrates that environmental conditions have been addressed to the satisfaction of SCDES and are appropriate for the proposed residential development.