Narrative Information Sheet

1. **Applicant Identification** North Country Council, 161 Main Street, Littleton NH 0356
2. **Funding Requested**
   a. **Assessment Grant Type:** Community-Wide
   b. **Federal Funds Requested**
      i. $500,000
      ii. Not applicable
3. **Location**
   a. Albany | Colebrook | Gorham | Littleton | Stark
   Bartlett | Columbia | Groton | Lyman | Stewartstown
   Bath | Conway | Hart's Location | Madison | Stratford
   Benton | Dalton | Haverhill | Milan | Sugar Hill
   Berlin | Dummer | Jackson | Monroe | Thornton
   Bethlehem | Easton | Jefferson | Northumberland | Warren
   Campton | Eaton | Lancaster | Pittsburg | Waterville Valley
   Carroll | Ellsworth | Landaff | Randolph | Wentworth
   Chatham | Errol | Lincoln | Rumney | Whitefield
   Clarksville | Franconia | Lisbon | Shelburne | Woodstock
   b. Carroll, Grafton, and Coos County
   c. New Hampshire
4. **Target Area and Priority Site/Property Information**
   a. City of Berlin and Town of Colebrook
      Priority Sites: Isaacson Steel: 149 Jericho Road, Berlin, NH 03570
                      Colebrook Academy: 13 Academy Street, Colebrook, NH 03576
5. **Contacts**
   a. Project Director: Michelle Moren-Grey, 603-444-6303, mmoren@nccouncil.org,
      161 Main Street, Littleton NH 03561
   b. Chief Executive: Same as Project Director
6. **Population**
   a. Target Areas: Berlin, pop. 9,425; Colebrook, pop. 2,084
7. **Other Factors**

<table>
<thead>
<tr>
<th>YES/NO</th>
<th>Other Factor</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Community population is 10,000 or less</td>
<td>1</td>
</tr>
<tr>
<td>No</td>
<td>The applicant is or will assist, a federally recognized Indian tribe or the United States territory</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<td>Secured leveraging and commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of</td>
<td>N/A</td>
</tr>
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</tr>
<tr>
<td>No</td>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>N/A</td>
</tr>
<tr>
<td>No</td>
<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>N/A</td>
</tr>
</tbody>
</table>

8. **Letter from State** – Attached

9. **Releasing Copies of the Applications** – no portion of this application is confidential
EMAIL ONLY

November 12, 2021

Michelle Moren-Grey, Executive Director
North Country Council
161 Main Street
Littleton, NH 03601

Subject: North Country Council
FY22 Proposal for EPA Brownfields Community-Wide Assessment Grant
State Letter of Acknowledgement and Support

Dear Ms. Moren-Grey:

The New Hampshire Department of Environmental Services (NHDES) hereby acknowledges and expresses our support for North Country Council’s (NCC) 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 your 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 NCC. Please contact me should you have any questions.

Sincerely,

Michael McCluskey, P.E.
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-2183
Email: Michael.G.McCluskey@des.nh.gov
ecn: Dorrie Paar, EPA New England – Region 1
Karlee Kenison, P.G., Administrator, NHDES-HWRB
Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB
Melinda Bubier, NHDES-HWRB
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

The North Country Council (NCC) region includes all of Coos County and parts of Grafton and Carroll counties, comprised of 50 municipalities and 3,188 square miles in the rural northern third of New Hampshire. The population of the region is 83,107 representing approximately 6% of the population of the State of NH. The target communities of this grant are Berlin (pop. 9,425) and Colebrook (pop. 2,084), which are home to approximately 14% of the region’s population (https://www.nh.gov/osi/data-center/2020-census/index.htm). These communities are spread across the NCC region and have large downtowns with small compact urban centers. Berlin is situated north of Mount Washington on the banks of the Androscoggin River and Colebrook is located in the northwestern portion of the region near the Canadian border along the Connecticut River.

The NCC region is home to the White Mountains including the Presidential Range which includes Mount Washington. This spine of mountainous terrain, while beautiful, geographically separates most of the NCC region from other economically vibrant areas in southern NH and the rest of New England. Further isolating the NCC region is the Connecticut River which makes the state border with Vermont to the west and Androscoggin and Saco Rivers which have headwaters in the region near the eastern state boundary.

The NCC region was historically dominated by the forest products manufacturing industry providing the majority of jobs, growth, and vitality. However, according to the 2018-2022 Comprehensive Economic Development Strategy (CEDS), the economic activity surrounding forest products has been declining in the mid-1990s and the region has since undergone a shift of employment to a recreation/service-based economy that has significantly impacted NCC residents’ ability to achieve a livable wage. Over the last 20 years, there have been over 800 jobs eliminated in Coos County alone due to mill shutdowns, factory relocation, and business closures. The loss of high-paying manufacturing jobs and the resulting economic decline have led to a deterioration of the region’s downtowns especially in target communities of Berlin and Colebrook.

ii. Description of Priority Brownfield Site(s)

We estimate from a review of data available on the NHDES website and our prior inventory work that there are over 200 potential Brownfields in the target areas of Berlin and Colebrook (http://des.nh.gov/onestop/) occupying at least 260 acres and at least 750 potential Brownfields sites in the other NCC communities which will become the focus of future EPA grants. A description of the target area Brownfields is as follows:

Berlin has at least 100 potential Brownfields Sites remaining in town despite past work done under our previous 2004, 2007, 2009, and 2019 Brownfields Assessment grants. These sites are former commercial housing buildings, an armory, repair garages, dumping grounds, and auto body facilities. The potential contaminants at these Sites include: volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), semi-volatile organic compounds (SVOCs), and metals. Downtown buildings also include asbestos-containing building materials (ACM), lead-based paint (LBP), and PCBs in building materials. One of the key target sites for this grant is the Isaacson Steel property, which is located at the gateway to Berlin. The property has been used for vehicle maintenance/auto repair and as a salvage yard, and was previously assessed as part of NCC’s 2019 grant; however, needs substantial supplemental assessment and cleanup planning in order to address PCB contamination that was discovered in exterior soils throughout the yard and PFAS contamination discovered in soil and drinking water.
This site as well as other adjoining/nearby properties are the proposed location of a hotel to accommodate our growing recreational economy, and cleaning up this dilapidated and contaminated property will also lead to additional investment in the City’s gateway area.

Colebrook has at least 30 potential Brownfields Sites spread throughout the community many with aging buildings awaiting tax foreclosure located downtown. The downtown has some vacant storefronts and underutilized auto sales and service facilities. Other sites are similar in scope to those listed for other target areas. Contaminants at these sites likely include VOCs, PAHs, SVOCs, PCBs, and metals. Downtown buildings also potentially contain ACM, LBP, and PCBs. The targeted site in this community is the former Colebrook Academy building, which closed in 2019 as part of a school consolidation effort. Due to the age of the building and based on a similar project, the Academy building is likely to contain substantial hazardous building materials, and this site is known to have had a long history of petroleum storage and compliance issues. Definitive reuse plans have yet to be established; however, assessment/cleanup planning funds will assist the community in reuse analysis and evaluating the needs of the community and various proposed reuses of the site for affordable/senior housing, community space, and/or green space.

b. Revitalization of the Target Areas

i. Reuse Strategy and Alignment with Revitalization Plans

Beginning in 2012, NCC worked with member municipalities, community members, and sub-committees to shape a new vision for the North Country which resulted in the 2014 A Plan for NH’s North Country, the 2014 NCC Housing Needs Assessment and Fair Housing Equity Assessment, and the 2014 CEDS. Note that NCC is in the process of updating the Housing Needs Assessment and CEDS which will assist in the identification and redevelopment of properties for much-needed workforce housing to support a thriving economy. The CEDS articulated a desire to capitalize on the region’s assets in furthering economic development. One of the strategies is to revitalize, reuse and maximize downtowns across the region. This is aimed to accomplish several outcomes: better quality of life for residents; protection of water resources and natural landscapes; investment and revitalization of downtowns; increasing jobs; safe, quality, affordable housing; and increasing tax revenue. Consistent with this strategy, the NCC Brownfields Assessment program will focus on assessing sites in downtowns of Berlin, and Colebrook to accomplish these goals. The specific community needs to be addressed through this Brownfields program are as follows:

- There is an excess of vacant underutilized properties in the downtowns of the target areas and NCC communities have numerous sites in the downtowns being considered for tax foreclosure. Towns would like to acquire properties and turn them over to developers, but the environmental conditions at these properties are unknown.
- The lack of investment in downtowns is impacting local tax bases, encouraging sprawl, and inviting crime in the downtowns.
- There is a lack of affordable housing choices in the downtowns of numerous NCC communities including the target areas of Berlin and Colebrook.
- The shift in the North Country’s economy from manufacturing-based to recreation and retail-based has created a large gap in the livable wage.
- All groundwater is considered potential drinking water by NH law. No place is this truer than in the North Country where there are examples of where downtown have been built over potable aquifers.

NCC’s reuse strategy is to revitalize, reuse and maximize downtowns across the region. We will
put a high priority on facilitating redevelopments that reduce the amount vacant properties in the
target area downtowns, create opportunities for better-paying jobs to increase the livable wage in
these areas, lead to more affordable housing opportunities, create opportunities for communities
to put properties back on the tax rolls which will expand tax bases, and protection of human health
and the environment. Cleaning up these properties directly aligns with several aspects of the
region’s will also help address the threat to drinking water aquifers which in many cases overlap
with our downtowns. Specifically, in Berlin the projected reuse of the Isaacson Steel site directly
aligns with the community priority to eliminate vacant/underutilized property, encouraging
investment in the downtown/gateway area, boosting recreational economic development, and
preventing drinking water contamination. In Colebrook, the reuse of the Academy will also
encourage investment in the downtown through the redevelopment of the underutilized property
while providing much needed affordable housing opportunities. Most of the above community
priorities will also be met by assisting our communities with assessing some of the more than 100
Brownfields or properties that are being considered for tax foreclosure in their downtowns. Once
assessed, any non-target site that gets redeveloped could either provide more affordable housing
opportunities, increase the tax base, and eliminate unused properties in the downtown.

ii. Outcomes and Benefits of Reuse Strategy
Both Berlin and Colebrook will be directly impacted by the outcomes and benefits of our reuse
strategy and meet the definition of disadvantaged communities as a result of low income, persistent
poverty and blight due to the high number of abandoned properties and mills in the area. Reuse
of the Isaacson Steel site will not only clean up a dilapidated scrap yard/repair facility but will
clean up the gateway to Berlin’s downtown while removing an immediate health threat of PCBs
and PFAS. It will also serve to remove blighted properties in the area that will help to attract
additional commercial development including a much needed hotel to support the Cities tourism
industry. The development of a hotel is expected to create over $10 million in private investment
and create at least 50 construction related and good-paying full-time jobs while simultaneously
increasing the local tax base. The development of a hotel will also draw additional tourists to
Berlin, which will further support local hospitality and retail businesses.

Redevelopment of the Colebrook Academy into a mix of affordable/senior housing, community
space, and/or greenspace will immediately bring new life to the downtown. Based on prior similar
projects, it is anticipated that a direct investment of around $3 million dollars would be necessary
to reuse the site, which would likely result in 20-30 units of affordable/senior housing and
greenspace. Not only would this provide needed housing and increased property tax value, it
would likely provide at least 20 construction jobs and 5 full time jobs, and further support
downtown economic development by returning full-time residents to the downtown.

While specific redevelopment design plans have not yet been created, it is expected that any new
developments at the target, and/or other reused properties would include high-efficiency measures,
and it would be encouraged that developers include solar power, at a minimum, during any
building construction.

c. Strategy for Leveraging Resources
i. Resources needed for Site Reuse
Reuse of Brownfields sites will leverage support both from our member communities, Grafton
Regional Development Corporation (GRDC), and Coos Economic Development Council. The
target communities of Berlin and Colebrook have the potential to further leverage tax incentive
programs, including the Community Revitalization Tax Relief Incentive and the designated Economic Revitalization Zones, which focus on improving downtowns and historic districts.

The NHDES administers a Brownfields Assessment and Revolving Loan Fund program, and a Petroleum Reimbursement Program for the assessment and cleanup of sites and can make these funds available for eligible sites. Due to the previously described economic conditions, communities in the region have limited ability to draw on other sources of funding; however, this assessment funding will also leverage cleanup and reuse resources from private and non-profit developers. Known secured, pending, and potential resources that will/can be leveraged as part of this grant program include:

<table>
<thead>
<tr>
<th>Source</th>
<th>Purpose/Role</th>
<th>Amount ($</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volunteer Time</td>
<td>Advisory Committee Members, in-kind</td>
<td>$5,000</td>
<td>In-kind, Pending number of meetings and attendance</td>
</tr>
<tr>
<td>NHDES Brownfields Assessment</td>
<td>Assessment for municipally-owned sites</td>
<td>Site Specific</td>
<td>Potential</td>
</tr>
<tr>
<td>NHDES Petroleum Reimbursement Prog</td>
<td>Assessment and cleanup of identified petroleum impact sites</td>
<td>Site-Specific up to $2M</td>
<td>Potential if petroleum contamination is identified</td>
</tr>
<tr>
<td>NHDES RLF</td>
<td>Cleanup Funding</td>
<td>Unknown</td>
<td>Potential</td>
</tr>
</tbody>
</table>

ii. Use of Existing Infrastructure

Each of our target areas has electrical, communication, public water, sewer, and stormwater services in the areas of the target sites of the grant. Existing road infrastructure and multimodal transportation hubs including sidewalks, bike lanes and rail trails are also present in the target areas. Successful assessment and subsequent reuse of our brownfields in these areas will utilize this existing infrastructure resulting in cost savings for the redevelopments.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

Indicators of financial stress is evident by free and reduced school lunch participation. As of 2019, in Berlin and Colebrook the school population eligible to receive benefits in the program were 41% and 45.7% respectively, whereas the state-wide average was only 24.8% (https://www.education.nh.gov/who-we-are/division-of-educator-and-analytic-resources/bureau-of-education-statistics/free-and-reduced-lunch-eligibility)

High commuting costs also financial burden our residents due to a general need to travel outside of their hometowns to find jobs and/or there is a lack of better housing opportunities where residents work. Either way this speaks directly to an overall lack of downtown revitalization and economic development. The trend of non-livable wages, very low median household incomes, and the downtown blight that follows cannot be broken without assistance. Currently, property owners cannot afford to invest in their own properties. This is further compounded by the issue that NH does not have any sales or income taxes, so all municipalities are reliant on the collection of only property taxes to fund the work that they do. Municipal resources are already strained paying for essential work and basic infrastructure improvements so there is no money left over to reinvest in improving communities. The net result is that owners/municipalities do not have the
surplus funds to invest in their properties, this leads even lower property taxes and continues the cycle of disinvestment. As is probably clear, residents and communities do not have any resources left over to do any environmental work when there is a concern (assessment or cleanup). The problem with this is that municipalities become reluctant to foreclosure on sites with real or perceived environmental issues for fear that they will be stuck with the more cost. Berlin and Colebrook have over an estimated 100 properties awaiting foreclosure and many have not been foreclosed on for this reason. NCC only has limited member dues (only 6% of our overall budget) and relies on other federal grants to execute our mission so we do not have any excess money to fund environmental work in the region.

ii. Threats to Sensitive Populations

(1) Health and Welfare: According to the majority of metrics, Coos County is the most disproportionately impacted county in NH and has led to a higher rate of Brownfields and blight in the downtowns of the target areas (https://headwaterseconomics.org/apps/economic-profile-system/33007). This is interfering with upkeep of the existing building stock and the creation of new or rehabbed housing choices for residents. The NCC Housing Needs Assessment (2014) reported that even those with Section 8 vouchers have a hard time finding suitable rentals in the region, clearly outlining the overall lack of good downtown housing opportunities disproportionately impacting those living in poverty which account for up to 20% of the population in the target areas (see Table below). This is compounded by the fact that most of the region’s communities lack the needed public water and sewer infrastructure, public transportation and other services (except for our few urban downtowns) needed to support a range of adequate housing choices. Colebrook and Berlin have the highest vacancy rates of the target areas at 10.2 and 11.3% compared to the state-wide average of only 8.9% (NCC Housing Needs Assessment, 2014). In addition, 2021 NHDES OneStop GIS data indicate that highest concentrations of Brownfields sites are documented to exist in downtowns where most of the sensitive low-income populations already live. As such, those sensitive low-income residents living in poverty are those most likely to come in contact with contaminants associated with our regions Brownfields sites. Poverty and substandard housing are also linked to increased crime activity. Conversations with community members indicated that most of crime occurs in the downtowns of target areas. Simple assaults, aggravated assaults, burglary/breaking & entering, and theft from buildings occur at a similar or significantly higher rate in Colebrook and Berlin compared to the state average. Berlin experiences high rates of drug/narcotic violations and destruction/damage/ vandalism of property. In 2019, twelve communities in the region have crime rates above the state average.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: NH has documented 42,180 cases of invasive cancer between 2014 and 2018 (http://www.cancer-rates.info/naaccr/). The overall cancer age-adjusted incidence rate (per 100,000) is high compared to other areas of the country. The rates in Coos, Carroll, and Grafton Counties are 484.3, 465.0, and 446.9, respectively (https://statecancerprofiles.cancer.gov). While it is difficult to draw a direct relationship between cancer rates and the cumulative environmental impacts identified above (including our contaminated Brownfields sites and older residential housing), it is clear that most communities that have a high incidence of cancer also have a high number of Brownfields. NH DHHS Lead Exposure Data Briefs for 2019 indicate that there were 59 children in the Coos, Grafton, and Carroll counties with some level of lead in their blood. Lead poisoning is generally high in children living in poverty and in pre-1950 building stock. Most Brownfields in the NCC region are older buildings which would have a high risk of containing lead-based paint.
(3) Promoting Environmental Justice: Our target communities are home to high percentages of at-risk populations, including low-income elderly and children, and all environmental indices for both our target areas and the State are disproportionately higher than the country (see below). Both cities have a low-income populations near the state’s that are also well above the country’s. By assessing, cleaning up, and redeveloping sites within our target area we can help create new units of safe and affordable housing and the resulting jobs to help break this cycle.

<table>
<thead>
<tr>
<th>EJ Indexes for Target Areas</th>
<th>Berlin</th>
<th>Colebrook</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comparable Percentiles:</strong></td>
<td><strong>State</strong></td>
<td><strong>Region</strong></td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>93</td>
<td>76</td>
</tr>
<tr>
<td>Ozone</td>
<td>93</td>
<td>76</td>
</tr>
<tr>
<td>NATA Diesel PM</td>
<td>92</td>
<td>77</td>
</tr>
<tr>
<td>NATA Air Toxics Cancer Risk</td>
<td>92</td>
<td>76</td>
</tr>
<tr>
<td>NATA Respiratory Haz Index</td>
<td>93</td>
<td>76</td>
</tr>
<tr>
<td>Traffic Proximity and Volume</td>
<td>64</td>
<td>59</td>
</tr>
<tr>
<td>Lead Paint Indicator</td>
<td>68</td>
<td>60</td>
</tr>
<tr>
<td>Superfund Proximity</td>
<td>61</td>
<td>47</td>
</tr>
<tr>
<td>RMP Proximity</td>
<td>52</td>
<td>51</td>
</tr>
<tr>
<td>Hazardous Waste Proximity</td>
<td>93</td>
<td>76</td>
</tr>
<tr>
<td>Low-Income Population</td>
<td>89</td>
<td>82</td>
</tr>
<tr>
<td>Pop. w/less H.S. Education</td>
<td>87</td>
<td>77</td>
</tr>
<tr>
<td>Population under Age 5</td>
<td>41</td>
<td>40</td>
</tr>
<tr>
<td>Population over Age 64</td>
<td>64</td>
<td>66</td>
</tr>
</tbody>
</table>

*Source: EPA EJScreen 2021; EPA’s NATA (National Air Toxics Assessment) for Target Areas*

b. Community Engagement
i. Project Involvement and ii. Project Roles
The NCC Brownfields Program will continue to be supported by our existing BAC and community partners who have been invited to join our BAC and/or to provide direct input into projects as stakeholders in our target areas. Our project partners and their specific roles are as follows:

<table>
<thead>
<tr>
<th>Partner</th>
<th>Point of Contact</th>
<th>Role in Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing Education and Development (AHEAD)</td>
<td>Michael Claflin 603-444-1377 <a href="mailto:mclaflin@homesahead.org">mclaflin@homesahead.org</a></td>
<td>The mission of AHEAD is to develop and provide affordable rental housing, financial education, and home opportunities to strengthen the families and communities of Northern NH. AHEAD has committed to help the NCC Brownfields program with the identification of potential rental housing projects in the target areas. They will also provide a representative to serve on the BAC and provide meeting space in their conference room.</td>
</tr>
<tr>
<td>Coos Economic Development Corporation (CEDC)</td>
<td>Lise Howson 603-788-3900 execdirector @coosedc.org</td>
<td>CEDC mission is to strengthen local businesses, grow the economy, and foster community support networks that create jobs and build wealth within Grafton County. CEDC has committed to help the NCC Brownfields program with the identification of Brownfields projects in Coos County and provide a representative to serve on the BAC.</td>
</tr>
</tbody>
</table>
North Country Council

MWVHC is a 501(c)(3) non-profit organization with the goal of ensuring that the residents have access to an adequate supply of affordable rental and sale housing. MWVHC has committed to help the NCC Brownfields program with the identification of potential housing projects. They will also provide a representative to serve on the BAC.

It is this council’s mission is to strengthen local businesses, grow the economy, and foster community support networks that create jobs and build wealth within their region. MWVEC has committed to help the NCC Brownfields program with the identification of Brownfields projects their region and provide a representative to serve on the BAC.

### iii. Incorporating Community Input

NCC’s success are a direct result of the effort we put into community program awareness and outreach. We will continue to implement our community engagement program to seek and incorporate input by using previously successful methods including one-on-one meetings and “Brownfields 101” presentations to municipalities, public forums to increase awareness, neighborhood and landowner meetings. We will continue to maintain and update our existing website with general Brownfields information and specific accomplishments to highlight the program’s success. Public meetings will be held in communities where Phase II assessments have occurred to discuss cleanup planning, and will be live and/or live-streamed to increase participation, especially due to COVID-19. The meetings will be announced on the NCC and community websites, social media accounts, newsletters, newspapers, and flyers in frequented locations. Contact information will be provided for those unable to attend meetings and for follow-up questions and input. As cleanup and reuse plans are developed; they will be disseminated to the target community to solicit input and comments that can be incorporated into the projects.

### 3. Task Descriptions, Cost Estimates, and Measuring Progress

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

Since NCC has an existing Brownfields program, we will continue to conduct the following tasks as part of this assessment program and anticipate to complete the program within the 3-year duration of the cooperative agreement:

**Task 1 – Cooperative Agreement Oversight**

| i. Project Implementation: NCC will publish an RFQ, and contract a QEP to oversee assessment activities. We plan to attend the National Brownfields Conference, and will manage technical tasks associated with the program and perform required reporting and record retention. |
| ii. Anticipated Project Schedule: Oct – Dec 2022 for RFQ/obtain QEP; ongoing through project |
| iii. Task/Activity Lead: Michelle Moren-Grey, Project Director |
| iv. Outputs: 2 attendees at the Brownfields conference; 1 QEP contracted; Quarterly/MBE-WBE reports |

**Task 2 – Community Engagement and Site Selection:**

| i. Project Implementation: NCC will reconvene the existing BAC and solicit new members as appropriate for our target communities. NCC and the BAC will oversee the site selection process and implementation of the overall grant based on the established site selection criteria. In coordination with NCC, the QEP, and the BAC, the existing site inventory will |
be updated, additional targeted community outreach will be conducted, and new sites will be solicited/selected for assessment. Once assessments are complete, NCC will coordinate applicable outreach sessions in the targeted communities (e.g., PH II results or cleanup planning sessions) to inform stakeholders and the general public.

ii. Anticipated Project Schedule: Oct 2022 – July 2024, as needed pending funding constraints

iii. Task/Activity Lead: Michelle Moren-Grey, Project Director

iv. Outputs: 2 new BAC members; 3 BAC meetings; updated site inventory; 3 community meetings held; various outreach documentation

**Task 3 – Phase I & II ESAs**

i. Project Implementation: Based on the updated inventory and budgetary scale of the Sites to be assessed, Phase I ESAs will be conducted in accordance with ASTM 1527-13 and EPA’s “All Appropriate Inquiry” rule, SSQAPPs will be prepared, and Phase II ESAs will be conducted in accordance with ASTM 1903-11.

ii. Anticipated Project Schedule: October 2022 – July 2025

iii. Task/Activity Lead: QEP

iv. Outputs: 9 Phase I’s; 7 SSQAPPS; 7 Phase II’s; Sec 106 SHPO approvals, as applicable

**Task 4 – Cleanup and Reuse Planning**

i. Project Implementation: NCC will coordinate cleanup and reuse planning documents to support private cleanup and redevelopment work, or pursue other public and grant-funded opportunities for projects. In addition, it is planned that some site-specific reuse planning and visioning will be conducted on the previously assessed Isaacson Steel and other sites.

ii. Anticipated Project Schedule: April 2023 – July 2025

iii. Task/Activity Lead: QEP

iv. Outputs: 5 ABCA/RAPs with meeting documentation and designs

b. **Cost Estimates and Outputs**  
Costs are estimated below and are summarized in the following table; note that EPA considers NCC an exempt governmental agency that is not required to submit fringe costs in proposals:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Coop. Agreement Oversight</th>
<th>Task 2: Comm. Engagement &amp; Site Selection</th>
<th>Task 3: PH I/II ESAs</th>
<th>Task 4: Cleanup and Reuse Planning</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Costs</td>
<td>$15,250</td>
<td>$22,250</td>
<td>$6,000</td>
<td>$9,000</td>
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<td>Travel</td>
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<td>$106</td>
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<td>Supplies</td>
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<td>$150</td>
<td>$150</td>
<td>$900</td>
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<td>Contractual</td>
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<td>$325,000</td>
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<td><strong>Total Direct Costs</strong></td>
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<td><strong>$331,306</strong></td>
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<td><strong>Total</strong></td>
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<td><strong>$337,555</strong></td>
<td><strong>$71,756</strong></td>
<td><strong>$500,000</strong></td>
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**Task 1 - Cooperative Agreement Oversight:**  
*Project Director 250hrs=$10,000, Financial 150hrs=$5,250, Travel 150 miles at $0.56 per mile ($84); Two people attending Brownfields Conference: airfare ($500 RTx2 = $1,000), hotel ($150/nighthx3nightsx2 = $900) and meals
Task 2 - Community Engagement and Site Selection: Project Director 400 hrs = $16,000; Associate Planner 250 hrs = $6,250, Travel 500 miles at $0.56 per mile ($280); and $300 for document production supplies (copies, toner, postage, laptop). QEP contractual costs are estimated at 150 hours at $125/hour = $18,750 to assist with inventory and site selection, attendance at community and BAC meetings, and other engagement activities. Outputs of this task include an updated inventory, BAC and community meeting minutes, notes/sign-in sheets, community outreach documentation, property access agreements, and site eligibility approvals. Indirect cost $6,250 (5% of $500,000/4 tasks).

Task 3 - Phase I/Phase II ESAs: Task 3 - Phase I/Phase II ESAs: Project Director 125 hrs = $5,000; Associate Planner 40 hrs = $1,000, 278 miles at $0.56 per mile ($156); $150. for document production supplies (copies, toner, postage) QEP contractual costs are estimated at approx. $5,000 for each Phase I ESA ($45,000 total) and $40,000 for each combined SSQAPP/Phase II ESA ($280,000 total). Outputs of this task are anticipated to include nine Phase I ESA, seven SSQAPPs, and seven Phase II ESAs, in addition to Section 106 SHPO Review approvals as applicable.

Task 4 - Cleanup and Reuse Planning: Project Director 200 hrs = $8,000; Associate Planner 40 hrs = $1,000, 190 miles at $0.56 per mile ($106); $150 for document production supplies (copies, toner, postage). QEP expenses (contractual) are estimated at $6,250 per ABCA/RAP ($31,250) and an additional $25,000 for another cleanup, reuse planning, and visioning related QEP and other contractor tasks (e.g., market analysis, renderings, etc.). Based on our previously assessed and expected new sites, NCC anticipates that five (5) ABCA/RAPs will be developed and meeting minutes, charrette documents, conceptual designs, etc. will be generated as outputs.

c. Measuring Environmental Results

Outputs and outcomes of NCC’s program will be regularly communicated through BAC meetings, EPA quarterly progress reports and ACRES updates, and during community outreach events as detailed in NCC’s work plan. NCC coordinates with their QEP on a regular basis, at least monthly, to track project progress and will perform any necessary corrective actions in order to ensure the assessment program remains on budget and is completed within the grant performance period. NCC currently tracks program progress and communicates to our BAC using a Trello© board, and with the assistance of our QEP tracks any project leverages including in-kind contributions, volunteer time, direct expenditures, and resulting project investments that will also be recorded in ACRES.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity and iii. Key Staff

NCC’s region encompasses 50 communities in the northern 1/3 of the state. All eligible communities, including the target communities described in this application, are members in good standing as of FY2022. NCC has the knowledge, experience, and capacity to successfully implement and manage the FY22 Brownfields Assessment Grant. The Commission’s annual budget of approximately $800,000 is comprised of local dues as well as a variety of local, state and federal programs and grants. Ranging from economic development, local technical assistance projects such as the preparation of local capital improvement programs (CIPs), the NCC staff undertake a wide variety of planning functions on an annual basis.

Michelle Moren-Grey, Executive Director of NCC, will serve as project director for the
Brownfields program. Michelle is a planner who has been at NCC since 2006. She has assisted and managed the Brownfields grants in 2007, 2009, and 2019, as well as manages and implements many projects at NCC including regional planning efforts, economic development, and land use regulation development. James Steele, Finance Manager & Special Project Planner of NCC, will serve financial and reporting oversight for the Brownfields program. James has been with NCC since 1995 and has assisted with Special Projects including the Brownfields grants in 2009, and 2019 as well as oversees all of the financial and reporting aspects of state, federal and local grants at NCC. In terms of contracting, NCC will use 1 QEP firm to assist with the cooperative agreement oversight and community engagement portions of the program and execute the entire Brownfield’s program. The QEP public bidding process will be done in accordance with 40 CFR Part 31 with EPA and NHDES support.

ii. Organizational Structure
The Project Director will work closely with the BAC and the QEP to determine the priority of projects and a timeline to accomplish assessments. She will oversee the Finance Manager to ensure the financial and reporting requirements are met. The Finance Manager will oversee the QEP to ensure that project and other expenditures are captured in a timely manner and properly documented through invoices, quarterly and MBE/WBE reporting, and ACRES updates.

iv. Acquiring Additional Resources
NCC will contract a QEP using the 40 CFR Part 31 procurement process and approval by the EPA and NHDES. NCC utilizes a wide variety of partners ranging from economic analysts to lawyers where existing contract mechanisms are in place to acquire project-specific assistance as needed.

b. Past Performances and Accomplishments
i. Current/Previous EPA Brownfields Grant Projects (1) Accomplishments
In 2007, NCC received a $400,000 assessment grant. In 2009, NHDES previously shared a $1,000,000 EPA Brownfields Coalition Assessment Grant with NCC and the Town of Berlin. In 2019, NCC received a $300,000 assessment grant. The grants were focused on a number of NCC communities including Berlin, Groveton, Colebrook, and several other NCC communities. NCC assessed 6 sites with the 2004 grant (Phase I/Phase II). With this Grant NCC also developed an initial inventory of Sites, held two information workshops, did outreach to our member communities. With the 2007 grant 23 projects were worked on (including 23 Phase I ESA, 9 Phase II ESAs, and 5 cleanup plans (ABCA/RAPs). The 2009 EPA Coalition grant was used to complete 7 Phase I ESAs, 13 Phase II ESAs, 9 supplemental Phase II ESA, and 4 cleanup plans. NCC recently completed 5 Phase I ESAs and 5 Phase II ESAs at sites during the 2019 grant period. Public meetings were held, Brownfields brochures were developed, and websites were developed/updated as a part of outreach efforts in all grants. All information has been accurately reflected in ACRES since ACRES was developed for use.

ii. Compliance with Grant Requirements:
To our knowledge, the 2004, 2007, 2009, and 2019 EPA grants were all completed in compliance with the work plans prepared with EPA (and NHDES). EPA extensions were granted on the 2004 and 2009 grants to finish up on-going work, but all funds were appropriately expended. To our knowledge, EPA ACRES database has been updated on a regular basis, all quarterly reports were submitted on time, and assessment activities were completed on schedule and overwhelmingly more than 50% of grant funds were expended on assessment activities. All funds in the 2004, 2007, and 2009 grants were completed expended, and remaining funds in our existing 2019 grant (approximately $37,000) have also been allocated to ongoing assessment activities.
Threshold Criteria for Assessment Grants

1. Applicant Eligibility

North Country Council (NCC) is a New Hampshire Regional Planning Commission and quasi-governmental agency. As such, NCC is an entity eligible to apply for this EPA Brownfields Assessments grant. NCC was formed in 1973 based on a 1969 New Hampshire statute (RSA Title III, Chapter 36, Section 1). Articles of Agreement, Title NH Title III Chapter 36:1, and a State Certificate are included as documentation of our eligibility.

2. Community Involvement

NCC will implement a community involvement program during the grant period. We have devised our Community Involvement to include community engagement events to get the word out on the program, community meetings where sites are identified, development of a Brownfields website for the interested public, using news outlets to get out specific and general Brownfields information, and effective use our Brownfield Advisory Committee (BAC). We have considered underserved and low-income populations in this plan so that they will also have access to this information. Effective Use of the BAC: NCC will use our BAC to get information to the public. As such, NCC plans to address this and kick off the program by holding up to four public regional community engagement events (aka ‘Brownfields 101’ events). The events will be a convenient public location or virtual and at the time that ensures the greatest amount of public can attend. The events will be held in each of the two target communities and two other locations in the region. Engagement events will be programmed such to provide information on what Brownfields are, how the EPA program works (site EPA eligibility requirements and landowner requirements), effective redevelopment approaches, environmental and community implications of participating in the program, and questions/answer sessions. A portion of the time during each engagement event will be devoted to soliciting feedback from community members to understand where they think the Brownfields sites are and what redevelopments they would like to see in their community. We plan to bring in community members/developers from other places with successful Brownfields redevelopments so the public can hear firsthand how these projects get done. While the vast majority of community members speak English, NCC will provide accommodation with any language barriers during these events. In addition, NCC will make every effort to accommodate those community members with hearing/reading impairments. We will also look to offer childcare during the events so that parents with children do not feel excluded. Direct Community Meetings: We also plan to hold community meetings with Town officials (during Select Board/City Council meetings) at all communities where a site has been selected for inclusion in the Brownfields program (i.e., 1 meeting per enrolled site). All meetings will be advertised in accordance with NH’s State Right-to-Know Law. These meetings will be used to engage the community so that they know what potential environmental hazards exist and to get direct feedback on ideas for future reuse and redevelopment. Any non-English language needs and/or hearing/reading impairments will be accommodated as needed during these meetings. Using News Outlets: NCC will post information in local newspapers about the Brownfields program including upcoming events and important happens at sites will also be provided to newspapers in the form of news releases.
3. **Named Contractors and Subrecipients** – none
4. **Expenditure of Existing Grant Funds** – As of October 1, 2021, NCC had drawn down and disbursed $263,261.71, which is more than the 70% draw down threshold.