Narrative Information Sheet

EPA FY 2022 Brownfields Community-Wide Assessment Grant Application

1. **Applicant Identification:** Southwest Region Planning Commission
   37 Ashuelot Street
   Keene, NH 03431

2. **Funding Requested:**
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested
      i. Amount Requested: $500,000
      ii. Site-Specific Assessment Grant Waiver: Not Requested

3. **Location:**
The Southwest Region Planning Commission’s planning district comprises 34 municipalities in southwest New Hampshire: the 23 towns of Cheshire County, ten towns in western Hillsborough County, and one town in Sullivan County.

4. **Target Area and Priority Site/Property Information:**

<table>
<thead>
<tr>
<th>Target Areas</th>
<th>Census Tract Numbers</th>
<th>Priority Site Addresses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keene</td>
<td>971100</td>
<td>80 Laurel Street</td>
</tr>
<tr>
<td>Swanzey</td>
<td>970900</td>
<td>571 West Swanzey Road</td>
</tr>
<tr>
<td>Winchester</td>
<td>971700</td>
<td>15 Bridge Street</td>
</tr>
<tr>
<td></td>
<td></td>
<td>55 Recycle Way</td>
</tr>
<tr>
<td>Hinsdale</td>
<td>971600</td>
<td>54-55A Canal Street</td>
</tr>
</tbody>
</table>

5. **Contacts:**
   a. Project Director: Joshua Mack, Principal Planner; 603-357-0557; jbmack@swrpc.org; SWRPC, 37 Ashuelot Street, Keene, NH 03431
   b. Chief Executive: Tim Murphy, Executive Director; 603-357-0557; tmurphy@swrpc.org; SWRPC, 37 Ashuelot Street, Keene, NH 03431

6. **Population:** Population of towns in which each priority site is located:

<table>
<thead>
<tr>
<th>Towns</th>
<th>Population (2020 Decennial Census)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keene</td>
<td>23,407</td>
</tr>
<tr>
<td>Swanzey</td>
<td>7,270</td>
</tr>
<tr>
<td>Winchester</td>
<td>4,150</td>
</tr>
<tr>
<td>Hinsdale</td>
<td>3,948</td>
</tr>
</tbody>
</table>

TDD Access: Relay NH 1-800-735-2555
web site: www.swrpc.org
### Other Factors

<table>
<thead>
<tr>
<th>Description</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>3</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>NA</td>
</tr>
<tr>
<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>5</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>1</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>2</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 1.A., for priority site(s) within the target area.</td>
<td>NA</td>
</tr>
<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>
</tr>
</tbody>
</table>

8. Letter from State or Tribal Environmental Authority: Attached

9. Releasing Copies of Applications: N/A, the application does not have confidential, privileged, or sensitive information.
November 12, 2021

Tim Murphy, Executive Director
Southwest Region Planning Commission
37 Ashuelot Street
Keene, NH 03431

Subject: Southwest Region Planning Commission
FY22 Proposal for EPA Brownfields Community-Wide Assessment Grant
State Letter of Acknowledgement and Support

Dear Mr. Murphy:

The New Hampshire Department of Environmental Services (NHDES) hereby acknowledges and expresses our support for Southwest Region Planning Commission’s (SWRPC) proposal for an EPA Brownfields Community-Wide Assessment Grant. Should your proposal be successful, NHDES will again commit to providing a liaison to provide technical support. This assistance can include serving as a non-voting member of an advisory committee, helping vet proposed sites, and reviewing the various technical documents prepared pursuant to the grant.

While we cannot commit to providing specific funding for future work at sites addressed under this assessment grant, please note that NHDES anticipates making cleanup grants available pursuant to a grant competition in 2022.

We look forward to continuing our working relationship with SWRPC. Please contact me should you have any questions.

Sincerely,

[Signature]

Michael McCluskey, P.E.
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-2183
Email: Michael.G.McCluskey@des.nh.gov

cc: J.B. Mack, Principal Planner, SWRPC
    Dorrie Paar, EPA New England – Region 1
    Karlee Kenison, P.G., Administrator, NHDES-HWRB
    Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB
1. **PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**
   
a. **Target Area and Brownfields**

i. **Background and Description of Target Area**

The lower Ashuelot River Valley in Southwest New Hampshire (NH) continues to struggle to find its place in the 21st century, challenged by a globalizing economy, aging population, climate change, and now a pandemic. Earlier in its history the Valley prospered. The river towns of Hinsdale, Winchester, Swanzey, and Keene 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. Although the rail lines eventually stopped running, the area experienced a second boom between the 1970s and 1980s fueled by the in-migration of residents from eastern states attracted to the area’s natural beauty, historic villages and a still strong manufacturing sector. Since the closing years of the 20th century, however, the area has experienced a steady decline in good manufacturing jobs (62% decrease since 2001), leading to the abandonment or closure of many mills, the outmigration of young families seeking better job opportunities and a general decline in health and prosperity.²

ii. **Description of the Priority Brownfield Sites**

Up and down the Valley, the conditions of the many mills fall on a continuum from empty or underutilized mill buildings, to buildings that have fallen into disrepair due to flooding or neglect, to vacant lots. Five former mill sites are the focus of this proposal.

<table>
<thead>
<tr>
<th>Former Mill Sites</th>
<th>Target area</th>
<th>Acres</th>
<th>Environmental concerns³</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>McGoldrick Paper Co.</td>
<td>Hinsdale</td>
<td>2.5</td>
<td>Metals, PAH, PFAS, lead, asbestos</td>
<td>Vacant buildings/lot</td>
</tr>
<tr>
<td>Paper Services Ltd.</td>
<td>Winchester</td>
<td>4.3</td>
<td>PFAS</td>
<td>Vacant lot</td>
</tr>
<tr>
<td>A.C. Lawrence Tannery</td>
<td>Winchester</td>
<td>18.5</td>
<td>Metals, petroleum, PCE, TCE, chromium, PAHs, PFAS,</td>
<td>Vacant lot</td>
</tr>
<tr>
<td>Homestead Woolen Mill</td>
<td>Swanzey</td>
<td>5.7</td>
<td>Petroleum, lead, asbestos</td>
<td>Underutilized buildings</td>
</tr>
<tr>
<td>Kingsbury Manufacturing</td>
<td>Keene</td>
<td>21.6</td>
<td>Petroleum, CVOCs, PCBs, lead, asbestos</td>
<td>Vacant buildings/lot</td>
</tr>
</tbody>
</table>

Among the five mills, three will be discussed in more detail here for illustrative purposes. There is the former McGoldrick Paper Company in Hinsdale, a manufacturer of manila and tissue paper located partially on a federally designated flood plain, which ceased its operations in 2004. Some of the building has fallen in disrepair due to neglect, but a newer section of the building is in fine condition. The property is known to have metals and polycyclic aromatic hydrocarbons (PAHs) in its soils and per- and polyfluoroalkyl substances (PFAS) in its groundwater all of which will need remediation planning. Further up the river is the former AC Lawrence Tannery, a shearling tannery that was abandoned by its previous owners in 1987. All that remains on the site are slab foundations of the former buildings. The site, which is mostly on a federally designated flood plain, consists of two parcels with the northerly parcel known for having petroleum, chromium and PAH contamination, however, the southerly parcel

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² See [http://swrpc.org/files/MonadnockRegionFuture_RegionalPlan_FINAL.pdf](http://swrpc.org/files/MonadnockRegionFuture_RegionalPlan_FINAL.pdf)
³ Acronyms: polycyclic aromatic hydrocarbons (PAHs); per- and polyfluoroalkyl Substances (PFAS); tetrachloroethylene (PCE); trichloroethylene (TCE); chlorinated volatile organic compounds (CVOCs); and polychlorinated biphenyls (PCBs).
is less well understood and requires further study. Further north in Swanzey sits the former Homestead Woolen Mill, which ceased operations in 1985. Among all of the mill sites, it is in the best condition, with some of the building now being used for warehousing and indoor recreation. However, the site is known to have an old 10,000 gallon aboveground storage tank (AST) suspected of a release. All of the former mill sites featured in this proposal are priorities identified by Hinsdale, Keene, Swanzey and Winchester as critical to host activities that can meet local economic development, housing and sustainable energy goals.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The three mill sites described above each have a reuse plan. In Hinsdale, an entrepreneur has expressed interest in the McGoldrick site to expand a neighboring business, Green Mountain Tap Handles. After conducting some preliminary environmental assessments, the Town tax deeded the site from an owner that abandoned the property and adopted RSA 79-E, NH’s community revitalization tax relief incentive program, which provides short term property tax relief to landowners making improvements to structures located in its downtown. At the AC Lawrence Tannery site, the Town of Winchester has been working with a solar developer to convert the site into a Brightfield. In order to make a solar array development financially viable, the developer identified a need to expand the project onto the southerly parcel where environmental assessment work is still needed. At the Homestead Woolen Mill, a private developer is actively marketing available space. The owner is working closely with the Town of Swanzey, which has been implementing a vision developed for the mill and the surrounding neighborhood through a public charrette process in 2012 facilitated by Plan NH. The redevelopment plan envisions the mill as a mixed-use facility and recommends upgrades to roads and sidewalks in the area which the Town is now addressing with the support of public infrastructure grants. Reuse strategies have been identified for the other two priority sites as well.

ii. Outcomes and Benefits of Reuse Strategy

All of these redevelopment projects have great potential to stimulate the economy and improve the quality of life in disadvantaged communities that have suffered from economic decline ever since the mills closed. Among the featured projects cited in this application, the McGoldrick project would create new permanent jobs in the town with the sixth highest unemployment rate in NH4, the AC Lawrence Tannery project would alleviate the Town and the local school of its high energy costs5 and lower high property taxes in a neighborhood where 32% of households live below the poverty level6, and, in the case of the Homestead Woolen Mill, it would provide new workforce housing in a County that has a startlingly low housing unit vacancy rate of only 1.7%.7 Following years and sometimes decades sitting as liabilities, providing no property tax revenue while draining police, fire and public works budgets to keep the properties safe and secure, each project has strong potential to reclaim their former legacy as community assets. Due to the location of each mill site, their redevelopment will also address plans to improve environmental stewardship along the river as well as enhance safety and community health by removing blight along the rail trail network and making the trails more attractive for recreation.8

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4 NH Department of Employment Security Local Area Unemployment Statistics, October 2021, 4.7%
5 According to the U.S. Energy Information Administration, NH had the sixth highest retail electric rates in the country in 2020 at 16.63 cents/kWh.
6 U.S. Census Bureau, 2019 American Community Survey 5-year estimates for Winchester CDP
case of the AC Lawrence site, it would become the first Brightfield in NH and demonstrate a new redevelopment option for other brownfields in the State.

c. Strategy for Leveraging Resources
   i. Resources Needed for Site Reuse

SWRPC and its partners plan to take advantage of a number of resources to improve the likelihood of success at each brownfield site. Through local enabling legislation in Hinsdale and Keene, the McGoldrick and Kingsbury sites are eligible to apply for temporary property tax relief through NH RSA 79-E, a redevelopment tool that allows municipalities to freeze the assessed value of properties for up to 5 years. This action allows developers to focus their resources on rehabilitating mill sites while delaying the increased valuation of the sites. Several of the sites are also located in severely distressed areas eligible for federal New Market Tax Credits, a tax credit program that attracts private capital in low income areas leveraging on average $8 of private capital to each federal dollar. These include the McGoldrick, AC Lawrence Tannery, Paper Services Ltd and Kingsbury Manufacturing sites. 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 the Town of Swanzey to rebuild infrastructure around the Homestead Woolen Mill ($0.5 M). If a release is found at the Homestead Woolen Mill, NH Petroleum Funds (up to $0.5 M) could be used toward cleanup. Finally, the AC Lawrence Brightfield is eligible for group net metering, a monetary credit for any surplus energy produced by the facility that won’t be used by the Town of Winchester. The Town has discussed transferring these credits into a savings account to support cleanup efforts on the site.

   ii. Use of Existing Infrastructure

By strategically investing brownfields funds with other sources of capital identified above, SWRPC and its partners will be able to preserve the Valley’s high quality forest and agricultural land while focusing investment in areas that are currently served by existing infrastructure including sewer, water, broadband, 3-phase power, roads, sidewalks, and rail trails. All priority sites described herein are connected to municipal sewer and water. Despite the fact that the Valley includes many areas with inadequate broadband connectivity, all sites meet the Federal Communications Commission’s definition of acceptable broadband (>25/3 Mbps). In addition, all sites have access to 3 phase power, a necessity for the AC Lawrence Brightfield as well as mills seeking to attract certain commercial and industrial tenants. Finally, all sites have direct access to good roads while the Homestead Woolen Mill and Kingsbury Manufacturing sites have direct access to sidewalks, and all sites except McGoldrick have direct access to the Valley’s vast network of rail trails.

2. Community Need and Community Engagement
   a. Community Need
      i. The Community’s Need for Funding

In this mostly rural area, where local government is commonly run by volunteers and part-time staff, three of the four target communities have populations under 10,000. The neighborhoods around the AC Lawrence Tannery, Kingsbury and McGoldrick sites have extremely high rates of poverty (Winchester, 32%, Keene 16% and Hinsdale, 16%) compared to Cheshire County (9%) and NH (8%). The closure and subsequent devaluation or abandonment of the mills has led to disinvestment in surrounding neighborhoods, greatly impacting municipal revenues. Property values in the four towns have decreased

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9 U.S. Census Bureau, 2019 American Community Survey 5-year estimates.
7.5% since 2011 and the number of jobs has decreased 13.3% since 2001. Meanwhile, for decades the lack of income or sales tax in NH continues to downshift many costs to local governments and schools, which rely heavily on bonding and property taxes for revenue to maintain infrastructure and provide services. This great downshifting disproportionately affects poor communities with low land valuation leaving them no choice but to raise property taxes. Keene, Hinsdale, Winchester, and Swanzey had the 3rd, 6th, 22nd and 63rd highest tax rates in NH in 2020, all well above the median total tax rate for NH’s 234 municipalities. Between 2011-2020, Hinsdale and Keene’s total tax rates increased 31% and 21%, respectively. The communities’ challenges with revenue impede their abilities to secure the level of funding needed to meet their environmental assessment needs. EPA brownfields funding will help to counteract these worsening trends, ameliorate the human toll and loss of hope triggered by these economic effects, and by better defining risks, be a catalyst for more investment.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The sites featured in this proposal are located in neighborhoods disproportionately housing sensitive populations, including young children (93rd to 96th percentile rank for 3 of the 5 priority sites), people with less than a high school education (78th to 90th percentile rank for 4 sites), seniors (70th and 72nd percentile rank for 2 sites), low income people (75th to 94th percentile rank for 4 sites), and linguistically isolated people (between 70th and 82nd percentile rank for all 5 sites). As discussed above, the disproportionate number of these vulnerable populations means that residents living in these communities have greater challenges including the personal means to acquire basic health and welfare resources. As an example, Winchester has astonishing high proportions of children on public health insurance (69%) as well as adults with no health insurance (21%). While some public transit is available for Hinsdale and Keene residents to get to supermarkets, pharmacies and hospitals, service is meager, and Winchester and Swanzey have no access to public transit. The mill sites, which were built adjacent to aged and often dilapidated housing, are not adequately secured. For several of the mills, there is evidence of homeless living on-site as well as criminal activity including illegal dumping of wastes, substance misuse, and vandalism. Perhaps related, violent and property crime rates in Hinsdale, Winchester and Keene exceed those of the State. EPA funding will directly address these health and welfare issues as the proposed redevelopment projects will remove harmful contaminants and catalyze economic and community development investments, creating new opportunities for local residents and reducing the crime that accompanies blight.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The potential contaminants at the target brownfields sites, including PAHs in soils; PFAS, and VOCs in groundwater; and petroleum and chromium, may be linked to high rates of respiratory disease, preterm births, and high blood lead levels among children. Data shows the worst rates in Cheshire County for the following which may be linked to potential contamination pathways: hospital visits for chronic obstructive pulmonary disease (Winchester, 101.8 per 10,000 population), preterm births (Keene, 10.9%), and Keene is ranked the 6th highest in the state among 234 municipalities in children with elevated blood lead levels (>10 μg/dL). Cancer risk is another brownfield concern. Data indicates

11 NH Department of Revenue.
12 EPA’s EJScreen Tool accessed November 2021, NH percentile rankings indicated.
13 US DOT Bureau of Transportation Statistics for 2020 shows that NH ranks 49th out of all states in transit funding.
14 Federal Bureau of Investigation, 2011-2020. Swanzey data was not available.
15 Source: NHDHHS, 2019 Community Health Outlooks.
that Cheshire County had 2,457 cancer cases between 2012-2016, including higher mortality rates for brain, breast, cervical, ovarian, and liver cancers than NH as a whole.\textsuperscript{16} Given that each site is adjacent to the Ashuelot River or a tributary, there are more opportunities to spread contamination than other brownfields sites by means of surface and stormwater. The most recent Ashuelot River water quality report card documents impaired water quality with advisories against swimming and fishing in the target communities.\textsuperscript{17} Situated in the Ashuelot River Valley, all target communities have experienced increased incidences of flooding and property damage in recent years including washouts at the Paper Services Ltd and Kingsbury Manufacturing sites.\textsuperscript{18} EPA funding will be used to assess the presence and develop plans to mitigate or remove carcinogens in the soil and water, as well as high lead concentrations in coal ash, soil and lead paint, thereby reducing the risks of these public health.

(3) Promoting Environmental Justice

An EPA brownfields assessment grant is precisely the tool needed to bring environmental justice to the four target communities in this proposal, because of its unique role as a funding source to address unknown environmental risks hindering redevelopment. In addition to the contamination pathways that the mills represent to the residents’ local environment, each mill’s blight and neglect—caused by decisions made by industrial and commercial entities unable or unwilling to adapt to changes in the economy or address the environmental impacts of their properties—have led to a social environment of despair in each of these communities. Just as the abandonment and closure of the mill sites largely precipitated decline in the communities, the reuse plans for the sites can catalyze prosperity for local residents. Each reuse strategy for the five mills was established through comprehensive community-based planning processes and will benefit the residents directly, not only addressing health and environmental risks from contamination, but uplifting the communities with reuse strategies aimed at creating new job opportunities (all 5 mill sites), reducing unsustainable property tax burdens (all 5 mill sites), creating affordable housing (Paper Services Ltd, Homestead Woollen Mill and Kingsbury Manufacturing), reducing community energy expenses while improving local energy resilience (A.C. Lawrence Tannery), and improving recreational opportunities by removing blight from the rails to trails system (all mill sites except McGoldrick).

b. Community Engagement

i. and ii. Project Involvement and Project Roles

Active participation will be provided by municipal representatives from each community as well as sectors including business, economic development, human services, landowners, conservation, and citizens living in the neighborhoods where the brownfields sites are located. SWRPC has built strong relationships with these partners over the duration of its on-going Brownfields Assessment program. Program partners include members of the Brownfields Advisory Committee (BrAC) who will be directly involved in reviewing site nominations and eligibility determination, oversight of all phases of ESAs, and Analyses of Brownfields Cleanup Alternatives (ABCA) development and implementation for site cleanup and restoration of properties to productive uses that benefit the community, environment, economy, and public health. Given space limitations, the partners that are expected to provide the most support are listed below, however there are many others. BrAC members are denoted with *. Members with direct experience managing/redeveloping brownfields are denoted with *+. Liaisons with priority brownfield property owners are denoted with ¡.

\textsuperscript{16} Source: NH Health WISDOM, NHDHHS, 2015.
\textsuperscript{17} NH Department of Environmental Services Ashuelot River Report Card, 2016.
\textsuperscript{18} Hinsdale, Keene, Swanzey and Winchester Hazard Mitigation Plans.
<table>
<thead>
<tr>
<th>Organization/Entity/Group</th>
<th>Point of Contact/Title/Level of Engagement</th>
<th>Specific Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town of Hinsdale</td>
<td>Sean Leary/ Planning Board Chair*</td>
<td>This group of individuals provides technical assistance with planning, community and economic development, brownfields referrals, and assists with public meetings.</td>
</tr>
<tr>
<td>Town of Winchester</td>
<td>Sara Carbonneau/ Former Planner*</td>
<td></td>
</tr>
<tr>
<td>Town of Swanzey</td>
<td>Matthew Bachler/ Dir. of Planning &amp; Economic Development*</td>
<td></td>
</tr>
<tr>
<td>City of Keene</td>
<td>Elizabeth Dragon/ City Manager*</td>
<td></td>
</tr>
<tr>
<td>Monadnock Economic Development Corp.</td>
<td>Steve Fortier/ Interim President*</td>
<td>Provides technical assistance in connecting sites and prospective owners with economic development programs as well as public/private financing throughout the target area.</td>
</tr>
<tr>
<td>City of Keene</td>
<td>Dan Scully/ Architect*</td>
<td>Provides perspective on redevelopment designs, structural integrity of buildings, zoning &amp; building codes, etc.</td>
</tr>
<tr>
<td>NH Department of Environmental Services</td>
<td>Michael McCluskey/ Brownfields Lead*</td>
<td>Provides technical assistance on State regulatory matters &amp; assists in review of ESA scopes of work, quality assurance project plans (QAPPs), reports, etc.</td>
</tr>
<tr>
<td>Hinsdale Economic Development Corp.</td>
<td>Mike Darcy/ President*</td>
<td>Provides ancillary technical advice, sponsors neighborhood meetings and recruits investors in Hinsdale.</td>
</tr>
<tr>
<td>Winchester Economic Development Corp.</td>
<td>Mark Tigan/ President*</td>
<td>Provides ancillary technical advice, sponsors neighborhood meetings and recruits investors in Winchester.</td>
</tr>
<tr>
<td>Ashuelot River Advisory Committee</td>
<td>Barbara Skuly/ Chair</td>
<td>Provides technical advice relating to Ashuelot River management and sponsors meetings with neighborhood stakeholders.</td>
</tr>
<tr>
<td>Monadnock Region Rail Trail Collaborative</td>
<td>Michael Kowalczyk/ Founder</td>
<td>Coordinates on regional trail use promotion, removing brownfield blight along trails, and assists in outreach to trail stakeholders.</td>
</tr>
<tr>
<td>Monadnock Public Health Advisory Council</td>
<td>Tricia Zahn/ Director, Community Strategic Partnerships</td>
<td>Conducts outreach to raise awareness of connection between public health and brownfield cleanup and redevelopment.</td>
</tr>
</tbody>
</table>

### iii. Incorporating Community Input

SWRPC will use its existing 2020 Public Involvement Plan\(^\text{19}\) as guidance for community involvement activities and communicate project progress. Brownfields meetings will be promoted via community and governmental websites, local newspapers, flyer postings, e-mail lists, and regular entries in SWRPC’s newsletters. SWRPC will work with community partners and other stakeholders to form neighborhood project advisory committees for each brownfield project. Meeting agendas will be

oriented around four milestones that request community feedback including: 1) the target brownfield property; 2) Phase I ESA results and recommended Phase II scope of work; 3) Phase II ESA results and discussion about redevelopment opportunities; and, 4) cleanup/remediation planning scope of work for redevelopment opportunities and a discussion of next steps. During the on-going pandemic, SWRPC will offer meeting access via Zoom and will promote safety precautions such as guidelines issued by the Centers for Disease Control regarding the use of masks and social distancing.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

   a. **Description of Tasks/Activities and Outputs**

   i – iv. Project Implementation, Anticipated Project Schedule, Task Lead and Outputs

<table>
<thead>
<tr>
<th>Task 1: Program Oversight &amp; Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: Update BrAC membership roster (Q1); Develop a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP) and legal services (Q1); Select a QEP and legal services through a competitive bid process and finalize agreements (Q2); Submit quarterly reports (including final closeout) and requests for reimbursement (Q1-12); Submit MBE/WBE reporting (Q’s 4, 8 &amp; 12); Update site inventory quarterly (Q1-12); Participate in training activities as needed including participation in one National Brownfields Conference (Q1-Q12). Eligible programmatic support and QEP services are USEPA grant funded; USEPA and NHDES staff assistance with oversight are separately funded, and BrAC members that participate in evaluating RFPs or participating in trainings are in-kind donations.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: Q1-12 as noted above.</td>
</tr>
<tr>
<td>iii. Task Lead: SWRPC.</td>
</tr>
<tr>
<td>iv. Outputs: Updated BrAC roster; QEP and legal services RFPs; QEP and legal services agreements; ACRES inputs; Quarterly reports and requests for reimbursement; MBE/WBE reports; Grant closeout report; Complete brownfields files suitable for audit purposes; Updated inventory; Documentation of attendance at trainings.</td>
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</tbody>
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<thead>
<tr>
<th>Task: Community Engagement and Planning Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: Conduct public BrAC meetings quarterly (Q1-Q12); Write brownfields articles in SWRPC’s newsletter quarterly (Q1-Q12); Write notices regarding upcoming BrAC meetings in SWRPC’s e-newsletter quarterly (Q1-Q12); Write press releases regarding success stories or stories alerting public to public meetings or charrettes as needed; Maintain brownfields assessment program webpage and outreach materials as needed; Conduct meetings and charrettes with neighborhood project advisory committees and general public as needed; Communicate regularly with the general public and key stakeholders (sharing information, seeking input, planning &amp; strategizing) through meetings, mail, e-mail and phone as needed; Integrate brownfields program into SWRPC’s municipal, environmental and economic development planning programs. Eligible programmatic support and QEP support is USEPA grant funded; USEPA and NHDES staff participation in community engagement activities are separately funded, and BrAC members and Community Organization assistance are in-kind donations.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: Q1-12 as noted above.</td>
</tr>
<tr>
<td>iii. Task Lead: SWRPC supported by QEP.</td>
</tr>
<tr>
<td>iv. Outputs: 12 Brownfields Advisory Committee meetings; 12 newsletter articles; 12 meeting postings on SWRPC website and in online-newsletter; 2 press releases; Updated webpage and outreach materials; One local radio spot; 18 public meetings with the general public, local elected officials, and key stakeholders.</td>
</tr>
</tbody>
</table>

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officials, community organizations and/or private brownfield owners/prospective purchasers;
Letters and e-mails relating to community engagement.

**Task 3: Phase I and II Assessments**

i. Project Implementation: Determine site eligibility with assistance from USEPA and NHDES as needed; Ensure insurance certificates cover scopes of work; Work with site owners/prospective purchasers and NHDES on scopes of work; Complete Environmental Site Assessment (ESA) scopes of work; Complete All Appropriate Inquiries (AAI) forms for Phase I ESAs; Complete Generic Quality Assurance Project Plan (QAPP) (Q1), Site Specific QAPPs, Phase I and II ESAs as warranted. Eligible programmatic support and QEP support is USEPA grant funded; USEPA and NHDES staff participation in reviewing scopes of work, QAPPs and reports are separately funded. SWRPC will seek cost share arrangements for assessments whenever possible.

ii. Anticipated Project Schedule: Q2-12 as warranted.

iii. Task Lead: For the coordination activities noted above, SWRPC is the lead. For all other activities the QEP is the lead with review, feedback and guidance from SWRPC.

iv. Outputs: 7 Phase I ESAs (including 2 renewals), 7 All Appropriate Inquiries Forms; 1 Generic QAPP; 10 SSQAPPs; 10 Phase II ESAs.

**Task 4: Reuse & Cleanup Planning**

i. Project Implementation: Conduct Analyses of Brownfield Cleanup Alternatives (ABCAs); Work with site owners, NHDES and USEPA on ABCAs, site reuse assessments, market studies, and evaluations of market viability. Eligible programmatic support and QEP support is USEPA grant funded. USEPA and NHDES staff participation in reviewing ABCAs are separately funded. SWRPC will seek cost share arrangements on ABCAs whenever possible.

ii. Anticipated Project Schedule: Q2-Q12 as warranted.

iii. Task Lead: QEP is the lead with review, feedback and guidance from SWRPC.

iv. Outputs: 5 ABCAs; 5 site reuse assessments, market studies or evaluations of market viability.

**b. Cost Estimates**

i. and ii: Development and Application of Cost Estimates

All estimates below are derived from costs related to SWRPC’s experience with previous cooperative agreements and assume 3 full years of programming. Mileage rates used are $.575/mi. SWRPC staff rates are an average of $40/hour and QEP rates are an average of $120/hour.

**Task 1 – Program Oversight & Training:** 360 SWRPC staff hours = $14,400. Travel is for one staff person to attend one National Brownfields conference ($1,000/person for airfare/lodging/meals) + 3 trainings x 150 miles round trip per training = $1,258. Estimate for desktop computer and software, copies, postage and miscellaneous office supplies is $4,300.

**Task 2 – Community Engagement Activities:** 550 SWRPC staff hours = $22,000. Travel is for 20 meetings x 25 miles round trip per meeting = $288. Estimate for laptop computer, software and installation, copies, postage and miscellaneous office and outreach/public involvement supplies is $5,715. 360 QEP hours + 15 trips x 75 miles round trip per meeting = $43,847.

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20 See https://www.epa.gov/brownfields/information-eligible-planning-activities
**FY 22 Application for U.S. EPA Brownfield Cleanup Grant – Section IV.E. Narrative**

Southwest Region Planning Commission, New Hampshire

Task 3 – **Phase I & II Assessments**: 420 SWRPC staff hours = $16,800. Travel is for 11 meetings x 25 miles round trip per meeting = $158. QEP costs include: 2 Phase I ESA renewals @ $1,500/ESA + 5 Phase I ESAs @ $4,500 + 6 Limited Phase II ESAs x $20,000/ESA + larger 4 Phase II ESAs @ $45,000 = $325,500 (travel and supplies included in estimates). Among the brownfields featured in this proposal, it is anticipated that at least 1 Phase I ESA renewal will be required for the McGoldrick site, 2 Phase I ESAs will be needed for the Homestead Woolen Mill and Paper Service Ltd site, 2 Limited Phase II ESAs will be needed for the Homestead Woolen Mill, McGoldrick and Paper Mill Ltd sites, and 2 larger Phase II ESAs will be needed for the Kingsbury site and AC Lawrence Tannery site. Remaining ESA work anticipated for other brownfields in inventory.

Task 4 – **Site Reuse & Cleanup Planning**: 420 SWRPC staff hours = $16,800. Travel is for 18 meetings x 25 miles round trip per meeting = $288. QEP costs include 5 ABCAs @ $5,000 = $25,000 + 192 hours (rounded) of additional technical assistance with site reuse and cleanup planning activities including site reuse assessments, market studies, and evaluations of market viability (assumes 15 meetings x 75 mi per round trip) = $48,647. It is anticipated that the 5 ABCAs and 5 site reuse assessments or studies will be used for the priority sites.

**Budget Categories**

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<th>Direct Costs</th>
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<td></td>
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<td>Community Engagement Activities</td>
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<tr>
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**c. Measuring Environmental Results**

SWRPC will track, measure and evaluate its progress on a quarterly basis based on the 12 quarter timeline described in Section 3a. Objectives will be determined for each activity, based on the number and types of outputs documented in this proposal and the preferred outcome of that activity as determined by SWRPC, the QEP, the BrAC, the brownfields owner/prospective purchaser, and key stakeholders. In cases where project outputs are defined as happening during a specific quarter, those will be tracked and evaluated by that measure. Otherwise, progress will be tracked based on a benchmark that describes the rate at which other activities occur over the three-year grant period. This will allow SWRPC to meet performance goals and make adjustments to work activities as the program occurs, resulting in optimal project results over the three-year period.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

i. iii. Organizational Capacity, Structure and Description of Key Staff

SWRPC has administered EPA Brownfields Assessment grants since October 2003 and the Region 1 EPA office has pointed to our program as a model for new grantees for its transparent decision-making process, high degree of public involvement, and its ability to complete all technical, administrative and financial requirements of the project and grant. J.B. Mack, SWRPC’s Brownfields Project Director, has served in that capacity since 2007. J.B. has a M.A. in Regional Planning and has worked as a professional planner for 19 years. Tim Murphy, Executive Director and Becky Baldwin, Office
Manager provide support to the program in the areas of overall administration and financial management. They have both been affiliated with SWRPC’s Brownfields Assessment program since its inception. Tim has a M.S. in Geography focused on City and Regional Planning with over 35 years as a professional planner, and Becky has a B.A. degree with over 40 years in municipal and regional planning fiscal operations and administration.

iv. Acquiring Additional Resources

SWRPC has access to a deep bench of professionals with expertise in land use, natural resource and transportation planning, community and economic development, hazard mitigation, energy planning and more. SWRPC’s brownfields activities are integrated with each of these other focus areas ensuring a comprehensive consideration of each brownfield’s challenges and opportunities. In addition, SWRPC has a rich and diverse BrAC that includes 2 seasoned planners, an architect, a president of the regional economic development agency, 3 former or acting elected officials with their own brownfields experience, and ex-officio support from NHDES and US EPA Region 1. Moreover, SWRPC has strong relationships with regional federal government officials representing HUD, USDA, EDA, and FHWA as well as relationships with housing, commercial and solar array developers. These partners have many years of experience with the leverage opportunities identified above in Section 1.c.i.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

SWRPC has administered 10 community-wide and 1 site-specific EPA brownfields assessment cooperative assistance agreements since 2003.

(1) Accomplishments

With the exception of one site-specific grant in which the owner decided not to participate after a Phase I ESA was conducted, SWRPC has always met its outputs and outcome targets for its eleven cooperative agreements. To date, SWRPC has conducted work on 37 sites. Among the 37 brownfields, SWRPC has conducted 27 Phase I ESAs, and 41 Phase II or Supplemental Phase II ESAs. To date, SWRPC’s program has resulted in the creation of 6 new community institutions (community center, courthouse addition, nonprofit headquarters, Headstart program, community theatre, community library), 76 new housing units (senior, family/workforce, residential condos), new office space, a new hotel, community-based food co-op, industrial park, a restaurant and a brewery/restaurant. In addition, some brownfields were transformed to 38 acres of green space. It is estimated that at least 215 direct new jobs have been created as a result of our brownfields program, not including construction jobs and other indirect employment. These projects have successfully leveraged substantial private capital, bank loans, CDBG funds, New Market Tax Credits, FHWA and USDA funds, and the NHDES’ petroleum fund.

(2) Compliance with Grant Requirements

SWRPC has successfully utilized its USEPA Assessment grant funds over the course of its ongoing program. Our quarterly performance and technical reporting have been consistently submitted on time and complete. SWRPC has kept its ACRES data updated as new information on sites is developed and has followed all contract terms and conditions. As noted above, SWRPC was not able to fully utilize its one site assessment grant and coordinated with EPA staff to de-obligate its site-specific brownfields assessment grant in September 2020. In this instance, all grant obligations were met. Our consistent performance in administering our on-going brownfields assessment program is the best predictor of future success for the priority projects listed in this proposal for the Ashuelot River Valley.
Threshold Criteria for SWRPC FY 2022 Community-Wide Assessment Grant

III.B. Threshold Criteria for Assessment Grants

1. **Applicant Eligibility**

Southwest Region Planning Commission (SWRPC) is a New Hampshire Regional Planning Commission. Regional Planning Commissions, like municipalities and counties, are recognized as political subdivisions of the State of New Hampshire. Please see the attachment showing state law RSA-36:49a explaining SWRPC’s status.

2. **Community Involvement**

SWRPC will use its 2020 Public Involvement Plan as guidance for all community involvement activities. The plan contains guidance for identifying and locating target populations, selecting meeting venues, contingency planning for transportation for non-drivers, meeting notification best practices, guidance on creating readable and comprehensible reports, presentations or other work products, and other associated guidance, including guidance for adjusting to the COVID-19 pandemic.¹

SWRPC’s community involvement plan will include several layers of involvement including 1) general public involvement and outreach, 2) neighborhood involvement and outreach, and 3) Brownfields Advisory Committee (BrAC) meetings. General outreach will include an up-to-date website, newsletter entries, press releases, hosting a regional information forum, and going to speaking engagements at stakeholder meetings as needed. Neighborhood involvement will be sponsored in brownfields neighborhoods by our relevant community partners to provide information and collect feedback at various stages of brownfield assessment. Finally, SWRPC will hold quarterly Brownfields Advisory Committee meetings, which will be posted and open to the public, for the community to participate in the process of deciding on scopes of work for assessment activity.

Our plan for involving stakeholders will first require that we gather as much information as possible about each site that we are considering. Much of this work will occur under Task 2, when we propose meeting with brownfield site owners and learning about their needs and goals, working with NHDES to understand the contamination history of the site, doing a site walk, examining the brownfields relationship to the neighborhood, and speaking to any known parties that already have an interest in the site. All of this background work will help ensure that further discussions with residents and other stakeholders are productive.

3. **Named Contractors and Subrecipients**

SWRPC is not naming any contractors or subrecipients to conduct work for the assessment grant at this time. SWRPC plans to go through an EPA-approved procurement process for Qualified Environmental Professionals and for legal assistance.

4. **Expenditure of Assessment Grant Funds**

SWRPC affirms that it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant at this time.