

Brownfields Assessment Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: The Nashua Regional Planning Commission (NRPC) is seeking a community-wide Brownfields Assessment grant to assess brownfields in the Nashua Region of New Hampshire and specifically, the target areas of the downtown Nashua and Milford. Located in the southern portion of the state, the NRPC region is comprised of the City of Nashua and 12 surrounding towns ranging in size from 1,329 residents in Mason to 86,795 in Nashua. As identified in NRPC's 2014 Regional Plan, the major issues facing the region are the loss of younger workers, un/underemployment of downtown residents, outmigration from downtowns, and an aging population.

The success of the Nashua Region economy rests on its ability to adapt to changing conditions. Starting with the textiles mills along the rivers that flowed through Nashua and Milford in the early 1800s, the region became prosperous as one of the major manufacturing centers of New England. When mills closed, the region's economy shifted to healthcare and technology. This trend prompted residents to migrate away from Nashua and Milford downtowns to outlying communities. It also resulted in increased un/underemployed or travelling long distances to obtain decent jobs for remaining residents. As people and jobs left our downtowns, the hearts of these communities were left with abandoned or underutilized industrial sites stained with a legacy of contaminated soil, groundwater and sediment. High levels of blight and vacancy coupled with the environmental uncertainties have discouraged private investment in the target areas of downtown Nashua and Milford. Furthermore, known and potential brownfields sites also pose health risks to the disproportionately low-income, minority and older people who continue to live in the aging housing stock of these areas. Poverty in Nashua's Center is near double and unemployment nearly 50% higher the national rate and the median household income for both the Milford and Nashua downtown areas is significantly below the state and national averages.

ii. Description of the Priority Brownfields Sites: Almost 200 brownfields have been identified in the Nashua Region through NRPC's previous 2004 and 2007 EPA Brownfields Assessment Grants. Roughly 58% of these sites inventoried are located in Nashua and Milford alone. For almost a century, the Johns-Manville Corporation provided free waste asbestos to property owners in the region to help them fill low lying areas. As a result, there are over 300 known asbestos disposal sites in the region, more than half of which are located in the Nashua downtown target area. Downtown Nashua is home to over 2million square feet of former mill space including sites identified for redevelopment as part of this grant. Milford has also experienced the loss of its industrial base and is now home to three active Superfund sites. Milford relies on aquifers for its drinking water supply. Due to industrial contamination, two of three public water supply wells were abandoned in 1983 and 1984. In 2018, EPA issued a fish advisory the Souhegan River that runs through the downtown core. Milford's redevelopment efforts are focused around downtown's South Street and the adjacent "Oval" where many buildings, including a Priority Brownfields Site, back-up directly onto the Souhegan. Priority Brownfield Sites in Nashua and Milford include:

Ultima-NIMCO (Nashua): This site is a former machine shop located on the Nashua River that was acquired by the City for back taxes. It is planned for redevelopment into incubator space to facilitate entrepreneurship, create jobs and decrease commute times for area residents. Suspected contaminants include waste oil, PCBs, solvents, metals, fuel oil, asbestos, and lead paint.

Redi-Mix Concrete & Corriveau and Routhier Sites (Nashua): These adjacent vacant sites are connected by a series of abandoned rail line parcels that are planned for redevelopment into a rail

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trail. The sites encompass over 16.5 acres and are the largest vacant contiguous parcels in the downtown area. The sites are surrounded by a mix of dense residential and commercial uses. Nearly 5,500 residents live in direct proximity to the properties, 33% of which are minorities and 18% of whom live below poverty. Suspected contaminants include asbestos, gasoline, and fuel oil.

South Street Gas Station Site (Milford): This abandoned gas station is in the heart of downtown Milford across from the Oval, abutting the Souhegan River. The site is a visual and physical impediment to local revitalization efforts, pedestrian connectivity and access to the River. Its suspected petroleum and benzene contamination also deter developers from investing in the area. The Town plans for redevelopment of the site for mixed-uses to increase investment, create jobs and attract new residents to the downtown core. Portions are within the 100-year floodplain.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans: In 2012, NRPC received a three-year Sustainable Communities Regional Planning Grant from HUD to draft a comprehensive plan; one that examines the region holistically, integrating all subject areas to draft a blueprint for the future. Adopted in December 2014, the Plan's vision calls for the Nashua Region to *maintain a high quality of life characterized by the Region's small-town feel and suburban setting. Economic prosperity is based on well-functioning public infrastructure, including vibrant town centers and downtowns, and easy access to natural resources and recreational opportunities.* Specific objectives include: redevelop key sites in Nashua and Milford; increase job opportunities to encourage young adults to live in the region; plan for an aging demographic and protect the region's environment. Public outreach efforts associated with the Regional Plan made it clear that residents wish to focus new development in downtowns and along already developed corridors. Brownfields redevelopment for commercial and residential uses plays a key role in the continued regeneration of the region.

Based on this planning effort, the City of Nashua commissioned MIT in 2018 to conduct an Economic Development Analysis of the downtown including the Millyard. It recommended redevelopment of three City owned properties in the Millyard to serve as catalysts for private investment including the priority Ultima-NIMCO site which would provide low cost maker space and startup incubator space to promote entrepreneurship, create living-wage jobs and reduce poverty and unemployment in the City. In addition, the Redi-Mix/Corriveau Routhier sites are ideally poised for mixed-use, transit-oriented development that would complement the Ultima-NIMCO redevelopment plan, given their proximity to the Nashua and Merrimack Rivers and new Park & Ride facility planned as a future commuter rail stop.

Milford conducted a Community Design Charrette in 2013 that considered reuse of the targeted Boston & Maine buildings as the focal point of the ongoing efforts to revitalize the downtown area and improve pedestrian connectivity to the Milford Oval (downtown), nearby schools, and passive/active recreation. Further, the properties represent an essential element of the 2014 Town-wide pedestrian, bicycle, trail and recreation connectivity plan developed by the Planning Board and NRPC. Unfortunately, the priority Gas Station site caused the scope of a recently completed NH DOT funded Transportation Enhancement pedestrian and streetscape improvement project to be reduced due to the potential for contamination and increased remediation related costs.

ii. Outcomes and Benefits of Redevelopment Strategy: Redevelopment of the Ultima-NIMCO site into maker space and startup incubator space will promote entrepreneurship, create well-paying jobs and reduce poverty and unemployment in City. It will also target local residents and

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young professionals who can thereby both live and work in Nashua, creating a multiplier effect for other downtown businesses. Further, redevelopment of the blighted property would stimulate investment in other vacant and underutilized properties in the vicinity. Within five years from completion, the initiative is expected to support and create over \$20 million in investment in the downtown and create 100 additional jobs. Once this formalized start-up network is established, the district will stimulate formation of a new type of development, an “experience district”, where visitors can come to the Millyard district and participate in the industrial and manufacturing businesses and services including brewing, distilling, crafts and art, and other light manufacturing along with tours and show rooms. Redevelopment of the Redi-Mix Concrete & Corriveau and Routhier Sites into a mix of transit-oriented retail, office and mixed-income housing is anticipated help attract younger workers to the area while providing improved housing conditions and job opportunities to the area. Notably, the NIMCO and Redi-Mix/ Routhier sites will be connected by planned extension of the Heritage Rail Trail. The collective impact of these improvements would transform the entire downtown Nashua area.

Once implementation is complete, the South Street/Oval redevelopment initiative in Milford is expected to dramatically improve pedestrian connectivity, traffic circulation and the quality of place in downtown Milford. Redevelopment of the former Gas Station and Railroad buildings is expected to result in the creation of at least six new businesses with up to 30 new jobs and new residents, including young professionals, will once again be attracted to the downtown core.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: NRPC, Milford and Nashua combined have leveraged \$8,613,894 in funding derived from a combination of in-kind staff support and transportation enhancements that directly support the redevelopment of the target areas. All three entities have committed to work collaboratively in grant administration such as organizing Brownfields Advisory Committee (BAC) meetings, conducting outreach and assisting to secure site access agreements. The City of Nashua has undertaken a multifaceted initiative to revitalize its downtown area through investments in multi-modal transportation improvements based on *Smart Growth* principals. The City’s \$3,274,760 *Eastern Gateway* project, current in the design phase, will transform the East Hollis/Bridge Street entrance to the downtown area at the Merrimack River with new street alignments, bicycle/pedestrian accommodations and landscaping. A similar \$2,040,000 (\$200,000 in City Matching funds) improvement is planned for the Courthouse Oval adjacent to the Millyard. The City has also been awarded a \$900,598 Congestion Management Air Quality (CMAQ) grant from the NH Department of Transportation coupled with \$225,149 in City matching funds to extend the existing Heritage Rail Trail from the Millyard the Merrimack River adjacent to the Redi-Mix/Corriveau Routhier sites. In 2017, Nashua completed construction of a \$2.9 million intermodal park-n-ride facility designed to serve as a future commuter rail station in close proximity to both sites.

In Milford, \$989,152 in federal and \$247,288 in local matching funds have been secured to improve traffic flow and pedestrian accommodations around the downtown Oval with construction anticipated for 2020. \$936,947 in federal funds has also been approved to restore the historic *Swing Bridge*, an 1889 iron and cable suspended footbridge over the Souhegan River that provides a key pedestrian link to downtown. Construction is planned for 2025. Both projects will significantly enhance access to the Oval and South Street target area including the Priority Gas Station and Boston & Maine Railroad sites.

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ii. Use of Existing Infrastructure: The target areas of Nashua and Milford are already developed. As a result, cleanup and redevelopment of these sites will be able to utilize existing infrastructure rather than having to build additional roads, sewer, and utilities in outlying areas. The target brownfield sites in both Nashua and Milford will build upon existing infrastructure, in particular existing transportation networks, power, water and sewer availability in the downtown. Downtown Nashua has direct connections to existing road infrastructure and City bus routes as well as an expanding multi-modal network. NRPC is working with Nashua and Milford in 2019 to assess feasibility of extending fixed route bus service. High speed internet availability makes the target area viable for high tech and other business growth. Emphasis will be placed on solutions that increase access to housing choice, transportation options, jobs opportunities and recreation for low to moderate income households. In addition, the Nashua Millyard utilizes a shared utility network for water, sewer and fire protection. This results in efficiencies and lower costs for redevelopment and building operation.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for the Funding: The target areas are characterized by high un/underemployed, and large minority and aging populations. The population living in Downtown Nashua suffers from high levels of poverty (32% in census tract 01050), and an unemployment rate of 18%. Residents in both Nashua and Milford have disproportionately low household income levels compared to the state (50% and 25% lower, respectively) as well as minority populations (260% and 50% higher than state average, respectively). In addition, Milford has an aging population 20% higher than the US average. This combined with flat population growth in the region between 2000 and 2010, including a slight decrease in Nashua, resulted in a workforce shortage and stagnant economy. Growth has further been limited by a lack of redevelopment investment.

Both Nashua and Milford need to invest more in their downtowns. However, this is challenging for our target communities in several ways. With no state income or sales tax, property taxes serve as New Hampshire's primary source of funding for state, county, and local municipal budgets. With recent cost shifting from the State government, local municipal budgets face increase strain. This was compounded over this past winter when local municipalities had to draw on reserve funds for increasing snow removal costs. Within the City of Nashua, population and economic growth has been stagnant over the last decade, while health care and other costs have skyrocketed, further putting a strain on municipal budgets.

With limited funds from state and municipal operations, regional planning commissions struggle to attain adequate funding. NRPC receives only 1% of its funding from the State Office of Strategic Initiatives (OSI) and depends upon dues for 12% of its budget, supplementing the remainder with grants and contracts. NRPC has no reliable source of funds to pay for the much needed brownfields assessments in the region. Furthermore, Nashua and Milford also lack the financial resources to implement these required assessments. Without grants from the EPA, these Brownfield sites in Nashua and Milford will continue to hinder development, thus jeopardizing the future success of the Nashua Region and the people who live within it. Since these trends are expected to continue, Brownfields funding is essential.

ii. Threats to Sensitive Populations:

(1) Health and Welfare of Sensitive Populations: Brownfields exacerbate the issues Nashua and Milford already face. There is a correlation between brownfields and areas with greater levels of

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criminal activity. Of the region's 2,606 property crime arrests in 2015, 58.4% of them were located in Nashua and Milford. These vacant properties reduce nearby property values, discourage community investment, deter business start-ups, and cause a loss of community pride. This phenomenon is also contributing to high rates of substance abuse in Nashua and Milford within the Nashua Region. According to American Medical Response, there were 246 opioid overdoses in Nashua in 2015. As a result the City has established Safe Stations at each of its fire stations where a trained firefighter is able to connect those looking for help with recovery and crisis help. The East Hollis Street station is directly adjacent to the Nashua brownfields focus area.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: 2006 Center for Disease Control and Prevention data shows that NH ranked in the top tier of breast cancer and myeloma incidence rates and the second highest tier for leukemia, lung cancer, lymphoma, and ovarian cancer. Asbestos is a major concern for brownfields sites in the Nashua Region. Inhalation of its fibers causes respiratory disease and cancer. According to the NH Comprehensive Cancer Collaboration, cancer was the leading cause of death in NH in 2006 and roughly one-third of cancer incidences in the US are linked to exposures to occupational and environmental carcinogens and prenatal exposures. Based on U.S. Department of Housing and Urban Development (HUD) air index ratings range from a low of 9 to 44, air quality has a score of 9 in Downtown Nashua. Children and the elderly suffer more from the effects of air pollution, which also plays a role in asthma attacks. Data from NH Department of Health and Human Services (DHHS) shows that asthma rates in Hillsborough County were 11/100 residents and rates within Nashua were 16/100 residents, exceeding the state-wide rate of 9.7. Assessing and cleaning up our downtown brownfields will directly lead to reduced risk of exposure to contaminants resulting in lasting long-term health benefits for our target community.

(3) Economically Impoverished/Disproportionately Impacted Populations: Despite the Nashua Region's proximity to greater Boston, Nashua and Milford have not shared in Boston/Cambridge's economic growth. This is highlighted by the fact that the target areas are characterized by high un/ underemployed, and large minority and aging populations. As previously stated, the population living in Downtown Nashua suffers from high levels of poverty (32% in census tract 01050), and an unemployment rate of 18%. Residents in both Nashua and Milford have disproportionately low household income levels compared to the state (50% and 25% lower, respectively) as well as minority populations (260% and 50% higher than state average, respectively). One of the key reasons for this is that brownfields have moved jobs outside the downtown, reducing access to these jobs as they are not located within the downtown target areas.

According to the 2018 *Nashua Interstate Analysis*, 57.8% of the labor force in the Nashua portion on the NH-MA NECTA has to work outside of the region as there are not jobs within the downtown. In Nashua, 68.1% of the labor force commutes outside of the City for work including 30.1% who commute to Massachusetts, as compared to 25% in 2010. This disproportionately impacts the economically impoverished as commuting long distances puts a significant financial and time strain on the target community, too much for many of the residents (and directly leading to the high un/underemployment and poverty levels in the target areas).

Like many parts of the country, the region's economy is changing, manufacturing employment is contracting while health care and services jobs are growing, and it's important that the region adapt to those changes moving forward. Yet, the region's labor force is aging and its population of young people is contracting. More than 20% of workers in the region are approaching retirement age, including a major concentration in manufacturing. By remediating and redeveloping brownfield

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sites in our urban cores that serve to impede private investment as part of a comprehensive redevelopment strategy that includes targeted transportation and quality-of-life improvements, our communities can attract new commercial and residential development to create local jobs and new housing opportunities to attract younger workers while improving access to good jobs for the existing residents.

b. Community Engagement

i. Community Involvement: Our diverse team of partners include the following:

Partner Name	Point of contact (name, email & phone)	Specific role in the project
Greater Nashua Chamber of Commerce	Tracy Hall, Executive Dir. thatch@nashuachamber.com (603) 881-8333	Outreach to Nashua and Milford businesses, property owners and developers; attend BAC meetings
NeighborWorks Southern NH	Robert Tourigny, Executive Director rtourigny@nwsnh.org (603) 626-4663 x1700	Identify sites for redevelopment; assist with community outreach and engagement; attend BAC meetings.
Nashua Community Development Department	Sarah Marchant, Director marchants@nashuanh.gov (603) 589-3095	Assist in identify sites for re-development; assist with outreach to businesses, residents, property owners and developers; attend BAC meetings
Milford Community Development Office	Lincoln Daley, Director ldaley@milford.nh.gov (603) 249-0600	Assist in identify sites for re-development; assist with outreach to businesses, residents, property owners and developers; attend BAC meetings

ii. Incorporating Community Input: NRPC utilizes a multi-media approach to ensure a broad cross-section of residents are engaged in the inventory, assessment, and redevelopment planning process. NRPC will host informational workshops, meet with municipal boards, attend/host public meetings and produce fliers and technical guides in both English and Spanish. Meetings will be held in convenient locations to the affected communities, accessible by public transit, and at a time when they can be attended by working residents. NRPC will provide stakeholders with updates on the Brownfields Program through a combination of press releases, postings on its partners’ websites, placement of fliers at area businesses and organizations, e-newsletter articles (462 Constant Contact subscribers), social media (467 Twitter feed and 336 Facebook followers). In addition to print media described above to be distributed through partner and area organizations, a dedicated Brownfields page will be developed on the NRPC website to highlight educational resources, engagement opportunities, and ongoing work. Additionally, several partners have committed to help with the outreach and communication process, such as the Greater Nashua Chamber of Commerce with over 600 members in their network. These established communication mechanisms will be used to announce events, meetings and workshops, distribute technical guides, fliers, and other literature and web-based information. Input from the community will be solicited directly at each public meeting. In addition, contact information including phone and email will be placed prominently on all notices, presentations, reports and web sites to directly solicit community input. Lastly, a community feedback form will be placed on the NRPC

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Brownfields website that can serve to directly provide input by the community. All comments and feedback received from the community will be formally responded to in writing on our website.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Description of tasks and Activities

For each of the following tasks, all costs (personnel, travel, supplies, and contractual) are split 2/3 to hazardous substance (haz) and 1/3 to petroleum (pet) grant funds. Additionally, total cost per staff person includes fringe (21.6% of total staff cost).

- **TASK 1: Cooperative Agreement Oversight:** NRPC will hire a QEP, attend the National EPA Brownfields Conference, complete required EPA quarterly reporting, and manage technical tasks associated with the program. The BAC, comprised of volunteers/in-kind support, will oversee the inventory process and implementation of the overall grant. *Costs* are Asst. Dir at 80hrs (53 haz/27 pet)=\$6,607, Regional Planner 20hrs (13 haz/7 pet)=\$1,190, Sr. Env. Planner 20hrs (13 haz/7 pet)=\$1,314 (total personnel & fringe \$9,111); 112 miles at \$0.54 per mile; airfare (\$300RT), hotel (\$129/night x2 nights) and meals (\$54/day x3 days) for 2 persons to attend the National Conference; and \$150 in supplies (copies, toner, postage).
- **TASK 2: Outreach and Engagement:** NRPC will begin by reconvening and soliciting new members to the BAC. Throughout the grant process NRPC and the BAC will employ a variety of outreach methods to engage and partner with community-based organizations, landowners, developers, municipal officials, businesses and residents to obtain and incorporate feedback. *Costs* are Sr. Env. Planner 40hrs (27 haz/13 pet)=\$2,626, Regional Planner 100hrs (67 haz/33 pet)=\$5,950, GIS Planner 20hrs (13 haz/7 pet)=\$1,082, Asst. Dir 20hrs (13 haz/7pet)=\$1,652 (total personnel & fringe \$11,310); 278 miles at \$0.54 per mile; \$150 for document production supplies (copies, toner, postage); and Contractual costs for preparation and attendance at meetings (\$9,000 total).
- **TASK 3: Inventory, Site Selection and Prioritization:** Beginning with the existing brownfields inventories completed in January 2006 and updated in July 2009, NRPC will update sites and information provided by BAC members and municipal contacts. The updated inventory will then be used to formulate a prioritized ranking of potential sites for assessment. Following the initial round of assessments, NRPC will revisit the prioritization process to identify any additional high priority sites for a final round of assessments to be conducted in the final project year. *Costs* are Sr. Env. Planner 20hrs (13 haz /7 pet)=\$1,313, Regional Planner 20hrs (13 haz /7 pet)=\$1,190, GIS Planner 36hrs (24 haz /12 pet)=\$1,947, Asst. Dir 20hrs (13 haz /7 pet)=\$1,652 (total personnel & fringe \$6,102); 278 miles at \$0.54 per mile; \$150 for document production supplies (copies, toner, postage); and \$6,000 contractual costs for site ID work, including travel, meetings, and inventory updates.
- **TASK 4: Phase I & II Environmental Site Assessments:** complete Phase I and II ESAs, beginning in fall 2019, for four (4) hazardous substance brownfields sites and two (2) petroleum sites identified through the prioritization and ranking completed in Task 3. Phase I ESAs will be conducted in accordance with ASTM 1527-13 and EPA's "All Appropriate Inquiry" rule and Phase II Investigations in accordance with ASTM 1903-11. NRPC staff will be responsible for oversight and review of all QEP activities to ensure that the Quality Assurance Project Plan (QAPP) is fully developed, approved and implemented prior to initiating Phase II activities. *Costs* are Sr. Env. Planner 40hrs (27 haz /13 pet)=\$2,622, Regional Planner 50hrs (33 haz /17 pet)=\$2,971, Asst. Dir 20hrs (13 haz /7 pet)=\$1,652 (total personnel & fringe \$7,245); 278 miles at \$0.54 per mile; \$150 for document production

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supplies (copies, toner, postage); and include QEP expenses of \$4,000 for each Phase I ESA and \$31,850 for each Phase II ESA.

- TASK 5: Phase III Remediation and Reuse Planning:** depending on site characteristics, NRPC will provide up to six (four-hazardous substances, two-petroleum) Phase III Remedial Action and Reuse Plans for sites assessed in the first phase of ESAs. Work will commence by summer 2020. The reports will contain descriptive information on each of the existing conditions of the sites; community input and involvement related to site prioritization, assessment, and redevelopment opportunities; results of Phase I and II Assessments; and recommendations on remedial actions required and/or redevelopment opportunities envisioned. The reports will provide a key information source for future cleanup activities. *Costs* are Sr. Env. Planner 42hrs(28 haz /14 pet)=\$2,756, Regional Planner 65hrs(43 haz /22 pet)=\$3,867, GIS Planner 20hrs (13 haz /7 pet)=\$1,082, Asst. Dir 20hrs (13 haz /7 pet)=\$1,652 (total personnel & fringe \$9,357); 140 miles at \$0.54 per mile; \$150 for document production supplies (copies, toner, postage); and include QEP expenses of \$4,000 per plan.

b. Cost Estimates and Outputs

Budget Categories	Project Tasks: Hazardous Substances (\$)					Total
	(Task 1)	(Task 2)	(Task 3)	(Task 4)	(Task 5)	
Personnel	\$4,762	\$5,912	\$3,190	\$3,788	\$4,892	\$22,544
Fringe	\$1,312	\$1,628	\$878	\$1,042	\$1,346	\$6,206
Travel	\$1,000	\$100	\$100	\$100	\$50	\$1,350
Supplies	\$100	\$100	\$100	\$100	\$100	\$500
Contractual	\$0	\$6,000	\$4,000	\$143,400	\$16,000	\$169,400
Total Costs - Haz	\$7,174	\$13,740	\$8,268	\$148,430	\$22,388	\$200,000
Budget Categories	Project Tasks: Petroleum (\$)					Total
	(Task 1)	(Task 2)	(Task 3)	(Task 4)	(Task 5)	
Personnel	\$2,381	\$2,956	\$1,595	\$1,894	\$2,446	\$11,272
Fringe	\$656	\$814	\$439	\$521	\$673	\$3,103
Travel	\$500	\$50	\$50	\$50	\$25	\$675
Supplies	\$50	\$50	\$50	\$50	\$50	\$250
Contractual	\$0	\$3,000	\$2,000	\$71,700	\$8,000	\$84,700
Total Costs - Pet	\$3,587	\$6,870	\$4,134	\$74,215	\$11,194	\$100,000
Total Budget	\$10,761	\$20,610	\$12,402	\$222,645	\$33,582	\$300,000

Specific task-based outputs include:

- Oversight:** *Outputs* include quarterly reports throughout the grant period, updated info. posted to the ACRES database, RFP for contractual services, approved QEP contract.
- Outreach:** *Outputs* include up-to-date, interesting, and accessible information available through public meetings, website, press releases, social media, and newsletter articles; consistent participation of BAC members.
- Inventory:** *Outputs* include a comprehensive inventory of potential brownfields sites within the NRPC region and a set of site-ranking criteria that can be used for future inventory activities.

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4. ESAs: Outputs include six completed Phase I and detailed Phase II ESAs; approved master QAPP and site-specific addendums for each of the assessed brownfields properties.
5. Remediation Plans: Outputs include six site-specific Remedial Action and Reuse Plans, Letter of Consent from State Environmental Authority (NHDES).

c. Measuring Environmental Results

All outputs and outcomes resulting from the implementation of this program will be measured and communicated to the EPA as part of NRPC's quarterly progress reports and ACRES information updates, and to the region at large through NRPC's project task obligations. At the outset of the project, NRPC will develop a detailed project timeline that will incorporate all task expectations, project outputs, and staffing considerations to help guide project progress. This timeline will be shared with the EPA project officer, BAC, and QEP to aid in communicating the project vision.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure: NRPC has the knowledge, experience and capacity to successfully implement and manage the FY19 Brownfields Assessment Grant. NRPC's total budget for FY19 is \$1,455,880. Approximately 88% of NRPC's budget is awarded through grants and state and federal contracts which are consistently and successfully managed. NRPC is the federally mandated Metropolitan Planning Organization for the Nashua Region and in this role manages over \$1,000,000 in federal funds every year. NRPC has received federal funding through the Environmental Protection Agency, Federal Transit Administration, Federal Highway Administration, Federal Emergency Management Agency, HUD, and DHHS and has not had any adverse audit findings. As planning needs in the region have become more sophisticated, NRPC has responded by raising the level of technical skill required of its staff and adding expertise as needed. The following staff members would have primary responsibility for the managing the Brownfields Program:

Jay Minkarah, NRPC Executive Director, will serve as the project lead and oversee public outreach, partner engagement and overall project management. Mr. Minkarah has worked in planning and economic development for over thirty years. Prior coming to the NRPC, he served as President & CEO of the nonprofit *DevelopSpringfield Corporation* in Springfield, MA focused on redeveloping blighted and abandoned properties including two brownfields sites. As Economic Development Director for Manchester, NH from 2007 to 2012, Mr. Minkarah managed the successful deployment of \$400,000 in EPA Brownfield Assessment grant funds. Mr. Minkarah received a Bachelor of Urban Planning from the University of Cincinnati and a Juris Doctor from the University of New Hampshire School of Law.

Katherine Lafond, NRPC Business Manager, will manage the project budget, maintain financial records, process invoices and payments, manage vendor contracts and grant agreements and provide general administrative oversight. Ms. Lafond has over twenty years of local government experience. She received a BA in Sociology from Southern New Hampshire University with a Concentration in Community Health.

Mason Twombly, Regional/Environmental Planner, serves as project manager for NRPC's Household Hazardous Waste program and for our *Toxic Free – Easy as 123* initiative funded through a 2018 EPA Healthy Communities grant. Mason will assist with

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project administration, public outreach and engagement. Mr. Twombly has a BS in Community and Environmental Planning from the University of New Hampshire.

ii. Acquiring Additional Resources: Upon receipt of the grant, NRPC and the BAC will solicit and hire a qualified environmental professional (QEP). The BAC will assist with developing and advertising a request for proposals to select and hire a QEP in fall 2019. This process will be conducted in accordance with NRPC's procurement policies utilizing a competitive bid process consistent with Uniform Guidance 2 CFR §200.317 through §200.326. All NRPC contracting activities utilize open, fair, and public processes to advertise, select, and award project contracts in accordance with agency policies that will be used for to hire the QEP. NRPC actively considers MBE/WBE status during the Request for Proposals evaluation process.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant:

(1) Accomplishments: NRPC received Brownfields Assessment Grants from the EPA in 2004 and 2007. These funds were used to assess seven high priority sites across the region and it is anticipated that these assessments will leverage more than \$80 million in redevelopment. The Nashua Manufacturing Boiler House Phase I, II & RAP, Majestic Motors Junkyard Phase I and II, and the Grugnale Disposal Site Phase I were each successfully assessed under NRPC's 2004 Brownfields Assessment Grant. Under NRPC's 2007 Brownfields Assessment Grant, over 200 potential brownfields sites were identified in the region and the Grugnale Disposal Site Phase II, the Milford Old Police Station Phase I and II, and the Hudson Asbestos disposal site Phase I and II were successfully assessed. NRPC's greatest strength is its ability to successfully implement this project by leveraging well established relationships and coordinating the extensive work already completed under previous Brownfields Assessment grants. The FY19 Nashua Regional Brownfields Program will build on its past work to identify brownfield sites, assess the spatial extent and degree of contamination, and conduct remedial action feasibility and reuse planning.

(2) Compliance with Grant Requirements: FY 2007 Hazardous Substances Brownfields Assessment Grant (BF97185901) - *Funds Expenditure:* grant funds remaining at end of grant period = \$0. *Compliance with Grant Requirements:* NRPC complied with all quarterly reporting, MBE/WBE disclosures, financial status reports, ACRES updates, and progress monitoring. *Compliance with Work Plan:* three Phase I ESAs and two, Phase II ESAs were completed for three properties within the NRPC region. Developers are already on board for each site and are anticipated to leverage over \$80 million in private investment. A Brownfields Guidebook was written to aid both municipal and public audiences in understanding the relevance of brownfields and benefits of redevelopment.

FY 2004 Petroleum Brownfields Assessment Grant (BF97118901)-*Funds Expenditure:* grant funds remaining at end of grant period = \$0. *Compliance with Grant Requirements:* NRPC complied with all quarterly reporting, MBE/WBE disclosures, financial status reports, ACRES updates, and progress monitoring. *Compliance with Work Plan:* Phase I & II ESAs and Remedial Action Plans were completed for two contaminated sites within the NRPC region. \$2,246,000 in leveraged funds were generated and additional cleanup work on both sites is ongoing. NRPC also created a regional inventory of likely petroleum-contaminated and hazardous substances sites.