



Upper Valley Lake Sunapee
Regional Planning Commission

December 18, 2015

Mr. Frank Gardner
EPA Region 1
5 Post Office Square
Suite 100, Mail Code OSRR7-2
Boston, MA 02109-3912

Subject: FY 2016 EPA Brownfields Assessment Grant Proposal Transmittal Letter

Dear Mr. Gardner,

On behalf of the Upper Valley Lake Sunapee Regional Planning Commission (UVLSRPC) and the 27 communities we serve, enclosed is a proposal for United States Environmental Protection Agency funding for brownfields assessment activities.

The Upper Valley Lake Sunapee Region of western New Hampshire is one of Northern New England's oldest industrial regions, encompassing parts of Grafton, Sullivan, and Merrimack Counties. The area was once home to factories producing paper, textiles, firearms, and most notably, machine tool industries. Today, many of these former industrial sites are contaminated and unused. EPA Brownfields Assessment funding will provide the resources needed to help our communities assess the brownfields-related environmental issues that prevent sound economic development and bring contaminated and underutilized sites back into productive use to support the diversification of our local economy.

The Upper Valley Lake Sunapee Regional Planning Commission is a state-enabled regional planning agency serving 27 communities in western New Hampshire's Connecticut River Valley. The UVLSRPC received HUD Sustainable Communities, Challenge Grant funding in its inaugural round in 2011. Additionally, the Commission was part of a statewide consortium and received HUD Sustainable Communities, Regional Planning Grant funds in 2012. UVLSRPC has recently adopted a new Regional Plan as part of this HUD Sustainable Communities Initiative grant, and the development of a regional brownfields assessment program will be a crucial component in the implementation of our Regional Plan.

Please do not hesitate to contact me at (603) 448-1680 or nmiller@uvlsrpc.org if you have any questions or need further information regarding this proposal. Thank you for your consideration.

Sincerely,

Nathan Miller
Executive Director

- A. **Applicant Information:** Upper Valley Lake Sunapee Regional Planning Commission (UVLSRPC)
10 Water Street, Suite 225
Lebanon, NH 03766
- B. **DUNS Number:** 624393138
- C. **Funding Requested:** Grant Type: Assessment
Federal Funds Requested: \$400,000
Contamination: Both (\$200,000 Hazardous Substances and \$200,000 Petroleum)
Community-wide

D. **Location:** Twenty-seven municipalities in Grafton, Sullivan, and Merrimack County, New Hampshire:

Town of Acworth	Town of Newport	Town of Grafton
Town of Lempster	Town of Croydon	Town of Springfield
Town of Canaan	Town of Orange	Town of Grantham
Town of Lyme	Town of Dorchester	Town of Sunapee
Town of Charlestown	Town of Orford	Town of Hanover
Town of New London	Town of Enfield	Town of Unity
City of Claremont	Town of Piermont	City of Lebanon
Town of Newbury	Town of Goshen	Town of Washington
Town of Cornish	Town of Plainfield	Town of Wilmot

E. **Site-Specific:** N/A

F. **Contacts:**

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Planner
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Lebanon, NH 03766
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nmiller@uvlsrpc.org

G. **Date Submitted:** December 18, 2015

H. **Project Period:** Three years (36 months) from EPA Cooperative Agreement Date

I. **Population:** UVLSRPC Region Population 89,552

Brownfields Focus Areas (BFA)

Claremont BFA Population 13,074

Lebanon BFA Population 13,589

J. **Regional Priorities Form/Other Factors Checklist:** See attached.

**Appendix 3
Regional Priorities Form/Other Factors Checklist**

Name of Applicant: Upper Valley Lake Sunapee Regional Planning Commission

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.E, please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Assistance to Communities That Have Limited In-House Capacity to Manage Brownfields Projects

Page Number(s): Page 4

Assessment Other Factors Checklist

Please identify (with an **x**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	1
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	4 (Plant Closure and Natural Disaster)

<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.</p>	5, 12
<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	

NARRATIVE PROPOSAL

1. Community Need

1.a. Targeted Community and Brownfields

1.a.i. Targeted Community Description - The Upper Valley Lake Sunapee Region of western New Hampshire consists of 27 communities in Sullivan and Grafton Counties and is one of Northern New England's oldest industrial regions. Situated along the Connecticut River and its major tributaries (e.g., the Sugar River and Mascoma River), water provided early mills with power and efficient transportation to outside markets. During the late 1800s and early 1900s, the Upper Valley Lake Sunapee Region grew into a bustling industrial area with manufacturing factories dominating its largest cities, Claremont and Lebanon. While the region was best known for its innovations in precision machine tool manufacturing (the region was referred to as the "Precision Valley" for these innovations), the area was also home to numerous factories producing paper, textiles, and firearms.

By 1960, more than one-third of the region's employment was concentrated in manufacturing. In Sullivan County (home to the industrial center of Claremont), this figure was even higher, with 42.5% of employment concentrated in manufacturing¹. The region's household income was commensurate with state and national averages, and the population of the region and its primary industrial centers were growing steadily. However, by 1970, advances in technology, competition from other regions of the country, and global market influences began to impact the region's industrial employment base. This trend continued throughout the 1980s, 1990s, and early 2000s with the closing of regional manufacturers like Joy Manufacturing in Claremont. Today, industrial jobs represent only 12.2% of overall employment in the Upper Valley Lake Sunapee region².

The Upper Valley Lake Sunapee region is a rural region. Twenty-four (24) of the 27 communities in the region have populations less than 10,000. By population, the largest of the 27 communities are the Cities of Claremont and Lebanon. Claremont and Lebanon are the two communities in the region hardest hit by the loss of manufacturing due to the effects of globalization on the precision machine tool manufacturing industry. These two communities are the "Brownfields Focus Areas" (BFAs) or target communities for Brownfields assessment.

Claremont was a manufacturing town with large brick factories built along the Sugar River, including the Sunapee Mills, Monadnock Mills, Claremont Machine Works, Home Mills, Sanford & Rossiter, and Claremont Manufacturing Company. These factories produced cotton and woolen textiles, lathes and planers, and paper.

Lebanon has a similar industrial heritage with a mill district developed at the falls of the Mascoma River in mid-19th century. Industries included furniture mills, a tannery, several machine shops, a woolen textile mill and a clothing factory. This area became the center of town, while West Lebanon grew into a railroad hub with a separate identity after rail lines entered from Boston. Both the mill district and the railroad, declined into the 1950s and 1960s. The town suffered two major fires; the second, in 1964, destroyed a large portion of the old mill district.

¹ *Pop & Economic Analysis for the Lake Sunapee Reg* (1972), Upper Valley Lake Sunapee Planning & Development Council.

² U.S. Census 2006-2010 American Community Survey.

1.a.ii. Demographic Information

	Claremont BFA	Lebanon BFA	Sullivan County	Grafton County	NH	USA
Population ¹	13,074	13,589	43,103	89,658	1,326,813	3,11,536,594
Unemployment ²	4.0%	2.8%	4.5%	4.3%	3.9%	5.3%
Poverty Rate ¹	15.9%	12.0%	9.9%	11.2%	8.7%	11.3%
% Minority	4.8%	13.5%	4.5%	8.8%	8.7%	36.7%
Median HH Income ¹	\$42,236	\$52,231	\$54,463	\$54,912	\$64,916	\$53,046
Median Home Value ¹	\$142,400	\$235,400	\$171,000	\$212,000	\$239,900	\$176,700
Asthma in Children ³	NA	NA	9.3%	12.1%	9.6%	8.3%

Sources: 1) 2014 U.S. Census State and County Quick Facts Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Estimates; 2) 2014 Annual Average Benchmarked Unemployment Rates, Economic and Labor Market Information Bureau, NH Employment Security; 3) County Health Rankings & Roadmaps website, Robert Wood Johnson Foundation Program; 4) USDA Food & Nutrition Service website

While the cost of living in the State of New Hampshire is higher than the nation as a whole, as the above demographic data show, the Claremont and Lebanon BFAs both struggle with median household incomes substantially lower than the state average, poverty rates substantially higher than the state average, and depressed median home values compared to the state average. The above table does not provide historical data, but with the loss of precision tool manufacturing jobs over the past 40 years, population declines have been steep. For instance, the population of Claremont has decreased by more than 10% from a peak population of 14,557 in 1980.²

1.a.iii. Description of Brownfields - According to data from the New Hampshire Department of Environmental Services (NH DES), there are over 1,000 known areas of reported contamination and potential brownfields in the Upper Valley Lake Sunapee Region. While all 27 communities in the region are home to potential brownfields, the University of New Hampshire estimates that 60-75% of New Hampshire's brownfields are located in former industrial village centers where low-income populations typically find more affordable housing. This is the case in both the Claremont and Lebanon BFAs.

The City of Claremont has a former industrial downtown situated along the banks of both the Connecticut River and the Sugar River. There are a reported 156 potential brownfields sites in Claremont. Claremont is home to the Monadnock Mills industrial area and numerous former machine tool manufacturing facilities and small gas stations. Claremont was successful in obtaining EPA Brownfields Assessment funding in 2002, which led to the cleanup and redevelopment of a portion of the Monadnock Mills complex. However, much work remains to be done. PCBs, asbestos, petroleum, and other hazardous materials are known to exist in the soil in this area, and some of these contaminants have migrated into surface waters including the Sugar River which accounts for 29% of Claremont's public drinking water supply. With assessment grant funding, targeted sites in Claremont would include the Topstone Mill (chlorinated solvent and petroleum contamination) and a site located in the Monadnock Mill historic district on Main Street. Both sites have infill redevelopment potential but are currently stalled due to environmental concerns.

The City of Lebanon has a former industrial village situated along the banks of the Connecticut River, Mascoma River, Mascoma Lake, as well as the former Boston and Maine Railroad yard located in the western portion of the City. The Mascoma River is the primary drinking water source for the City of Lebanon. There are 192 reported potential brownfields sites in Lebanon. With assessment grant funding, targeted sites in Lebanon would include the Westboro Rail Yard, which is in need of an assessment to determine cleanup needs and redevelopment options. This site is located on the Connecticut River near a bridge into Vermont where there is a municipal park. The Westboro Rail Yard could potentially be reused as a park with the bridge walkway as a connector between the parks in New Hampshire and Vermont. However, concerns regarding petroleum contamination, PCBs and chlorinated solvents have stalled redevelopment.

1.a.iv. Cumulative Environmental Issues - As is the case with many New England communities, the Region's Brownfields sites are primarily located along waterways, including the Connecticut, Sugar, and Mascoma Rivers. The Sugar and Mascoma Rivers are primary drinking water sources for the Cities of Claremont and Lebanon. In addition, the Mascoma River is a "Protected River" in the state of New Hampshire due to impairment for supporting aquatic life due to low dissolved oxygen, invasive plants, aluminum, and nine segments of the Mascoma River are impaired for safe swimming due to E. coli. The NH Department of Environmental Services has also issued an advisory that women of childbearing age and young children eat no fish from Mascoma Lake (a key waterway serving the Lebanon Brownfields Focus Area) due to mercury and PCB concentrations in fish. In addition, the Connecticut River struggles to meet Class B status due to the region's industrial legacy which has resulted in at least eight federally-threatened and endangered species, including: the shortnose sturgeon, piping plover, puritan tiger beetle, dwarf wedgemussel, small whorled pogonia, Jesup's milk-vetch, and Northeastern bulrush. These rivers are critical to the livelihood of this region, yet are at risk and continue to be threatened by the contaminants found on potential targeted brownfields sites.

1.b. Impacts on Targeted Community

The Claremont and Lebanon Brownfields Focus Areas are home to the vast majority of the Region's brownfields sites. These communities are not only home to the majority of industry in the region, but are also home to high percentages of at-risk populations, including low-income households (see table in Demographic section above). Much of the housing stock was constructed before 1960 to house industrial workers and contains asbestos, lead-based paint, and other hazardous materials. Claremont, where the median household income is approximately 20% lower than the state average (see table in Demographic section above), is disproportionately impacted by Brownfields-related health issues, which raises environmental justice concerns.

- The NH Department of Health and Human Services conducted a Behavioral Risk Factor Survey to quantify the prevalence of adult asthma. Adult asthma prevalence totals 10.5%, a figure that is higher than the national average. Asthma in children in Grafton and Sullivan Counties are higher than the national percentage as shown in table above. Among counties in New Hampshire, Sullivan County (home to the Claremont) had the highest rate of outpatient emergency hospital discharges with asthma as the principal diagnosis at 73.9% (the state average was 47.8%).³
- The NH Department of Health and Human Services conducted an analysis of childhood lead poisoning in New Hampshire. The Claremont area was identified as "High Risk Area" based

³ 2009-2014 State Asthma Plan, available <http://www.dhhs.nh.gov/dphs/cdpc/asthma/documents/state-plan.pdf>

on lead testing conducted around the state. In Claremont, 9% of one-year-old children and 22% of 3-5-year-old children were found to have elevated blood lead levels. This is the highest percentage in the state.⁴ We suspect lead contamination at our targeted brownfields sites, and know that neighborhoods with children are located close to these sites.

Throughout the Upper Valley Lake Sunapee Region's Brownfields Focus Areas, due both to tradition and low median household incomes in these communities, residents utilize waterways for sustenance by fishing. Unfortunately, due to brownfields and brownfields-related contamination, key waterways in these communities are either inaccessible or too contaminated for fishing.

1.c. Financial Need

1.c.i. Economic Conditions

While the recent economic recession has impacted the entire Upper Valley Lake Sunapee Region, the recession's effects have been especially difficult in the Claremont and Lebanon Brownfields Focus Areas. Recent plant closures include Customized Structure in Claremont in 2008 (loss of 125 jobs) and Wheelabrator Incinerator in 2013 (loss of 25 jobs). These closures have not only resulted in lost jobs but have also created vacant and potentially contaminated sites. The poverty rate in both Brownfields Focus Areas is higher than the state average of 8.7% with Claremont almost double the state average. Similarly, the median household income in the two Brownfield Focus Areas is substantially lower than the state average, with Claremont 20% lower than the state average. Recent federally-declared natural disasters, including Tropical Storm Irene in 2011 have significantly added to this economic distress as large businesses in the region (e.g. J.C. Penney in Lebanon) were temporarily or permanently closed due to disaster impacts. Communities in the Brownfields Focus Areas were forced to expend unbudgeted funds for recovery.

The combination of plant closures, declining population, unanticipated expenses due to natural disasters, low median household income, and depressed home values have resulted in enormous local fiscal pressures in both Claremont and Lebanon. These pressures are further exacerbated by brownfields that need assessment and redevelopment to rebuild the tax base and stave off population declines. The City of Claremont now has the highest property tax rate in the State of New Hampshire, and is laying off municipal employees⁵. As a result of these conditions, Claremont and Lebanon have limited in-house capacity to manage Brownfields projects and need the technical assistance and administrative support that could be provided via the EPA Brownfields Assessment Program.

1.c.ii. Economic Effects of Brownfields

The presence of Brownfields impacts our target communities in a number of ways that have a lasting economic effect. The blight associated with many of these sites lead to the surrounding neighborhood taking on the same run-down appearance. This serves to deter new investments into the housing stock and keeps home values chronically low. Both Brownfields Focus Areas have median home values lower than the state average with Claremont nearly 40% lower than the state average. The presence of these brownfields will continue to decrease property values and thus tax revenue, and decrease the appeal for residents to move to downtowns.

⁴ NH Department of Health and Human Services, "Eliminating Childhood Lead Poisoning in New Hampshire", available: <http://www.dhhs.nh.gov/dphs/bchs/clpp/documents/eliminating.pdf>

⁵ <http://www.wcax.com/story/10066562/claremont-rejects-furloughs-begins-layoffs>

The self-perpetuating brownfields cycle, with increasing brownfields results in less property tax revenue to the towns, especially in the case of abandoned brownfields properties that end up the towns' possession and off the tax role entirely. The combination of small communities and environmental stigma of the Brownfields properties results in developers overlooking the downtowns of the target communities and investing elsewhere, which results in sprawl with new development in undeveloped areas.

The blight associated with our Brownfields sites has had a significant impact on the region's economic growth. It is a contributing factor related to the outward migration from the region's blighted urban and suburban communities. This is happening because residents are looking for better neighborhoods and housing opportunities. The environmental stigma and brownfield status of many of the target properties (particularly the mills and vacant gas stations) further deter developers from these towns. The neighborhoods, typically downtowns where the brownfields sites are located, are at the lower end of the spectrum where greater poverty and lower income populations are concentrated, which continue to raise environmental justice concerns.

The above conditions have led to the two Brownfields Focus Areas have disproportionately high property tax rates. At \$41.33 per \$1,000 of assessed value, the City of Claremont currently has the highest property tax rate of any municipality in the State of New Hampshire. Due to significant cuts in state and federal funding and reductions in town budgets, there is no additional funding to implement controls necessary to protect these neighborhoods from impacts associated with the Brownfields. These populations are forced to rely on threatened drinking water supplies and be exposed to potential indoor air impacts.

2. Project Description and Feasibility of Success

2.a. Project Description, Project Timing, and Site Selection

2.a.i. Project Description

The purpose of this project is to formalize a Brownfields Assessment Program within the Upper Valley Lake Sunapee Region that concentrates on both key Brownfields Focus Areas: Claremont and Lebanon. If funded, UVLSRPC intends to concentrate at least 75% of available assessment funding in the Brownfields focus areas, with remaining funds allocated for sites elsewhere in the region.

The implementation of a Brownfields Assessment Program will not only help achieve goals in the UVLSRPC's Sustainable Communities Regional Planning Project (funded by the U.S. Department of Housing and Urban Development as a statewide effort involving New Hampshire's nine Regional Planning Commissions). It will also provide a critical component towards the implementation of local master plans in these communities as they transition from industrial economies to diversified economies. The UVLSRPC Regional Plan and the Lebanon and Claremont Master Plans specifically target the Claremont and Lebanon Brownfields Focus Areas for downtown in-fill development, conservation of green space outside the downtowns, population growth near downtown transportation and commercial resources (e.g. restaurants, grocery stores, medical) and in areas served by public water and sewer. These goals can be achieved by making the area safe (i.e. no contamination) and attractive (i.e. no dilapidated buildings and unappealing lots).

In order to implement the Brownfields Assessment Program, a regional Brownfields Advisory Committee will be formed (see Task 2 description below) and will meet on a quarterly basis to engage municipal and regional officials, oversee the program, and guide assessment funding. The Committee will be comprised of a diverse group of organizations representing varied economic, health, social and land use interests, including the Mascoma River Local Advisory Committee, the Lebanon Chamber of Commerce, the NH Department of Environmental Services, the Grafton County Economic Development Council, the Upper Valley Land Trust, among others.

Community Outreach (see Task 3 description below) will be critical, as the Brownfields Assessment Program will be new to the region. Municipal officials, residents, and property owners need to be aware of the assessment opportunity in order to bring sites into the program. The outreach process will be overseen by the Regional Brownfields Advisory Committee. Outreach will take many forms, including traditional media (e.g. newspapers, radio, TV), networking events, local and region-wide informational meetings, organizational websites, and social media.

Upon the identification and selection of sites, the program will transition to Phase I and Phase II site assessments (see Task 5 description below). Site assessment activities will be conducted by qualified environmental professional (QEP) procured using the 40 CFR Part 31 procurement process and approved by the NH DES. Phase I activities will include site visits, researching historical records, interviewing past owners of the site, and evaluating the risks to properties abutting the subject property. The sites will then undergo a Phase II assessment. During the Phase II assessment, on-site testing of soil, groundwater and building materials will occur and contaminants will be identified and quantified.

2.a.ii. Project Timing

The Brownfields assessment program will be managed by UVLSRPC staff with direct input from the NHDES, the EPA project officer, the Regional Brownfields Advisory Committee, and the selected Brownfields QEP. We will hold initial Advisory Committee meetings in late summer 2016 to discuss hiring the QEP. A request for qualifications will be submitted to the local QEP community by the end of September 2016 and we expect to have a QEP under contract by mid-October 2016. Starting with informal discussions now and formal discussions immediately following the QEP's selection, UVLSRPC will work diligently to obtain access to our high priority sites. Access agreements will be obtained in winter 2016/2017 and environmental assessments will begin in early 2017 and continue through summer of 2017.

During the grant period, we will hold quarterly meetings with the Brownfields Advisory Committee to ensure we are moving in the right direction. Community outreach will be executed through regular public meetings, web-based media, educational materials, news releases, and community visits. We will hold monthly teleconferences with the QEP to ensure they are moving forward on schedule. This will all ensure work is accomplished within the grant period of 3 years.

2.a.iii. Site Selection

As outreach activities progress, UVLSRPC will transition to Site Identification and Selection (see task 4 description below). Sites will be identified through three key methods. First, community representatives (including municipal officials, community groups, and residents) will be able to nominate properties they feel may be potential brownfield sites from their prospective municipalities. Second, a survey will be sent to municipal leaders to assist the Brownfields

Advisory Committee in identifying areas within the region that may have potential brownfield sites. Third, NH DES online records will be reviewed and an update to the existing brownfield inventory will be conducted in the region to identify potential sites. Sites will be prioritized based on funding availability, documented community priorities, and selection criteria developed by the Brownfields Advisory Committee. Selection criteria will be based on meeting the Brownfields grant eligibility requirements, overall redevelopment potential, timeframe to complete cleanup and redevelopment, potential to increase job opportunities in our target communities, reduce sprawl, and contribute to the local property tax base. Additionally, the City of Lebanon is embarking on a Downtown Visioning Study that will inform site selection and redevelopment planning within the Lebanon BFA⁶.

2.b. Task Descriptions and Budget Table

2.b.i. Task Description

Task 1- Cooperative Agreement Oversight: UVLSRPC will manage the assessment program including reporting, procuring and managing contractors, overseeing Section 106 historic resource reviews, updating the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database, and other tasks as necessary. Outputs include: preparation of Quarterly Reports, MBE/WBE procurement forms, and entering property data into the ACRES database. This task will be completed quarterly throughout the grant period. Staff Breakdown: Project Manager (est. 180 hours for Hazardous Substances and 180 hours for Petroleum).

Task 2- Advisory Committee Development: UVLSRPC has assembled local and regional partners, as demonstrated by the letters of support included in Attachment B of this proposal to serve on a Regional Brownfields Advisory Committee. A regional forum will be held to kick off the program and educate the Brownfields Advisory Committee members on their role. The regional forum will provide committee members with information about the Brownfields Assessment Program, the types of properties that are eligible and what responsibilities landowners may have if they participate in the program. Quarter Advisory meeting will be held thereafter. Outputs include notices and handouts during meetings. To be completed over entire grant period of project. Staff Breakdown: Project Manager (est. 180 hours for Hazardous Substances and 180 hours for Petroleum).

Task 3- Training and Community Outreach: UVLSRPC will increase awareness of the Brownfields Assessment Program through a robust community outreach program. As the Brownfields Assessment Program will be new to the region, partnerships will need to be formed with municipal leaders, community groups, and property owners to identify potential assessment sites. Outreach meetings will be held in each municipality where assessments are conducted, and informational materials about the program will be developed and distributed through both traditional media and social media. Funding for this task will also provide professional development and training for UVLSRPC's Brownfields staff through attendance at the EPA National Brownfields Training Conference and/or NHDES-sponsored training events. Outputs include marketing materials, notices and handouts during meetings. To be completed Years 1 and 2. Staff Breakdown: Project Manager (est. 180 hours for Hazardous Substances and 180 hours for Petroleum).

⁶ See: <https://sites.google.com/a/lebnh.net/planning/home/master-plan/implementation/chapter-3/revisioning-downtown-lebanon>

Task 4- Site Identification and Selection: The program will first solicit sites from the two Brownfields Focus Areas (Claremont and Lebanon), followed by other communities in the region. UVLSRPC will conduct an initial review of proposed sites, in consultation with the NH DES, to determine program eligibility. Through coordination with the regional Brownfields Advisory Committee, sites will be evaluated, prioritized, and selected for assessment. Outputs include the inventory database, GIS outputs, prioritization listing of sites, site access agreements, and site eligibility forms. To be completed in Years 1 and 2. Staff Breakdown: Project Manager (est. 264 hours for Hazardous Substances and 264 hours for Petroleum).

Task 5- Phase I and Phase II Assessments: Task 5 includes Phase I and Phase II assessment work, laboratory analysis, and review and oversight of contractor work. Depending on the complexity of the sites selected, approximately 9 Phase I assessments for hazardous substances (estimated \$5,000 each), 7 Phase I assessments for petroleum (estimated \$5,000 each), 3 Phase II assessments for hazardous substances (estimated \$30,000 each), and 4 Phase II assessments for petroleum (estimated \$25,000 each) will be conducted on the sites selected during Task 4. UVLSRPC will rely on the NH DES to review submittals and provide technical feedback. Site-specific reuse plans will also be prepared to further develop remedial action costs based on likely reuse scenarios for the property. These assessments will contain information that is consistent with that required by EPA and NHDES including the NHDES Voluntary Cleanup Program (VCP) and Petroleum Fund so as to streamline the transition of sites from remedial action planning to clean up and successful re-use and/or redevelopment. More than seventy percent (70%) of funds will be used for assessments. To be completed in Years 2 and 3. Staff Breakdown: Project Manager (est. 200 hours for Hazardous Substances and 200 hours for Petroleum).

2.b.ii. Budget Tables

Project Budget and Tasks for UVLSRPC Brownfields Assessment Program - Hazardous						
Budget Categories	Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	TOTAL
	Cooperative Agreement Oversight	Advisory Committee Development	Training & Community Outreach	Site ID and Selection	Phase I and Phase II Assessments	
Personnel	\$7,320	\$7,320	\$7,320	\$10,570	\$8,000	\$40,530
Fringe	\$1,680	\$1,680	\$1,680	\$2,430	\$1,850	\$9,320
Travel	\$100	\$450	\$2,500	\$300	\$550	\$3,900
Supplies	\$100	\$300	\$500	\$100	\$250	\$1,250
Contractual	N/A	N/A	\$5,000	\$5,000	\$135,000	\$145,000
TOTAL	\$9,200	\$9,750	\$16,700	\$18,700	\$145,650	\$200,000

Project Budget and Tasks for UVLSRPC Brownfields Assessment Program - Petroleum						
Budget Categories	Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	TOTAL
	Cooperative Agreement Oversight	Advisory Committee Development	Training & Community Outreach	Site ID and Selection	Phase I and Phase II Assessments	
Personnel	\$7,320	\$7,320	\$7,320	\$10,570	\$8,000	\$40,530
Fringe	\$1,680	\$1,680	\$1,680	\$2,430	\$1,850	\$9,320
Travel	\$100	\$450	\$2,500	\$300	\$550	\$3,900
Supplies	\$100	\$300	\$500	\$100	\$250	\$1,250
Contractual	N/A	N/A	\$5,000	\$5,000	\$135,000	\$145,000
TOTAL	\$9,200	\$9,750	\$16,700	\$18,700	\$145,650	\$200,000

The following assumptions were used to develop the UVLSRPC's proposed budgets:

- Personnel/Fringe: Pay rate of \$40/hour for Project Manager, with federally-approved fringe rate of 23.08%;
- Travel: Local travel at \$0.585/mile and attendance at National Brownfields conference (at \$1,500 travel/hotel expenses);
- Supplies: Standard office supplies to implement the assessment program, including paper, binders, poster boards, etc.;
- Contractual: UVLSRPC will procure site assessment contractors in accordance with 40 CFR Part 31.

2.c. Ability to Leverage

The Upper Valley Lake Sunapee Regional Planning Commission receives approximately \$100,000 annually through dues from its member communities. While dues revenues fund the administrative expenses of the Commission, a portion of the funding will be used to leverage programs that bring additional resources to the region and provide technical assistance to our communities. The UVLSRPC has committed five percent of dues funding during the duration of the grant period to supplement the development of a Regional Brownfields Assessment program. A letter documenting this firm commitment is attached to this proposal narrative in Attachment C.

In addition, both the New Hampshire Department of Environmental Services and the Capital Regional Development Council (see Attachments A and B of this proposal) administer Brownfields Revolving Loan Funds for cleanup and can make these funds available for eligible sites.

Due to the previously described economic conditions and impacts of Brownfields, communities in the region have limited ability to draw on other sources of funding. However, based on local experience, Brownfields assessment funding can lead to the leveraging of private redevelopment resources. This is demonstrated by the cleanup and redevelopment of the Monadnock Mills in Claremont, which was spurred by EPA assessment funding in 2002 and is cited by the EPA as a Brownfields success story.⁷

⁷ http://www.epa.gov/region1/brownfields/success/09/R1_SS_Claremont_NH.pdf

3. Community Engagement and Partnerships

3.a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress

3.a.i. Community Involvement Plan

UVLSRPC will implement a meaningful and informative Community Involvement program throughout the grant period. Initially, a regional forum will be held to kick off the program to introduce regional stakeholders to the assessment program and to educate the Brownfields Advisory Committee members on their role. The regional forum will provide information about the Brownfields Assessment Program, the types of properties that are eligible and the responsibilities landowners may have if they participate in the program. In addition to the regional forum, community meetings will be held in each community that hosts a Brownfield site selected for Phase I Assessment. All meetings shall be advertised in accordance with RSA 91-A (New Hampshire's State Right-to-Know Law). These meetings will solicit input from the targeted community regarding their ideas for redevelopment and reuse of the site. Any non-English language needs will be met using Limited English Proficiency (LEP) guidelines.

As the program develops, UVLSRPC (working in coordination with the Advisory Committee) will track and report assessment program progress by posting updates in the aforementioned local newspapers, developing a separate webpage to track the progress of the project with individual web pages for each assessment site, filming community meetings for local cable access channels, direct mailings, and periodic reports to participating municipalities. Within these outreach efforts, UVLSRPC will target underserved and low-income populations, as these groups may not have access to internet communications.

Oral and written comments will be compiled and presented to the Brownfields Advisory Committee. The Brownfields Advisory Committee will review all comments received through this process, and will consider whether changes to the work plan should be made to respond to the comments. We will prepare a written summary of how comments were addressed, and/or why changes in response to comments were or were not made. This summary will also be posted on the UVLSRPC website and be provided to others upon request.

3.a.ii. Communicating Progress

There will be public meetings in every town where assessments will occur. These will be noticed by municipal and UVLSRPC web sites, any municipal "list serve" e-mails, Facebook, the UVLSRPC newsletter, local newspapers, radio, and community access television. Contacts will be provided for information for those unable to attend meetings and for information after public meetings. Progress information will be provided primarily on the web sites, social media, and newspaper reporting.

3.b. Partnerships with Government Agencies

3.b.i. Local/State/Tribal Environmental Authority

New Hampshire Department of Environmental Services (NH DES): NH DES oversees the state's Brownfields Covenant (voluntary cleanup) Program. The agency also administers a revolving loan fund for Brownfields site cleanup. UVLSRPC will coordinate closely with NH DES at the start of assessment projects to ensure that landowners understand the regulatory process and liability considerations, and that all of the assessed sites will be registered with NH DES if contaminated. They will also provide review of technical submittals for consistency and compliance with federal

and state regulations. The Commission has a long history of partnering with NH DES on environmental issues including, but not limited to, source water protection and watershed planning.

New Hampshire Department of Health and Human Services (NH DHHS): NH DHHS oversees most public health functions in the state, and UVLSRPC has a long history of collaborating with NH DHHS on a variety of regional health initiatives. They will support and advise UVLSRPC in areas of human health impacts from contaminants as well as community notifications in cases of any identified public health concerns.

3.b.ii. Other Governmental Partnerships

New Hampshire Community Development Finance Authority: The CDFA administers the state's Community Development Block Grant Program, Community Development Investment Program, and administers a variety of other grant programs that may be leveraged as part of the Brownfields program, targeting housing development and job retention. UVLSRPC coordinates closely with the CDFA, as their programs complement the Commission's strengths.

U.S. Environmental Protection Agency: As a critical partner in our brownfield program, we will collaborate closely with staff at USEPA Region 1.

3.c. Partnerships with Community Organizations

3.c.i. Community Organization & Role

UVLSRPC Brownfields Program will be supported by the following Community Organizations:

The Greater Lebanon Chamber of Commerce is a private, not-for-profit association of business and professional firms and individuals in the Lebanon, New Hampshire area. Their role will be two-fold: 1) Assisting the Commission in generating interest in the Brownfields Assessment Program within the business community; and 2) Participating as a member of the Advisory Committee.

The Grafton County Economic Development Council (GCEDC) and the Capital Region Development Corporation (CRDC) serve the region's economic development needs. These regional development entities will assist with the creation of businesses, provide low interest loans for businesses to create new jobs, train employees, expand physical infrastructure and assist with debt restructuring that will lead to retaining or expanding employment at brownfields sites in the region.

The Upper Valley Land Trust is the largest land trust in the region serving almost the entire Upper Valley Lake Sunapee Regional Planning Commission area. The UVLT will assist the Committee by engaging citizens who may otherwise not make the connection between sustaining a vibrant economic base and preserving the natural setting with which northern New England is identified.

Vital Communities is an organization that "works to engage citizens in community life and to foster the long-term balance of cultural, economic, environmental and social well-being in our region." They will lend significant civic engagement in the Brownfields program. They have a vast network of supporters and have been successful in inspiring social capital to mobilize to solve regional issues.

The Mascoma River Local Advisory Committee and the Mount Ascutney River Local Advisory River Subcommittee advise the NH DES on matters pertaining to the protection of water quality for

the Mascoma River, Mascoma Lake, and its tributary drainage areas to the Connecticut River. They have committed to participating on the Brownfields Advisory Committee.

3.c.ii. Letters of Commitment

Letters of support from the above listed community organizations are attached to this proposal narrative in Attachment B.

4. Project Benefits

4.a. Health and/or Welfare and Environmental Benefits

4.a.i. Health and/or Welfare Benefits

A regional Brownfields Assessment program is an essential first step toward the cleanup and redevelopment of former industrial properties in our Brownfields Focus Areas. The Brownfields Assessment Program, and the eventual reuse of these sites will lead to:

- Improving water quality in the regions' primary waterways (e.g. the Connecticut River, Mascoma River, and Sugar River) by reducing contamination in riverfront Brownfield sites; thereby reducing contamination in public drinking water supplies, mitigating impacts to the documented threatened/endangered species living in these waters, and reducing the contamination in fish that are a food source for many residents.
- Spurring new investments in Brownfields-related housing stocks that will reduce child lead exposure, asbestos exposure, and reduce child lead poisoning and asthma as well as reduce crime rates;
- Improving the overall quality-of-life in the Brownfields Focus Areas (and ultimately the region as a whole) by making former Brownfields available for economic development, recreation, and/or greenspace;
- Promoting environmental justice and equitable development principles, as informed by the HUD-funded Sustainable Communities Initiative Regional Planning Grant Work, including workforce housing development, the development of a diversified economy, and fostering a clean and healthy natural environment;

4.a.ii. Environmental Benefits

The assessment, remediation and redevelopment of Brownfield sites in the target communities will reduce the environmental impacts associated with the broad spectrum of contaminants including heavy metals, PCBs, semi-volatile organic compounds, petroleum compounds, and solvents. Most Brownfields sites in the target area represent a threat to human health via direct contact, inhalation or incidental ingestion of contaminated dust from the site, or contaminated vapors due to vapor intrusion, or through storm water runoff from the site into the Connecticut River, Mascoma River, and Sugar River. Remediating the Brownfield properties in the target communities will help to eliminate the direct threat to human health, lower blood lead levels and asthma rates in children, and help reverse the cumulative environmental threats to the surrounding environment and area drinking water sources including the Connecticut River's eight federally-threatened and endangered species, including: the shortnose sturgeon, piping plover, puritan tiger beetle, dwarf wedgemussel, small whorled pogonia, Jesup's milk-vetch, and Northeastern bulrush.

4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

4.b.i. Policies, Planning, and Other Tools

UVLSRPC is currently participating in a HUD funded sustainable community planning grant. This project involves developing an integrated sustainability plan for the region which addresses both

federal and NH's livability principles. Conformance with this regional and the local master plans and local regulations and ordinances will be used in the selection criteria. This will lead to projects that include in-fill in downtown areas which provides residential walkable access to essential services, public transportation, and recreation. Existing water and sewer infrastructure will also be reused resulting in reduced cost of development.

4.b.ii. Integrating Equitable Development or Livability Principles

Given that the UVLSRPC's Brownfields are primarily located in former industrial downtowns and village centers, redeveloping these downtowns would not require expanding water and sewer infrastructure into greenfield areas. As a result, the region would preserve unfragmented wildlife habitat and agricultural lands, and save taxpayer money by mitigating the need for costly infrastructure expansions. The Regional Brownfields Advisory Committee will give special consideration to those projects that incorporate smart growth principals, green building principles, and energy efficiency into reuse plans.

4.c. Economic and Community Benefits (long-term benefits)

4.c.i. Economic or Other Benefits

Economic development is a primary goal of the UVLSRPC's proposed Brownfields Assessment Program as the cleanup and redevelopment of Brownfields will allow our region's Brownfields Focus Area communities to encourage the downtown reinvestment necessary to develop a diversified economy. We expect the Brownfields Assessment Program, and the eventual reuse of these sites to lead to the following economic benefits:

- Increasing the local tax base in the region's Brownfields Focus Areas. The two Brownfields Focus Areas have disproportionately high property tax rates (Claremont currently has the second highest property tax rate in NH). The assessment, cleanup, and reuse of Brownfields sites will spur new business investments in these communities, thereby increasing the local tax base and reducing these disproportionately high property tax rates.
- Creating jobs in the region's Brownfields Focus Areas. While Brownfields assessment sites and reuse projects are yet to be determined, the job creation benefits of Brownfields projects are well documented. In the Upper Valley Lake Sunapee Region, the recent redevelopment of a portion of the Monadnock Mills District in Claremont spurred approximately \$25,000,000 in private investment and the creation of more than 100 new jobs. If the targeted sites identified in this application were assessed and ultimately redeveloped, we estimate that at least 100 additional jobs could be created.
- Decreasing the poverty rate and increasing median incomes in the region's Brownfields Focus Areas. With redeveloped Brownfields playing a key role in the transition to diversified economies in the region's two Brownfields Focus Areas, residents of these communities will have greater economic opportunities.
- Increasing median home values in the region's Brownfields Focus Areas. Much of the housing stock in the region's two Brownfield Focus Areas reflects a bygone era of mill worker housing. This housing stock is laden with lead-based paint and asbestos, and as documented in the Financial Need Section of this Narrative Proposal, the median home value in the region's Brownfields Focus Areas is substantially lower than the New Hampshire state average. Redeveloped Brownfields provide new vitality for former industrial downtowns will create new demand for housing in these revitalized downtowns.

4.c.ii. Job Creation Potential: Partnerships with Workforce Development Programs

While there are no Brownfields job training grantees in our area, hiring local as a part of the assessment and during future cleanup and redevelopment work is a focus for us. We will work with the municipalities to develop criteria for municipally owned reclaimed brownfields to lease or sell to job creating entities. Additionally, we will also work with local workforce development entities to hire local workers for brownfield reclamation and redevelopment.

5. Programmatic Capability and Past Performance

5.a. Programmatic Capability

The Upper Valley Lake Sunapee Regional Planning Commission was established in 1963 and is one of nine regional planning commissions in the state of New Hampshire enabled through state legislation (RSA 36, see Attachment A). The Commission is governed by a Board of Commissioners appointed by each of the 27 municipalities in the region. There are specific duties and powers of RPCs such as assisting towns with comprehensive planning, providing comments on local and state plans, administering state & federal grants, providing education and training, and adopting a Regional Plan (UVLSRPC Regional Plan adopted June 2015). The UVLSRPC has successfully completed a number of federally-funded projects in the last three years, meeting all applicable reporting and financial management requirements in a timely manner. Our accounting system is Sage 50 with Sage TimeSlips as our time management system. Our Finance Manager, Yutian Zhang, is a Certified Public Accountant. Our Executive Director, Nathan Miller, and the Treasurer of the Commission, Peter Guillette, review all invoices, expenditures, and time sheets.

The Upper Valley Lake Sunapee Regional Planning Commission has successfully managed over \$20 million in federal and state grants since 1963. The regional Brownfields Assessment Program would be overseen by the following key staff:

Nathan Miller, Executive Director, will provide oversight for the Brownfields Assessment Program. Mr. Miller has more than ten years of experience managing federal and state cooperative agreements. Mr. Miller will manage all aspects of the Brownfields Assessment Program, including cooperative agreement oversight, reporting, and oversight of the assessment projects. He holds a Master's Degree in Urban Planning from McGill University.

Yutian Zhang, Finance Manager, will provide oversight related to accounting matters. Mr. Zhang has over 15 years experience and is a Certified Public Accountant.

Victoria Davis, Planner, will act as Project Manager. She has been working in the environmental planning field for over 25 years; manages our hazardous waste programs; and hazard mitigation and emergency management planning. She has a M.A. in Resource Management and Administration as well as in Environmental Education.

If funded, the UVLSRPC will contract with duly-qualified site assessment contractors procured using the 40 CFR Part 31 procurement process and approved by the EPA and NHDES.

5.b. Audit Findings

The Upper Valley Lake Sunapee Regional Planning Commission has never had any adverse audit findings. Recent financial and A-133 audit reports can be found on the UVLSRPC website.

5.c. Past Performance and Accomplishments

5.c.ii. Has Not Received EPA Brownfields Grant but has received Other Federal or Non-Federal Assistance Agreements

While the UVLSRPC has not previously received an EPA Brownfields Grant, examples of five most recent other federal grant agreements managed by UVLSRPC are described below. In all cases, the UVLSRPC has successfully managed these agreements, performed all work required, performed reporting requirements, and submitted competent technical reports. The Commission maintains records, public access, and notification in accordance with the specifications outlined in the cooperative agreements, provides a variety of documentation of overhead rates and indirect costs, and conducts a professional annual audit regardless of the amount of funding received. No agency has issued any negative oversight reviews of any Commission-managed projects.

Funding Agency: US Department of Agriculture (Solid Waste Management);

Funding Amount: \$200,000 (FY 2014-2015) Status: Completed.

Project Purpose & Accomplishments: Expand hazardous waste collections; provide chemical safety workshops to school labs and art teachers; provide waste transfer station technical training; and develop unwanted medicine collection and disposal programs.

Funding Agency: U.S. Department of Housing and Urban Development (Regional Planning, via Statewide Partnership between the nine Regional Planning Commissions)

Funding Amount: \$300,000 (FY 2012-2014) Status: Completed.

Project Purpose & Accomplishments: To collaborate with local, regional, and statewide partners as necessary to develop a Regional Plan for the Upper Valley Lake Sunapee region that includes the following livability principles: Traditional Settlement Patterns and Development Design, Housing Choices, Transportation Choices, Natural Resource Functions and Quality, Community and Economic Vitality, and Climate Change and Energy Efficiency.

Funding Agency: U.S. Department of Housing and Urban Development (Community Challenge)

Funding Amount: \$147,878 (FY 2011-2013) Status: Completed.

Project Purpose & Accomplishments: To conduct a regional housing needs assessment, map healthy food sources, analyze food source/housing dynamics, implement energy efficiency finance mechanisms within a pilot community, conduct municipal policy audits that identify barriers to sustainable communities and make changes to ordinances and land use policies that assure food security, housing options, and energy efficiency for communities.

Funding Agency: U.S. Department of Agriculture (Solid Waste Management)

Funding Amount: \$184,747 (FY 2013-2014) Status: Completed.

Project Purpose: To provide technical assistance to help our communities increase recycling rates, reduce solid waste disposal costs, and assist them with collaborative efforts that will lower their municipal expenses through coordinated solid waste management efforts.

Funding Agency: U.S. Federal Highway Administration (via NH Department of Transportation)

Funding Amount: \$521,176 (FY 2016-2017) Status: In Progress.

Project Purpose & Accomplishments: To develop a transportation planning program that integrates four key elements: 1) Traffic data collection; 2) Integrating the Regional Transportation Improvement Program with the Statewide Transportation Improvement Program; 3) Actively and effectively engaging the public and municipal officials in transportation-related decision making; and 4) Providing technical assistance and support to municipalities and state agencies.