Re: Montachusett Regional Planning Commission
FY 2022 Brownfields Assessment Grant Application

Dear Mr. Gardner:

Please find attached the Montachusett Regional Planning Commission’s (MRPC) request for Hazardous Substance and/or Petroleum grant funding under the U.S. Environmental Protection Agency’s Brownfields Assessment Grants Program. The total request of $500,000 includes the expenditure on Hazardous Substances and/or Petroleum funding for the completion of Phase I and Phase II Environmental Site Assessments, and Reuse Planning over three program years.

The MRPC Region is comprised of 22 cities and towns in north central Massachusetts, about 40-75 miles west northwest of Boston. Funding to facilitate the redevelopment of the Region’s known 195 hazardous sites offer an immense opportunity to support regional economic revitalization efforts. Assessment activities will target the Route 2 Corridor, an area within the Region which has been especially hard hit by job loss, crime, and poverty. Properties within the Region not in the Route 2 Corridor will also be considered for assessment.

1. Applicant Identification: Montachusett Regional Planning Commission,
   464 Abbott Avenue, Leominster, MA 01453

2. Funding Requested:
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested:
      i. $500,000
      ii. NOT requesting a Site-specific Assessment Grant waiver of the $200,000 limit.

3. Location: The Montachusett Region consists of 22 municipalities:
   a. Ayer, Groton, Shirley, and Townsend
   b. Middlesex County
   c. Massachusetts
      b. Worcester County
c. Massachusetts

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

Route 2 Corridor Target Area: Athol, Ayer, Clinton, Fitchburg, Gardner, Leominster, Shirley, and Winchendon.


This is a Community-wide proposal.

5. **Contacts:**
   a. **Project Director:** Karen Chapman, Planning and Development Director
      Phone: 978-345-7376, Ext. 320
      Email: kchapman@mrpc.org
      Mailing Address: Montachusett Regional Planning Commission
      464 Abbott Avenue, Leominster, MA 01453
   
   b. **Chief Executive:** Glenn P. Eaton, Executive Director
      Phone: 978-345-7376, Ext. 310
      Email: geaton@mrpc.org
      Mailing Address: Montachusett Regional Planning Commission
      464 Abbott Avenue, Leominster, MA 01453

6. **Population:**
   a. The total population of the Montachusett Region is 244,481 (2015-2019 ACS 5-Year Estimates)
   
   b. The Route 2 Corridor Target Area total population is 155,146 (2015-2019 ACS 5-Year Estimates)
      Athol=11,713   Ayer=8,106   Clinton=13,935   Fitchburg=40,702
      Gardner=20,610   Leominster=41,606   Shirley=7,633   Winchendon=10,841

7. **Other Factors Checklist:**
   Items that apply to this proposed project are listed below. All remaining Other Factors are not applicable to this proposal.

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less</td>
<td>1</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
</tbody>
</table>

8. **Letter from the State or Tribal Environmental Authority.** Please see attached letter from the Massachusetts Department of Environmental Protection acknowledging that the applicant plans to conduct assessment activities and is planning to apply for FY22 federal brownfields grant funds.

9. **Releasing Copies of Applications:** not applicable

Should you require further information, please do not hesitate to contact either Karen Chapman or myself (contact information above in #5.).
Glenn Eaton

Executive Director
November 9, 2021

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

RE: STATE LETTER OF ACKNOWLEDGMENT
Montachusett Regional Planning Commission, Application for EPA Assessment Grant Funds

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Montachusett Regional Planning Commission (MRPC) under the Fiscal Year 2022 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. MRPC has been successful in utilizing past EPA funding to facilitate the eventual construction of affordable housing units, new municipal facilities, and the creation of new jobs. Together with funding from the Federal Department of Commerce, Economic Development Administration, FY22 funding from EPA will help MRPC promote economic development by providing technical assistance to member communities and to seek and obtain federal and state grant funds for planning and construction projects and to promote brownfields redevelopment.

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

We greatly appreciate EPA’s continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Elizabeth Callahan
Acting Assistant Commissioner, Bureau of Waste Site Cleanup

cc: Karen Chapman, MRPC
    Amy Sullivan, MassDEP Central Regional Office
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

The region covered by the Montachusett Regional Planning Commission (MRPC), located in north central Massachusetts, consists of 22 communities, and is situated in a rural setting with urban cores first developed during the industrial revolution dating back to the 1790s, absorbing people from the rural areas as the workforce in the factories in the urban cores. The region is birthplace to John Chapman, known as Johnny Appleseed, an American pioneer who planted apple trees throughout the country. While he became an American Legend, his birthplace became a liability laden with an industrial legacy of waste.

The region has witnessed the widespread decommissioning of local mills and employment centers, jobs being outsourced overseas, businesses migrating to areas with improved transportation infrastructure and housing, and the closing of several small and medium sized businesses because of the COVID-19 pandemic. Contaminated skeletons of our industrial past, as well as abandoned businesses of all types were left behind in the wake of these changes along with scarce remaining living wage employment prospects, an aging population with low-incomes, and a severely limited tax base from which local communities can invest into their public resources.

The social determinants of health include the impacts of the built environment on the population and have included contamination of structures and land, degradation of neighborhoods, urban blight, and economic distress. These factors coupled with poverty, food deserts, and rising housing costs result in a degradation of the quality of life of the population in the region. Communities are littered with abandoned buildings, boarded up windows, chain-link fences with barbed wire, and properties with illegal dumping. Many of these sites are former mill buildings with peeling lead-based paint, sheets of asbestos insulation draping from the ceilings and walls, soil laden with metals and the industrial residues of cancer-causing chemicals, groundwater unsafe to drink, and potential chlorinated vapors lurking beneath the building footprints. Today our member communities are struggling to attract new businesses and residents to the downtown areas due to the poor housing stock left in the shadows of the industrial past and the inaccessibility to the area despite our location 45-75 miles west northwest of Boston.

The area hit the hardest within the Montachusett Region is the “Route 2 Corridor Target Area” which includes the eight communities of Athol, Ayer, Clinton, Fitchburg, Gardner, Leominster, Shirley, and Winchendon (both Ayer and Shirley have a population under 10,000 residents). Not only are many Brownfields located in the Route 2 Corridor Target Area, but per capita income, unemployment, and poverty are an issue within each individual community, as well as containing Environmental Justice Populations. The Route 2 Corridor is fighting to redevelop its industrial legacy into incubators for new business and makerspaces, affordable workforce housing, green tourism, and business expansion, but the battle is waning. Assessing and cleaning up these former industrial properties will provide opportunities for the development of affordable housing, and small business opportunities for the rural areas and the underserved low-income populations struggling to survive in a pandemic world of high housing costs and food insecurity.

ii. Description of the Priority Brownfield Site(s)

Parts of the Region were incorporated as early as 1653. Dominant industries were furniture fabrication, papermaking, metals and instrument production, packaging, shoe manufacture,
cleaners, and plastics which continued into the 20th Century. Few of these industries remain in the Target Area or the Region, for example, only one furniture manufacturer remains in the Region where once there were 65. The Route 2 Corridor Target Area was historically the most densely industrialized area in the Region due to its proximity to the Nashua River to the east and the Millers River to the west. Nine of Fitchburg’s major mill sites are located within this Corridor with surrounding residential areas. The industries of the past have contaminated properties with PCBs, dioxins, and chlorinated VOCs. Brownfields sites have degraded waterways and lead to a blighted industrial landscape with both real and perceived contamination. A very real human health risk exists for current residents and sensitive populations along with the stigma of environmental issues scaring off new investment, potential residents, and redevelopment.

MRPC’s database inventory and GIS mapping of potential Brownfields sites in the Region, originated from the 2,085 “Waste Site & Reportable Releases” sites listed by the MA Executive Office of Energy & Environmental Affairs1. Of these listed sites, 1,862 are minor in nature or closed with or without restrictions. This leaves 195 sites in the Region which are listed by Massachusetts Department of Environmental Protection (MassDEP) and meet EPA’s definition of a “Brownfield” (impacted by either hazardous materials and/or petroleum). Within the Target Area, there are over 158 or 81% of the Region’s brownfields sites. The brownfields sites range from small dry cleaners to large abandoned industrial mill complexes in the tens of acres in size. The majority are located over productive aquifers, many of which serve as the primary water supplies for residents. Further posing risk, in a sample of 89 Brownfield sites within the Target Area, 14 (16%) are located within high risk (AE) FEMA-designated flood zone areas.

b. Revitalization of the Target Area
   i. Reuse Strategy and Alignment with Revitalization Plans

Our Brownfields assessment project under this grant will continue the success of our past grants to support assessment/redevelopment activities focusing on Phase I and Phase II ESAs within the Route 2 Corridor Target Area and some reuse planning. Numerous sites need Phase IIs to facilitate development. If a potential brownfields project is identified in any of MRPC’s 22-member communities, assessment activities will be considered on a “community-wide” basis to protect the environment, eliminate blight, and reduce urban sprawl, thereby protecting green space. The goals of this Brownfields project fit well into multiple recently completed Regional/Master Plans Encompassing the Montachusett Region drafted by MRPC as well as numerous local community plans (e.g.: Open Space Plans, Master Plans, Urban Renewal Plans, Community Development Plans, etc.). These plans have had significant community participation/input. Plans include visions, goals, objectives, recommendations and implementation:

**Wachusett Corridor Smart Growth Plan:** The Smart Growth Plan, funded by the U.S. Dept. of Housing and Urban Development (HUD), was completed by MRPC in October 2014 and recommended “Proactively Work to Foster Redevelopment of Brownfields within the Wachusett Corridor, identify status of remediation, secure federal funding for assessment and further remediation as appropriate under the U.S. EPA’s Brownfields Program”. By-implementing this recommendation, MRPC will provide a catalyst to jump start reinvestment and redevelopment needed in this area. **Devens Economic Impact Report:** MRPC received a grant facilitated by the City of Leominster and funded through the Massachusetts Executive Office of Housing and Economic Development (EOHED) to analyze and report on the Economic Impact of Devens on the Montachusett Region. Included in Next Steps on page 122, it is quoted that the Region must

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1 [https://eeaonline.eea.state.ma.us/Portal/#!/search/wastesite](https://eeaonline.eea.state.ma.us/Portal/#!/search/wastesite)
“Proactively work to foster the redevelopment of brownfields to eventually allow remediation to take place, redevelopment to occur, and generate new tax revenue”. **2019 Montachusett Region Comprehensive Economic Development Strategy (CEDS):** Funded by the Federal Economic Development Administration (EDA) and updated in 2019, the CEDS plan promotes and enhances economic development and job creation and captures MRPC’s vision for revitalization: “Brownfields must be redeveloped in order to: Eliminate environmental hazards from our air, soils and water, mitigate or eliminate environmental injustices, produce public benefits for communities such as new housing, jobs and open spaces, support smart growth and sustainable development initiatives”.

### ii. Outcomes and Benefits of Reuse Strategy

MRPC has evaluated equitable development, sustainable practices, and environmental justice approaches and how our Brownfields Grant will help foster them. In fact, the foundation of the regional plans noted above are based upon these principles. Many of MRPC’s towns and cities have recently included renewable energy into their town bylaws. 20 of our 22 communities are designated Green Communities\(^2\) and follow the Massachusetts Stretch Code, which emphasizes energy performance, as opposed to prescriptive requirements, and is designed to result in cost-effective construction that is more energy efficient than that built to the "base" energy code.

It should be noted that each of the eight communities within the Route 2 Corridor Target Area contain areas of Environmental Justice Populations that would reap the benefits that a Brownfields Grant would have to offer in terms of economic, health, and environmental improvements. In remediating and redeveloping the large number of contaminated sites along the Route 2 Corridor, the creation of new public-private partnerships will develop which simultaneously work to support local business activity and provide added value and resources to the community as a whole.

### c. Strategy for Leveraging Resources

#### i. Resources Needed for Site Reuse

Massachusetts offers several funding programs which can be used to help assess, remediate, and redevelop brownfield sites: The Massachusetts Brownfield Program is offered by the MassDEP and provides technical assistance and financial incentives for cleanup and redevelopment of contaminated properties. Mass Development, the state’s economic development and finance agency, offers grant money through its Brownfields Redevelopment Fund. Available funding includes up to $100,000 for site assessment, $500,000 for remediation, and up to $2 million for remediation and site assessment for projects designated as “Priority Projects” by the agency. MRPC will continue working closely with communities to identify and apply for these and other available funding programs. Private investment opportunities will also be pursued through advertising of brownfield sites ready for redevelopment along with any associated incentive programs – e.g. the Brownfields Tax Credit Program offered by the Massachusetts Department of Revenue or the Brownfields Redevelopment Access to Capital (BRAC) Program – that may help facilitate site reuse with environmental insurance subsidies.

#### ii. Use of Existing Infrastructure

Those areas that are planned to be redeveloped will ensure access to transportation by targeting redevelopment near job centers where existing infrastructure is available. Making brownfields sites available for redevelopment in areas with existing infrastructure will increase the economic competitiveness of the Region’s urban centers. The following redevelopments are examples of the use of existing infrastructure and the potential benefits this Project can bring into the Region:

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\(^2\) [https://www.mass.gov/orgs/green-communities-division](https://www.mass.gov/orgs/green-communities-division)
Wachusett Station: The Montachusett Area Regional Transit (MART) estimates as many as 2,580 new jobs could eventually be generated in the vicinity of this new station and layover areas. An Assessment Grant would present a coordinated approach by taking advantage of the existing new station and greatly assist this job creation effort. Power Plant Site, Fitchburg: Fitchburg has a large Brownfield site which includes a demolished Power Plant. Utilizing this downtown property will allow for the use of existing subsurface infrastructure, thereby reducing the need for new sewer, water, and communication lines on a “green/undeveloped property”. Former Apple Orchard Site, Shirley: The 13-acre parcel is unavailable for development due to contamination. Adjacent to the site is successful redevelopment activity at an abandoned airport. Unfortunately, the Town has limited development-ready parcels at this time, as it struggles with a residential tax burden making it difficult for residents to maintain municipal services, including education.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
   a. Community Need
      i. The Community’s Need for Funding
      MRPC utilizes a variety of local, state, and federal resources to maintain highly capable and professional staff members to perform regional planning activities over a large geographic area. In the past, MRPC has administered seven successful EPA Brownfields programs. MRPC is frequently approached for assessment funding by our communities. Additionally, member communities rely heavily on residential tax bases and struggle with operating budgets to cover the costs of basic municipal functions like education, public safety, and day to day operations. The Region also has disproportionately high unemployment, declining manufacturing, and increasingly high housing costs; affecting the ability of communities to generate sufficient tax revenue, impacting fiscal conditions throughout the Region. Redevelopment dollars for underutilized properties continue to be scarce and financing is difficult to secure due to concerns over potential environmental liabilities.
      At this time the poverty rate for the communities in the Target Area is 12%, compared to the State which is 9.4%. Seven of the eight Target Area communities have a lower median household income when compared to the state ($81,215), particularly Gardner ($49,679), Athol ($54,142), Fitchburg ($57,207) and Leominster ($61,825).
      ii. Threats to Sensitive Populations
         (1) Health or Welfare of Sensitive Populations
         The disproportionately high number of potential brownfields sites in the Target Area (158) and the Region as a whole (195) has a direct negative effect on the welfare of the Region’s population. By adding blight, property vacancy, community disinvestment, burden on municipal services and a reduced tax base; Brownfields contribute to high unemployment rates, poverty, and erosion of home values among other ills. The low-income and unemployed residents need safe, non-contaminated affordable housing and access to employment opportunities. Most Brownfields are clustered in the urban areas of the Region and these urban areas tend to have higher densities and significantly higher sensitive populations (low income, minorities, elderly, children, and women of child-bearing age) than surrounding areas. These residents are disproportionately impacted by brownfields and associated environmental problems. Data for

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3 U.S. Census Bureau; American Community Survey, 2015-2019 5-Year Estimates, Table S1701
4 U.S. Census Bureau; American Community Survey, 2015-2019 5-Year Estimates, Table S1901;
sensitive populations in our target areas are highlighted below with data obtained from EPA’s EJSCREEN Tool.

**Low Income:** According to the EPA Tool, areas of Leominster and Fitchburg are above the 90th percentile for low-income at 92\textsuperscript{nd} percentile and 91\textsuperscript{st} percentile respectively. Other communities in the Target Area are Athol at the 83\textsuperscript{rd} percentile, and Winchendon and Gardner both at the 79\textsuperscript{th} percentile. **Children:** Seven of the eight Target Area communities have percentiles greater than 87\% for children under five (5) years old in areas of their communities. **Disability:** 12.6\% of households in Massachusetts include one or more person with a disability. Of the eight Target Area communities, five (5) exceed this figure. **Education:** According to the EPA Tool, seven of the eight Target Area communities’ EJ populations exceed the 72\textsuperscript{nd} percentile of residents 25 years or older without a high school diploma; with Fitchburg and Leominster at 95\textsuperscript{th} percentile and 91\textsuperscript{st} percentile respectively. **Elderly:** The elderly population (those 65 years of age or older) in Massachusetts is 16.2\%. A higher proportion is found in MRPC’s member communities including Athol (17.1\%) Petersham (25.4\%) and Royalston (22.8\%).

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

The 2021 Heywood Hospital and 2021 Health Alliance Hospital Health Needs Assessments completed recently by MRPC further support the threats to health and safety facing these sensitive populations who live within the Target Area:

**Asthma:** According to the Massachusetts Bureau of Community Health and Prevention, Massachusetts has one of the highest rates of asthma in the United States. In 2017, 10.5\% of individuals in the state report currently having asthma compared to 8.2\% nationally. 12.9\% of Massachusetts children, and 10.2\% of adults are reported to be suffering from asthma as of 2017.\textsuperscript{7} In the Montachusett Region, asthma numbers are comparable with the state data; however, those between the ages of 25 and 34 are reporting higher prevalence of asthma (19.9\% vs 18.5\%). **Breast Cancer:** In 2017, the age-adjusted breast cancer mortality rate per 100,000 women in Massachusetts was 13.94. In the city of Gardner, the rate was 29.1, and in Ashburnham, this rate was 63.7. **Cancer:** In 2017, the cancer mortality rate in Massachusetts was 201.46 per 100,000. Communities in the Target Area had significantly higher rates (Gardner [213.5], Athol [307.4] Ashburnham [334.3] and Winchendon [249.1]). **Lung Cancer:** In 2017, Massachusetts had an age-adjusted lung cancer mortality rate of 47.87 per 100,000. The town of Athol’s rate was over double of the state average, at 102.5. Other communities that were higher than the state average included Lunenburg (87.7), Gardner (66.52), Winchendon (73.8), and Ashby (124.2).

**Overall Mortality Rate:** The Mortality Rate is defined as the number of deaths per 100,000 people per year. In 2017, the age-adjusted mortality rate in Massachusetts was just 675.7 per 100,000. Athol had a higher overall mortality rate (888.5). Winchendon (826.0) and Gardner (938.9) also had abnormally high rates when compared to the state in its entirety. **Premature Mortality Rate:** Premature mortality is defined as deaths occurring before the age of 75. The premature mortality rate (PMR) is the number of premature deaths per 100,000. In 2017, the age adjusted PMR in Massachusetts was 282.6 per 100,000. In Athol, the age adjusted PMR was twice as high with an astounding 404.4 premature deaths per 100,000. Gardner’s rate was even higher (487.8 per 100,000). **Heart Disease:** In 2017, the heart disease mortality rate in Massachusetts was 176.5

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\textsuperscript{5} https://ejscreen.epa.gov/mapper/
\textsuperscript{6} U.S. Census Bureau; American Community Survey, 2015-2019 5-Year Estimates, Table DP05
\textsuperscript{7} https://www.mass.gov/service-details/statistics-about-asthma
\textsuperscript{8} All mortality rates are from MA Department of Public Health, 2017 Death Report.
deaths per 100,000. This rate is significantly higher in some communities, such as Gardner, with a rate of 300.8, Athol at 256.1, and Templeton at 282.9.

(3) **Promoting Environmental Justice**

MRPC and the Montachusett Brownfields Group (MBG) will prioritize the EJ population zones in evaluating properties for potential assessments. Efforts will be made to include the people in the EJ zones as much as possible in the process. **EJ Populations:** According to the EPA’s EJSCREEN tool, there are 72 identified Environmental Justice (EJ) Populations within the eight Target Area communities representing 97,161 residents (approximately 63% of total residents). All 72 EJ areas are located within one mile of a Brownfield site. Collectively, EJ areas represent populations with high minority (M), non-English speaking (E) and/or low-income (I) populations. 64 of the EJ areas along the Corridor have low-income designation: 23 are EJ-designated due to income alone (I), 40 also have high minority populations (MI), and one EJ area is due to high numbers of minority, non-English speaking as well as low-income residents (MIE). The additional 8 areas received EJ designation are due to a high proportion of minority residents (M); these are predominantly located in Fitchburg (3) and Leominster (4), along the Corridor.

**b. Community Engagement**

i. **Project Involvement**

The Montachusett Brownfields Group (MBG) will meet quarterly and be responsible for engaging the region to create a successful Brownfields Program to increase public participation through online tools, web capability and social media (with the assistance of the QEP firm). At each of these meetings, the status/progress of the program will be stated verbally and in writing, contributing to the communication of progress.

The MBG is made up of members of each of MRPC’s 22 communities, local government officials, lenders, lawyers, private and public-sector funding entities, realtors, developers, community-based organizations, regional planners, economic developers, and the community. These primary stakeholders strategically make up a diverse partnership that will provide outreach to our Region, have the capabilities of overseeing assessment activities, and facilitate the leveraging of additional resources to ensure sites are redeveloped sustainably. Since the focus of this assessment grant is the Route 2 Corridor, the MBG representatives from Athol, Ayer, Clinton, Fitchburg, Gardner, Leominster, Shirley, and Winchendon as well as others will be heavily involved. All public notices of meetings, hearings and the availability of funding will be posted in town halls, libraries, municipal websites, local cable access programming, along with the MBG’s website.

ii. **Project Roles**

<table>
<thead>
<tr>
<th>Name of Organization/Entity/Group</th>
<th>Point of Contact (name, email &amp; phone)</th>
<th>Specific Involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montachusett Brownfields Group (MBG)</td>
<td>Karen Chapman, <a href="mailto:kchapman@mrpc.org">kchapman@mrpc.org</a>, (978)798-6168</td>
<td>provide outreach to Region, oversee assessment activities, facilitate leveraging resources to ensure sites are</td>
</tr>
</tbody>
</table>
iii. **Incorporating Community Input**

MRPC will communicate the progress of the project through the community engagement process described above/below including updates on a quarterly (3 month) basis to the MBG, CNC, online tools, web capability and social media. **MRPC/MBG Website:** MRPC Brownfields contains postings for public meetings, meeting minutes, project updates, and reports, which will be regularly updated. **Information Repository:** MRPC’s handicap-accessible office serves as the location for hard copies of all program-related documents for review by the public. **Public Meetings:** Public meetings will be held during and after the project selection process for each site. *We anticipate up to 10 meetings during this grant cycle.* Meetings will be held outside of normal working hours to increase attendance. Public meeting announcements and project updates will be broadcast through our Facebook, Twitter and LinkedIn accounts. **Print Newsletters:** MRPC and target municipalities will utilize their print and email newsletters to promote the program and provide regular project updates. *We anticipate 6-9 Newsletters over the grant.* **Newspaper Releases:** Announcement of grant funding and public meetings will be publicized extensively in local and state-wide newspapers. *We anticipate 6 releases.* **Flyers:** MRPC will distribute flyers at municipal offices, chambers of commerce, and other high foot traffic locations, as well as to neighbors of project sites. *We anticipate 2 flyers.* **Brochure:** MRPC has developed a general brownfields brochure to promote the program and will distribute to communities (also in translation as needed). **Email:** MRPC will announce and promote the program, solicit input, advertise meetings, and disseminate outcomes through Microsoft Outlook email services. **Social Media:** MRPC will utilize Facebook and Twitter to promote the availability of Brownfields Assessment Grant monies and successful brownfields redevelopment.

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

A total of **$445,795** will be designated for the completion of 20 Phase Is and 13 Phase IIs and potential reuse planning. MRPC will use a portion of the $500,000 grant award for costs related to personnel, travel, supplies, and contractual:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Contact Person</th>
<th>Contact Information</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Millers River Watershed Council</td>
<td>Ivan Usach</td>
<td><a href="mailto:ivan@millersriver.net">ivan@millersriver.net</a> (978)248-9491</td>
<td>redeveloped sustainably.</td>
</tr>
<tr>
<td>Nashua River Watershed Association</td>
<td>Elizabeth Ainsley Campbell</td>
<td><a href="mailto:EAC@nashuariverwatershed.org">EAC@nashuariverwatershed.org</a> (978)448-0299</td>
<td>results from its water monitoring programs</td>
</tr>
<tr>
<td>North Central Mass Workforce Investment Board (NCWIB)</td>
<td>Jeffrey Roberge</td>
<td><a href="mailto:jroberge@masshirenorthcentralwb.com">jroberge@masshirenorthcentralwb.com</a> (978)534-1023</td>
<td>Provide employment and business info</td>
</tr>
<tr>
<td>NewVue Communities</td>
<td>Marc Dohan</td>
<td><a href="mailto:mdohan@nvcomm.org">mdohan@nvcomm.org</a> (978)342-9561</td>
<td>Attend MBG mtgs, technical assistance w/ redevelopment</td>
</tr>
<tr>
<td>QEP</td>
<td>TBD after procurement</td>
<td>Outreach, Assessments, Reports</td>
<td></td>
</tr>
</tbody>
</table>
### Description of Tasks/Activities and Outputs

#### 1. Task/Activity: Cooperative Agreement Oversight and Administration

<table>
<thead>
<tr>
<th>i. Project Implementation</th>
<th>Submit signed contract documents, update ACRES as needed, complete all reporting requirements of the agreement, support the MBG, attend conference.</th>
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<tbody>
<tr>
<td>ii. Anticipated Project Schedule</td>
<td>Throughout grant period</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>MRPC Project Manager</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>12 quarterly reports, contract documents, notices of meetings, minutes of meetings, attendance at 2 conferences</td>
</tr>
</tbody>
</table>

#### 2. Task/Activity: Procuring a Qualified Environmental Professional

<table>
<thead>
<tr>
<th>iii. Project Implementation</th>
<th>Obtain a qualified QEP via proper procurement process.</th>
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<tbody>
<tr>
<td>iv. Anticipated Project Schedule</td>
<td>Completed by end of 1st quarter. MRPC to perform procurement without EPA funding, contributing in-kind salary dollars</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>MRPC Project Manager</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>Successful contract with QEP</td>
</tr>
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#### 3. Task/Activity: Community Outreach

<table>
<thead>
<tr>
<th>v. Project Implementation</th>
<th>Assist QEP w/ outreach to communities, notify organizations of Grant and funding availability</th>
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<tbody>
<tr>
<td>vi. Anticipated Project Schedule</td>
<td>Throughout grant period</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>MRPC Project Manager</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>Flyers, brochures, emails, articles via print, website, social media</td>
</tr>
</tbody>
</table>

#### 4. Task/Activity: Identify and Prioritize Potential Sites

<table>
<thead>
<tr>
<th>vii. Project Implementation</th>
<th>Identify potential brownfield sites to create an inventory of properties to perform assessments or reuse planning for</th>
</tr>
</thead>
<tbody>
<tr>
<td>viii. Anticipated Project Schedule</td>
<td>End of 3rd quarter</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>QEP with MRPC assistance</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>Inventory of properties for assessment or reuse planning</td>
</tr>
</tbody>
</table>

#### 5. Task/Activity: Phase I ESAs

<table>
<thead>
<tr>
<th>ix. Project Implementation</th>
<th>Complete Phase I Assessments on 15 properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>x. Anticipated Project Schedule</td>
<td>Throughout grant period</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>QEP</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>20 Phase I ESAs</td>
</tr>
</tbody>
</table>

#### 6. Task/Activity: Phase II ESA

<table>
<thead>
<tr>
<th>xi. Project Implementation</th>
<th>Complete Phase II Subsurface Investigations on 12 properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>xii. Anticipated Project Schedule</td>
<td>Throughout grant period</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>QEP</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>13 Phase II ESAs</td>
</tr>
</tbody>
</table>
7. Task/Activity: Remedial/Reuse Planning/Plans

<table>
<thead>
<tr>
<th>iii. Project Implementation</th>
<th>Complete planning/plans for two-four properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>iv. Anticipated Project Schedule</td>
<td>Throughout grant period</td>
</tr>
<tr>
<td>iii. Task/Activity Lead</td>
<td>QEP with assistance from MRPC</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>2-4 Reuse Plans</td>
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</table>

b. Cost Estimates

<table>
<thead>
<tr>
<th>Task</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
<th>Task 4</th>
<th>Task 5</th>
<th>Task 6</th>
<th>Task 7</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$18,650</td>
<td>0</td>
<td>$6,210</td>
<td>$6,210</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$31,070</td>
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<tr>
<td>Fringe Benefits</td>
<td>$10,258</td>
<td>0</td>
<td>$3,416</td>
<td>$3,415</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$17,089</td>
</tr>
<tr>
<td>Travel</td>
<td>$5,200</td>
<td>0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
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<td>$5,200</td>
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<tr>
<td>Equipment</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Supplies</td>
<td>$846</td>
<td>0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
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<td>$846</td>
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<tr>
<td>Contractual</td>
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<td>$80,000</td>
<td>$325,000</td>
<td>$15,000</td>
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<tr>
<td>Other</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>$36,454</td>
<td>0</td>
<td>$15,921</td>
<td>$27,625</td>
<td>$80,000</td>
<td>$325,000</td>
<td>$15,000</td>
<td>$500,000</td>
</tr>
<tr>
<td>Direct Costs</td>
<td>$26,196</td>
<td>0</td>
<td>$12,505</td>
<td>$24,210</td>
<td>$80,000</td>
<td>$325,000</td>
<td>$15,000</td>
<td>$482,911</td>
</tr>
<tr>
<td>Indirect Costs</td>
<td>$10,258</td>
<td>0</td>
<td>$3,416</td>
<td>$3,415</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>$17,089</td>
</tr>
<tr>
<td>Total Budget</td>
<td>$36,454</td>
<td>0</td>
<td>$15,921</td>
<td>$27,625</td>
<td>$80,000</td>
<td>$325,000</td>
<td>$15,000</td>
<td>$500,000</td>
</tr>
</tbody>
</table>

c. Measuring Environmental Results

Using QEP Assessments and Reports, as well as MBG meeting minutes and public input, all properties will be tracked in an excel spreadsheet to ensure we are on track to perform the tasks and assessments.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity

Since 1968, MRPC has administered state and federal grants of varying sizes and complexity.

ii. Organizational Structure

MRPC has an Executive Director who oversees the Planning & Development and Fiscal Directors. The Fiscal Director provides quarterly or monthly expenditure reports to the Planning & Development Director to ensure all contracts are being spent according to the contract.

iii. Description of Key Staff

With over 19 years of planning experience, Karen Chapman, Planning and Development Director, is MRPC’s Brownfields Project Manager, supervises MRPC’s planning and development staff and is supported by Glenn Eaton, Executive Director (33 years of experience). Ms. Chapman is new to the position but has assisted Mr. Hume the former Brownfield’s Project Manager with award tasks and attended the National Brownfields Conference in 2017. Mr. Eaton successfully managed MRPC’s 2001 and 2004 Brownfields Programs. MRPC’s policy is to involve other staff in various Brownfields related responsibilities (ACRES, Quarterly Reports, Consultant Oversight, etc.) adding resiliency should employee turnover occur.
iv. **Acquiring Additional Resources**
MRPC has a proven procurement process already in place that has been utilized for more than two decades on six previous EPA Brownfields grants and will hire a QEP firm within the first quarter. Procurement includes preparation and distribution of an RFP in Massachusetts Secretary of State’s “Goods and Services Bulletin”; ranking of the proposals by MRPC staff and MBG; interviews with a “short list” of QEP firms; and a recommendation to MRPC Commission Members who will vote to hire the QEP. All proposal submittals, evaluations and contracts shall conform to the Federal Uniform Procurement Act and Mass General Laws, Chapter 30B (MGL, Ch. 30B). MRPC will utilize our outside legal counsel for access agreements, as needed. This task will be completed with in-kind salary and not this Brownfields grant funds.

b. **Past Performance and Accomplishments**

i. **Currently Has or Previously Received an EPA Brownfields Grant**

(1) **Accomplishments**
Significant accomplishments have been made on properties assessed by MRPC’s Brownfields Program (all have been reported in ACRES). MRPC also gained national recognition by winning the “Best Community Redevelopment Project” award for a presentation at the National Brownfields Conference April 2011. Select redevelopments below include:

**Assessment activities supported:** construction of a public library/60 parking spaces in Gardner; supported the design/construction of a solar project in Lancaster; development of a rail trail to connect the Region’s population; creation of Pond Street in downtown Gardner opening up new areas for redevelopment opportunities in the Central Business District; creation of two single-family affordable housing units in Fitchburg leveraging no cost labor through the Montachusett Enterprise Center, Inc; redevelopment of a school into senior housing in Athol; construction of three single-family affordable housing units in Gardner (units are fully occupied and generating tax revenue); redevelopment of a former gas station into a public park in Athol; cleanup at Coolidge Park in Fitchburg expanding recreational opportunities to lower income residents at one of the City’s most heavily used parks.

**RLF loan supported:** Cleanup and redevelopment at an industrial site on Stone Street in Clinton creating more than a dozen jobs and renewed tax revenue. MRPC Commissioners recently voted a new RLF Policy whereby MRPC can relend EPA Program Income funds.

(2) **Compliance with Grant Requirements**
MRPC has always been compliant with the workplan, schedule, and terms of conditions. MRPC is compliant with updating ACRES and the submission of EPA quarterly reports with two exceptions of the Site Assessment and BCRLF quarterly reports (closed in June 2008 and current 2019 Assessment Grant). Procedures were implemented in 2009 to ensure future quarterly reports were submitted on time and MRPC was compliant until the current grant. COVID-19 affected all aspects of MRPC’s operations and losses in personnel exacerbated the efforts to comply with the quarterly report deadlines. New personnel are being trained by the Executive Director on requirements of the grant award. MRPC has not been the subject of any adverse findings from an OMB Circular A-133, an audit conducted by a Federal, State, Tribal, or Local Government inspector, or audits conducted by the U.S. General Accounting Office. MRPC has not been required to comply with special “high risk” terms and conditions under agency regulations implementing OMB Circular A-102.
1. **Applicant Eligibility**
The Montachusett Regional Planning Commission (MRPC) is a regional government body. It was created in 1968 in accordance with Massachusetts General Law Chapter 40B, Section 3 (MGL Ch. 40B, Sec. 3). According to MRPC’s General Counsel, the MRPC is a unit of regional government created in accordance within the laws of the Commonwealth of Massachusetts. (In the past, the MRPC proved to the EPA that it was an eligible grant recipient and to date has been awarded six Site Assessment grants and one RLF Cleanup grant.)

2. **Community Involvement**
Over the last twenty-one years, MRPC has reached out to neighborhood organizations, citizens’ groups, the private sector, and important stakeholders to participate in the Montachusett Brownfields Group (MBG, staffed by MRPC) and learn about the EPA’s Brownfields program, and nominate Brownfields sites for assessment. Through the MBG, MRPC staff will be responsible for engaging the community and other stakeholders to create a successful Brownfields Program utilizing 21st century technology to increase public participation in the planning process through online tools, web capability and social media. The MBG is made up of local government officials, lenders, lawyers, private and public-sector funding entities, realtors, developers, community-based organizations, and regional planners and community and economic developers. These individuals and organizations are primary stakeholders strategically made up of a diverse partnership that will provide greater outreach to our Region, have the capabilities of ensuring proper assessment activities are conducted, and facilitate the leveraging of additional resources to ensure sites are assessed, cleaned up and redeveloped sustainably. All public notices of meetings, hearings and the availability of funding will be posted in city and town halls, libraries, municipal websites, local cable access bulletin boards and local access programming, along with the MBG’s website. All meetings will be open to the public.

3. **Named Contractors and Subrecipients:** N/A

4. **Expenditure of Assessment Grant Funds**
Please see attached Automated Standard Proposal for Payments (ASAP) displaying the amount of cooperative agreement funds drawn down by October 1, 2021 qualifying MRPC to apply for additional Assessment Grant funding.