Application for Brownfields Community-wide Assessment Grant for States and Tribes
New Hampshire Department of Environmental Services (NHDES)

IV.D. Narrative Information Sheet

IV.D.1. Applicant Identification
New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

IV.D.2. Funding Requested
  a. Assessment Grant Type
     Community-wide Assessment Grant for States and Tribes
  b. Federal Funds Requested
     i. Requested Amount - $2,000,000
     ii. Federal Funds Requested Waiver – Not applicable

IV.D.3. Location
State of New Hampshire (state-wide)

IV.D.4. Target Area and Priority Site/Property Information
  Target Areas:
  City of Berlin, NH
  Town of Derry, NH
  Town of Winchester, NH
  Priority Sites:
  Isaacson Structural Steel, Jericho Road (Map 105, Lot 11), Berlin, NH
  Isaacson Structural Steel, 149 Jericho Road (Map 105, Lot 14), Berlin, NH
  Isaacson Structural Steel, Jericho Road (Map 107, Lot 3), Berlin, NH
  Webber Landfill, 128 Goodhue Road, Derry, NH
  J&G Auto, 7 Back Ashuelot Road, Winchester, NH
  A.C. Lawrence Property, 15 Bridge Street, Winchester, NH

IV.D.5. Contacts
  a. Project Director
     Melinda Bubier, Project Manager
     Phone: (603) 271-1169
     E-Mail: melinda.s.bubier@des.nh.gov
     29 Hazen Drive, PO Box 95
     Concord, NH 03302-0095
b. Chief Executive/Highest Ranking Elected Official
Robert R. Scott, Commissioner
Phone: (603) 271-2958
E-Mail: robert.r.scott@des.nh.gov
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

IV.D.6. Population
Berlin, NH – 9,425
Derry, NH – 34,317
Winchester, NH – 4,150

IV.D.7. Other Factors

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>NA</td>
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<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>NA</td>
</tr>
<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>1, 2 &amp; 3</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>3</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>3 &amp; 4</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td>NA</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
<td>NA</td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>NA</td>
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IV.D.8. Letter from the State or Tribal Environmental Authority
Not applicable – applicant is a state.

IV.D.9. Releasing Copies of Applications
Not applicable.
IV.E. Narrative/Ranking Criteria (and Evaluation Criteria) for Assessment Grants

IV.E.1. Project Area Description and Plans for Revitalization

IV.E.1.a. Target Area and Brownfields
This grant focuses on three target areas that represent three general categories of geography and demographics including: the northern part of the state which continues to see significant economic stressors such as high rates of poverty, unemployment, and outmigration; a growing metropolitan area where additional housing, clean energy, and safe, reliable drinking water are necessary to support increased population centers; and distressed communities in rural river valleys where previous industrial settlement have now left a legacy of abandoned properties along rivers subject to increased flooding. These target areas include the City of Berlin and the Towns of Derry and Winchester.

IV.E.1.a.i. Background and Description of Target Area
The first target area includes the City of Berlin (pop. 9,425). Located in the northern part of New Hampshire, along the Androscoggin River, this is the most severely and economically distressed area of the state. Berlin in particular continues to see significant economic stressors such as high rates of poverty, unemployment, low incomes, aging population, and outmigration. Other indicators of economic decline include abandoned housing, vacant storefronts, and underutilized mill buildings and industrial sites. In the early 1930s, as a leader in the pulp and papermaking industry, Berlin embodied attributes of a thriving hub, with theatres, a symphony orchestra, banks, prominent schools, and a variety of civic, athletic and service organizations. In 2006 when Fraser Paper, Berlin’s third in a succession of major paper mill owners, closed the mill in Berlin, many generations of families who called Berlin home had no other choice but to leave to seek new employment, resulting in a sharp decline in population by more than half. Berlin is now struggling to support its 9,425 current residents and to provide services to tourists who frequent the area for its natural beauty, ski areas, and expansive ATV and snowmobile trail network centered around Jericho Mountain State Park. Berlin’s gateway area along Route 110, which includes three of our priority sites, is also hampered by numerous vacant or underutilized commercial and/or industrial properties, all a deterrent to redevelopment, expanding the tourism industry, and reversing the exodus of population.

The second target area is the Town of Derry (pop. 34,317), a metropolitan statistical area in the southern part of the state. The opening of Interstate 93 in 1963 allowed Derry residents to commute by car to employment outside the town. Derry gradually became a bedroom community for Manchester, NH and Metro Boston. Tremendous population growth continued into the 1970s and 1980s triggered by the combined forces of Baby Boom household formations and the migration of Massachusetts workers wanting to reside in New Hampshire. Derry continues to be a central hub in southern NH, providing amenities, resources, and labor to larger municipalities nearby.

The third target area is the Town of Winchester (pop. 4,150), a rural town located within the Ashuelot river valley. Similar to nearby river towns, Winchester experienced rapid growth in the middle of the 19th century after three newly constructed rail lines connected the area to the rest of New England and fostered the development of numerous profitable mills along the banks of the Ashuelot River. Since the closing years of the 20th century, however, the area has
experienced a steady decline in good manufacturing jobs (62% decrease since 2001\(^1\)), leading to the closure or abandonment of many mills, the outmigration of young families seeking better job opportunities, and a general decline in health and prosperity\(^2\). Up and down the valley, the conditions of the many mills fall on a continuum from empty or underutilized buildings that have fallen into disrepair due to flooding or neglect, to vacant lots. Winchester is home to a number of these mills as well as other problem sites along the river banks.

**IV.E.1.a.ii. Description of the Priority Brownfield Site(s)**

The sites described below are the priority sites chosen for this grant application; however, there are several other potential properties within each target area and other parts of the state. Given space limitations, our proposal will focus on the following:

Three former **Isaacson Structural Steel** properties are located along Route 110 in the gateway to the **City of Berlin** near Jericho Mountain State Park. These properties, among others in the gateway, are largely underutilized, run down, junkyard type relics of the area’s industrial past. Isaacson Structural Steel utilized the three sites for truck maintenance, staging, and materials storage. The current owner has more recently used the properties for vehicle salvage, junk storage, and hoarding. The City has been struggling with the owner for years over code violations and general environmental concerns, and is poised to inherit these problem properties through an involuntary court settlement. These properties are of particular concern because the blight in the area has negatively impacted marketability to the point where redevelopment has not occurred. Initial assessment of these properties identified polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), per- and polyfluoroalkyl substances (PFAS), and metals. Additional assessment is necessary before cleanup alternatives can be identified.

The **Webber Landfill** site is a demolition debris landfill located at 128 Goodhue Road in the **Town of Derry**. The property is a 25-acre parcel located in a residential neighborhood of single family homes. All homes in the area are served by private drinking water wells. In the 1980s the owner allowed demolition debris to be disposed in a former gravel pit area on the southeast portion of the property. Sampling last performed in May 1993 identified groundwater impacts at the site (primarily lead, nitrate, arsenic and manganese). Currently the owner is behind in the payment of property taxes in excess of $150,000. Due to the significant timeframe since the last monitoring took place, and that the demolition debris landfill has been left uncapped, there is a potential for leaching and additional groundwater impacts from the landfill. Furthermore, the site has not been sampled for PFAS. Given the prevalence of PFAS associated with landfills, the previous detection of other groundwater contaminants, and the location of this site within a residential neighborhood with private drinking water wells, this site is identified as priority for assessment.

The **Town of Winchester** has numerous properties in need of assessment, two of which are highlighted as priority sites in this application. **J&G Auto** is an inactive gas station which repairs and scraps vehicles. NHDES responded to a complaint regarding the site in July 2021 after a significant rainfall event caused the Ashuelot River to overflow its banks in the vicinity of the

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\(^1\) Source: Economic and Labor Market Information Bureau, NH Employment Security.

\(^2\) See [http://swrpc.org/files/MonadnockRegionFuture_RegionalPlan_FINAL.pdf](http://swrpc.org/files/MonadnockRegionFuture_RegionalPlan_FINAL.pdf)
site causing several containers of oily/hazardous material (OHM) to overturn and discharge their contents directly to the floodwaters. NHDES hired a contractor and removed approximately 1,900 gallons of OHM in drums from across the site. The site remains littered with up to 300 tires, vehicles in various states of disassembly, and several recreational vehicles with people living in them. Reportedly, questionable activities occur at the site including possible drug use/distribution and prostitution. The owner currently owes $70,000 in back taxes, the Town is incurring legal fees, and NHDES spent approximately $10,000 for drum removal. Assessment is paramount to identify what contaminants are present at the site, address imminent environmental concerns, and evaluate cleanup options.

The former A.C. Lawrence Tannery, also located in Winchester, is an 18.5-acre shearling tannery that was abandoned in 1987 and taken for back taxes. All that remains on site are the slab foundations of former buildings. The site, which is mostly on a federally designated flood plain, consists of two parcels with the northerly parcel known to have varsol (a petroleum-based solvent), chromium and PAH contamination, while the southerly parcel is less well understood. The Town was recently awarded two grants to utilize a small portion of this site for parking for an adjacent rail trail and to improve the trail surface, making it more bike friendly.

**IV.E.1.b. Revitalization of the Target Areas**

**IV.E.1.b.i. Reuse Strategy and Alignment with Revitalization Plans**

The City of Berlin recently completed a 2019 Economic Development Action Plan focused on building on the city’s unique assets, and making progress towards city-wide goals related to reversing population loss and industry decline. A key component of this Plan is to utilize the vast natural resources within close proximity of Berlin (including trails, rivers, mountains, and more) to enhance tourism and outdoor recreation activities, bringing income and jobs to Berlin. It was identified in this report that the lack of a hotel and limited eating options force those visiting to spend money outside the city limits. Utilizing the Isaacson Structural Steel sites for a hotel and/or other commercial establishments directly aligns with this plan, will bring increased property tax revenue, and provide jobs for residents.

Currently approximately 50% of Town of Derry’s residents are on private drinking water wells utilizing a regional aquifer. Maintaining the regional aquifer as source of clean drinking water is a priority in their Master Plan. Assessment of groundwater quality at the Webber Landfill site will help to assure that the Town’s drinking water resources are being protected. The infrastructure to support a productive community (municipal services, schools, drinking water and wastewater) also demands a significant amount of costly energy. In 2016, Derry created a Net Zero Task Force focused on conserving energy in the Town’s municipal buildings and schools and replacing carbon based energy sources with renewable energy. The Webber Landfill site will be evaluated for its suitability for a solar array development and for housing in a part of the state where demand significantly exceeds supply.

The Town of Winchester’s Master Plan includes encouraging development that focuses on the recreational and natural beauty of Winchester and reflects the community’s desire to preserve natural resources. Due to the location of both the J&G Auto and A.C. Lawrence Tannery sites, their “redevelopment” (including flood plain storage and green space) will address plans to improve environmental stewardship along the river as well as enhance safety and community
health by removing blight along a rail trail network currently under development and making the trails more attractive for recreation. At the A.C. Lawrence Tannery site, the Town of Winchester has also been working with a solar developer to convert the site into a Brightfield.

IV.E.1.b.ii. Outcomes and Benefits of Reuse Strategy
The vast natural resources within and in close proximity to the City of Berlin (including trails, rivers, mountains, and more) has driven increased visitation of all types to the region, including ATVs, hiking, biking, hunting, fishing, boating, birding, and others. These assets are currently being utilized to varying degrees; however, the absence of tourist amenities is a constraint to the City’s ability to capitalize on these visitors. The lack of a hotel and limited eating options force those who are visiting Berlin to stay (and spend their money) outside of the city limits. Utilizing the Isaacson Structural Steel sites along the key Route 110 corridor will have significant fiscal benefits through increased jobs, encourage residents to move in or stay in the community, and increase property tax revenue for a municipality with the second highest property tax rate in the state.

The outcome of assessment at the Webber Landfill in the Town of Derry is protection of the groundwater resource and putting the land to productive use. As part of the assessment, site reuse options will be evaluated with the Town to determine the most beneficial use of all portions of the site. Given the size and location of the site, the most probable outcome would be to utilize areas of the site for housing and another portion for solar. Additional housing will lessen the burden on low income residents including single women and children, and solar use will meet the Town’s goal of reducing its carbon footprint and lowering energy costs.

Following years and decades sitting as liabilities, providing no property tax revenue while draining police, fire and public works budgets to keep the properties safe and secure, the projects in the Town of Winchester have a strong potential to become community assets by attracting visitors to the town instead of deterring them. Assessment of the J&G Auto and A.C. Lawrence sites will directly impact the quality of the Ashuelot River and also provide an opportunity to redevelop the properties themselves or nearby properties with into amenities (e.g., coffee shop, restaurant, etc.) for people passing through on the adjacent rail trail. Getting both these properties back on the tax rolls would be a financial boost to Winchester and they would also see energy savings and/or revenue from a solar array at the A.C. Lawrence site.

IV.E.1.c. Strategy for Leveraging Resources

IV.E.1.c.i. Resources Needed for Site Reuse
In addition to the national grant competition held annually by EPA, NHDES holds a Brownfields Cleanup Grant competition every other year. Sites that have completed the assessment process and are positioned for cleanup would be eligible to apply for these grants.

Other than what NHDES can offer, sites located in severely distressed areas are eligible for federal New Market Tax Credits, a tax credit program that attracts private capital in low income areas. These include the Isaacson Structural Steel sites, J&G Auto, and A.C. Lawrence Tannery. Aside from the Brightfield project, all other sites are excellent candidates for the federal Community Development Block Grant program, a source of funding for developing housing and expanding

economic opportunities to benefit low- and moderate-income individuals. The Northern Border Regional Commission is another source of funding which has already been leveraged by entities in the area of Berlin and Winchester. Finally, the A.C. Lawrence and Webber Landfill sites are eligible for net metering, a monetary credit for any surplus energy produced by solar facilities that is in excess of the energy used by the municipality.

IV.E.1.c.ii. Use of Existing Infrastructure

By strategically investing brownfields funds with other sources of capital, including those identified above, NHDES will facilitate the reuse of sites in areas currently served by existing infrastructure including sewer, water, broadband, 3-phase power, and roads, and will promote recreation activity and build resiliency in areas proximate to existing rail trails and rivers. All of the priority sites identified, except the Webber Landfill, have access to municipal sewer and water. As a result of previous industrial uses and higher population in Berlin, existing infrastructure capacity is more than adequate to support the gateway redevelopment plans. While the Webber Landfill site does not have sewer and water, there are adequate community services and existing infrastructure to support additional development in this area.

IV.E.2. Community Need and Community Engagement

IV.E.2.a. Community Need

IV.E.2.a.i. The Community's Need for Funding

Throughout the state, a common thread among small rural cities and towns is the fact they often lack the experienced staff and capacity of their urban counterparts to initiate projects and navigate complicated federal grant programs and already have more work than they can often manage. By providing a statewide source of Brownfields funding over five years, NHDES staff can conduct additional outreach to these communities and work directly with stakeholders to provide meaningful assessment as well as cleanup and reuse planning activities in their communities, without relying entirely on local resources (staff time and finances) to tackle these projects. The staff of most rural communities consist of a few dedicated people fulfilling the duties of multiple roles.

In the Town of Winchester, the municipal staff includes two full time staff to cover all of the duties of Town administration and planning. The Town Administrator is responsible for the functions of town departments day to day, as well as tax assessment, grant writing, project oversight, and handling any other uncovered duties. The Town Planner covers traditional planning tasks, and also serves as the code enforcement officer and health officer. Economic development and many other projects are addressed on an as-needed, when available basis. Many town positions also go unfilled. As an example, in Berlin, the City Manager has recently resigned and the Director of Public Works position is also vacant. This has essentially left a single City Planner to manage all the existing projects and ongoing work of the City, which leaves little time to apply for available grant funding. This forces communities to prioritize which grants they apply for, and often Brownfields funding gets overlooked for more critical or larger grant opportunities. A large, longer term grant administered by the State of New Hampshire would provide much needed resources for these communities.
New Hampshire’s lack of sales and income tax is a challenging factor for all communities. In the absence of these taxes, municipalities rely primarily on property taxes to cover the cost of municipal services and the administration of schools. Addressing contaminated sites is often viewed as a “want” rather than a critical “need”, particularly in low-income communities where they rely almost exclusively on property tax revenue. Municipalities such as Berlin and Winchester, who traditionally have some of the highest tax rates in the state, and also some of the lowest median household incomes, have received considerable pressure to maintain or reduce the tax burden on its already stressed taxpayer base. Berlin and Winchester have tax rates in the 90th state-percentile and Derry ranks above the 60th state percentile for the past five years⁴. Based the most recent Census Bureau estimates, the median household incomes of Berlin ($38,315) and Winchester ($50,087) are well below the state average of $68,485. Derry’s median household income at $67,946 falls just below that of the state; however, in this instance the median can be deceptive. For example, married couples with dependent children have Derry’s highest incomes overall ($101,680). By contrast, single women with dependent children tend to have very low incomes, with a median of just $26,071. Derry also has a higher than average rate of childhood poverty level at 15.6% versus the state (7.6%). Overall and childhood poverty rates for Berlin (18.5%, 24.6%) and Winchester (31.9%, 48.3%) are also significantly higher than the state average overall (7.6%,) and child poverty levels (9.2%).

IV.E.2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Data from the EPA’s EJ Screen tool indicate that extreme disparities persist in both Berlin and Winchester. Based on the demographic index, which accounts for poverty and minority status of the population, Berlin ranks at the 90th percentile when compared to the state. The community ranks at or above the 93rd state-level percentile for six of the EJ indices, and at or above the 56th USA-level percentile for these indices. For the other five EJ indices, Berlin is ranked in the 52nd to 68th state-level percentile. Winchester exhibits similar disparities based on the demographic index, ranking at the 85th state-level percentile; and with all EJ indices at or above the 84th state-level percentile, except lead paint indicator (76th percentile) and the wastewater discharge indicator (37th percentile) due to the rural nature of the community where most homes are on private septic. While Derry’s EJ indices are not as extreme, disparity exists ranking in the 60th state percentile for low income population, the 75th state-percentile for linguistically isolated populations and the 56th state-percentile for population with less than a high school education compared to the rest of the state. In addition, the environmental indicators indicate a higher than average at the state level for ozone, NATA Diesel PM, NATA Cancer Risk, NATA Respiratory HI, ranging from the 70th to 87th percentile. Derry also ranks in the 80th state-level percentile and 87th USA-level percentile for superfund proximity.

The New Hampshire Division of Health and Human Services (NHDHHS) in their 2019 Asthma burden report identified that “New Hampshire has seen consistently high rates of adult asthma in comparison to the rest of the country. People with less than a high school degree are more than two times as likely to have asthma than college graduates. Lower income individuals are up to three times more likely to have asthma than higher income individuals. NHDHHS hospital

⁴ Source: NH Department of Revenue.
discharge data show that in the northern part of the state, where Berlin is located, the rate of asthma related hospital visits is significantly higher than the rest of the state (61 visits per 10,000 population in Coos County, compared to 41 per 10,000 in the rest of the state).

Reuse strategies in all target areas remove sites that are common eyesores and degrade from the value of the community, both financially and aesthetically. Improving these areas intrinsically increase the value of the area, but they also promote opportunity for increased tax base, decreasing the residential tax burden. Additionally, the sites in Berlin will create jobs for local residents and the sites in Winchester include creating outdoor recreation sites encouraging pedestrian friendly commuting, exercise opportunities, and will attract visitors to the area who will promote tourism.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions
As mentioned above, the contaminants at the target brownfields sites, including PAHs, metals, and PCBs in soils; PFAS and VOCs in groundwater; which may be linked to high rates of respiratory disease, preterm births, and some are known carcinogens. According to data from the Center for Disease Control and Prevention, New Hampshire has one of the highest overall age adjusted cancer rates (per hundred thousand) in the country. According to the most recent 5-years of cancer data (2014-2018), NH has the 9th highest incidence rate. Age adjusted data for Coos County (i.e., northern New Hampshire) for 2014-2018 data indicates the cancer rate in this area is slightly above the New Hampshire rate. Numerous studies also cite that people in low- and middle-income counties in the United States are more likely to die of cancer than those who live in high-income counties. One recent study indicated eight factors, including lack of access to quality clinical care, food insecurity, smoking, and obesity may explain more than 80% of the relationship between poverty and disparities in cancer death rates at the county level. The three target areas have demonstrated sensitive populations with low income and higher than average rates of poverty which can contribute to many health risks including cancer.

(3) Promoting Environmental Justice
In addition to identifying and assessing potential sources of contamination which can be linked to health impacts, improving the economic quality of the residents in Berlin and Winchester will have a direct impact on improving their quality of life by providing opportunities to increase the median income and lessen the tax burden on residents, providing more income for them to reduce food insecurity, access to health care, and other improvements through increased options for outdoor recreation. In addition, residents in Winchester and other low lying riverine areas are disproportionately impacted by environmental justice issues linked to the target brownfields sites including a history of water quality and flooding issues related to increased precipitation events. EPA funding will contribute to addressing these conditions through equitable development approaches, building community resiliency, and thoughtful engagement of vulnerable populations as identified in this proposal.

According to estimates from HUD, 72% of Derry residents are paying more for housing than they can actually afford. Derry’s median home value increased 33% between 2013 and 2017, a

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5 Cancer Epidemiol Biomarkers Prev. October 29, 2020 Persistent Poverty and Cancer Mortality Rates: An Analysis of County-Level Poverty Designations Jennifer L Moss, Casey N Pinto, Shobha Srinivasan, Kathleen A Cronin, Robert T Croyle
6 Town of Derry, NH Master Plan 2020.
faster rate of value growth than any other town in the region. Over 70% of the lower-income households in Derry pay more than 30% of their monthly income for housing, which means they are housing cost burdened. While Derry has met its statistical “fair share” of workforce housing, it still has many households that struggle to make their monthly mortgage payment or rent. By creating more areas available for housing stock with reliable and safe drinking water, more affordable housing options will be offered. In addition, decreasing the Town’s reliance of fossil fuels for energy and utilizing clean energy such as solar will improve air quality issues.

IV.E.2.b. Community Engagement

IV.E.2.b.i. and ii. Project Involvement and Roles
In preparing this application, NHDES has reached out to leaders in various NH communities that in on our experience could benefit from brownfields assistance but do not have the capacity to apply for and manage their own grant. From this effort, we identified the target areas and priority sites included in our grant application. We currently have a point of contact in key municipal positions in each target area that will facilitate communication with community stakeholders, identify community needs/priorities, and assist with site access. We view this as just a starting point as there was much interest during the outreach period and we have built a list of other potential sites and contacts. NHDES has strong relationships with those doing Brownfields work in each region of the state as we serve as a liaison between EPA and Brownfields grantees and have long standing relationships with each group. Upon being awarded a grant, we will reach out state-wide to solicit interest from other communities who were not initially identified as target areas. We intend to focus on communities that do not have the capacity to administer their own grant, rural communities, and disadvantaged communities as determined primarily by, but not limited to, low income, persistent poverty, high unemployment, high housing cost burden, impacts from climate change, and high energy cost burden. We will also work to identify sites with internal NHDES contacts through our EJ Coordination team, which is also focused on working with disadvantaged communities.

IV.E.2.b.iii. Incorporating Community Input
NHDES’ initial engagement with communities is typically through community leaders as they are the ones who can best gauge needs and what actions would be of greatest benefit to the communities they represent. After that, it is important to also engage the members of the community themselves. The purpose of outreach meetings is not only for educating the public but also to solicit input in identifying properties that could benefit from brownfields assistance, and to learn how distressed properties impact the community and what is appropriate reuse of these properties. Community engagement in reuse planning is a key element for both sides (the planners and the community) to envision the future of their community. All community questions, comments, concerns, and recommendations will be taken into consideration when planning for additional sites to be assessed. NHDES intends to hold meetings in-person within the various communities but will adjust as necessary to take into consideration COVID-19 related precautions as appropriate. This includes providing a remote option (e.g., Microsoft Teams or Zoom) and following any Center for Disease Control (CDC) guidelines for group meetings. Additional methods of communication will include NHDES and local websites, one-on-one conversations, local newspapers, NHDES newsletters, social media, and e-mail.
### IV.E.3. Task Descriptions, Cost Estimates, and Measuring Progress

#### IV.E.3.a. Description of Tasks/Activities and Outputs

<table>
<thead>
<tr>
<th>Task 1: Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td>i. Project Implementation: Administrative oversight of grant including, but not limited to, quarterly performance reports, ACRES updates, and management of QEP contracts. Attendance at the National Brownfields Conference(s). Procurement of QEP for years 2-5 will be performed with alternative funding sources.</td>
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<td>ii. Anticipated Schedule: Throughout grant period</td>
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<td>iii. Task Activity Lead: NHDES</td>
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<td>iv. Outputs: Quarterly performance reports, ACRES data</td>
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<th>Task 2: Community Outreach</th>
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<td>i. Project Implementation: Outreach meetings to educate the public, discuss the status of previously identified sites, identify new sites, and solicit community input. Via other communication methods (e.g., website, social media, e-mail, in-person or remote meetings with community leaders and stakeholders, etc.), solicit interest from communities that may not have benefitted from brownfields funding in the past. The primary criteria for identifying additional sites include: 1) sites in communities that do not have the capacity to administer their own grant; 2) rural communities; and 3) sites in disadvantaged communities.</td>
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<td>ii. Anticipated Schedule: Throughout the grant period</td>
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<td>iii. Task Activity Lead: NHDES and community partners</td>
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<td>iv. Outputs: Community meetings – At least 2 in each target area and at least one in each community where sites are located (i.e., minimum of 15 meetings)</td>
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<th>Task 3: Phase I and Phase II Environmental Site Assessments</th>
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<td>i. Project Implementation: Securing site access. Preparation of Phase I and Phase II ESAs including: work scope approvals, site-specific quality assurance project plans (SSQAPPs), field work, report preparation, report reviews and approvals. NHDES project oversight and any legal assistance required for securing site access will be performed utilizing alternative funding sources.</td>
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<td>ii. Anticipated Schedule: Throughout the grant period</td>
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<td>iii. Task Activity Lead: NHDES and QEP(s)</td>
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<td>iv. Outputs: 12 Phase I ESAs, 12 Phase II ESAs, 8 Supplemental Phase II ESAs</td>
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<th>Task 4: Cleanup and Reuse Planning</th>
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<td>i. Project Implementation: For sites that have proceeded through the assessment process, NHDES will work with communities to position them for future cleanup funding by assisting in the preparation of cleanup and/or reuse plans. NHDES project oversight will be performed utilizing alternative funding sources.</td>
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<td>ii. Anticipated Schedule: Throughout the grant period</td>
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<tr>
<td>iii. Task Activity Lead: NHDES and QEP(s)</td>
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<td>iv. Outputs: 8 Remedial Action Plans (RAP)/Assessment of Brownfields Cleanup Alternatives (ABCA). Note: NHDES requests that RAPs and ABCAs be prepared as a single document. 5 Reuse (i.e., visioning) Plans or planning charrettes.</td>
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</tbody>
</table>
IV.E.3.b. Cost Estimates

Task 1: Cooperative Agreement Oversight: The costs included under this task are primarily administrative. Personnel costs are based on assuming 10% of NHDES’ Brownfields Coordinator’s time (195 hours/year x $47.09/hour x 5 years). Fringe benefits are based on 50.28% of Personnel costs. Travel costs are based on 3 individuals attending 1 National Brownfields Conference held during the grant period (3 x $1,600/person for airfare, hotel, meals, and registration fees). Supply costs are estimated. Other costs include direct administrative costs based on 6% of Personnel and Fringe Benefits, and an Audit Set-Aside equal to 1/10% of the total grant amount. Indirect costs are based on the EPA negotiated rate of 3.09%.

Task 2: Community Outreach: These costs are for reaching out to the communities identified in this application provide education regarding all things brownfields and to solicit their input regarding how best to spend these funds for the most benefit within their communities. We will also be reaching out state-wide to solicit interest from other communities who were not identified as target areas. Personnel costs are based on assuming 25% of NHDES’ Program Manager/Project Manager time (487.5 hours/year x $38.98/hour x 5 years). Fringe benefits are based on 50.28% of Personnel costs. Travel costs are for in-state travel for various outreach efforts (1,000 miles/year x $0.56/mile x 5 years). We will also require the assistance of our QEP(s) at an estimated $30,000 per year.

Task 3: Phase I and Phase II Environmental Site Assessments: All costs under this task are Contractual for our QEP(s) to complete 12 Phase I Environmental Site Assessments (ESAs) at $8,000 each; 12 Phase II ESAs at $60,000 each; and 8 Supplemental Phase II ESAs at $40,000 each. NHDES project oversight and any legal assistance required for securing site access will be funded from alternative sources.

Task 4: Cleanup and Reuse Planning: All costs under this task are Contractual for our QEP(s) to complete 8 Remedial Action Plans (RAPs)/Assessment of Brownfields Cleanup Alternatives (ABCA) at $40,000 each; and prepare 5 Reuse Plans or coordinate 5 planning charrettes at $30,000 each. NHDES project oversight will be funded from alternative sources.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1 Cooperative Agreement Oversight</th>
<th>Task 2 Community Outreach</th>
<th>Task 3 Phase I and Phase II ESAs</th>
<th>Task 4 Cleanup and Reuse Planning</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$45,913</td>
<td>$95,014</td>
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<td>$140,927</td>
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<td></td>
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<tr>
<td>Supplies</td>
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<tr>
<td>Contractual</td>
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<td>$470,000</td>
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<tr>
<td>Indirect Costs</td>
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<tr>
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<td>$470,000</td>
<td>$2,000,000</td>
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IV.E.3.c. Measuring Environmental Results

NHDES will track and report the progress in implementing our work plan through quarterly performance reports and keeping ACRES up-to-date with respect to the projects we have taken on. **NHDES’ primary objective in implementing this grant is to position sites for cleanup (and cleanup funding) with the ultimate goal of getting sites redeveloped and put back into productive use while being protective of human health and the environment.**

IV.E.4 Programmatic Capability and Past Performance

IV.E.4.a. Programmatic Capability

IV.E.4.a.i., ii, and iii Organizational Capacity, Structure, and Key Staff

The assessment and cleanup of hazardous waste contaminated sites is overseen by NHDES’ Hazardous Waste Remediation Bureau (HWRB). HWRB will be the lead implementer of this grant. For any petroleum impacted sites, we will also be supported by NHDES’ Oil Remediation and Compliance Bureau and/or MtBE Remediation Bureau. HWRB is also supported by NHDES’ Environmental Health Program, which is staffed with toxicologists and risk assessors who provide HWRB with detailed evaluations of the potential risks to human health posed by conditions at contaminated sites. Financial administration tasks will be performed by NHDES’ Grants Management Section who will be responsible for financial tracking and reporting.

NHDES' Brownfields Program resides within HWRB. Michael McCluskey serves as the Brownfields Coordinator. Michael has 35 years of experience as an environmental engineer including 19 years working within NHDES’ Brownfields Program. Melinda Bubier will serve as the Project Director for this grant. Melinda has 20 years of experience working in the field of environmental engineering. She also serves as a liaison between NHDES and 4 New Hampshire Brownfields grantees where she provides technical support, serves as a non-voting member of their advisory committees, helps vet proposed sites, and provides technical reviews of the various documents prepared pursuant to their grants. In addition, HWRB maintains a highly qualified staff of environmental professionals (i.e., engineers and hydrogeologists) to serve as project managers for the oversight of sites addressed pursuant to this grant.

IV.E.4.a.iv. Acquiring Additional Resources

NHDES will also require the support of Qualified Environmental Professionals (QEPS) to implement much of the technical work required pursuant to the grant. NHDES’ Waste Management Division, which includes our Brownfields Program, goes through a procurement process as prescribed by New Hampshire RSA 21-I:22 every four years to contract with 4 to 5 environmental firms in support of our various programs.

IV.E.4.b. Past Performance and Accomplishments

IV.E.4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

NHDES has successfully administered EPA Brownfields State Response Program Grants (i.e., CERCLA 128(a) grants) since their inception through to the present. In addition, NHDES has also administered three Brownfields Revolving Loan Fund (RLF) Cleanup Grants from 1999 through 2018 and a Brownfields Coalition Assessment Grant from 2009 to 2012.
(1) Accomplishments

The 128(a) grants we have received over the years have been an invaluable resource for enhancing and maintaining NHDES’ State Response Program. In recent years, 128(a) funds have been used for, but is not limited to, increasing our capacity to oversee the assessment and cleanup of contaminated properties, maintaining a robust database of the contaminated sites we work on that is readily available to the public, updating rules and standards, and establishing an Emerging Contaminants Section. When funding has allowed, we have also performed assessment work and cleanup activities at 65+ sites.

NHDES has administered three different Brownfields RLF Cleanup Grants. Pursuant to these grants, NHDES has loaned a total of $3,589,676 for 10 cleanup projects and awarded subgrants totaling $2,833,657 for 12 cleanup projects. All three of these grants are now closed; however, we have been using program income generated from these grants to support site-specific assessment work at 2 to 4 sites per year and we have been holding a cleanup grant competition every other year. Thus far we have awarded 5 cleanup grants totaling $797,450.

Redevelopment that has been made possible as a result of our 128(a) and RLF grants include: a food cooperative, two senior housing complexes, three hotels, a resort, three residential apartment complexes, healthcare offices, several multi-use buildings, rehabilitation of a historic theater, a bank, a town library, municipal parking, trailhead access and greenspace.

ACRES data for projects funded at the time individual grants were active is up-to-date. Data for projects funded with RLF program income and cost recovery funds from closed grants cannot be inputted into ACRES but are instead reported as part of our 128(a) performance reports.

(2) Compliance with Grant Requirements

NHDES has successfully administered EPA Brownfields Grants for the past 24+ years. During that time, NHDES has fully complied with the conditions of our Cooperative Agreements and the scope of the Work Plans for each of our grants. NHDES has completed and submitted all required performance reports to EPA, albeit not always on time. Delays to report submittals in the past have typically been attributable to not having financial information available in a timely manner. In addition, for the past two 128(a) grants, the semi-annual performance reports due after the first six months of the grant period were not submitted as a result of the challenges associated with gathering the information needed for the reports while working remotely due to the COVID-19 pandemic. All final performance reports have been submitted as required.

For all of the 128(a) grants administered by NHDES, we have expended the full amount of the grants funds. The same is true for 2 of 3 RLF grants. For the last RLF grant, NHDES agreed to deobligate funds associated with the petroleum portion of the grant. This was attributable to the difficulty in identifying prospective borrowers for petroleum-related projects that could also meet the petroleum eligibility criteria. We also agreed to deobligate a portion of our hazardous substance funds at the end of the grant. We had subgranted all that we could pursuant to the grant and there was limited interest in loans under any terms after the “great recession”.

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III.B. Threshold Criteria for Assessment Grants

1. **Applicant Eligibility**
   The New Hampshire Department of Environmental Services (NHDES) is a state agency and is therefore an eligible applicant.

2. **Community Involvement**
   In preparing this application, NHDES has reached out to leaders in various New Hampshire communities that based on our experience could certainly benefit from brownfields assistance but do not have the capacity to apply for and manage their own grant. Based on this effort, we identified the target areas and priority sites included in our grant application. We view this as just a starting point. Upon being awarded a grant, we will go to the next step and reach out to these communities as a whole to educate them on all things brownfields and solicit their input regarding how best to utilize these funds for the benefit of their respective communities. We will also be reaching out state-wide to solicit interest from other communities who were not initially identified as target areas. We intend to focus on communities that do not have the capacity to administer their own grant, rural communities, and disadvantaged communities as determined primarily by, but not limited to, low income, persistent poverty, high unemployment, high housing cost burden, impacts from climate change, and high energy cost burden.

   Consistent with above, NHDES’ initial engagement with communities is typically through community leaders as they are the ones who can best gauge needs and what assistance would be of greatest benefit to the communities they represent. After that, it is important to also engage the members of the community themselves. NHDES plans to hold outreach meetings for the purpose of not only educating the public but also to solicit input in identifying properties that could benefit from brownfields assistance and for NHDES to learn how distressed properties impact the community and how assessing these properties will help toward the betterment of the community in which they are located. All community questions, comments, concerns, and recommendations will be taken into consideration when planning for additional sites to be addressed pursuant to this grant.

   NHDES intends to hold meetings in-person within the various communities but will adjust as necessary to take into consideration COVID-19 related precautions as appropriate. This includes providing a remote option (e.g., Microsoft Teams or Zoom) and following any Center for Disease Control (CDC) guidelines for group meetings. Additional methods of communication will include NHDES and local websites, local newspapers, NHDES newsletters, social media, and e-mail.
3. **Named Contractors and Subrecipients**  
NHDES’ Waste Management Division, which includes our Brownfields Program, goes through a procurement process as prescribed by New Hampshire RSA 21-I:22 every four years to contract with 4 to 5 environmental firms in support of our various programs. Our existing contractors will be in the final year of their existing contract during the first year of the grant. NHDES will again procure contractors who will be available to us for the last four years of the grant following the same state procurement process.

There will be no subrecipients for this grant.

4. **Expenditure of Assessment Grant Funds**  
NHDES does not have an open EPA Brownfields Assessment or Multipurpose Grant.

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### III.C. Additional Threshold Criteria for Site-Specific Applications Only

- Not applicable

### III.D. Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes

1. **Target Areas and Priority Sites**  
The three (3) target areas and five (5) priority sites identified in Section IV.D.4 of the Narrative Information Sheet include:

   **Target Areas:**
   - City of Berlin, NH
   - Town of Derry, NH
   - Town of Winchester, NH

   **Priority Sites:**
   - Isaacson Structural Steel, Jericho Road (Map 105, Lot 11), Berlin, NH
   - Isaacson Structural Steel, 149 Jericho Road (Map 105, Lot 14), Berlin, NH
   - Isaacson Structural Steel, Jericho Road (Map 107, Lot 3), Berlin, NH
   - Webber Landfill, 128 Goodhue Road, Derry, NH
   - J&G Auto, 7 Back Ashuelot Road, Winchester, NH
   - A.C. Lawrence Property, 15 Bridge Street, Winchester, NH

A minimum of ten (10) sites in total will be addressed during the grant period.