NARRATIVE INFORMATION SHEET

1. Applicant Identification: Merrimack Valley Planning Commission (MVPC), 160 Main Street, Haverhill, MA 01830

2. Funding Requested:
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested: $500,000

3. Location: Merrimack Valley Planning District, consisting of 15 Essex County municipalities: Amesbury, Andover, Boxford, Georgetown, Groveland, Haverhill, Lawrence, Merrimac, Methuen, Newbury, Newburyport, North Andover, Rowley, Salisbury, and West Newbury. All 15 municipalities will be covered by the proposal; however, the primary target area will be the three densely developed and economically distressed urban centers of Haverhill, Lawrence, and Methuen.

4. Target Areas and Priority Site Property Information: The primary target areas will be the three densely developed and economically distressed urban centers of Haverhill, Lawrence, and Methuen. Including:
   - Merrimac Paper - 7, 9, 19 South Canal Street, Lawrence – Census Tract 2516004
   - Tombarello Site – 207 Marston Street, Lawrence – Census Tract 2508003
   - Hoyt and Worthen Tanner – 60 Railroad Avenue, Haverhill – Census Tract 2610003
   - Stevens Mill Site – Stevens Street, Haverhill – Census Tract 2607001
   - Battye Property – Old Ferry Road, Methuen – Census Tract 2526002

5. Contacts:
   a. Project Director: Jennifer Hughes/Environmental Program Manager, Merrimack Valley Planning Commission, 160 Main Street, Haverhill, MA 01830; Phone: 978-374-0519; Fax: 978-372-4890; E-mail: jhughes@mvpc.org

   b. Chief Executive: Jerrard Whitten, Executive Director, Merrimack Valley Planning Commission, 160 Main Street, Haverhill, MA 01830; Phone: 978-374-0519; Fax: 978-372-4890; E-mail: jjwhitten@mvpc.org

6. Population (Census 2020):
   a. MVPC District (15 member communities): 365,779;
   b. MVPC Brownfields Program Target Area (Cities of Haverhill, Lawrence, Methuen): 199,064
7. **Other Factors**

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<th>Other Factors</th>
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<tr>
<td>Community population is 10,000 or less</td>
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<td>The applicant is a federally recognized Indian tribe or United States territory or whether the project is assisting a tribe or territory</td>
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<td>The priority site(s) is impacted by mine-scarred land</td>
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<td>The priority site(s) is adjacent to a body of water</td>
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<td>The priority site(s) is in a federally designated flood plain</td>
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<td>Reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy</td>
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<td>Reuse of the priority site(s) will incorporate energy efficiency measures</td>
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<td>30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area</td>
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<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>
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8. **Letter from the State Environmental Authority**—Letter dated October 27, 2021, from MassDEP acknowledging MVPC application is attached.

9. **Releasing Copies of Applications** – Not applicable
October 27, 2021

U.S. EPA New England
Attn: Frank Gardner
Via email

Subject: STATE LETTER OF ACKNOWLEDGMENT
Merrimack Valley Planning Commission, Application for EPA Assessment Grant Funds

Dear Mr. Gardner:

MassDEP is pleased to support the proposal submitted by the Merrimack Valley Planning Commission (MVPC) under the Fiscal Year 2022 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. If awarded, MVPC intends to use the funding to assess properties in the fifteen (15) communities within the district. Of those fifteen (15) communities, three (3) Gateway cities (Haverhill, Lawrence, and Methuen) comprise the primary target area, which are densely developed and economically distressed. MVPC’s goal is to spur redevelopment and bring these areas back to productive re-use.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. Massachusetts Department of Environmental Protection (MassDEP), through our regional officers, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to help MVPC make this project a success.

I hope that this information is helpful, and please feel free to contact Angela Gallagher at (617) 620-2626 or at angela.gallagher@mass.gov if you have any questions or concerns.

Sincerely,

Paul Locke, Assistant Commissioner
Bureau of Waste Site Cleanup

ec: Jennifer Hughes, Merrimack Valley Planning Commission
    Joanne Fagan, BWSC-NERO
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields.  1.a.i. Background and Description of Target Area. The Merrimack Valley Planning Commission (MVPC) region encompasses 15 cities and towns with a population of 365,779 people in the Merrimack River Valley of Essex County, MA (8 communities have population <10,000). Merrimack Valley’s industrial factories in the core cities of Lawrence, Haverhill and Methuen relied on the Merrimack River for power and led the 19th century American industrial revolution. For generations, these “Gateway Cities” were home to industry that offered residents good jobs and a “gateway” to the American Dream. The region has endured decades of economic transition since the 1950’s: the decline of the dominant textile and leather industries, suburbanization, the boom and bust of the plating industry, and successive waves of new immigrants, the most recent primarily from Latin America and Asia. Long-term unemployment, wage stagnation, high poverty rates and a legacy of industrial-era environmental contamination continue to be structural barriers to economic revitalization. These structural challenges persist since the Great Recession of 2008-2009 and have been amplified by the COVID-19 pandemic which has again burdened the region with high-profile plant closings and job losses.

The Merrimack Valley region has been designated an Economic Development District by the U.S. Economic Development Administration because of the economic distress indicators and Brownfields condition throughout the region which are most pronounced in the immigrant Gateway cities of Lawrence, Haverhill, and Methuen, the target area for the MVPC Brownfields Program. Additionally, within these communities are recognized Environmental Justice (EJ) neighborhoods, or census tracts with low-income or minority populations that often experience disproportionate and adverse environmental, human health, climate-related and other cumulative impacts, as well as the accompanying economic challenges of such impacts. All census tracks within the City of Lawrence and portions of Haverhill and Methuen include EJ concerns for many of the environmental indicators including those for air quality (particulate matter), lead paint, wastewater discharge, traffic proximity, hazardous waste and RMP Proximity.

1.a.ii. Description of the Priority Brownfields Sites. Today, remnants of our industrial legacy are Brownfields located throughout the region and particularly concentrated in the urban centers of our target communities. Blighted properties continue to be a threat to our environment, our health and safety, and our economy. Our current Brownfields inventory has identified 973 potential Brownfields sites in the target areas and 1,985 sites overall in the region. Priority sites in the target region were selected based on redevelopment potential, City priority, availability of existing infrastructure, and overall economic and social return to the community and include the following:

Lawrence: The Merrimac Paper Site at 7, 9 and 19 South Canal Street will be given immediate priority upon award of the grant. Located within Census Tract 2516004, the property consists of three lots totaling 4.75 acres as well as 18 buildings. The section of interest for assessment consists of areas where former buildings were demolished as well as 13 industrial buildings which are in severe disrepair and structurally unsound. Petroleum and other hazardous substances are the concern that require cleanup. The Merrimack River borders the site to the north. The Former Merrimac Paper Company operated a paper processing and finishing plant from 1866 until 2005 when that firm ceased operations and filed for bankruptcy. The City has acquired the property, is actively conducting demolition and cleanup, and seeking redevelopment for mixed use housing, commercial and waterfront park. MVPC is committed to providing additional investigation of areas that are now available for assessment after building removal. The Tombarello site at 207 Marston Street (Tract 2508003) has been another cleanup and proposed redevelopment site where additional site characterization and delineation is needed in a location along the border with an adjacent parcel. PCBs were recently discovered at a drainage outfall and relocation of drainage culvers and a sewer interceptor will require additional assessment work. Several redevelopment proposals have been
submitted for the property including commercial and transportation options which would further much needed economic development in the area.

**Haverhill**: Significant Brownfields properties are located along the Bradford (part of Haverhill) riverfront (South side of the Merrimack River) requiring assessment to remove the hurdle for future redevelopment including the Hoyt and Worthen Tannery at 60 Railroad Street (Tract 2610003) which has concerns related to PCBs and chlorinated solvents. This and other sites along the Merrimack River lie in the FEMA designated floodplain. Another priority Brownfield Site in Haverhill is the Stevens Mill Site located on the Little River in Haverhill’s Lower Acre (Tract 2607001) which has been vacant since 2006 and is proposed for redevelopment into 80 units of housing (a portion affordable) and a restaurant but redevelopment is complicated by the presence of asbestos, petroleum tanks, and other contaminants.

**Methuen**: A priority site in Methuen is the Battye Property on Old Ferry Road in Methuen (Tract 2526002). It is a former construction and trucking company which has a history of illegal construction debris landfilling (+/-577,000 c.y.) (including asbestos) that has been documented by MassDEP. The site abuts several residential neighborhoods and contains state priority habitat for endangered species. Assessment funding is needed to identify the nature of impact to the site from the long history of dumping. Assessment will help inform the community to acquire the site by tax title and return the site to productive use as the future home of Methuen’s Department of Public Work facility. The project is stalled until the dumped waste is properly assessed/cleaned up.

**Additional Sites**: Several other sites in the target communities have been identified for assessment. In Lawrence these include properties acquired for back taxes on May Street, South Canal, Florence Street and Tower Hill at Broadway. Another redevelopment opportunity involves the Greater Lawrence Sanitary District which is looking to construct a 4-million-gallon sewage storage tank. Locations being considered include several City lots where assessment is needed before soil removal could be proposed. In Haverhill, additional assessment sites, all within EJ Census Tracts, include 194 River Street which has a history of industrial use, 266 River Street, an old shoe mill currently being used as an antiques storage building (both in Tract 2608002). Haverhill is also expecting the Haverhill YMCA to build new housing near its current location on a lot formerly owned by Verizon (Tract 2601002). Potential expansion of Haverhill’s industrial park and redevelopment of the former Dutton Airfield off Interstate 495 are also potential assessment sites and would expand job opportunities in the city. Other priority sites within EJ neighborhoods in Methuen include a former substation site at Osgood and Broadway (Tract 2532002) and a former nursing home at Pleasant and Broadway. Another potential redevelopment parcel in need of assessment is located on River Street (Tract 2532002) and was the former location of an auto dealer. The site has been identified as a location for a pedestrian friendly park and housing development.

1.b. Revitalization of the Target Area

1.b.i. **Reuse Strategy and Alignment with Revitalization Plans**: The overall goal of the MVPC Brownfields Assessment Program and each target area is to return sites with real or perceived contamination back into productive use for our target communities. MVPC, through use of its EPA funded Brownfields Assessment and RLF Grant programs, has a history of working collaboratively with its communities and community partners to assess and cleanup properties that align with local government land use and revitalization plans including the **Merrimack Valley Priority Growth Strategy** where regional priority development areas were identified (including the target areas) to encourage growth. MVPC also produces the region’s **Housing Production Plan** and **Hazard Mitigation Plan** which help communities identify potential redevelopment opportunities for housing while ensuring development in hazard prone areas is avoided.
The target community of Lawrence has focused attention on Brownfield opportunities with its EPA-led “Making a Visible Difference” planning initiative and has established an urban renewal district in the target area. The Lawrence Redevelopment Authority (LRA) is also undertaking the creation of an urban renewal plan that identifies action steps that the LRA and other public and private partners can take to advance four key goals: 1. Economic development; 2. Job creation; 3. Improved quality of life; and 4. Fiscal stability. Redevelopment of the Merrimac Paper site and others in Lawrence will be consistent with these goals.

Several of Haverhill’s identified assessment sites are located within the City’s Priority Growth Area as identified by MVPC and within identified Environmental Justice neighborhoods. Proposed redevelopment includes affordable housing, market-rate housing, commercial space, and additional open space including rail trail connections. Additional development is proposed outside of the PGA and EJ areas and is focused on the industrial sector and potential job growth. In 2016, Haverhill was recognized by the Federal Reserve Boston as a “Working Cities Challenge Community” supporting the Mount Washington Alliance partnership efforts in neighborhood-based actions to increase employment opportunities, improve the quality of education, and connect Haverhill residents to food nutrition and health resources.

Methuen established a smart growth zoning district in its downtown/industrial area to promote denser, mixed-use development. Much of Methuen’s proposed redevelopment in the Broadway and River Street is focused on pedestrian friendly neighborhoods with parks, housing, and access to transportation. These areas are also within Methuen’s low-income, English Isolation, and Minority Census Tracts (Tract 2523002 and 2524003). Assessment and redevelopment in Methuen will be consistent with these goals.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The MVPC Brownfields Assessment Program has encouraged community and regional economic development in several ways including strengthening and expanding the Region’s business sector, providing employment and housing opportunities, enhancing educational opportunities, and enhancing business revitalization through local hiring, procurement, and job training. The MVPC Brownfields Assessment Program will have a major beneficial impact timed with economic recovery to reverse a climate of disinvestment in urban neighborhoods, especially disadvantaged communities which have been historically marginalized and overburdened by pollution and underinvestment. The program is structured as an economic development tool linked to community-building at the neighborhood level. As already noted, the heavy concentration of Brownfields in the area’s Gateway Cities has had a severe, long-term negative impact on their ability to remove the existing blight, attract and retain viable businesses, provide reliable jobs for the minority and low-income populations, and broaden a constrained local tax base that is overly dependent on residential property taxes. With the continued use of the assessment grant tool, MVPC will be able to continue to leverage a variety of private and public funds to redevelop these sites and leverage other programs focused on economic recovery, housing, and climate justice to build a more robust and diversified economy, more and better job opportunities and affordable housing to the area’s large population of minorities and chronically underemployed citizens.

1.c Strategy for Leveraging Resources
1.c. i. Resources Needed for Site Reuse: MVPC has demonstrated capacity leveraging other investments for Brownfields redevelopment. Key funding resources that will be utilized to support the completion of the assessment, remediation and reuse of the priority sites include: MVPC Brownfields Cleanup RLF Program: MVPC currently maintains a Brownfields RLF program to support cleanup efforts at Sites to be assessed under this program. MVPC currently has $335k available for loans and subgrants and has committed using these funds to complement this Program. Federal CDBG Funds: Lawrence, Haverhill
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and Methuen all have active community development programs with access to federal CDBG funds. Lawrence and Haverhill are HUD Entitlement communities for CDBG. For all three communities, Brownfields redevelopment are strategic priorities, and CDBG funds will be used to support Brownfields cleanup and redevelopment. **State Leveraging:** MassDevelopment, a quasi-public state financing agency that has collaborated and partnered on MVPC on multiple cleanup efforts including the Hooker Howe building in Haverhill and Coastal Metals in Merrimac has made available low-interest loans of up to $500K (for assessment) and up to $2M (for remediation projects) as well as MassDEP’s Site Assessment and Remediation Support Services (SARSS) program to provide additional site evaluation support. **Community/Non-profit Partners:** Groundwork Lawrence (GWL) is a neighborhood non-profit based in Lawrence with extensive experience in community building. GWL currently supports Lawrence’s Brownfields program and is a partner in the City’s Cleanup Grant for the Merrimack Paper site and conduct extensive education and outreach as part of this project. MVPC’s will provide additional assessment for the property, and which will be a key step in advancing the project.

1.c.ii Use of Existing Infrastructure: The reuse of existing infrastructure is a critical and necessary component of funded Brownfields redevelopment projects. In addition to prioritizing work in Environmental Justice neighborhoods, MVPC will be assessing and promoting redevelopment of sites that advance EPA/HUD/DOT livability principles directly by supporting existing communities and enhancing the economic competitiveness of our region by leveraging investment in underserved neighborhoods. MVPC’s Brownfield Program decision-making will include site selection criteria that includes having access to water/sewer infrastructure and reusing existing buildings, including those with historical value as selection criteria. Based on this, the Brownfields sites selected for assessment will be in downtowns where buildings, associated water/sewer services, parking and transportation access are already in place in these areas and thus, will be reused as part of the projects. In addition, MVPC is committed to making existing infrastructure more climate resilient and energy efficient in accordance with our Environmental Program priorities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need 2.a.i. The Community’s Need for Funding: MVPC is a regional planning agency dependent on federal, state and foundation grant funding for multi-community initiatives as member dues make up only 6% of our annual budget. Existing Brownfields Assessment resources available through our current Brownfields Assessment program are depleted at a time when renewed developer interest in Brownfields properties has generated more demand for environmental site assessments. Our target communities are among the poorest urban areas in Massachusetts with municipal budgets dependent on state aid and property tax revenue increases capped at 2.5% annually.

All three target communities have limited in-house Brownfields capacity, lack the means to fund site assessment and cleanups using local resources alone, and therefore rely on the coordinated approach with MVPC. Their annual operating budgets are already severely strained with the demands for even basic services – schools, public works, police, and fire protection – outstripping the available revenues. Lawrence is Massachusetts’ poorest city where over 22.8% of the population lives in poverty, according to 2019 American Community Survey (ACS) data. In Haverhill, the percentage is 13.8 and in Methuen the percentage is 10.4.

2.a.ii. Threats to Sensitive Populations: (1) *Health or Welfare of Sensitive Populations:* Per the EPA website, “Environmental Justice” refers to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. It also states that not all communities enjoy the same degree of protection from environmental and health hazards, or the equal access to the decision-
making process to have a healthy environment in which to live, learn and work. In the Merrimack Valley, Lawrence is majority minority, experiences English isolation, and is very low income compared with the statewide average. By demographic-based metrics, Massachusetts considers 100% of Lawrence’s population meeting Massachusetts environmental justice criteria. 65.2% of Methuen and 49.8% of Haverhill also meet the same criteria, according to 2020 statistics. Highly urbanized areas like Lawrence, Methuen and Haverhill face additional environmental challenges associated with dense urban neighborhoods where past industrial development has caused pollution and environmental degradation. In Lawrence, persons under the age of 18 account for just under 27% of the population with 8% of the population under the age of 5 (higher than the Essex County average of 21% under 18 and 5.5% under 5). Lawrence has a very high percentage (65%) of households with children under the age of 18 headed by a female single parent.

By working with Community organizations like Groundwork Lawrence and partnering with our municipalities on other regional planning initiatives like the Merrimack Valley Regional Housing Production Plan and Regional Hazard Mitigation Plan, MVPC’s Assessment Program will facilitate the identification and reduction of threats to the health and welfare of these sensitive populations through environmental assessment and eventual cleanup and redevelopment of Sites within the targeted areas.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: Our region’s older housing stock and contamination in soils, groundwater, and rivers have disproportionately impacted residents’ health in our target communities; the data is significant. In Lawrence, the region’s largest city, the health challenges are daunting. Infant mortality rate is 25% higher than the state rate and intensified by a 25% decrease in mothers receiving adequate prenatal care. Stresses already evident on a sensitive infant population can be greatly exacerbated by the addition of chemical stresses, either during fetal development or in the years following birth.

Finally, statistics on mortality, hospitalizations, lead poisoning, and emergency rooms visits due to asthma as well as overall asthma rates in 0–4-year-olds, 5-14 year olds, and 15-34 year olds are all between 1.5- and 3-fold higher than state rates. Children in Lawrence have asthma rates in the general population that are 67% higher than the statewide average (Sources: MA Dept. of Public Health and Boston Univ. School of Public Health for MA Prevention Center). Asthma prevalence is linked to the building environment and is exacerbated by airborne particulates due, in part, to the presence of auto-related uses and industrial facilities. EJ Screen shows Lawrence in the 95th percentile for Particulate Matter and Respiratory Hazard Index in EPA Region 1. This means only 5 percent of the region’s population has a higher value than Lawrence. Although banned in 1978 in Massachusetts, lead paint is the most common source of lead poisoning in children putting them at risk of damage to brain, kidney, and nervous system functions. Lead levels in children in Lawrence are currently three times the state rate. This risk is exacerbated by Brownfields, many of which are contaminated with lead and other heavy metals. Assessment and cleanup of our Brownfields will directly address these health concerns.

(3) Promoting Environmental Justice: EPA’s EJ Screen shows the target communities of Lawrence, Haverhill, and Methuen as disproportionately affected by environmental and/or public health burdens. Lawrence ranks in over the 90th percentile in the state for selected variables on the EJ Screen such as Lead Paint, Superfund Proximity, and Hazardous Waste Proximity. Haverhill and Methuen rank in the high 80’s to the low 90’ on these same indicators. These communities are poor and have high percentage of sensitive populations. These cities have some of the oldest housing stock in the Commonwealth. According to the 2018 City of Lawrence Housing Production Plan completed by MVPC, Lawrence has some of the oldest housing stock in the region. Approximately 83% of the housing was built prior to 1979.

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Housing units of this age often have lead paint, asbestos, and other safety and health code compliance issues. A concern with this issue is the high rental rate in the City and the percentage of households who rent (72%) is much higher than the region (37%). People who rent don’t often have the ability or knowledge to upgrade their homes to remedy these issues. By assessing, cleaning up, and redeveloping sites within our target area, we can help break the cycle of disinvestment and disproportionate impacts to our EJ community by removing contamination and blight, and creating new units of safe and affordable housing, commercial space, and investment in our target areas.

2.b. Community Engagement

2.b.i. Project Involvement: Our Brownfields team has developed strong working partnerships with a number of key community-based organizations in our region. The following organizations will continue to play a vital role in the successful planning and implementation of our Brownfields program:

2.b.ii. Project Roles:

List of Organizations/Entities/Groups & Roles

<table>
<thead>
<tr>
<th>Name of organization/entity/group</th>
<th>Point of contact (name, email &amp; phone)</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwork Lawrence</td>
<td>Heather McMann, Executive Dir. <a href="mailto:hmcmann@groundworklawrence.org">hmcmann@groundworklawrence.org</a> (978) 974-0770</td>
<td>Project Identification, Translation, and Outreach</td>
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<tr>
<td>Northern Essex Community College</td>
<td>Lane Glenn, President <a href="mailto:lglenn@northernessex.edu">lglenn@northernessex.edu</a> (978) 556-3855</td>
<td>Outreach</td>
</tr>
<tr>
<td>Mt. Washington Alliance</td>
<td>Christine Soundara <a href="mailto:csoundara@communityactioninc.org">csoundara@communityactioninc.org</a></td>
<td>Outreach, Translation, Project Identification</td>
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<tr>
<td>Merrimack River Watershed Council</td>
<td>Matthew Thorne, Executive Dir. <a href="mailto:matthew@merrimack.org">matthew@merrimack.org</a> (603) 717-1748</td>
<td>Outreach, Project Identification</td>
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<tr>
<td>Greater Haverhill Chamber of Commerce</td>
<td>Dougan Sherwood, President/CEO <a href="mailto:dougan@haverhillchamber.com">dougan@haverhillchamber.com</a></td>
<td>Outreach, Redevelopment Partners, Site Promotion</td>
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<tr>
<td>Merrimack Valley Chamber of Commerce</td>
<td>Joe Bevilacqua, President/CEO <a href="mailto:jbevilacqua@mvcc.org">jbevilacqua@mvcc.org</a> (978) 686-0900</td>
<td>Outreach, Redevelopment Partners, Site Promotion</td>
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2.b.iii. Incorporating Community Input: In carrying out this program, special consideration will be given to providing equal access to our region's harder-to-reach residents, including the large Hispanic population for whom language can be a barrier. As highlighted in Section 3, we plan to host 9 public meetings (3/year) in the target communities to discuss the inventory process, as well as the Phase I/II/ and ABCA results. Meeting notices and materials, as well as website postings, will be presented in both English and Spanish; translation and signing services will be provided at public meetings as needed and requested. Staff will also make use of MVPC’s language proficiency analysis update to coordinate other appropriate language outreach and consult with local partners to design a meeting schedule facilitating participation. Factors to be considered will include daytime/ evening meetings, transit hours of operation, convenient, transit-served locations, and provision of childcare services if needed. Our meetings will be advertised through news releases, direct mailings, and public postings, including posting on MVPC’s
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regional website (www.mvpc.org) and social media (Facebook and Twitter) as well as the websites of our target community partners and community-based organizations. Through daily communication and hands-on project work with neighborhood groups and citizens, our community-based organizations will play a key role in effective outreach to publicize and promote meaningful participation in target neighborhoods. In response to COVID-19 restrictions, MVPC has fully engaged with its communities virtually, hosting meetings and community input sessions on three virtual platforms (GoToMeeting, Zoom, Teams). These platforms also offer opportunities to use call in options if internet connections are not available. Virtual polling and other tools are used to gauge community sentiment on plans and assess engagement and interest.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a.i, ii, iii, and iv. Description of Task/Activities and Outputs: MVPC will utilize the Brownfields funding to continually update our existing Brownfields inventory as well as conduct environmental assessment at a minimum of 10 additional sites within the region. Our proposed tasks and budget are presented below:

Task 1: Cooperative Agreement Oversight and Contractor Procurement: MVPC will administer the program and provide economic development and planning staff support for the implementation. MVPC will conduct contractor procurement of qualified environmental professional (QEP) and will continue to work cooperatively with local officials and business leaders. The QEP will assist MVPC in ACRES and quarterly reporting. Schedule will be ongoing through entire 3-year grant period. Task Activity Lead will be the Environmental Program Manager. Outputs consist of 12 Quarterly reports, closeout report and MBE/WBE reporting. MVPC staff will attend 2 EPA Brownfield conferences & training.

Task 2: Community Engagement: MVPC staff in partnership with GWL and its QEP will lead targeted proactive community outreach and education process. MVPC will host a minimum of 9 public outreach/education meetings and community-building activities (3/year). Schedule includes meetings spread out throughout the grant period (October 2022 through September 2025). Task Activity Lead will be the Environmental Program Manager, GWL and the QEP. Outputs consist of presentations and planning/education outreach in target neighborhoods and community partners with sharing of information through print, website, and social media.

Task 3: Identify and Prioritize: With support from the Project Partners, local community development personnel, our hired QEP, and using the evaluation criteria cited above, MVPC’s Brownfields staff will select the region’s highest-ranking sites for assessment in the identified target area. Our priority sites have already been vetted and will be given preference. As part of this process, MVPC will update the existing Regional Brownfields Database which in addition to providing developer marketing information on Brownfields opportunities, will be used, in conjunction with ACRES, to track and store site information, including progress and future steps and to assist in strategic planning and EPA grant reporting. Schedule of site prioritization will be within first year of grant (October 2022 through September 2023) and as needed beyond that. Task and Activity Lead will be the Environmental Program Manager and the QEP. Outputs consist of inventory record updates of potential sites and 10 prioritized sites.

Task 4: Phase I & Phase II ESAs: MVPC will evaluate 10 properties for a Phase I and Phase II ESAs that meets applicable ASTM standards (ASTM E1527-21 and ASTM E1903-19) and EPA’s All Appropriate Inquiries Rule. Where possible, these properties will be “clustered” or “grouped” to complete assessments simultaneously to maximize efficiency. MVPC will work with private property owners to make the process collaborative and participative to obtain access agreements for priority sites. Staff time will be provided in-kind. Schedule: throughout the grant period (October 2022 through September 2025).
Task and Activity Lead will be the Environmental Program Manager and the QEP. **Outputs** consist of 10 Phase I and II ESAs completed and reported in ACRES.

**Task 5: Remedial/Reuse Planning/Plans:** MVPC intends to evaluate cleanup alternatives on four (4) properties. Staff time will be provided in-kind. Schedule includes the second and third year of the grant (October 2023 through September 2025). Task and Activity Lead will be the Environmental Program Manager and the QEP. **Outputs** consist of 4 Remedial Action/Reuse Plans.

### 3.b. Cost Estimates

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<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td><strong>Contractual</strong></td>
<td>$5,000</td>
<td>$10,000</td>
<td>$5,000</td>
<td>$400,000</td>
<td>$20,000</td>
<td>$440,000</td>
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<tr>
<td><strong>Total Direct Costs</strong></td>
<td>$15,000</td>
<td>$25,000</td>
<td>$15,000</td>
<td>$400,000</td>
<td>$20,000</td>
<td>$475,000</td>
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<tr>
<td><strong>Indirect Costs</strong></td>
<td>$5,000</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$0</td>
<td>$0</td>
<td>$25,000*</td>
</tr>
<tr>
<td><strong>Total Budget</strong></td>
<td>$20,000</td>
<td>$35,000</td>
<td>$25,000</td>
<td>$400,000</td>
<td>$20,000</td>
<td>$500,000</td>
</tr>
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</table>

**Task 1: Cooperative Agreement Oversight:**
MVPC staff time (100 hrs. x ~$50/hr. = $5k). Travel = EPA training at 2 national conference attendees @ $3.5k for mileage/airfare/lodging/per diem. The Contractual QEP will assist MVPC in ACRES and quarterly reporting (50 hrs. @ $100/hr.)

**Task 2: Community Outreach:** MVPC staff time (200 hrs. x ~$50/hr.) = $10k. Travel = $2,000 plus miscellaneous supplied, handouts and advertising at $3k. Contractual QEP = 9 meetings @ $1,111/meeting including preparation.

**Task 3: Identify and Prioritize:** MVPC staff time (200 hrs. x ~$50/hr.) = $10K and Contractual QEP = 50 hrs. @ $100/hr.

**Task 4: Phase I & II ESAs:** We have estimated $5,000 for a typical Phase I ESA 10 sites = $50,000 budget and QAPP/Phase IIs are estimated at $35k for a total assessment cost for 10 sites at $350k. MVPC coordination time is in-kind.

**Task 5: Remedial/Reuse Planning/Plans:** We have estimated $5,000/site for remedial planning 4 sites x $5,000/site = $20,000 Total Task Budget. MVPC coordination time is in-kind.

*Indirect: MVPC has an approved indirect cost rate of 141.15% per its annual federal Negotiated Cost Rate Proposal (NICRP).
3.c. Measuring Environmental Results: The mechanism for tracking, measuring, and evaluating progress and achieving our program outcomes (short and long-term) is measured through our quarterly EPA reports. In addition, project site information including leveraged investment and beneficiaries are updated regularly as projects progress in the EPA ACRES database and through our in-house GIS database of sites. Upon notification of award, MVPC will prepare the required Cooperative Agreement Work Plan with EPA. The work plan will outline the overall project schedule and project budget and will identify the various stages, work tasks, required benchmarks, and milestones that will be tracked and measured during grant implementation. By connecting the outputs to our work plan will provide an important way to link the results of the grant funding with EPA’s strategic plan as well as demonstrate to Congress the tangible results of the Brownfields grant program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability; 4.a.i. – 4.a.iii. Organization Capacity, Structure, and Key Staff: MVPC has managed seven (7) prior EPA Brownfields grants without adverse audit findings. All funds were expended in a timely manner and all administrative reports (quarterly, annual, closeout) were completed and submitted on time or the grant was extended using standard practices to accommodate assessments that require more time to complete. An annual audit of all MVPC financial records is performed by an independent certified public accountant to evaluate and certify contract activities.

Since its establishment in 1959, MVPC has received and managed federal and non-federal grants, including our current EPA Brownfield Assessment and Brownfields RLF grants. Over the past ten years we have successfully managed over $15 million in funding from numerous federal agencies and private foundations funding projects related to Brownfields, transportation, economic development, GIS mapping and land use planning & analysis. MVPC currently has full-time staff of 15 planning professionals and support staff. We are led by an experienced executive director as well as both environmental program manager and finance director, each with existing Brownfields experience. We have established well defined management protocols and systems in place for all components of grant management including accounting, file management, financial, audit, progress reporting, payroll, contract procurement and oversight. Thus, we have the capacity and structure to successfully manage and execute this grant. Key staff include:

Jerrard Whitten, MVPC Executive Director, has more than 25 years of experience in regional planning and community development, as GIS Program Manager and most recently as MVPC Executive Director. His team at MVPC includes Jennifer Hughes, Environmental Program Manager, with over 20 years of experience in environmental permitting and compliance. She currently manages MVPC’s Brownfields Assessment and Cleanup RLF Programs and has done so since 2019. MVPC Finance Director, Jen Dunlap, has more than 25 years of agency experience and will maintain grant financial records including accounting, grant disbursement oversight, arranging annual audit, and processing fund drawdown.

4.a.iv. Acquiring Additional Resources: MVPC will continue to follow federal guidelines and state law in public procurement for Licensed Site Professionals (LSP)/QEPs within weeks of finalizing our Cooperative Agreement with EPA. The procurement process involves public notice and outreach to environmental engineering firms; issuance of a Request for Proposals (RFP), ranking of the proposals by the MVPC staff and MVPC Brownfields Committee; & contractor selections. All proposal submittals, evaluations and contracts shall conform to the Federal Uniform Procurement Act and Mass General Laws, Chapter 30B (MGL, Ch. 30B).

4.b. Past Performance and Accomplishments. 4.b.i. Currently or Has Ever Received an EPA Brownfields Grant. 4.b.i.1. Accomplishments. MVPC has been awarded five prior EPA Brownfields assessment grants (hazardous substances and petroleum) and two RLF grants. Grant awards in FY 2003
(2), 2006 (2), 2009, and 2012 have been fully expended and project closeouts completed in compliance with all cooperative agreement workplan, schedule, and reporting requirements. MVPC’s current 2017 Assessment Grant has been expended and is in the closeout process. MVPC’s most recent grants are highlighted in the table below.

<table>
<thead>
<tr>
<th>MVPC USEPA Brownfields Grants History</th>
<th>Amount</th>
<th>Grant Type</th>
<th>Contaminant Class</th>
<th>Grant Status</th>
<th>Ph I ESA Sites</th>
<th>Ph II ESA / Add. Assess.</th>
<th>Cleanup / Planning</th>
<th>Remaining Funds</th>
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<tr>
<td>BF00A00161 (FY17)</td>
<td>$300k</td>
<td>Assess</td>
<td>Haz/Pet</td>
<td>In Closeout</td>
<td>6</td>
<td>3</td>
<td>3</td>
<td>$0</td>
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<tr>
<td>BF00A00246 (FY16)</td>
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<td>RLF</td>
<td>Haz/Pet</td>
<td>Open</td>
<td>-</td>
<td>-</td>
<td>2</td>
<td>$540</td>
</tr>
<tr>
<td>BF96163801 (FY12)</td>
<td>$200K</td>
<td>Assess</td>
<td>Haz</td>
<td>Closed</td>
<td>4</td>
<td>6</td>
<td>-</td>
<td>$0</td>
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</tbody>
</table>

We have used the EPA grant funds to establish and implement a highly successful district-wide brownfields program that has assessed both hazardous substance and petroleum-contaminated sites. Our workplan outputs and outcomes have included completion of over 80 Phase I/II ESAs and Mass. Contingency Plan response actions. Our sites have ranged from large mill complexes and manufacturing facilities to machine shops, metal-plating shops, commercial trucking depots, dry-cleaners, and abandoned rail corridors. The following MVPC example assessment projects accomplishments show our dedication to livability principles and community development through successful public/private partnerships:

**Housing Support:** MVPC provided assessment of a former chlorinated solvent release from the former Hooker Howe Costume facility. This assessment has facilitated a fast track to site closure and made possible residential redevelopment of the adjacent parcel that was impacted by past operations.

**Tombarello:** MVPC provided assessment of PCB and metals impacted soils and hazardous building materials assessment of 5 buildings to help move the site closer to cleanup and facilitated a future community RFP for redevelopment of the property. These funds are supporting three existing EPA cleanup grants

**Amesbury Visitor Center:** MVPC provide assessment and removal of three old, abandoned USTs. The Site is the trailhead for the Garrison Trail along the Whittier Bridge on I-95 which leverages more than $3M in improvements to the property in this location and for a trail under I495 between Salisbury and Amesbury. The Visitor Center property will now be an important jump off point for the trailhead.

**Methuen Highway Garage:** MVPC provided cleanup planning to assist the community with the cleanup and demolition of an asbestos impacted portion of the highway garage that will become a laydown area for the City’s equipment.

**Trader Allen Truckstop:** MVPC assessed property to facilitate the redevelopment of this strategically important property and area in Amesbury. The assessment will make the property ready for a public RFP for redevelopment which will support a large hockey complex which is planned for the area.

**4.b.i.2. Compliance with Grant Requirements.** In managing our EPA Brownfields assessment grants, we have consistently followed our Cooperative Grant Agreement terms and conditions as well as our Work Plan commitments, and we have successfully completed all Pre-Award Community Notification requirements, financial status reports, and submitted our Quarterly Reports on time and as required by EPA. MVPC Program reporting in ACRES and quarterly report submittals are current and consistently submitted on time.
APPENDIX A

THRESHOLD CRITERIA
1. **APPLICANT ELIGIBILITY**

   The Merrimack Valley Planning Commission is a regional governmental entity “Regional Council” established in 1959 under Massachusetts General Laws Chapter 40B. (See Appendix B Summary Description of MVPC organization, membership & purpose; Background on Massachusetts regional planning agencies.)

2. **COMMUNITY INVOLVEMENT**

   In carrying out this program, special consideration will be given to providing equal access to our region's harder-to-reach residents, especially those in minority and low-income communities. These include residents with limited English proficiency. Meeting notices and materials, as well as website postings, will be presented in both *English and Spanish*; translation and closed caption/signing services will be provided at public meetings as needed and requested. Staff will also make use of MVPC’s language proficiency analysis update to coordinate other appropriate language outreach and consult with local partners to design a meeting schedule facilitating participation. Factors to be considered will include daytime/evening meetings, transit hours of operation, convenient, transit-served locations, and provision of childcare services if needed. Our meetings will be advertised through *press releases, direct mailings, and public postings*, *including posting on MVPC’s regional website (www.mvpc.org) and social media including Facebook* as well as the websites of our target community partners and community-based organizations.

   Through daily communication and hands-on project work with neighborhood groups and citizens, our community-based organizations will play a key role in effective outreach to publicize and promote meaningful participation in target neighborhoods. In response to COVID-19 restrictions, MVPC has fully engaged with its communities virtually, hosting meetings and community input sessions on two virtual platforms (GoToMeeting and Zoom). These platforms also offer opportunities to use call in options if internet connections are not available.

   Outreach to traditionally underserved groups helps ensure that all constituents have opportunities to affect the decision-making process. It sets the tone for subsequent project activities and promotes a spirit of inclusion. The greater the consensus among all community members, the more likely the position agreed upon will aid in decision making for the plan, program, or project. The MVPC staff endeavors to understand the full range of a community’s needs in order to create more responsive and innovative plans.

3. **NAMED CONTRACTORS AND SUBRECIPIENTS**

   **Contractors:** N/A - No contractor has been procured for this work.

   **Subrecipients:** N/A

4. **EXPENDITURE OF ASSESSMENT GRANT FUNDS**

   MVPC is in the process of closing out its FY2017 EPA Brownfields Assessment Grant (#BF00A00161). At this time, 100% of MVPCs assessment funds have been drawn down and a report from the Automated Standard Application for Payments (ASAP) system is attached indicating that the funds are exhausted.