Narrative Information Sheet
EPA FY2022 Brownfields Community-Wide Assessment Grant Application
Town of Gray, Maine

1. Applicant Identification: Town of Gray, Maine
24 Main Street, Gray, Maine 04039

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

3. Location
   a. City: Gray
   b. County: Cumberland County
   c. State: Maine

4. Target Area and Priority Site Property Information:
   a. Target Areas: Village Center and Route 100/Portland Road Corridor
   b. Census Tract: 47.01 and 47.02
   c. Priority Sites: Copp Equipment located at 71 Portland Road and the Junkyard at 80 Whitney Road

5. Contacts:
   a. Project Director: Nate Rudy, Town Manager, 24 Main Street, Gray, Maine 04039; 207-657-3339 (phone); 207-657-2852 (fax); nrudy@graymaine.org. Nate will supported by Doug Webster, Gray’s Community Development Director who can be reached at the numbers above and dwebster@graymaine.org
   b. Chief Executive/Highest Ranking Official: Nate Rudy, Town Manager, 24 Main Street, Gray, Maine 04039; 207-657-3339 (phone); 207-657-2852 (fax); nrudy@graymaine.org

7. Other Factors Checklist:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>4</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>NA</td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>4</td>
</tr>
<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>NA</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>NA</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>3</td>
</tr>
<tr>
<td>Reuse of the priority site(s) will incorporate energy efficient measures.</td>
<td>3</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
<td>NA</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>NA</td>
</tr>
</tbody>
</table>

8. Letter from State or Tribal Environmental Authority: Attached
November 17, 2021

Ms. Dorrie Paar  
EPA Region I  
5 Post Office Square  
Suite 100, Mailcode: OSRR7-2  
Boston, Massachusetts 02109-3912

Dear Ms. Paar:

The Maine Department of Environmental Protection’s (“Department”) Bureau of Remediation and Waste Management acknowledges that the Town of Gray plans to conduct site assessments and is applying for federal Brownfields grant funds.

Nate Rudy of the Town of Gray has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the town.

If the town receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, Quality Assurance Plans, and Health and Safety Plans. For sites where cleanup is pursued, the Department’s Voluntary Response Action Program (“VRAP”) staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight (as necessary) of contractor’s work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner’s Certificate of Completion.

Please feel free to call me directly at (207) 592-0882 should you have any questions regarding this letter.

Sincerely,

Nicholas L. Hodgkins  
Voluntary Response Action Program  
Division of Remediation  
Maine Department of Environmental Protection

Pc: Nate Rudy, Town of Gray
IV.E. Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
      i. Background and Description of Target Area The Town of Gray, Maine was incorporated in 1778, and as stated on the Town seal was once home to “the first woolen mills in Maine”. Samuel Mayall established the first successful water-powered woolen mill in North America in 1791 along Collyer Brook in East Gray. In the 1800s and early 1900s, Gray was home to sawmills, charcoal manufacturing, tanneries, barrel makers, minor industry and crafts, brickyards, quarries, grist mills, and farming/food production. Gray has been and remains home to multiple, large surface mining operations where sand and rock are extracted for construction and industrial uses, representing a substantial acreage of potential mine-scarred land sites at various location around town.

      Gray’s post-World War II economy was shaped by the Federal and State highway systems, and consists largely of the service industry of restaurants, gas stations, and support for the vehicle traffic through Gray. The Maine Turnpike (I-95) built in the 1960s created an exit in Gray that brought traffic and the "crossroads of Maine" title, but other than small service-related commerce, the town’s major employers are service industries, light manufacturing, retail, and the local school district.

      The McKin Co. Superfund site in Gray (a former hazardous liquid waste handling facility), on a seven-acre parcel in a rural residential area, was established in the 1970s to remediate groundwater contamination from a mixture of solvents, oils and other chemicals after residents of East Gray reported odors in well water and discoloration of laundry.

      Gray has several historic landmarks and buildings within its borders. Although Gray doesn’t have a “downtown,” its Village Center, situated along I-95 and the convergence of five heavily trafficked State roads, includes several historic buildings. These include the former Pennell Institute, a still-standing schoolhouse that was built in 1876 and renovated in 2010 as Gray Town Hall, home to Gray's municipal government and part of the "Henry Pennell Municipal Complex" which features recreational fields and the town’s childcare facility. The Village forms a potential community economic development opportunity for Gray which, compared to surrounding communities in the greater Portland area, has not experienced the same amount of new business and real estate investment in the last 30 years.

      The Target Area for the Town’s Brownfield program will be the Gray Village Center intersection of the I-95, Route 26 / 26A, Route 202 / 302 Main Street, Route 115 Yarmouth Road, and Route 100/Portland Road corridors, which extends from the Village Center into neighborhoods approximately one and one-third miles out within the Town of Gray. Main Street / Route 100 / 115 / 202 bisects Gray’s two Census Tracts (CT-47.01 and CT-47.02) and runs through the Gray Village (CDP 28835). Our preliminary 2021 Brownfield site inventory identified seven (7) potential Brownfield sites in the Village Center Route 202/Main Street area and another ten (10) potential sites within the Route 100/Portland Road Corridor. These potential Brownfield sites have negatively impacted the Target Areas and surrounding corridors, evidenced by underutilized structures and properties, depressed property values, and in a disparity between business growth and economic opportunity in surrounding municipalities vs. the Town of Gray.

      ii. Description of the Priority Brownfield Site(s) The Brownfield sites that have been identified in our Target Areas as part of our preliminary inventory range from small, single-lot dry cleaners and gas stations to gravel mines that occupy land in excess of 50 acres. These Brownfield sites are estimated to encompass more than 150 acres of land within the Town of Gray and include abandoned mills, gravel pits, junkyards, tanneries, buildings/land associated with the railroad, and other former industrial facilities located in the Gray Village and Route 100/Portland Road Corridor. These sites have caused significant environmental, health, and welfare impacts. Historic use of petroleum, chlorinated solvents, paints, lacquers, and other organic compounds have resulted in volatile organic compound contamination; and former industrial processes have resulted in heavy metal (including lead, arsenic, chromium, and
mercury) contamination in soil, groundwater, and soil vapor. Additionally, many of these buildings have identified hazardous building materials, including asbestos, polychlorinated biphenyls (PCBs), lead paint, and universal wastes. **Because many of the Brownfield Sites located in our Target Areas are surrounded by residential neighborhoods, it is not only the Brownfield Sites that are contaminated, but also our adjacent residential properties.**

Of the seventeen (17) preliminary Brownfield Sites that have been identified in our Target Areas, the 10-acre Copp Equipment site located at 71 Portland Road exemplifies a large industrial site in dire need of Brownfield assessment funds. This priority site sits less than a mile from our Village Center, has a long history of industrial use, and is located in a commercial/residential area that is prime for redevelopment. Given the age and history of the site buildings, it is likely that asbestos, lead-based paint, and other hazardous materials are present. There is a strong possibility that historic site operations have adversely impacted soil, groundwater, and soil vapor, and potentially sediment in the surrounding wetlands and stream. Another priority site is the junk yard site located at 80 Whitney Road, where tons of construction and household wastes were dumped by the former owner prior to the Town taking ownership of the lot due to unpaid tax liens. This property is directly adjacent to wetlands and residential areas that rely on private drinking water wells.

The historic industrial use of the potential Brownfields sites within the Target Areas have caused significant perceived and known environmental, economic, health and welfare impacts; not just to the Brownfield properties themselves but also to the residential properties which are often located immediately adjacent to the Brownfield Sites, and to the community’s desirability as a new business and development location.

b. Revitalization of the Target Area  

i. Reuse Strategy and Alignment with Revitalization Plans **Brownfields projects in the Target Areas align directly with Gray’s Comprehensive Plan** (recently updated as part of a two-year, community-driven process and adopted by the Town Council in 2020) that serves as a guide for future Town decisions about growth, development, redevelopment, and change over the coming decade. Our plan was developed by a committee of Town residents, who engaged the community and sought feedback throughout the planning process. The Comprehensive Plan is widely regarded as a plan written by, and for, the benefit of the community. This plan lays out redevelopment priorities, make recommendations on land use and zoning regulations, and articulate a vision for our Target Area neighborhoods and an action plan to achieve those goals. The community intends to pursue an elimination of blighted properties and environmental risks; new mixed use development that protects the history and character of our neighborhoods, but allows new and improved land uses that conform to the area; investments in new affordable housing that serves the traditional working class neighborhoods in our Target Areas; preservation of some commercial and industrial uses; and the creation of new quality jobs that pay a living wage within walking distance of the residential areas. Our priority site is the 10+ acre Copp Equipment site, as its reuse could include residential/commercial use that could accommodate all of the uses described above (commercial/residential/light manufacturing) and in our Comprehensive and Master Plans. **The Brownfield program will be a catalyst to achieving our community’s vision.**

Our Brownfield program will be organized to conduct comprehensive assessments of priority Brownfield properties in our community. The downtown Route 202/Main Street area, and the Route 100/Portland Road Corridor (interspersed with working class neighborhoods) in our Target Areas need environmental assessment. The Brownfield program responds to a strong perception in the community that a significant number of unoccupied and underdeveloped properties are contaminated with hazardous and petroleum materials, which is contributing to blight, loss of economic opportunity, and health and environmental degradation in those areas.

ii. Outcomes and Benefits of Reuse Strategy **Gray will utilize our Brownfields funds to update the preliminary inventory; prioritize and select sites for the program; conduct community engagement activities; characterize, assess, and plan for remediation (cleanup) and reuse of Brownfields sites and their buildings in our Target Areas and adjoining neighborhoods**
to aid in the redevelopment of these distressed, blighted, and otherwise underutilized properties. This program will return the priority Brownfield sites back to economic vitality or for the public’s use and enjoyment (e.g. green space in our downtown). This is not only expected for these sites but also for nearby properties that have been impacted by their proximity to these Brownfield sites. The eventual remediation of Brownfield sites including their existing buildings will minimize risk of exposure both at the site and on adjacent properties. Additional expected outcomes of completing remedial activities of our Brownfields sites will be the new investment that occurs, creation of new jobs, new housing opportunities, as well as the increased tax base accompanying the revitalization and redevelopment within our Target Areas, which will benefit our disadvantaged communities. Renewable energy will be incorporated into the reuse planning, as in the absence of desperately needed residential, commercial, and business uses, Gray has attracted two to five potential solar field / renewable energy projects.

c. Strategy for Leveraging Resources
   i. Resources Needed for Site Reuse The Comprehensive Plan envisions future mixed-use commercial redevelopment, including market-rate workforce and senior housing, along with protection of Gray’s sensitive environmental resources and rural character outside of the Village CDP. A clearer understanding of potential Brownfields hazards could help catalyze an investment of approximately $15-20M to redevelop key commercial areas that includes new mixed-use housing development. Redevelopment of our priority site (Copp Equipment) along Portland Road, could result in $10’s of millions in private redevelopment investment of existing buildings and other parcels along existing roads and infrastructure systems. The Town will work with site owners to retain competent development teams who have completed successful projects in Town. If additional work (e.g., assessment/cleanup/reuse planning) is required to complete the tasks identified above, the Town will seek supplemental funding from sources provided below:

<table>
<thead>
<tr>
<th>Source</th>
<th>Purpose/Role</th>
<th>Amount</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gray TIF Funds</td>
<td>Assessment/Cleanup</td>
<td>$1,000,000</td>
<td>Secured</td>
</tr>
<tr>
<td>Gray CDBG Funds</td>
<td>Support Cleanup</td>
<td>$100,000</td>
<td>Pending-Rolling Application Process</td>
</tr>
<tr>
<td>Greater Portland Council of Governments (GPCOG) RLF</td>
<td>Additional Assessment &amp; RLF Cleanup Funds</td>
<td>$100,000</td>
<td>Funds previously secured for town-wide assessments-Rolling Application Process</td>
</tr>
<tr>
<td>Maine Dept of Economic and Community Development</td>
<td>RLF Cleanup Funds</td>
<td>$200,000</td>
<td>Pending-Rolling Application Process</td>
</tr>
<tr>
<td>MEDEP’s 128A Brownfields Assessment Program</td>
<td>Additional Assessment Funds</td>
<td>$50,000</td>
<td>Pending-Rolling Application Process</td>
</tr>
</tbody>
</table>

In addition, the Town plans to provide matching funds from municipal (such as Tax Increment Financing [TIF]), State (Brownfields Program), and Federal (CDBG and other) sources (appropriations) to obtain the total amount required to complete the above tasks. TIF monies may be available in the Main Street area, or within the geographic boundaries of designated and approved TIF areas. Additional funds will likely be required for cleanup and redevelopment (refer to GPCOG above & Maine DECD). The specific amount required for additional phases is currently unknown but will be developed in the Remedial Action Plan and Reuse Planning portion of the Assessment process. The Town will leverage all that it can through State programs or supplemental grants and other funds, and with potential developers to obtain private funding for assessment, development, and cleanup.

   ii. Use of Existing Infrastructure Our project’s Target Areas have all the infrastructure in-place to support our redevelopment strategy. Most of our Target Areas are currently serviced by high-speed internet, power, and connected by public water. Our Target Areas are poised to be redeveloped with housing options for our sensitive (meaning to include - but not limited to older people and affordable workforce housing with opportunities for low-income residents, Gray has the infrastructure and highway-based location required to support the development of light industrial and manufacturing businesses, as well as service-based industries
that will provide jobs to the residents of Gray. **Our Target Areas are located in close proximity (20-minutes) to Portland (the State’s largest city) making it an attractive and desirable geographic location for future development/redevelopment.** The redevelopment options available to our Target Areas are virtually unlimited and the infrastructure is in place to support the desired development options.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**
   a. **Community Need**
      i. **The Community’s Need for Funding**
         Gray has a small population base of 8,223 (2020 Census) that limits its annual municipal budget, and it relies heavily on partnership grant funding to plan and implement economic development projects. Gray is not an entitlement community, which requires our grant funding to come through a competitive application process. Pressures to keep local tax burdens low, partly based on low wages, increasing costs of living, and declining quality of life, limit the Town’s funds for economic development. The Town does not have the capacity to fund environmental assessments given the density and number of former industrial sites in the Town.

         Many of the Brownfield sites within our Target Areas are found in Gray Village and surrounding residential areas and have contributed to the overall economic decline of the surrounding community, preventing redevelopment of urbanized land and exacerbating existing sprawl and housing development on former farm, forest, and other crucial open land tracks in rural areas. These unused properties are blighted vestiges of the town’s commercial past—long-vacant buildings with broken windows, structural failure, and/or evident decay—that remain economically depressed and frozen in time, hearkening back to an era of manufacturing jobs that may never return, and reminders of the prosperity of the region that has evaded Gray.

      ii. **Threats to Sensitive Populations**
         (1) **Health or Welfare of Sensitive Populations**
            Gray residents include significant sensitive populations (children and older people) who are often disproportionately affected by environmental health hazards. Many of these sensitive populations live in areas that are adjacent to our Brownfields sites. Statistical data on sensitive populations in and around the target area capture the potential environmental justice issues that beg for Brownfields assessment in the Town.

         (2) **Greater Than Normal Incidence of Disease and Adverse Health Conditions**
            Gray neighborhoods are cut off from each other and the congested, blighted Village core by six Federal and State highways, and presumably due to massive vehicle emissions in close proximity, CT 47-02 is in the 89th percentile in the State and 98th percentile in the region for the Particulate Matter Environmental Indicator (EJSCREENTool). The Town of Gray is above the 90th percentile compared to the State, EPA Region 1, and nation for the Superfund Proximity Environmental Indicator. The McKin Co. Superfund site is located 1.7 miles from the Gray Village in a largely residential area.

            The Gray population is too small to report most town-level health indicators under health privacy restrictions, but 2014 Maine CDC county environmental public health data demonstrate high levels of cancers including leukemia, liver and bile duct, non-Hodgkins lymphoma, melanoma, and pancreatic cancer in Cumberland County vs. other Maine counties, and higher instances in men for heart attacks (43.1 per 10,000) in Gray vs. Cumberland County (40.7) overall. Gray is home to acres of mine-scarred and quarry lands with little or no public value or development opportunities in their present condition. Due to lagging economic opportunities vs. surrounding areas, Gray is also home to a disproportionate number of junk yards.

            Our aging population faces lack of access to community assets including assisted living and health care providers, in a car-based environment that is increasingly inaccessible for aging people who cannot safely drive. A recent Census study shows that Gray’s population of people over age 80 is significantly lower, trending to non-existent, compared to State averages, which we suspect is due to people being forced to leave the Town for more “livable” places.

            We plan to use a portion of Brownfields assessment funds for planning human-scale streetscape development following our Complete Streets policy and Comprehensive Plan, including more
green spaces, tree canopy, bike-ped friendly travel ways, and restful seating in the Gray Village and along connecting roads.

(3) Promoting Environmental Justice (10 points)

Due in part to Gray’s proximity to six Federal and State highways in a congested and blighted Village core, Gray has not been perceived as a destination community for new business and real estate investment, but rather a place people drive through to get somewhere else. Our community has experienced economic deficit in the last 30 years, as the Town has failed to attract new retail, industrial, or commercial businesses, and thus has not experienced the job growth that other communities in the Cumberland County/Greater Portland area have experienced. The Brownfield sites located in the Target Areas, and the presence of the McKin Superfund site, has diminished these opportunities in Gray and have cast the town as an undesirable location for new development. Gray is a bedroom community within drivable distance to other places with jobs, but for those who lack access to private or public transportation, Gray does not provide the livability/opportunities of our surrounding Towns.

The effects of this on the aspiration gap that Gray children experience adverse health behaviors as reflected in county level data in the 2021 Cumberland County Health Profile, which shows increasing and higher than state average levels of marijuana use in high school students and adults; increasing cigarette use by high school and middle school students; increasing misuse of prescription drugs by middle school students, increasing numbers of middle school students who report to have seriously considered suicide, as well as increasing drug-and alcohol-induced deaths and increasing poisoning deaths across all ages. According to EPA’s EJSCREEN Tool and EnviroAtlas, the Town of Gray is above the 90th percentile compared to the State, EPA Region 1, and nation for the Superfund Proximity Environmental Indicator. The McKin Company Superfund site is located 1.7 miles from the downtown area of Gray. CT 47-02 is in the 89th percentile in the State and 98th percentile in the region for the Particulate Matter Environmental Indicator. Promoting Environmental Justice will increase job opportunities, improve property values and improve the health of our sensitive populations.

b. Community Engagement

i. Project Involvement

We will involve community groups and other interested stakeholders in the planning and decision-making process of the Brownfields assessment projects and with public education and outreach. A list of our community organizations and a brief description of each follow: **Cumberland County Public Health** - Social service, health promotion and other programs to improve the health and quality of life in the Cumberland County/Gray). Cumberland County Public Health will participate in our Brownfield Advisory Committee and help bring a regional perspective to local health issues. **Gray Community Economic Development Committee** - provides insights to Council and programming to the community that promotes Gray as a viable location for new investment. They will assist in site solicitation and prioritization and will appoint a representative to serve on the BAC. **Sebago Lakes Chamber of Commerce** - promotes economic growth and prosperity for Gray and the surrounding region through marketing, advocacy, networking and education. They will serve on the BAC and assist with site solicitation and outreach to reuse developers.

ii. Project Roles

Our partners include the following:

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact (name, email, phone)</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumberland County Public Health</td>
<td>Liz Blackwell-Moore, MPH <a href="mailto:Blackwell-moore@cumberlandcounty.org">Blackwell-moore@cumberlandcounty.org</a> (207) 253-3882</td>
<td>Community Health liaison; community health reuse planning; BAC member</td>
</tr>
<tr>
<td>Gray Community Economic Development</td>
<td>Schelene Shevchenko, Chair, <a href="mailto:chair@graymaine.org">chair@graymaine.org</a> (207) 415-8980</td>
<td>Site solicitation &amp; prioritization; BAC member</td>
</tr>
<tr>
<td>Sebago Lakes Chamber of Commerce</td>
<td>Robin Mullins, Executive Director/CEO <a href="mailto:director@sebagolakeschamber.com">director@sebagolakeschamber.com</a></td>
<td>Site Solicitation; site reuse/development outreach;</td>
</tr>
</tbody>
</table>
iii. Incorporating Community Input

We will conduct up to three public education and information meetings that will be held in each neighborhood within our Target Areas during the assessment and reporting phases, and remedial and reuse planning (interpreters will be provided). Project stakeholders include site owners, neighbors, developers, community organizations, citizen groups, lenders, EPA, and the MEDEP. We will conduct up to two public meetings for each selected site: after the Phase II Assessment and after the ABCA/RAP phase. These meetings will be community planning charrettes (in-depth design/planning process) to solicit public involvement and develop cleanup/reuse options that incorporate green space, recreation, and architectural options for the reuse of existing buildings, as well as community needs for the proposed site redevelopment. We will compare findings to our Comp Plan for context. The Qualified Environmental Professional (QEP) will provide drawings of cleanup/reuse options.

We will advertise these meetings publicly via e-mail, a legal announcement in the local newspaper(s), and on the Town’s website, and will make meeting minutes publicly available. We will distribute paper flyers to the BAC members, houses of worship, downtown businesses, and elder care facilities. The Town Clerk will maintain regular status updates; make reports available for review at Town Hall; issue legal ads and other public notices as needed; and inform local news outlets of public meetings including the Initial Brownfields Inventory meeting and subsequent meetings for assessment sites. We will submit press releases on the Gray Brownfields program to newspapers, including the Portland Press Herald and the Sun Journal.

Gray has an outreach program to notify the public about economic development projects, maintains an informative public website, and uses social media (Facebook) to promote public awareness. We live stream our Town Council meetings and important Brownfields topics will be made part of those agendas. The Town utilizes and will continue to utilize live streams and video conferencing as a result of COVID-19.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs (including 3.a. i., ii., iii., iv.)

<table>
<thead>
<tr>
<th>Task/Activity 1: Cooperative Agreement Oversight</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation:</td>
</tr>
<tr>
<td>• EPA-Funded Activities: Gray will perform program development, organization, and support; will conduct programmatic oversight, and will develop a BAC that will include members from the Town, the QEP, MEDEP, EPA, and citizen/project stakeholders. Based on a competitive bid process (per 40 CFR 30), we will develop a Request for Proposals, hold interviews, and select a QEP. Gray will attend the National Brownfield conference. Quarterly reports and MBE/WBE reporting will be completed. ACRES will be maintained/updated. We will establish a schedule and facilitate meetings with the BAC, MEDEP, and EPA.</td>
</tr>
<tr>
<td>• Non-EPA grant resources needed to carry out task: None</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: We anticipate the BAC will be developed within 1 month of funding, and that meetings will be held at regular intervals throughout the project. We anticipate a QEP will be selected within 1-2 months of funding. Quarterly and MBE/WBE reports will be submitted on a quarterly basis as needed. ACRES will be updated throughout the grant period.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead: The Town will oversee this task, with assistance from the BAC and selected QEP.</td>
</tr>
<tr>
<td>iv. Outputs: A BAC will be developed; a QEP will be selected; Gray and the QEP will facilitate/attend up to three meetings with the BAC; 12 quarterly reports will be prepared; MBE/WBE reporting will be conducted as needed; ACRES will be updated throughout the grant period.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task/Activity 2: Community Engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Implementation:</td>
</tr>
</tbody>
</table>
• Discussion of EPA-funded activities: Gray and the QEP will develop marketing materials; will notify residents, site adjacent landowners, identify community members, and community partners of assessment public information meetings and schedules; hold public meetings to inform, educate, and update the target areas regarding assessment and redevelopment activities; provide updates as necessary at Town council meetings; and prepare public outreach materials. Gray will advertise for public meeting through online and in-person methods and will hold three public meetings to solicit input, educate, and update the community. Outreach material will be available on-line (Town websites) and in hard copy at select locations throughout the Town.

• Non-EPA grant resources needed to carry out task/activity: Community partners will be used to help advertise public meetings and solicit input from the community. Meetings may be held at the Gray Town Hall.

ii. Anticipated Project Schedule: Community outreach will be performed for the duration of the grant period; we anticipate the first public meeting (Brownfields 101) will be held within three months of QEP selection; the second public meeting will be held after the first round of assessments have been completed; and the third public meeting will be held when assessments are nearing completion and reuse planning begins.

iii. Task/Activity Lead: Town will oversee this task with assistance from the BAC, QEP & community partners.

iv. Outputs: Outreach & educational materials (Brownfield 101 brochure & FAQ handout), public meeting ads, press releases & project update reports, educational materials to support public meetings (PowerPoint presentations & handouts). Three public meetings. One-on-one meetings with Site abutters, as needed.

Task/Activity 3: Phase I/II Environmental Site Assessments (ESAs)

i. Implementation:

• EPA-Funded Activities: An ASTM-compliant 1527-13/21 Phase I ESAs and Hazardous Building Materials Inventories (HBMs) for Sites approved by the EPA/MEDEP. Using these reports, the QEP will conduct Phase II ESAs to evaluate RECs in accordance with ASTM E1903-11. Prior to the Phase II ESA, the QEP will develop a MEDEP and EPA-approved Quality Assurance Plan (QAPP) and Site-Specific QAPP (SSQAPP). Investigative activities will vary based on which Area of Concern (AOC) is being assessed; however, these activities will likely consist of soil, groundwater, soil vapor, and sediment sampling, and conducting HBMs as outlined in the SSQAPP. At the completion of Phase II ESA activities, the QEP will prepare a summary report for review and approval by the Town, the MEDEP, and the EPA. landowners, as necessary. Priority will be given to sites that have the highest redevelopment potential as well as projects that support our Comprehensive Plan.

• Non-EPA grant resources needed to carry out task/activity: None

ii. Anticipated Project Schedule: The QEP will begin working on Phase I’s/SSQAPPs within 1 month of selection. Once approved by the MEDEP/EPA, we anticipate assessment activities will begin within 2 months. Assessment and reporting will occur throughout the grant period; we see no impediment to completing this work in the 3-year grant period.

iii. Task/Activity Lead: The QEP will oversee this task, with assistance from the Town and the BAC

iv. Outputs: MEDEP and EPA-approved Phase I/IIIs, SSQAPP, Phase II ESA Reports (refer to Task 3 below for numbers)

Task/Activity 4: Cleanup Planning/ Reuse Planning

i. Implementation:
Town of Gray, Maine FY2022 Brownfields Assessment Grant

- **EPA-Funded Activities:** The QEP will develop Analyses of Brownfields Cleanup Alternatives (ABCA)/Remedial Action Plans (RAP) for AOCs that require remediation based on Phase II ESA data. The ABCA/RAPs will include remedial actions for each identified regulated contaminant that exceeds applicable MEDEP guidelines. Remedial actions will be compared based on metrics such as cost, feasibility, and effectiveness in protecting human health and the environment. Based on the results, a remediation plan will be developed for the AOC, considering the specific or potential reuse scenario(s) for the site (or selected area of the Site). Concurrently, Gray, the BAC, and the QEP will complete reuse planning activities on select Sites. A public meeting will be held during this reuse planning period to solicit input from the public and community partners; we envision this meeting as a design charrette to encourage public participation.

- **Non-EPA grant resources needed to carry out task/activity:** None

  ii. **Anticipated Project Schedule:** ABCA/RAPs will be completed within 3-6 months of finalizing the Phase II ESA report. The public meeting/design charrette will be held after the draft ABCA/RAPs are complete, but before they are finalized. We anticipate no impediment to completing this task within the grant period.

  iii. **Task/Activity Lead:** The QEP will oversee the completion of ABCA/RAPs. The Town will oversee the public meeting/design charrettes with assistance from the QEP and BAC.

  iv. **Outputs:** Outputs include up to ten (10) ABCA/RAP reports; one public meeting/design charrette (and associated outreach/presentation materials).

b. **Cost Estimates**

  **Task 1 – Cooperative Agreement Oversight** – We have budgeted 140 staff hours at an average rate of $50/hour to this task, plus supplies. Our program manager will attend two EPA Brownfield conventions with costs for fees, travel/lodging, and expenses. Contractual expenses are for QEP assistance in developing outreach materials and assistance with EPA reporting.

  **Task 2 – Community Outreach & Engagement** – A total of 140 staff hours budgeted at an average rate of $50/hour to this task, plus supplies. Work items include preparation/distribution of site nomination forms, meeting with community officials to obtain site nominations, meeting with the selected QEP (contractual expenses) regarding preliminary site inventory & develop threshold/ranking criteria, & assistance with owner outreach/education.

  **Task 3 – Phase I & II Site Assessments** – We anticipate our QEP completing 14 Phase I ESAs (14 x $4,000 each). Staff time is budgeted as 70 hours at an average rate of $50/hr plus supplies to review reports and interfacing with the MEDEP and property owners. If Phase I Assessment results indicate “recognized environmental conditions” are present, we will complete additional investigations to confirm or dismiss the conditions and determine the nature and extent of contamination. We will prepare a Quality Assurance Project Plan (QAPP) and submit it to the EPA and MEDEP as part of this task prior to undertaking Phase II activities. We will prepare site-specific QAPP addenda for each identified and assessed site. We will develop the scope of the Phase II based on specifics from each site to determine whether the existence and extent of hazardous materials. The Phase II Investigation may include monitoring well and test boring installations; test pit excavations; and groundwater, soils and soil gas sampling. We will use results from the Phase II investigations to develop ABCAs/RAPs. As with all project tasks, we will collaborate with each property owner, provide public information, and receive citizen input throughout the assessment. We anticipate 11 Phase II Investigations (11 x $27,500 each). Staff time is budgeted at 40 hours with an average rate of $50/hr to review reports and interface with the MEDEP and property owners.

  **Task 4 – Cleanup/Area-Wide/Reuse Planning** – We anticipate our QEP completing 10 ABCAs/RAPs (10 x $8,300). Staff time is budgeted at 100 hours with an average rate of $50/hr. The Town will review reports; coordinate, attend and prepare for public meetings; and work with the MEDEP and property owners. Our budget is provided below:

<table>
<thead>
<tr>
<th>Budget</th>
<th>Project Tasks</th>
</tr>
</thead>
</table>
c. Measuring Environmental Results

Consistent with other federally funded grants awarded to the Town we will ensure project funds are expended timely and efficiently. The Town and QEP will hold monthly status meetings to review priority sites, schedule, and budget. We will utilize our Quarterly Reports and ACRES to monitor project progress. Our completion of prepared environmental reports (i.e., Phase I ESAs, QAPPs, Phase II’s, ABCA’s, etc.) will document remediation progress at each site and will also be outputs of our program. We will track the reports internally and make sure that each is distributed to our stakeholders for comments before finalizing. Sites selected to participate in the Brownfield assessment program will be entered into the MEDEP Voluntary Response Action Program (VRAP). Outputs of the assessment work include obtaining “No Action Assurance” letters and “Certificates of Completion” from MEDEP. Successful VRAP completion will ensure necessary remedial actions were conducted to eliminate contamination and protect human health and the environment. We will track the number and particulars of sites assessed (i.e., acres of site, contaminants found, assessment money spent/leveraged, etc.) via EPA Quarterly reports as well as the EPA ACRES database. Completing this work will transition these sites to redevelopment which is directly in-line with the Comprehensive Plan for our Target Areas.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity The Town has capacity for completing the requirements of an Assessment Grant. We are fortunate to have a team well versed in completing timely submission of the programmatic, administrative, and financial requirements including ACRES and quarterly reporting. Nate Rudy, Town Manager, previously managed three Brownfields Assessment grants and one Cleanup grant on behalf of other municipalities.

ii. Organizational Structure The Town includes fully staffed departments of planning and development, finance, and the executive office. Our employees are highly experienced professionals with incredible depth and breadth of knowledge in managing Brownfields and other development programs. As evidenced with other community successful Brownfields Assessment and Cleanup Grants managed and led by Nate Rudy, we are confident that we will expend the funds in a timely fashion (3years) and complete all requirements of the grant. Gray staff previously led Brownfields Programs as further described in the sections below.
iii. Description of Key Staff Town Manager Nate Rudy, MBA (Project Director) has worked in municipal government in Maine for more than 11 years and will have direct oversight of the program. He was instrumental in developing and implementing the City of Gardiner Maine’s Brownfields Assessment and Cleanup programs when he served as Gardiner’s Economic Development Director. Nate previously served as the City Manager in Hallowell, Maine where he initiated and implemented a Brownfields Program. He functions as a critical liaison with the Town Council and the citizens of Gray and will be instrumental in the public outreach and education portions of the project. Nate will fulfill the position of Project Director

Doug Webster, Community Development Director, is an AICP certified planner and state certified Code Enforcement Officer/ Local Plumbing Inspector who has worked for Gray in various capacities for 14 years. Doug has been integrally involved with administering several CDBG grants and was the project manager for the $2.4M renovations to Gray's Town Hall. Doug has a degree in geography/ geology, a Masters in Town Planning, and brings significant knowledge of the town and Target Areas to the project.

iv. Acquiring Additional Resources In conjunction with the BAC described above, the Town and its selected QEP will liaison with the MEDEP to design, coordinate, and oversee the successful completion of the proposed assessment program. When necessary, the BAC will also seek the advice and support of the EPA Region 1 and MEDEP Brownfields Coordinators for direction on programmatic requirements. The Town routinely creates requests for proposals and qualifications and conducts competitive procurements to obtain appropriate resources for proposed projects throughout Gray, and our Town Manager works closely with Gray Public Works on many of these projects. Examples include the Town’s contracted planning, engineering, and other services, and numerous public infrastructure procurements, including buildings and facilities, streets, and wastewater utilities. All substantial Town projects are publicly bid and advertised.

Other Town staff members who will likely assist with the Brownfield Program include employees of the Planning Department, Finance Department, and the Public Works Department. The Town also intends to contract with an experienced Brownfields Qualified Environmental Professional (QEP) to assist with community outreach and EPA reporting, in addition to the assessment activities of this grant.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements Gray is presently managing a Community Development Block Grant (CDBG) award for projects that have made tangible improvements for the citizens of Gray. We are confident in our ability to similarly manage a Brownfields grant that would expand our Village reuse plan in a new direction with long-term community economic benefits.

(1) Past Performance and Accomplishments The Town of Gray has demonstrated effective grant management through its use of a 2020 CDBG grant, which was awarded to fund three projects in the town: a new playground for our childcare facility, environmental remediation and a feasibility study for reuse of an historic building next to Town Hall, and a pocket park reuse of a former house lot on Rt. 115 Yarmouth Road in the Gray Village. The town has adhered to all the requirements of these grants, including the reviews, standards, and regular reporting on deadline. We have also maintained the project completion timelines, with great success: The playground site work is underway, with equipment installation on track for spring of 2022, while the pocket park is nearly complete, allowing visitors to enjoy a shaded pavilion and a public vegetable garden in the heart of the village area. We completed the Pennell Lab study in March 2021, within the grant timeframe, and it has provided the town with valuable information to pursue reuse of this historic building on the Town Hall campus.

(2) Compliance with Grant Requirements Gray has made substantial progress towards achieving the expected results of our CDBG grant. The Town has managed grant projects and federal funds for similar projects for decades, including hiring the necessary professional services to complete successful projects. Gray has met and complied with all grant reporting requirements, submitted technical reports, and successfully accomplished the goals of these agreements.
ATTACHMENT A

Threshold Criteria for Assessment Grants

Town of Gray, Maine
EPA FY2022 Brownfields Assessment Grant Proposal
III.B. Threshold Criteria for Assessment Grants

1. **Applicant Eligibility**

The Town of Gray is a municipality eligible to apply for Brownfields Assessment funding from the EPA Brownfields Grant Program.

2. **Community Involvement**

Overall, the Town of Gray will hold up to three open meetings/workshops for periodic assessment progress reports and community education regarding potential environmental risks from the Brownfields sites. We will advertise these meetings publicly via e-mail, a legal announcement in the local newspaper, and on the Town’s website, door-to-door fliers, and will make meeting minutes publicly available. We will communicate the progress of our Brownfield assessment program to citizens through regular status updates available on the Town’s website; reports available for review at Town Hall; press releases, legal ads, and other public notices, as needed; and through local news coverage of public meetings including the Brownfields public outreach and education meetings and subsequent meetings for each specific assessment site. **The Town utilizes and will continue to utilize live streams and video conferencing as a result of COVID-19.**

We will submit press releases on the Town of Gray’s Brownfields program to local newspapers including the *Portland Press Herald and Sun Journal*. The majority of the community speaks English, but we will provide interpreters and/or language translations and accommodate any special needs, as needed. Through its other state/federal grant programs, and community initiatives, the Town of Gray already has a strong and successful outreach program to notify the public about economic development projects, maintains an informative public website, and uses social media (Facebook) to promote public awareness. The Town of Gray is always exploring new techniques and technology to solicit greater input from a broader segment of the community, particularly the disproportionately disadvantage populations that we have identified in our grant application. For this grant application, we are targeting specific and select sites along the Village Center and Route 100/Portland Road Corridors, in order to develop immediate action strategies out of the gate.

Many of the sites that will be included in the Brownfields Program are abandoned and/or derelict properties located primarily in our target areas; although, based on our existing Brownfields inventory, many more sites have been identified at various locations throughout the Town. With Brownfields funding, the focused target areas within the Town can be revitalized and become the catalyst to invigorate sustainable redevelopment and growth throughout the community.

3. **Named Contractors and Subrecipients**

N/A as Contractors/Subrecipients have not been procured/named.

4. **Expenditure of Assessment Grant Funds**

The Town of Gray affirms that it does not have an active U.S. EPA Brownfields Assessment Grant.