Enclosed please find the Southern New Hampshire Planning Commission’s application for a FY 2022 Community-Wide Assessment Grant under the U.S. Environmental Protection Agency’s Brownfields Assessment Grants Program. This grant will support assessment and eligible reuse planning activities of priority brownfields sites in two targeted communities of the Southern New Hampshire Region with the ability to conduct these activities for all 14 communities within our region. The targeted communities include the City of Manchester, New Hampshire and the Town of Derry, New Hampshire.

NARRATIVE INFORMATION:

1. **Applicant Identification:** Southern New Hampshire Planning Commission, 
   a. 438 Dubuque Street, Manchester, NH 03102 
   b. **Applicant DUNS Number:** 040232563

2. **Funding Request:**
   a. **Assessment Grant Type:** Community-wide 
   b. **Federal Funds Requested:** $500,000 / No waiver of Site-specific Assessment Request

3. **Location:** The following two municipalities are the focus of this grant: Town of Derry, New Hampshire in Rockingham county, and the City of Manchester, New Hampshire in Hillsborough county. The request covers all Southern New Hampshire Regional Planning Commission Member Communities. In Hillsborough and Rockingham Counties of NH.

4. **Target Area and Priority Site/Property Information:**
   a. Pro Works Collision Center; 52 Elm Street in Manchester, New Hampshire 
   b. Jac Pac Facility; 163 Hancock St, Manchester, New Hampshire 
   c. Whispering Pines; 192 Route 28 Bypass in Derry, New Hampshire

5. **Contacts:**
   a. **Project Director:** James Vayo, AICP, Project Manager, Southern New Hampshire Planning Commission, 438 Dubuque Street, NH 03102. Telephone: (603) 669-4664; fax (603) 669-4350; and email: jvayo@snhpc.org. 
   b. **Chief Executive:** Sylvia von Aulock, Executive Director, Southern New Hampshire Planning Commission, (address above). Telephone: (603) 669-4664; fax (603) 669-4350; and email: SvonAulock@snhpc.org. 
   c. **Regional Planner:** Cameron Prolman, Regional Planner, Southern New Hampshire Planning Commission, 438 Dubuque Street, NH 03102. Telephone: (603) 669-4664; fax (603) 669-4350; and email: cprolman@snhpc.org.

6. **Date Submitted:** December 1, 2021
7. **Project Period:** July 2022 through August 2024
8. **Population:**
   a. The U.S. Census 2018 population estimates report that the Southern New Hampshire Planning Commission Region jurisdiction has a total population of 274,980.
b. 2018 Population estimates for the two targeted communities in this grant is 146,192.

9. **J. Other Factors Checklist:** The priority site(s) is adjacent to a body of water: Page 2. No other ‘Other Factors’ apply to the communities and sites in this application.

Thank you for your consideration of the Planning Commission’s application. Please contact me or James Vayo of Commission staff, with any questions or comments.

Sincerely,

Sylvia von Aulock, Executive Director
SOUTHERN NH PLANNING COMMISSION
FY2022 EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION
ATTACHMENT: LETTER FROM NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
Subject: Southern New Hampshire Planning Commission
FY22 Proposal for EPA Brownfields Community-Wide Assessment Grant
State Letter of Acknowledgement and Support

Dear Ms. von Aulock:

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

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

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

Sincerely,

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

cc: Cameron Prolman, Regional Planner, SNHPC
    Dorrie Paar, EPA New England – Region 1
    Karlee Kenison, P.G., Administrator, NHDES-HWRB
    Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB
1) Project Area Description and Plans for Revitalization
   a) Target Area and Brownfields
      i) Background and Description of Target Area: Southern New Hampshire Planning Commission (SNHPC) is a political subdivision of the State of New Hampshire which provides regional planning services to 14 municipalities across 3 counties in Southern New Hampshire. The Commission’s region includes NH’s largest City and employment center (Manchester, pop. 111,660) and largest town (Derry, pop. 33,510). Both municipalities contain census tracts identified by SNHPC as Areas of Concentrated Poverty and those census tracts are the poorest communities in the region, with a range of 9.2% to 44.4% of resident families living below the poverty line. Downtown Manchester and Derry have an extensive industrial heritage dating back to 1810 when the Amoskeag Manufacturing Company was established. Both communities were tied together by the movement of goods via the Manchester-Lawrence Rail Line. Over the 19th century, industrial production sustained economic growth and vitality along the rail line that resulted in significant wealth creation for these two communities. In Manchester, the Amoskeag Manufacturing Company (AMC), the largest cotton textile mill in the world, employed thousands of regional residents. In Derry, the Pillsbury Shoe Factory sparked new economic growth to the region, providing storefronts, housing, and supporting a successful lumbermill and train depot. By the 1920’s industry started to fall into decline, culminating in the bankruptcy of AMC in 1935 and decline of rail service in the 60’s and 70’s and its ultimate abandonment, removing the main form of affordable transportation for residents in the region. In the years that followed, a strong period of commercial growth resulted in unprecedented economic expansion for the greater region, nearly tripling of the region’s population since 1945. While the region experienced growth, the industrial areas of Manchester and Derry, especially along the rail line, fell into disrepair. Today, these areas suffer from a legacy of dirty industrial activity and have an ongoing condition of disinvestment due to their brownfields, contributing to local disparities in poverty, health, and life expectancy for community members.

      ii) Description of Priority Brownfields Sites: The SNHPC region has at least eighty brownfield sites, of which the cleanup and redevelopment of two priority sites in downtown Manchester and one priority site in Derry Village have been identified as the priority for enabling the breakdown of existing disparities in wealth, health, and quality of life. **Pro Works Collision Center**, at 52 Elm Street in Manchester, New Hampshire, has been considered declassified since 4/22/09. The property owner is Thiebeault Corp. and the site has been a hazardous waste generator since 1991. In 1991, the property owner of the site was still Thiebeault Corporation, and the name of the site was Upworth Limited, Inc. DBA Choice Auto Body. Choice Auto Body’s owner received their first notification from the EPA on 11/29/91 listing the autobody shop as a small quantity generator of more than 11kgs/220 lbs per month of paint waste related material and waste petroleum. Throughout the years, there have been multiple hazardous waste manifests being kept on record for all the auto body’s auto-waste and there have been no reported spills. The building has been demolished, and the site is partially vacant and partially paved parking. This site is located proximate to the former Manchester – Lawrence Rail Line. It is also located within the City of Manchester’s Transit-Oriented Development (TOD) Plan study area and planned improvements associated with a $25M RAISE Grant, as discussed later in the narrative. Due to these planned investments, this site has a high potential for reuse as a high-density mixed-use development with housing built over ground floor retail. **Jac Pac Facility**, a 4.3-acre site in Manchester, NH, is currently vacant with no above-ground structures. The site was most recently part of the Jac Pac and Tyson Foods company as a meat processing and frozen food storage facility. The majority of the former Jac Pac facility has been redeveloped as the Elliott Hospital at River’s Edge. Overall
historical use of the property since 1933 was primarily meat processing and rendering and a slaughterhouse. The Site is part of NHDES listed site number 199904017. Most of the overall site has been investigated and remediated as part of prior Brownfields and redevelopment. However, the portion of the Site identified as Parcel 493-3 has not been thoroughly investigated. Two monitoring wells (MW-104 and MW-105) were installed as part of prior investigation activities to obtain site-wide groundwater data. Due to the overall historical nature of the site and surrounding area as manufacturing and commercial uses and minimal environmental data collected to date, additional investigation is warranted to fully characterize environmental conditions and facilitate site re-development. This site is located approximately 1,200 feet southwest of the Pro Works Collision Center site and is located near the former Manchester – Lawrence Rail Line and abuts the Merrimack River. It is also located within the City of Manchester’s TOD Plan study area, as discussed later in the narrative. Within the TOD Plan, this site has an identified reuse of housing along with open space which would be dedicated as a public park. Whispering Pines, located at 192 Route 28 Bypass in Derry, NH is a manufactured home community with 270 manufactured units. The site abuts Cohas Brook and the Auburn Road Landfill in Londonderry, New Hampshire, a 200-acre site that consists of three disposal areas that covers about 12 acres. The three areas include: the former Londonderry Town Dump, which operated during the 1960s and was used for the disposal of over 1,000 drums of chemical waste; a tire disposal area, where tires and demolition debris and several hundred drums of chemical waste were dumped; and a solid waste landfill, the largest disposal area. The State of New Hampshire ordered the landfill closed in 1980 after hazardous wastes were identified in the soil and toxic organic substances were found in surface water and ground water. In 1986, USEPA determined that contaminated ground water was flowing from the Auburn Road Landfill toward drinking water supply wells at the Whispering Pines Mobile Home Park. The nearby homes primarily used groundwater for drinking water until municipal water was supplied in 1987. A former septage lagoon, just northeast of the solid waste landfill, was excavated and disposed of within the solid waste landfill by the town before 1996. Drums of chemical waste were removed from the landfills from 1986 to 1988. In 1989, EPA called for the collection of contaminated groundwater through a series of extraction wells.

b) Revitalization of the Target Area

i). Redevelopment Strategy and Alignment with Revitalization Plans: SNHPC will work closely with property owners and community members to ensure sites transition from assessment to reuse planning, cleanup, and redevelopment. Site selection and assessment will strategically focus on supporting future economic development and increasing housing availability within economically underserved population areas within the SNHPC Region. The priority sites selected for this grant align with the objectives of the new Master Plans for both the City of Manchester and Derry. The 2021 Manchester Master Plan provides strategies for mixed-use redevelopment with a focus on revitalizing Manchester’s Downtown. Additionally, SNHPC, working with the City of Manchester, recently completed a TOD Plan, encompassing both of Manchester’s priority sites. The TOD Plan (available at CoUrb.Co/Manchester) provides guidance on how to best utilize these sites for full development-potential, connecting future commercial and residential development with local and regional transit service; providing a key connection to economic development and job growth in Downtown Manchester. Within this area, the Pro Works Collision Center site provides the opportunity to revitalize a largely open, unused space for mixed commercial and residential use, providing jobs and housing for one of the State’s most income and health burdened areas. The Jac Pac Facility, also within an Area of Persistent Poverty, sits along the Merrimack River and is a remnant site from the Elliot at Rivers Edge brownfields development. Renovating the City-owned Jac Pac remnant site would increase economic opportunity for the area’s population and provide
housing and recreation space for Manchester residents along the River. The Derry Master Plan has recently undergone an update, and provides a vision for housing economic opportunity, with a goal to promote affordable residential development. The availability of assessment funds during the due diligence process provides a unique opportunity for Whispering Pines, located downstream of one of the most polluted superfund sites in the region, to expand residential development on existing and planned water and sewer infrastructure connections, enabling the development of new affordable, and safe housing in a community where 17% have an annual income below $20,000 a year.

ii) Outcomes and Benefits of Redevelopment Strategy: Assessment and Redevelopment Planning of the Pro Works Collision Center and nearby Jac Pac Facility Site is an important next step in ensuring new residential and commercial development can take place in the Manchester target area. While Downtown Manchester has seen recent redevelopment, the target area continues to suffer from lack of investment and with aging housing stock with a prevalence of Lead Paint. Revitalization of this target area in line with the TOD plan will provide additional housing supply and increased access to nearby high-quality job opportunities for the existing neighborhood residents, especially for people living in the Bakersville Housing project. Additionally, revitalization of the Jac Pac Facility will enhance the livability of the target area by adding value to the area and reconnecting residents to the riverfront. By leveraging both EDA Loans, NH DOT Planning Funds, Municipal funding match and capitalizing on private investment sparked by new infrastructure built through the Manchester RAISE grant, the Jac Pac Facility and the Pro Works Collision Center sites will boost the economy through development of new housing, commercial and job growth, and recreational opportunities for one of Manchester’s most underserved populations. An EPA Brownfields grant will help with assessment and reuse planning for the Whispering Pines site. The Town of Derry seeks assistance of brownfields funds in order to restore the environment and expand critical water infrastructure services that will serve new affordable housing development on the site. Brownfields funds will act as a critical missing link to removing the legacy and impacts of the old Auburn Road Landfill superfund site, creating new development opportunities and enhancing public health for Derry residents.

c) Strategy for Leveraging Resources

i) Resources Needed for Site Reuse: All priority sites will leverage Brownfield Clean-Up Grant funding from the New Hampshire Department of Environmental Services (NHDES’s) Brownfields Revolving Loan Fund. New Hampshire’s regional development corporations also offer financing opportunities. SNHPC’s regional partners, the Regional Economic Development Center and Capital Region Development Council, will finance projects consistent with their missions and operate their own brownfield revolving loan funds. REDC has committed to working with SNHPC on obtaining funding through their Revolving Loan Fund up to $500,000. Our priority sites are in a new Economic Development District pending EDA confirmation, making them eligible for funding from the U.S. Economic Development Administration. Derry and SNHPC will also work with the Community Development Finance Authority (CDFA) to obtain funding through the Community Development Block Grant (CDBG) funds while Manchester is a designated entitlement community, meaning it receives annual funding directly from HUD for eligible programs.

Target area census tracts in both Manchester and Derry are designated as Economic Revitalization Zones, both municipalities have enabled other mechanisms, such as RSA 79-E tax credits and Tax Increment Financing investments, to support qualified infrastructure and private investment opportunities. Additionally, pedestrian and streetscape improvements can be funded through the NH Department of Transportation (NHDOT) Transportation Alternatives or Congestion Mitigation and Air Quality programs. Investments resulting from the Manchester TOD
planning effort can be funded through the Federal Transit Administration via a variety of allowable programs including Small/New Starts and Joint Development programs.

ii) Use of Existing Infrastructure: Our priority brownfield sites will build on existing infrastructure, in particular transportation networks, power, and water and sewer facilities. The Derry high priority site has frontage on NH Route 28, making it easily accessible and increasing the opportunity for reuse. SNHPC can work with NHDOT and private developers to program funds for transportation improvements or for future transportation infrastructure needed to support re-development. The existing priority brownfield sites are surrounded by more intensely developed areas. As a result of utilizing Brownfields funds, new redevelopment will be able to connect to the existing infrastructure, providing more opportunities for investment in the communities. Both Manchester priority sites are within the recently awarded $25M RAISE Grant project area. Utilizing the brownfields funds for assessment and reuse planning will be a critical link to ensuring the city can most effectively create the infrastructure connections necessary for housing and commercial development.

2) Community Need and Community Engagement
   a) Community Need
      i) Community Need for Funding: Median household incomes in Manchester and Derry, especially their respective target areas, are significantly below the state median, while poverty, child poverty, and unemployment rates are higher. Unlike other states, New Hampshire relies exclusively on property taxes to fund state and local government and schools. Ultimately, this forces communities like Derry and Manchester to focus their spending on basic services, resulting in fewer critical infrastructure improvements, and improvements to public health, often going unfunded for extended periods of time. In 2018 (last publicly available data), 66.49% of the City of Manchester’s governmental funds revenues were derived from property taxes, auto registrations, and franchise fees¹ (these categories are not differentiated), indicating just how critically important the tax revenue is to the City’s operations. Abandoned or underused brownfield properties depress property values, and their owners have frequently stopped paying property taxes, sapping the community’s ability to pay for the necessary assessments or planning activities. With vacant spaces throughout Manchester’s Downtown, revitalizing spaces like the Jac Pac Facility and the Pro Works Collision Center could substantially increase the current assessed value. With limited staff who are constantly dealing with meeting the needs of its residents and the needs of a growing opiate crisis, the City of Manchester as well as the Town of Derry rely on external technical assistance to conduct property assessment and reuse planning. Additionally, with less than 15% of our annual operating budget coming from member communities and 1% from the state, SNHPC must also leverage grants and funding to fulfill its mission. Without EPA assistance, SNHPC would not have the resources to continue the work on the Region’s high priority sites.

      ii) Threats to Sensitive Populations
          (1) Health and Welfare of Sensitive Populations: Per the Health Needs Assessment, 32% of Manchester’s housing stock has a high potential lead-risk, while 31.2% of the housing stock poses a potential lead-risk in Derry. The lead risk is symptomatic of the aged housing stock. Lack of new housing, stagnant wages and other factors are contributing to a housing crisis where there is less than 1% vacancy. Housing is unaffordable for many residents, resulting in young families with pregnant women or children being more likely to live in substandard housing. Between 2013 and 2017, 40% of households in Manchester reported spending more than 30% of their income on

housing costs, which poses a serious risk of insecurity to youth and elderly. According to HUD, in Derry, 72% are paying more for housing than they can afford. Abandoned or underused brownfield properties have historically been known to contain lead-based paints and other hazardous building materials that could contribute to these health effects. Promoting redevelopment of these sites through the Brownfields program would provide new alternative housing choices thereby reduce potential lead exposure for those most at risk.

(2) **Greater Than Normal Incidence of Disease and Adverse Health Conditions:** The incidence of disease and adverse health conditions is higher than normal in SNHPC’s service area and is exacerbated by the frequency of brownfields properties. In Derry, 27.8% of residents over 65 have chronic kidney disease which can be linked to harmful metals due to polluted properties. In Manchester, chronic lower respiratory diseases are one of the leading causes of death for all ages (6.3%), which can be linked to over-exposure to harmful chemicals which can be found on many contaminated sites in SNHPC’s Region. Chemical exposure can be by direct contact with contaminated soil (e.g., touching surficial soil or tracking soil home on their shoes), or via inhalation of contaminated dust particles generated from wind or traffic. The latter scenario can carry contaminated particles well outside the site boundaries and lead to potential impacts within the community. Environmental site characterization and eventual clean-up of the three target sites would reduce the exposure to potentially contaminated surficial soil, airborne particles, and exposure to harmful chemicals.

(3) **Promoting Environmental Justice:** Manchester’s center city neighborhoods, which include target area and high priority sites, have experienced extremely high (40%+) poverty rates since 1990. According to the City’s Health Assessment, the number of Manchester neighborhoods with high or extreme poverty rates has more than quadrupled since 1990. Over time, Manchester’s lack of investment in new housing stock, transit options, and economic development have handicapped the target area's ability to offer competitive opportunity to its residents. Adding more commercial and residential in the Manchester sites through the help of the EPA Brownfields Grant funds will provide the necessary support for additional transit options and pedestrian infrastructure, which will benefit disproportionately impacted populations. In Derry, low-income residents residing in the Whispering Pines site have disproportionally felt the impacts of downstream pollutants from the Auburn Road Landfill. Utilizing EPA Brownfield funds to develop affordable housing and expand on safe drinking-water infrastructure will enable the priority site’s residents to live healthier and fulfilling lives.

a) **Community Engagement**

i) **Community Involvement:** SNHPC will utilize the longstanding Brownfields Advisory Committee (BAC) to extend outreach efforts. The BAC will guide site selection and prioritization if funds outside the target area are available. The Granite State Organizing Project, and the Manchester Public Health department both have strong connections to vulnerable communities and have agreed to assist with outreach and content in their areas of practice. SNHPC will also request guidance on cleanup planning, funding, and development from municipal department directors, local developers, and private businesses. SNHPC will leverage the TOD planning efforts to solicit participation from target area residents as well as the Derry Chamber of Commerce.

**List of Project Partners**

<table>
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<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
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<tr>
<td>City of Manchester Community Development</td>
<td>Leon LaFreniere, Director</td>
<td>MHT Target Area Expertise and Priority Site Access</td>
</tr>
<tr>
<td>City of Manchester, Health Department</td>
<td>Anna Thomas, Director</td>
<td>Target Area Public Health Expert and Resource Guidance</td>
</tr>
</tbody>
</table>
ii) Incorporating Community Input: SNHPC has a talented staff with the resources to effectively connect with residents and stakeholders throughout the region and across media platforms. Initial outreach will leverage the Manchester TOD process to continue public involvement as planning activities continue into assessment, cleanup, and revitalization of the target area. Outreach in Derry will leverage municipal planning activities around development of higher density, affordable housing. SNHPC will utilize local traditional print (Union Leader, DerryNews), social media platforms (Facebook, Twitter, ConstantContact) and online media (Manchester InkLink, Derry News, and the Union Leader) to advertise meetings, events, and updates to the public. During the current COVID-19 pandemic, SNHPC recognized the importance of social distancing and has the capabilities to host virtual public meetings to continue to connect with the community, while following state and federal guidance.

3) Task Descriptions, Cost Estimates, and Measuring Progress

a) Description of Tasks and Activities

Task 1: Program Oversight: Contractor Procurement (July–Sept. 2022): SNHPC successfully closed-out their 2015 Brownfields Assessment Program and will utilize SNHPC’s Executive Director, Project Manager (PM), Regional Planner (RP), and Assistant Planner (AP) as the project staff to implement the FY2022 grant upon notice of award. The existing BAC dating back to 2004 will include new members from the target areas of Derry and Manchester. SNHPC and the BAC will select a QEP by the end of fall 2022. To do so, SNHPC will issue a request for qualifications (RFQ) using a competitive bid process in accordance with SNHPC procurement policies and consistent with Uniform Guidance at 2 CFR 200:317 through 200.326. SNHPC will interview the top-scoring firms and select the one showing the strongest familiarity with the region and the best ability to advance the goals.

Cooperative Agreement Oversight (July 2022 – Dec. 2024): Program oversight includes SNHPC’s management of the program, the QEP’s performance of ACRES updates, and our joint roles in quarterly reporting. SNHPC will develop a timeline showing task expectations, outputs, and staffing to share with project stakeholders.

Quarterly Stakeholder (BAC) Progress Meetings (July 2022 – Dec. 2024): SNHPC will facilitate and attend quarterly meetings of the BAC to report out on the progression of project milestones along the timeline established for oversight. The quarterly meetings will include regular business items for all tasks identified in this narrative.

Task 2: Community Outreach and Engagement: Public Informational Meetings (Nov. 2022 and June 2023): SNHPC and QEP will hold four publicly noticed community meetings. Two meetings will take place early in the inventory and site selection process, one per each target area. One additional meeting per target area will take place seven months later, to inform the public of progress and to re-solicit site nominations if needed. Meetings will announce the availability of assessment grants, explain the program, request comments, and solicit nominations for assessment sites.
Outreach Programming and Material Distribution (Sept. 2022 – Dec. 2024): Outreach will focus on populations carrying a disproportionate share of negative environmental consequences resulting from private operations or governmental policies. Communication will inform the public of the available funding, project goals, solicitation for nomination sites, known environmental risk factors, environmental impacts, and progress of site-specific assessments. Outreach includes the following strategies: individual interviews, focus groups, print articles, social media posts, website notices, e-newsletters, community partnerships with environmental justice (EJ) stakeholders, and presentations at public meetings, disadvantage population specific input meetings and noticed site-specific public hearings.

Inventory & Site Selection Process (Oct.–Dec. 2022): The BAC will pursue the high priority sites cited in this narrative before advancing to other sites within the target area. BAC will also consider cleanup planning for sites which received assessments but no planning in prior awards. New assessments in the target areas will focus on disadvantaged communities and known or environmental inequity conditions. BAC will select projects that address key community environmental needs as well as equity and justice goals such as access to economic opportunity.

Obtaining and Securing Site Access (Jan. 2022– Sept. 2023): SNHPC has used its site access agreement throughout the most recent grant program. New assessments will begin within three months of conducting outreach and education to the owners of privately held sites, especially priority site, and to municipalities. A second round of assessments will begin during the fall of 2023. If site access cannot be obtained, we will move to the next site as prioritized by the BAC.

Task 3: Phase I Environmental Site Assessments: (Feb. 2022 – June 2024) Based upon the BAC’s selection of sites identified and prioritized in Task 2, Phase I Assessments of up to twenty (20) sites will be conducted by a QEP. These assessments will determine the presence or likely presence related to storage, release, treatment, and/or disposal of petroleum products or hazardous substances at the site. The Phase I ESAs must conform to ASTM E1527-00 “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process”. If potential contamination is found or strongly suspected, the site will be forwarded to the BAC as a candidate for a Phase II assessment.

Task 4: Phase II Environmental Site Assessments: (April 2022– September 2024) The findings and results of all Phase I ESAs will be shared with the appropriate stakeholders. Based upon Phase I Assessment findings and recommendations of the QEP and NH DES, the QEP will perform up to fourteen (14) Phase II ESAs, which will delineate the areas of contamination and environmental concern at the site, confirm whether further investigation and/or remediation will be necessary, and provide a basis for estimating the cleanup and potential remediation costs. Phase II ESAs will also include additional interviews and site visits, the development of a Quality Assurance Project Plan (QAPP), collection of samples of soil, groundwater, surface water, and further identification of other contaminated buildings and materials, and any necessary geophysical testing. It will describe the assessment, sampling, and analysis strategies, methods, and procedures approved by the US EPA that will be used in all assessments. Phase II ESAs must conform with ASTM Phase 201 including ASTM E 1903-97. Following completion of the Phase II ESAs, the QEP will prepare a report documenting the results of the research and analysis, provide specific recommendations for mitigating the contamination, and outline reasonable and feasible re-use or redevelopment strategies and approaches.

Task 5: Cleanup, Reuse, and Area-wide Planning: (June 2022–December 2024) The QEP will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) and a Remedial Action Plan (RAP) for each site found in the Phase II ESA to exceed New Hampshire risk-based cleanup guidelines. The ABCA will include a remedial alternative evaluation and ranking based on proposed reuse options. Reuse/redevelopment plans will be prepared along with the RAPs to ensure that sites are brought
to the point of redevelopment and will include site reuse and land use assessments and market evaluations. Public meetings will be key to learning the community’s vision for site redevelopment.

**Task/Activity Lead:** Task 1: Program Oversight: The PM will oversee the program including QEP selection and cooperative agreement oversight. Task 2: Community Outreach and Engagement: SNHPC RP will lead community outreach and organize and facilitate all BAC meetings with SNHPC AP and input from the QEP. SNHPC AP will prepare outreach materials related to the Brownfields assessment program to distribute at meetings, workshops, conferences, and other venues. The QEP will coordinate site selection and prioritization materials, inventory updates, and program reporting relevant to their work. The BAC will discuss assessment priorities within the target area to ensure the highest priority sites are addressed first. SNHPC and the QEP will work with the BAC to review and update the inventory for the target area and the entire region. With the QEP’s assistance, SNHPC will obtain access agreements. Task 3: Phase I Environmental Site Assessments: The QEP will conduct up to 20 Phase I ESAs for inventoried and prioritized sites according to ASTM International standard 1527-13 and EPA’s “All Appropriate Inquiry” standards. If “recognized environmental conditions” (RECs) are found, the QEP will assess the environmental conditions and determine the nature and extent of contamination. Task 4: Phase II Environmental Site Assessments: Phase II ESAs will be led by the QEP and include additional interviews and site visits, the development of a QAPP, collection of samples of soil, groundwater, surface water, and further identification of other contaminated buildings and materials. The QEP will prepare a written report that will document the results of the research and analysis, provide specific recommendations for mitigating the contamination (including a RAP), and outline reasonable and feasible re-use or redevelopment strategies and approaches. Task 5: Cleanup, Reuse, and Area-wide Planning: The QEP will prepare an ABCA or RAP for each Phase II site when required. SNHPC will assist the QEP with public outreach to support community visioning, land use assessments, and market evaluations for reuse plans.

**b) Cost Estimates and Outputs**

**Cost Estimates** The following budget represents a request of $500,000 in Brownfields assessment funds. SNHPC staff time (personnel costs) is based on average hourly rate of $80 across project staff. The rate for fringe benefits is 45.95% of personnel costs. The QEP hourly rate is $100 for all tasks. Indirect costs are 5.00% of eligible expenses as per 2 CFR 200.414 including accounting and overhead. SNHPC is confident funds will be exhausted well within the three-year time limit of an award.

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<td>$3,200</td>
</tr>
<tr>
<td><strong>TOTAL BUDGET</strong></td>
<td><strong>$29,000</strong></td>
<td><strong>$49,200</strong></td>
<td><strong>$80,000</strong></td>
<td><strong>$275,000</strong></td>
<td><strong>$66,800</strong></td>
<td><strong>$500,000</strong></td>
</tr>
</tbody>
</table>

**Task 1-Program Oversight:** [5.8%] Personnel: $24,000 – 300 hrs. SNHPC project staff average rate of $80/hr. (60-hrs. SNHPC procurement of a QEP, 20-hrs EPA reporting and records
management per quarter, 20-hrs per quarter for progress meetings); Travel: $3,800 Attendance at Nat’l Brownfield Conference, 2-ppl: $3,800 (per person: $600 Airfare, 4 nights hotel $800, 4 days per diem and incidentals $500). **Task 2-Community Outreach and Engagement:** [9.8%] **Personnel:** $24,000 – 300 hrs. SNHPC project staff average rate of $80/hr. (20-hrs per quarter for community outreach materials creation and distribution, 20-hrs per quarter for facilitation of BAC, collection of input, and gathering nominations for assessment sites, and 20-hrs assisting QEP with noticing and public involvement for site-specific informational meetings); **Contractual:** $24,000 – 240 hrs. (20 hours quarterly, QEP coordination of site selection, prioritization and progress updates for the BAC, 20-hrs. quarterly, preparing outreach materials related to the Brownfields assessment program to distribute at meetings, workshops, conferences, and other venues.)

**Task 3: Phase I Site Assessments:** [16.0%] **Contractual:** $80,000 – 800 hrs. (QEP to conduct up to 20 Phase I environmental assessments in compliance with appropriate ASTM requirements.)

**Task 4: Phase II Site Assessments:** [55.0%] **Contractual:** $275,000 – 2,750 hrs. (QEP to conduct up to 14 Phase II environmental assessments in compliance with ASTM requirements.)

**Task 5: Cleanup and Reuse Planning:** [13.4%] **Personnel:** SNHPC PM 35 hours@$36/hr=$1,260; SNHPC RP 80 hours@$30/hr=$2,400 and associate planner 57.92 hours@$24/hr=$1,390; **Supplies:** $123 for document production supplies (copies, toner, postage); **Contractual:** Estimated QEP costs of $79,492 to conduct three ABCA/RAPs at $12,000 each, a cleanup plan and redevelopment visioning for Former Jac Pac Site at $14,500, a cleanup plan and redevelopment visioning at 109 Rockingham Road at $14,500, and open house outreach event and market analysis for 53 Elm Street/TOD study area at $14,429. **Outputs** The expected immediate outputs of this program are complete assessment and planned cleanup of priority sites to facilitate redevelopment and investment. Task-based outputs include: **Oversight:** A RFQ and contract with a QEP; ACRES updates and quarterly and MBE/WBE reports; an updated Brownfields inventory with updated SNHPC’s GIS database; and appropriate document retention. **Outreach:** BAC presentation materials and minutes; up-to-date, and accessible outreach materials for distribution at meetings, workshops, conferences, public meetings, on SNHPC website and social media, and in press releases and newsletters. **ESAs:** 3 Phase I ESAs, 3 SSQAPP, and 3 Phase II ESAs; an approved Generic QAPP. **Planning:** ABCA/RAPs, NHDES letters of consent, presentation materials and meeting minutes from reuse planning meetings, and community input documentation.

c) **Measuring Environmental Results** Quarterly reports to EPA will be updated in EPA’s ACRES database to track, measure, and evaluate our progress in achieving short- and long-term outcomes. Upon award, we will prepare a Cooperative Agreement Work Plan with EPA to specify the project schedule and budget. We will identify stages, tasks, benchmarks, and milestones to be tracked/measured during implementation. Connecting the outputs to our work plan will link the results of the grant funding to EPA’s strategic plan and demonstrate to Congress the results of the grant program. SNHPC will measure task-based progress and success toward project outputs and outcomes in these ways as it has in previous successful Brownfields programs. **Oversight:** meet all expected reporting requirements; partnering with local organizations, including QEP, NHDES, and EPA staff; ensure activities match program goals and objectives. State, regional, and local stakeholders will use the SNHPC brownfields inventory in short- and long-term planning efforts. **Outreach:** generate a diverse, well-informed audience on brownfields issues and on the SNHPC Brownfields Program goals and objectives. ESAs: ESAs will provide reuse opportunities for brownfields sites and guidance for redevelopment needs and considerations. **Planning:** knowledge of site-specific opportunity for redevelopment by stakeholders; government officials; and community members. Long-range outcomes will include the return of economic vitality to affected sites and neighborhoods. They will be measured by the amount of private investment leveraged by
the grant, the number of jobs created, the number of affordable housing units provided, increases in the property tax base, and the square footage of underused building space returned to productive use. Outputs will include Phase I & II ESAs, and remedial action and reuse plans at the priority sites. NHDES will issue a consent letter upon approval of the remedial actions at a site.

4) **Programmatic Capability and Past Performance**
   
a) **Programmatic Capability**
   
i) **Organizational Structure:** SNHPC has been the recipient of Federal and State Grants including the successful management, execution, and compliance of Brownfields funds. SNHPC currently manages over $2 million annually in local, state and federal funds, including grants from the NH DOT, the Federal Transit Administration, the NH Office of Planning & Development, the NH DES, and the NH Office of Emergency Management. SNHPC’s Brownfield Assessment Program will be managed by PM James Vayo. James has 10+ years of experience in planning and government. Cam Prolman, RP would implement day to day responsibilities of the grant activity. Executive Director Sylvia von Aulock oversees all SNHPC staff and activities and has direct experience Brownfield grant management. Deputy Executive Director Nathan Miller works closely with Financial Administrator Yutian Zhang to oversee and comply with all required financial reporting. SNHPC has had no adverse audit findings of their past Brownfield grants.

ii) **Acquiring Additional Resources:** Since 2007, SNHPC has managed an EPA-funded Brownfields Assessment Program totaling $1,000,000. Our formal procurement and payment systems are managed by the executive director, deputy executive director, and financial administrator. SNHPC also has a strong history of procuring technical, professional, and creative services, including engineering, legal, research, marketing, and planning services, through competitive bids. The QEP for this project will be hired through a prescribed RFQ selection process in accordance with federal and state procurement requirements.

b) **Past Performance and Accomplishments**
   
i) **Previously Received EPA Brownfields Grant:**
   
**Accomplishments** – SNHPC received its first $200,000 EPA Brownfields Community-Wide Assessment Grant for Petroleum in 2007. A total of $183,004.59 was expended before closing out in September 2010. As a result, SNHPC accomplished assessment of: **River’s Edge II** – complete Phase I & II, underground tanks were removed. Site redeveloped into Elliot at Rivers Edge Hospital. **Granite Landing Property**, complete Phase I & II, removal of underground tanks. As a result of our 2015 Assessment grant, SNHPC completed six Phase I and five Phase II ESAs in Goffstown and Manchester. At two of these sites, designated the **Fletcher Mountain Parcels**, following completion ESA, parcels were successfully redeveloped by a local manufacturing company, providing jobs and tax revenue to a previously vacant parcel.

(a) **Compliance with Grant Requirements** - In 2009, SNHPC received a $400,000 EPA Brownfields Community-Wide Assessment Grant for Petroleum and Hazardous Substance sites. This grant was successfully closed in September 2012. A total of $399,973.57 in EPA Brownfields Grant Funds were expended, leaving a balance of only $26.43 remaining in unspent EPA Brownfields Grant Funds. Under third grant, a total of $306,099.62 was expended, leaving a balance of $93,900 due to lack of petroleum eligible sites during this program cycle. The 2015 grant was awarded a one-year extension where SNHPC and the QEP conducted outreach to municipalities and other stakeholders helping to update the site inventory to support future grant activities. In each grant, we have consistently followed our Cooperative Grant Agreement terms and conditions as well as our Work Plan commitments, financial status reports, and submitted Quarterly Reports on time. The grant was successfully closed out in December, 2019.
Attachment i

Threshold Criteria for Assessment Grant Application

Applicant Eligibility
The Southern New Hampshire Planning Commission (SNHPC) qualifies as an eligible applicant as a “Government Entity Created by State Legislature” and as a “Regional Council or group of General Purpose Units of Local Government” as provided in Section III.A. of the FY21 Guidelines for Brownfields Assessment Grants. SNHPC is one of nine New Hampshire regional planning commissions established in 1969 by the State Legislature under New Hampshire State Statute, RSA 36:45-55 (see Attachment ii).
CHAPTER 36
REGIONAL PLANNING COMMISSIONS

36:45 Purposes. – The purpose of this subdivision shall be to enable municipalities and counties to join in the formation of regional planning commissions whose duty it shall be to prepare a coordinated plan for the development of a region, taking into account present and future needs with a view toward encouraging the most appropriate use of land, such as for agriculture, forestry, industry, commerce, and housing; the facilitation of transportation and communication; the proper and economic location of public utilities and services; the development of adequate recreational areas; the promotion of good civic design; and the wise and efficient expenditure of public funds. The aforesaid plan shall be made in order to promote the health, safety, morals and general welfare of the region and its inhabitants. To promote these purposes the office of energy and planning shall delineate planning regions for the state so that each municipality of the state will fall within a delineated region and shall have the opportunity of forming or joining the regional planning commission for that planning region. In determining these regions the office shall consider such factors as community of interest and homogeneity, existing metropolitan and regional planning agencies, patterns of communication and transportation, geographic features and natural boundaries, extent of urban development, relevancy of the region for provision of governmental services and functions and its use for administering state and federal programs, the existence of physical, social and economic problems of a regional character, and other related characteristics. To accommodate changing conditions, the office may adjust the boundaries of the planning regions, after consultation with the respective regional planning commissions.


36:46 Formation of Regional Planning Commissions. –
I. If no regional planning commission exists in any specific planning region as delineated by the office of energy and planning, then 2 or more municipalities in said planning region and having planning boards may, by ordinance or resolution adopted by the respective legislative bodies of said municipalities, form a regional planning commission.

II. If a regional planning commission already exists in any specific planning region as delineated by the office of energy and planning, then any municipality in said planning region and having a planning board may, by ordinance or resolution adopted by the respective legislative body of said municipality, become a member of the regional planning commission. A regional planning commission may also include municipalities located in an adjacent state.

III. Each municipality which shall become a member of a regional planning commission shall be entitled to 2 representatives on said commission. A municipality with a population of over 10,000 but less than 25,000 shall be entitled to have 3 representatives on said commission and a municipality with a population of over 25,000 shall be entitled to have 4 representatives on said commission. Population as set forth in this section shall be deemed to be determined by the last federal census. Representatives to a regional planning commission shall be nominated by the planning board of each municipality from the residents thereof and shall be appointed by the municipal officers of each municipality. Representatives may be elected or appointed officials of the municipality or county. In any county or counties in which a regional planning commission has been formed, the county may, by resolution of its county commissioners, become a member of said regional planning commission and shall be entitled to appoint 2 representatives on said
commission. The terms of office of members of a regional planning commission shall be for 4 years, but initial appointments shall be for 2 and 4 years. In municipalities entitled to 3 or more representatives, initial appointment shall be for 2, 3 and 4 years. Vacancies shall be filled for the remainder of the unexpired term in the same manner as original appointments. Municipalities and counties may also appoint alternate representatives. A representative to a regional planning commission shall, when acting within the scope of his official duties and authority, be deemed to be acting as an agent of both the regional planning commission and of the municipality or county which he represents. In addition, regional planning commissions are encouraged to consult, at their discretion, with agencies and institutions operating within the region whose activities influence planning and development in that region.


36:47 General Powers and Duties. –
I. A regional planning commission's powers shall be advisory, and shall generally pertain to the development of the region within its jurisdiction as a whole. Nothing in this subdivision shall be deemed to reduce or limit any of the powers, duties or obligations of planning boards in individual municipalities. The area of jurisdiction of a regional planning commission shall include the areas of the respective municipalities within the delineated planning region. It shall be the duty of a regional planning commission to prepare a comprehensive master plan for the development of the region within its jurisdiction, including the commission's recommendations, among other things, for the use of land within the region; for the general location, extent, type of use, and character of highways, major streets, intersections, parking lots, railroads, aircraft landing areas, waterways and bridges, and other means of transportation, communication, and other purposes; for the development, extent, and general location of parks, playgrounds, shore front developments, parkways, and other public reservations and recreation areas; for the location, type, and character of public buildings, schools, community centers, and other public property; and for the improvement, redevelopment, rehabilitation, or conservation of residential, business, industrial and other areas; including the development of programs for the modernization and coordination of buildings, housing, zoning and subdivision regulations of municipalities and their enforcement on a coordinated and unified basis. A regional planning commission may authorize its employees or consultants to render assistance on local planning problems to any municipality or county which is not a member of said regional planning commission. The cost of such assistance shall be paid entirely by the municipality or county to which the service is rendered or partly by said municipality or county and partly by any gift, grant, or contribution which may be available for such work or by combination thereof. Said commission shall keep a strict account of the cost of such assistance and shall provide such municipality or county with an itemized statement.

II. For the purpose of assisting municipalities in complying with RSA 674:2, III(1), each regional planning commission shall compile a regional housing needs assessment, which shall include an assessment of the regional need for housing for persons and families of all levels of income. The regional housing needs assessment shall be updated every 5 years and made available to all municipalities in the planning region.

III. In preparing a comprehensive plan for the development of the region within its jurisdiction, each regional planning commission may use the framework for the state's comprehensive development plan in RSA 9-A:1, III as the basis for its plan. Such plan shall be updated every 5 years or sooner if desired by the regional planning commission. Prior to its adoption, the plan shall be distributed to every library, planning board, and board of selectmen/aldermen/city council in each of the communities within the region, and to the office of energy and planning. The regional planning commission shall address in writing all comments
received prior to the publication of a final draft. A public hearing shall be held by the regional planning commission with 30 days' notice published in all newspapers of general circulation in the region, and shall state where the document can be viewed, the time and place of the public hearing, and shall allow for written comments. For each regional plan, the office of energy and planning shall offer comments as to its consistency with the state plan. The first regional development plans affected by this statute shall be adopted within 5 years of the effective date of this paragraph and renewed at least every 5 years thereafter.

IV. Regional planning commissions shall make a good faith effort to inform and respond to their local communities regarding the purposes and progress of their work in developing the regional development plan.


**36:48 Organization, Officers, and Bylaws.** – A regional planning commission shall elect annually from among its members a chairman, vice-chairman, and such other officers as it deems necessary. Meetings shall be held at the call of the chairman and at such other time as the commission may determine. A commission shall keep minutes of its proceedings and such minutes shall be filed in the office of the commission and shall be a public record. A commission may adopt such bylaws as it deems necessary to the conduct of its business.

**Source.** 1969, 324:1, eff. Aug. 29, 1969.

**36:49 Finances.** – A regional planning commission shall determine on a reasonable and equitable basis the proportion of its costs to be borne respectively by each municipality or county which is a member of said commission. A commission may accept and receive in furtherance of its functions, funds, grants, and services from the federal government or its agencies, from departments, agencies and instrumentalities of state, municipal or local government or from private and civic sources. Such funds may be used in conjunction with other funds from federal or state governments or from gifts, grants or contributions available for such work. Municipalities or counties are hereby authorized to appropriate funds to the use of a regional planning commission and to furnish a regional planning commission legal or other services which it may deem reasonable. Failure upon the part of any municipality or county to pay its proportionate annual share of the cost as determined by a regional planning commission shall constitute a termination of such municipality's or county's vote in the commission's affairs until such annual share is paid. Municipalities or counties are hereby authorized to enter into contracts with a regional planning commission for the furnishing of funds or services in connection with the preparation of a comprehensive regional master plan and any special planning work to be done by a regional planning commission for any member municipality or county. Within the amounts appropriated to it or placed at its disposal by gift, grant, or contribution, a regional planning commission may engage employees, contract with professional consultants, rent offices, and obtain such other goods, or services and incur short-term operating debt, not to exceed a term of one year and/or a line of credit secured by the assets of the commission, as are necessary to it in the carrying out of its proper function. Member municipalities and counties shall not be liable for any debt or line of credit incurred by a regional planning commission. Any private gifts or funds when received shall be deemed a contribution to the regional planning commission for a public purpose within the meaning of any federal or state laws relative to tax exemptions.

36:50 Relationship To Local Planning Boards. – A regional planning commission may assist the planning board of any municipality within the delineated region to carry out any regional plan or plans developed by said commission. A regional planning commission may also render assistance on local planning problems. A regional planning commission may make recommendations on the basis of its plans and studies to any planning board, to the legislative body of any city and to the selectmen of any town within its region, to the county commissioners of the county or counties in which said region is located and to any state or federal authorities. Upon completion of a comprehensive master plan for the region or any portion of said comprehensive master plan, a regional planning commission may file certified copies of said comprehensive master plan or portion thereof with the planning board of any member municipality. Such planning boards may adopt all or any part of such comprehensive master plan which pertains to the areas within its jurisdiction as its own master plan, subject to the requirements of RSA 674:1-4.


36:53 Additional Powers and Duties of Regional Planning Commissions. – In order to implement any of the provisions of a regional plan, which has been adopted or is in preparation, a regional planning commission may, in addition to its powers and duties under RSA 36:47 undertake studies and make specific recommendations on economic, industrial and commercial development within the region and carry out, with the cooperation of municipalities and/or counties within the region, economic development programs for the full development, improvement, protection and preservation of the region's physical and human resources.


36:54 Purpose. – The purpose of this subdivision is to:
I. Provide timely notice to potentially affected municipalities concerning proposed developments which are likely to have impacts beyond the boundaries of a single municipality.
II. Provide opportunities for the regional planning commission and the potentially affected municipalities to furnish timely input to the municipality having jurisdiction.
III. Encourage the municipality having jurisdiction to consider the interests of other potentially affected municipalities.


36:55 Definition. – In this subdivision "development of regional impact" means any proposal before a local land use board which in the determination of such local land use board could reasonably be expected to impact on a neighboring municipality, because of factors such as, but not limited to, the following:
I. Relative size or number of dwelling units as compared with existing stock.
II. Proximity to the borders of a neighboring community.
III. Transportation networks.
IV. Anticipated emissions such as light, noise, smoke, odors, or particles.
V. Proximity to aquifers or surface waters which transcend municipal boundaries.
VI. Shared facilities such as schools and solid waste disposal facilities.

SOUTHERN NH PLANNING COMMISSION
FY2022 EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION

Attachment iii.
DESCRIPTION OF COMMUNITY INVOLVEMENT

The Southern New Hampshire Planning Commission’s proven systematic approach to public outreach and involvement is described below:

- Hold two (2) public workshops (one per target municipality) during the site identification process to inform communities of the program, teach individuals how to nominate sites, and address any public concerns. SNHPC understands the limits of public gathering due to the COVID-19 pandemic. SNHPC has the capacity to conduct virtual meetings, following both New Hampshire and Federal guidelines.
- Meet directly with municipal staff of Target Communities in order to discuss the Brownfields Program, better understand sites located in the community, strategize on how the Brownfields Program can facilitate both economic development and environmental protection, and discuss prioritization of sites.
- Solicit additional site nominations from municipal officials throughout the region.
- Hold two (2) public meetings (one per target municipality) during the Phase II Assessment process for each of the sites near the completion of the Phase II Investigation to inform the public and other stakeholders of the findings of work conducted to date, to make the public aware of identified contamination and risks associated with the contamination, to define the additional activities remaining on each project, and to discuss the redevelopment if a developer is on board.
- Utilize SNHPC and local municipalities social media platforms, local news outlets such as Manchester InkLink, Union Leader, and Derry News for both online and print media outreach.
- Engage area developers to provide program progress updates and present the communitywide inventory to stimulate redevelopment interest in sites.
- Post legal notices in the Manchester Union Leader newspaper and SNHPC website.
- Convey project progress conveyed through the SNHPC website, press releases, and reports to SNHPC Commissioners and participating municipalities.
- Post information on municipal websites and have reports available for review by residents in order to indicate receipt of funds, solicit public comment on our proposed work plan, notify stakeholders of the meeting/forums, and make public other important events.
Southern New Hampshire Planning Commission (SNHPC) Proposal for FY22 Community-Wide Brownfields Assessment Grant

Attachment iv.

Statement on Contractors

Southern New Hampshire Planning Commission (SNHPC) has not yet procured a contractor/subrecipient for this project.
Southern New Hampshire Planning Commission (SNHPC) Proposal for FY22 Community-Wide Brownfields Assessment Grant

Attachment v.

Documentation of Available Balance

Southern New Hampshire Planning Commission (SNHPC) does not have an active EPA Brownfields Assessment Grant.