

City of Sanford, Maine - Narrative Information Sheet USEPA FY24 Brownfields Assessment Grant Application

1. Applicant Identification: City of Sanford, 919 Main Street, Sanford, Maine 04073
2. Funding Requested:
 - a. Assessment Grant Type: Community-Wide
 - b. Federal Funds Requested: \$500,000
3. Location: Sanford, York County, Maine.
4. Target Area & Priority Site Information:
 - Target Area: Historic Mill Yard, a 2.5-mile area located along Pioneer Avenue, Emery Street, High Street, River Street, No. 1 Pond, and portions of the Mousam River.
 - Census Tract: 23031030202
 - Priority Sites:
 - 1) International Woolen Mill, Pioneer Ave., Sanford, ME 04073
 - 2) Emery Mill, 72 Emery St., Sanford, ME 04073
 - 3) Wasco Mill, 22 Pioneer Ave., Sanford, ME 04073
5. Contacts:
 - a. Project Director:

Ian Houseal, Director of Community Development
919 Main Street
Sanford, ME 04073
Telephone: (207)-608-4101
Email: iphouseal@sanfordmaine.org
 - b. Chief Executive/Highest Ranking Elected Official:

Steven Buck, City Manager
919 Main Street
Sanford, ME 04073
Telephone: (207)-324-9173
Email: srbuck@sanfordmaine.org
6. Population: 22,266 (Census Estimate 2022)

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7. Other Factors:

Other Factors	Page #
Community Population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory	N/A
The priority brownfield site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy form wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3, 6
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	N/A

8. Letter from the State or Tribal Environmental Authority: See attached.

9. Releasing Copies of Applications: Not applicable.

Attachments: MEDEP Acknowledgement Letter



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

October 11, 2023

City of Sanford
Attn: Ian Houseal
919 Main Street
Sanford, ME 04073

Dear Ian Houseal:

The Maine Department of Environmental Protection (Department) acknowledges that City of Sanford (City) plans to conduct assessments of brownfields sites and is applying for an FY24 Environmental Protection Agency (EPA) Brownfields Assessment Grant.

Ian Houseal of the City has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the City.

If the City receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, quality assurance plans, and health and safety plans. For sites where cleanup is pursued, the Department's Voluntary Response Action Program (VRAP) staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight, as necessary, of their contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 215-8597 should you have any questions regarding this letter.

Sincerely,

Christopher Redmond
Department Brownfields Coordinator
Voluntary Response Action Program Manager
Bureau of Remediation and Waste Management, Division of Remediation
Maine Department of Environmental Protection

cc: Katy Deng, EPA Brownfields Region 1

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

1. PROJECT AREA DESCRIPTION and PLANS FOR REVITALIZATION

1.a.i. Overview of Brownfields Challenges and Description of Target Area: Eligible activities under this grant will be conducted in the City of Sanford, in York County, ME. Sanford is the 8th largest municipality in Maine with a population of 22,266. According to EPA's Cleanups in My Community, there are 112 contaminated sites in York County and 37 are in Sanford; the City contains 33% of the contaminated sites in the county, despite having only 10% of the county's population. The City's textile mills started in the 1860s along the Mousam River and its flood plains, which weave through the Mill Yard and the Downtown. Mill closings, loss of replacement industries, and devastating fires consumed approximately 18,000 sf of industrial and residential space, leaving large crumbling relics of a once prosperous mill town. Additionally, ***widespread loss of traditional manufacturing industries has had a significant impact. Blight and decay persist in the Mill Yard, adjacent inner-city neighborhoods, and Downtown***, directly impacting economic viability and ability to attract and retain businesses and jobs. ***Safe, affordable housing is scarce*** and developers, initially drawn to large, empty mill space, walk away when they see broken windows, crumbling facades, fire-scarred structures, and industrial buildings from an era of hazardous building materials underlain with contaminated soil and groundwater. The Target Area is the contaminated and largely vacant ***Historic Mill Yard*** (a 2.5-mile area along Pioneer Ave, Emery St, High St, River St, and No. 1 Pond). ***With this assessment grant, the City will be able to provide potential redevelopers with information about contamination and cleanup needs, to provide the community with prospects for new businesses, jobs, and upgraded housing.***

1.a.ii. Description of the Priority Brownfield Site(s): ***The Mill Yard's 22 Brownfields sites (per EJScreen) negatively impact Sanford's human, environmental, and economic center, which is home to a significant concentration of low income residents.*** From thriving industry to no man's land, the City's 3 priority sites identified in the ***Mill Yard***, further described below, are relics of its industrial past and adjoin each other along the Mousam River. They were developed as mills starting in late 1880s, and the Mousam River was dammed and diverted to make way for industry. The area was filled with contaminated materials in the 1920s to raise the grade, and the original wooden buildings were rebuilt as massive concrete structures. The last mill operations ceased in early 2000s, leaving crumbling, contaminated behemoths in its wake in the form of the still mostly vacant buildings. Housekeeping practices and environmental regulations were not at today's standards during mill operations and there are numerous reported historical releases of petroleum products and hazardous materials, drums, asbestos, and buried debris have been discovered throughout the target area.

Site 1: International Woolen (IW) occupies 7.2 acres and includes a 90,000 sf, 4-story former mill building, partially collapsed boiler house, 2 outbuildings, and vacant land that formerly hosted 9 buildings. Portions of the site are within a FEMA flood plain. The IW site is owned by a bankrupt, out-of-state entity and is vacant with exception of homeless encampments. 1 of 2 exhaust stacks at the boiler house collapsed in 2008, just missing nearby residences. The 2nd stack was removed above the roofline at the City's expense to prevent another public safety disaster. The boiler house roof is open to the elements and building materials containing asbestos, PCBs, and lead are further deteriorating and impacting the building and outside environment. The buildings are unsecure, exposing the public to contamination, especially the homeless population. Previous investigations indicate soil and groundwater are contaminated with ***volatile organic compounds (VOCs), metals, PAHs, and light nonaqueous phase liquid (LNAPL)***. Further investigation of subsurface conditions, building materials, vapor intrusion, and cleanup planning (cost estimates) is needed to cleanup and redevelop the site. ***It's currently a public safety and environmental hazard*** and is a priority due to the current danger to the homeless population and adjacent residents living in its shadow. Multiple developers have also expressed interest in this site over the past 5 years but walked away due to the unknown environmental costs, which also makes this a priority for assessment and cleanup.

Sites 2 and 3: 72 Emery Mill (Emery Mill) and Wasco Mill (Wasco): The 9.51-acre Emery Mill site includes 2 adjoining multistory former mill buildings (45,000 sf total) has been occupied by various commercial and light industrial uses since the mill closed. Vacant land associated with Emery formerly hosted a mill and several small outbuildings until destroyed by fire in the 1970s and is located within a FEMA flood plain. The 3.53-acre Wasco site includes a 45,000 sf former mill building, currently used for light industrial/commercial workspaces and storage. Previous investigations indicate soil and groundwater at these sites is contaminated with ***VOCs, metals, PAHs, and petroleum. 2 underground storage tanks***

(USTs) are in a vault beneath the roadway between the Emery Mill and Wasco; the USTs appear to be in poor condition, are often underwater due to groundwater encroachment, and may be a ***source of vapor intrusion into surrounding buildings***. The Emery Mill and Wasco buildings have leaking roofs, causing further deterioration of hazardous building materials (asbestos, PCBs, lead). These sites are high priority for assessment to address contamination and potential vapor exposure for future occupants of the buildings, and to allow for additional workspace buildout ***to support the local economy***. The owners of Sites 2 and 3, both small business owners and residents of York County, need the City's and Brownfields funding support to further expand their commercial business operations, because they don't have the extra capital to assess or cleanup the sites on their own, despite their entrepreneurial desires to invest in the Mill Yard.

1.a.iii Identifying Additional Sites: Though there is significant need for funding in the Mill Yard, the City plans to use grant funds for additional sites needing assessment within City limits, whether in the target area or beyond. The City will notify the community of fund availability through the methods detailed in later sections and encourage application for Brownfields funding. The City has already developed an application during prior grants and will update it to include criteria such as site history, redevelopment plans, expected leveraged funds, and whether the site is in an underserved community or disadvantaged census tract. The City will review the applications with a focus on our underserved communities identified in Section 2 below, both in terms of environmental and climate justice. Additional sites may also be identified through the City's land bank, which has a wide reach across the community and focuses on redevelopment of vacant and dangerous sites, often located within disadvantaged areas. The City will update its existing Brownfields inventory list with new sites as they are identified, and review both the Brownfields and land bank lists for prioritization. Priority will be given to sites in underserved communities, with the greatest health hazards, and/or with strong redevelopment interest.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: Sanford is a compact, livable community that is increasingly attractive in the 21st century. The proposed reuse strategy includes redeveloping the priority sites and remainder of the Mill Yard for mixed-use housing and commercial spaces with greenspace along the river. Our vision is to create a hub for both existing disadvantaged City residents and transplants from other communities seeking to live in an attractive redeveloped mill. Most houses and businesses are clustered along Main Street in the Downtown, Mill Yard, and next to the River ***in our Target Area***. Schools are centrally located within bicycling and walking distance of residents of both inner-city neighborhoods and the Mill Yard and are served by sidewalks. The community and residents embrace these qualities and use them to leverage economic development in the Mill Yard. The City built a \$2.5 million road and bike path through the Mill Yard, completed an Area-Wide Plan (AWP) in 2012 for the revitalization of the Mill Yard (funded by EPA's Brownfields AWP Pilot Program), along with a streetscape plan.

The City will focus on the Mill Yard using ***vision for mixed reuse residential/commercial/recreational use*** consistent with the local Comprehensive Plan, ***EPA AWP Action Plan, and community priorities***. The goals of the Comprehensive Plan (2005) include "revitalizing the Sanford Mill Yard," "encouraging development in and near the existing built-up areas of Sanford," "protecting the natural resources with a focus on improving the quality of the Town's surface waters, protecting the groundwater, and preserving important habitats," and "revitalizing the downtown of Sanford as a vibrant, mixed-use district." The Comprehensive Plan remains valid due to the lack of advancement/redevelopment as a result of scarce funding/resources available to support these goals; a Brownfields assessment grant is needed to achieve these community needs. The plans ***reflect livability principles and sustainable practices*** by reusing/enhancing existing development in core of community using smart growth principles. Available City and state resources are dedicated to resolving issues and additional funding is desperately needed to create housing and jobs in empty mills located just next door to residents. Our track record shows we have a sustained commitment to not just clean up Brownfields sites but to ensure redevelopment is consistent with the fabric of the community.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The City is in desperate need of new, safe, affordable housing for low-income, disadvantaged residents as well as commercial uses that create jobs and enhance the tax base and vibrancy of the area; this will be addressed by the proposed project through the creation of new, mixed uses in the mills with residents of mixed backgrounds/incomes, which will stimulate private investment and upgraded housing in nearby inner City neighborhoods. The City also needs jobs to support

these inner City residents and prevent further erosion of the tax base by removing blight; this will be addressed by the proposed project through the renovation/repurposing of the 3 priority sites for new industries/workspaces/jobs. These residents, workers, and visitors will benefit from the proposed greenspace along the river. With the assessment and future cleanup of the contaminated Mill Yard sites using Brownfields grant funds, ***the area will be remediated, the stigma will be eliminated, and will no longer deter economic investment in the Mill Yard, Downtown, and inner-city neighborhoods.***

The proposed greenspace along the Mousam River will provide recreation areas for existing and new residents/families which are severely lacking. There is only one park in the Target Area, Gateway Park, which could not have been created without previous Brownfields assessment/cleanup funding. The proposed greenspace will also provide healthy trees and vegetation that will sequester carbon as a climate mitigation strategy and will be designed in such a way to serve as a climate adaptation/resiliency tool to protect residents and redeveloped properties from more frequent and extreme flooding due to climate change (capture and store floodwaters, limit paved surfaces to ensure stormwater/rainfall infiltration). Redevelopment of the 3 priority sites will include renewable solar energy both from rooftop panels and import of solar power from the recently constructed CGA Solar Site, a contaminated Brownfields site and eyesore that languished for 30 years before it was remediated in 2022 with the City's Multipurpose funds for solar redevelopment. The redevelopment project will include new energy-efficient windows and appliances, new/upgraded lighting and HVAC systems. These renewable/efficient energy efforts will be marketed to attract commerce and residents who want to be in the center of a climate-conscious, green redevelopment.

Outcomes of this new grant will be measured by new economic development in the area and number of new jobs created (Sanford Regional Economic Growth Council), expanded tax base from new businesses (City Tax and Assessors data), and housing including both affordable and market rate (Codes Department). Additional assessment and cleanup planning will help developers see potential for mixed use redevelopment and build on City's successes like the Sanford Mill (discussed below) and soon to be Stenton Trust Mill. We believe ***the Mill Yard will foster broader economic investment in an area where environmental barriers and lack of assessment funding now hinder cleanup and redevelopment.***

1.c.i. Resources Needed for Site Reuse: In August 2022, the City was awarded a ***\$25 million Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant for the Downtown Sanford Village Partnership Initiative Project***, which builds on the previous accomplishments in the target area with new streets, sidewalks, crosswalks, parking, ADA-compliant features, and other upgrades, discussed later as applicable. These new features complement the reuse strategy of the priority sites, providing a safer and more walkable Mill Yard for future residents, workers, and visitors. In November 2022, the community passed a ***\$1 million bond to demolish and cleanup the IW Mill Boiler House parcel for a new municipal parking lot to serve the target area***, showing the strong support for the proposed reuse projects. The City is beginning to see investment in the Mill Yard. For example, Winn Companies received Planning Board approval in April 2023 to cleanup and redevelop the former Stenton Trust Mill with 90 new units of safe and affordable housing and storefronts. Stenton had been abandoned and half the mill was lost to fire in 2017. The Stenton redevelopment was made possible by previous Brownfields assessment. Sanford works hard to maximize combined funding sources to implement projects so success is greater than sum of each. City used a TIF district, ***\$675,000 Riverfront Bond***, for waterfront improvements, and private financing to attract Northland Enterprises (\$10.5 million investment) to redevelop the mixed use ***Sanford Mill, in the Mill Yard, which was acknowledged with a Phoenix Award in 2015***, and used a ***Community Development Block Grant*** to construct Gateway Park, along a waterfall across from Sanford Mill. Building on these accomplishments, the City used an EPA Brownfields cleanup grant to cap contaminated soil at the Aerofab property in the Mill Yard (next to IW Mill Boiler House) for use as a parking lot to serve residents and customers of the revitalized Sanford Mill. We also used Brownfields funds to begin assessment at the IW Mill parcels and Emery Mill, including a structural/ architectural analysis of the IW Mill Building (2020) to support reuse planning and provide useful information for future developers, but this assessment grant is needed for more work.

Our Target Area is in a ***designated Historic District so both State and Federal Historic Tax Credits are available to support private redevelopment.*** The City has the support of the Southern Maine Planning and Development Commission (SMPDC) for Brownfields cleanup loans/grants (and assessment funding if

SMPDC's application is successful), and we'll also seek funding from the MEDEP's Brownfields Revolving Loan Fund, EPA Targeted Brownfields Assessment (TBA) program, and other Brownfields resources. The City needs this Brownfields assessment funding to secure these commitments and to realize the full value/success of these supplemental funding resources. We'll continue to seek other funds and advocate for potential funding for developers through federal, state, and local grants/loans.

1.c.ii. Use of Existing Infrastructure: Redevelopment of the priority sites will allow reuse of existing structures and water, sewer, natural gas, and recently constructed broadband infrastructure in core of the City including Heritage Crossing, recently upgraded with lighting/sidewalks. Our RAISE grant will fund utility improvements (drainage) and roadway/sidewalk upgrades as needed. Gateway Park, Heritage Crossing, Aerofab Parking Lot, Sanford Mill, and soon the Stenton redevelopment all *reflect the City's on-going efforts to use sustainable practices* by reusing and enhancing existing development, incorporating smart growth principles, reducing sprawl, and fostering a sustainable and walkable Downtown in redevelopments.

2. COMMUNITY NEED and COMMUNITY ENGAGEMENT:

2.a.i. The Community's Need for Funding: The City and specifically the Mill Yard target area houses a low-income community. The population of the Mill Yard Census Tract is 6,083. Per the 2021 ACS, when compared to York County, the City has higher unemployment (3.3% City vs. 2.3% York), higher poverty (9.5% City vs. 7.7% York), lower per capita income (\$32,648 City vs. \$36,171), and lower mean income (\$76,921 City vs. \$93,205). The extent of vacant properties in the target area (75%, City Assessor) and depressed property values in nearby residential neighborhoods is daunting, further exacerbating lack of job opportunities and loss of population. Vacancies and poor housing conditions (average depreciated value of 10-15%, City Assessor) contribute to increased demand for emergency services, further contributing to financial pressures and loss of focus on environmental cleanup. For example, for Stenton Trust, we spent \$122,000 for firefighting, demolition, and legal costs, \$2-\$3 million for demo, and nearly \$500,000 lost valuation per City Manager. The presence of Brownfields also impacts larger community by expanding blight into surrounding neighborhoods, exacerbating Sanford's "run-down" appearance and image, which deters new investments in housing, depresses home values and owner-occupancy. *Sanford lacks many ingredients that drive successful redevelopment in other communities like higher income, larger population, tourist economy, direct highway access, and connection to a university or research center.* The assessment performed under this grant will lead to cleanup and redevelopment of Brownfields sites that will attract each of these ingredients.

Unfortunately, our community doesn't have the capacity to prioritize environmental assessment and cleanup. *Mill Yard residents are struggling day-to-day to keep housing and bring home food;* the residents and employers (those that manage to stay in operation, that is) can only focus on keeping their heads above water and cannot dedicate scarce resources/funding to environmental assessment, remediation, or redevelopment. Without assessment, cleanup, and redevelopment funding, the situation will only continue to worsen. The City *desperately needs safe, affordable housing and jobs* for existing residents and to support/attract new residents. The situation has been aggravated in the last 5 years with an estimated 40.2% increase in home values (Source: MaineBiz, 10/25/2022), barring the low-income population of the Mill Yard from housing security. Residents of adjacent dense and deteriorating inner-city neighborhoods bear greatest burden of the Mill Yard's Brownfields sites – they lost jobs when manufacturers abandoned the mills and from recent fires. They are among Sanford's lowest paid workers and struggle on the lowest rung of the economic ladder. *Sanford has a proven track record of efficiently using grant dollars to stimulate redevelopment. However, our work is far from complete. Without this new assessment grant, our prior efforts will be for naught and the decrepit priority sites will continue to be a roadblock for the health and economic wellbeing of our residents.*

2.a.ii.(1) Health or Welfare of Sensitive Populations: *The Target Area and the adjacent low income residential neighborhoods* have high density and concentration of sensitive populations (low income, children, women of child-bearing age, minority groups, homeless) which *are disproportionately impacted by Brownfields* because of exposure to contamination and recent fires. **72% of renters qualify for rent-restricted units**, assuming incomes up to 60% AMI for 4-person household (Sanford Area Market Assessment, Sanford Housing Authority, 2015). In Sanford, 15.4% of households receive food stamps compared to York County's 7.5% (2022 ACS). Inner-city residents live with fear for life and limb feeling

unsafe in their homes and exposure to opioid epidemic (*Vacant mill building may smolder for days in Sanford, Community in crisis: Battle against opioids rages in beaten-down Sanford*, 4/1/2017 and 6/24/2017, Portland Press Herald). The City has been working with the homeless community, which camps along the Mousam River in the Mill Yard, for several years to help provide housing and social services, most recently adding staff to help people find appropriate services and soliciting community input via City Council meetings. In addition to these economic/welfare struggles, the Mill Yard community faces severe health issues. The City and state resources are already dedicated to resolving these important issues and this Brownfields assessment grant is desperately needed to create housing and economic opportunities for these populations by assessing, cleaning up, and redeveloping the priority sites/target area with new residential/commercial space and greenspace.

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: CEJST identifies the Mill Yard Census Tract as disadvantaged because it's in 93rd percentile for weighted percent of people who have been told they have asthma and the 81st percentile for low income. Information from the Maine Tracking Network indicates a *disproportional rate of asthma and COPD emergency department visits* in the City vs York County. *Several cancer rates are also higher* in York County than the state average, including leukemia, lung, bladder, brain, and liver, all of which can be linked to contaminants of concern in the Mill Yard. *Studies indicate that 2.9% children in the City have elevated blood lead levels vs 1.9% at the state level* (Maine Tracking Network, 2021). A 2008 study by Maine Dept. of Health and Human Services also indicated that more than 80% of children in communities with *lead poisoning live in substandard rental housing*, most near mills and Brownfields. These statistics demonstrate that *residents, especially those in/adjacent to Mill Yard, are disproportionately impacted* compared to citywide, statewide, and county averages. Our residents' health has been compromised by the Mill Yard contaminants, including hazardous building materials, releases of fire-related ash, lead, dyes, solvents, fuel oil, metals, and PCBs from former mills during more than 100 years of industrial use (History of Sanford, Sanford Historical Society), contaminants include VOCs (threat if inhaled), and heavy metals from dyeing processes (threat if ingested and bio-accumulation in River sediments). In addition to the 3 Target Sites, the Mill Yard has also been impacted by releases of chlorinated solvents from dry cleaners (i.e. Alexsons Cleaners on High Street) that pose a significant risk to human health from vapors.

Based on these contaminants and the known toxicological effects, environmental impacts to the soil, water, and air in the target area may be contributing to the higher rates of asthma and cancer; lead-based paint in the deteriorating structures and adjacent areas is causing lead poisoning. The assessment grant will help to reduce these threats by helping the City understand exposure pathways/receptors and the most effective ways to clean up the contamination and stop further contact/exposure from occurring. The grant will also allow for the creation of new, safe, modern housing to eliminate contact to hazardous building materials in the existing aging buildings. The undeveloped areas will be turned into usable greenspace without the concern of ingesting contaminated soil/sediment/water.

2.a.ii.(3)(a) Identification of Environmental Justice Issues: CEJST identifies the Mill Yard Census Tract (23031030202), where all 3 priority sites are located, as disadvantaged. Data from EJSCREEN for the Mill Yard compared to the state average are as follows: 68th percentile for particulate matter, 62nd percentile for ozone, 88th percentile for toxic releases to air, 82nd percentile for traffic proximity, 64th percentile for lead paint, 71st percentile for hazardous waste proximity, 85th percentile for USTs, and 68th percentile for wastewater discharge. Per EJScreen, the Mill Yard is in 82nd percentile for unemployed residents, 81st percentile for low income, and 76th percentile for people of color compared to the state. Meanwhile our population is young and vulnerable – 94th percentile for less than high school education and 93rd for under age 5; 5.6% of the City's population is under the age of 5 and 22.9% is under 18 compared to 4.5% and 18.4% for Maine respectively; and 21.3% of young children in the City are living below poverty level (2020 Census). Pollution sources in the Mill Yard include the 22 Brownfields, 20 state Remediation Sites, and 31 state spill sites. The MEDEP Mousam River 2014 Data Report states the river is "impaired for toxics." The Mill Yard and nearby lower income inner-city neighborhoods have higher density and concentration of sensitive populations (low income, children, women of childbearing age, homeless) and are *disproportionately impacted by Brownfields* because of exposure to contamination, recent fires, and airborne debris, raising significant concerns about environmental justice.

2.a.ii.(3)(b) Advancing Environmental Justice: The assessment grant and associated reuse (mixed commercial/residential and greenspace) and outcomes (new industries/workspaces, job creation, housing, and climate adaptation and recreational/outdoor areas) will advance environmental justice by providing safe housing, minimizing/eliminating contact with impacted soil/water/air, providing climate resiliency near the river flood plain, and providing economic opportunities/desirable space for investors and businesses. Residents and business owners have started to look elsewhere; Our local partners described below will work with City government and the local community to minimize the displacement of residents/businesses and ensure the opportunities seen, as a result of assessment/cleanup/redevelopment from this grant, are made available locally. Priority will be given to local City residents, whenever possible, to ensure our existing community reaps the benefits of Brownfields cleanup and redevelopment. We will work with our partners to connect those in need in the community and the homeless with affordable housing, giving priority to those already in the target area. Incentives will be provided to local businesses (TIFs, ARPA funding) and advocated through SREGC and Sanford Chamber of Commerce.

2.b.i. and 2.b.ii Project Involvement and Roles:

Name of organization/ entity/group	Point of contact (name and email)	Specific involvement in the project or assistance provided
York County Community Action Corp. (YCCAC)	Carter Friend, carter.friend@yccac.org	Community-based org. Located in the Mill Yard. Community outreach, children and family assistance, healthcare, home ownership (classes, repair grants), heat/energy assistance. Assist with site selection, cleanup, and ensure reuse plans align with community needs (i.e. housing/jobs).
Strategies for a Stronger Sanford	Jo-Ann Masure, admin@strongersanford.org	Community-based org. Information sharing, serves children and youth, support/funding for local initiatives. Assist with site selection, cleanup, and ensure reuse plan aligns with community needs.
Sanford Regional Economic Growth Council (SREGC)	Keith McBride, kmmcbride@sanfordmaine.org	Non-profit. Attract business owners, investors, and developers, share funding and redevelopment opportunities, work with community on revitalization, help prepare strategies.
Mousam Way Land Trust	Gordon Johnston, mousamwaylandtrust@gmail.com	Non-profit. Protect local greenspace for the benefit of the public. Work with Mill Yard landowners to conserve and protect open/recreational land.
Sanford Housing Authority (SHA)	Diane Small, dsmall@sanfordhousing.org	Build affordable housing, provide Section 8 vouchers, allocate \$5M annually to assist low income residents in need of safe, affordable housing.
Sanford Chamber of Commerce	Rick Stanley, President rick@metrocast.net	Advocate for/coordinate efforts to recruit/strengthen businesses, focus on filling vacant storefronts. Attend developer meetings, help secure new retail, share funding and redevelopment information on website and with members, help prepare strategies.

2.b.iii. Incorporating Community Input:

The City will use the following tools, which have been successful in past Brownfields efforts: **City Website** (notices about public meetings, meeting minutes, project updates, Brownfields information repository including assessment/cleanup reports, presentations); **Public Meetings** (including regularly scheduled City Council meetings and specially scheduled meetings, during/after site selection, assessment, and cleanup, meetings broadcast via Zoom and public access TV); **Newspaper, E-Mail Listserv, and Social Media** (promote program/solicit new sites, provide updates and success stories, advertise meetings). City Hall is located Downtown blocks from the Mill Yard. Public City Council meetings occur the 1st and 3rd Tuesdays of the month providing regular opportunities to discuss the grant and outcomes as needed. The City will create paper flyers/postings at least once per year to publicize the Brownfields program and solicit

input. The City recognizes and embraces our diverse community. All public communication involving Brownfields will publicize the state TYY line for community members hard of hearing, have speech disabilities, or require translation. Translators are also provided at YCCAC and Goodall Hospital. We consider all input, because *this program is for the benefit of our community*, and will respond to requests/comments using these methods, along with direct written responses, as necessary. We will also set up additional meetings/postings/publications, as needed, to further respond to public input/comments.

3. TASK DESCRIPTIONS, COST ESTIMATES, and MEASURING PROGRESS

3.a.i. - iv. Project Implementation, Schedule, Leads, and Outputs

<p>Task 1: Cooperative Agreement Oversight</p> <p><i>i. Project Implementation</i></p> <ul style="list-style-type: none"> EPA-funded tasks/activities: Grant management, cooperative agreement oversight. Quarterly reporting, FFR reports, MBE/WBE forms, compliance with technical requirements (historic preservation, threatened/endangered species), ensure protection of human health and the environment. Prepare technical closure report at the end of the grant period of performance. Interactions/mtgs with EPA and DEP, including Brownfields regional/national conferences. Non-EPA grant resources needed to carry out tasks/activities: City funds in-kind costs, including time for financial drawdowns from ASAP, maintaining files, planning and economic development staff and legal services, procurement of QEP. <p><i>ii. Anticipated Project Schedule:</i> Procure QEP in Q1 2025, quarterly reports in ACRES every quarter for the 4 year grant period, monthly meetings with QEP to track grant funding/discuss program strategy/site updates or more often as needed for the 4 year grant period. Submit technical closure report at the end of the grant period. City attends Brownfields regional and national meetings (1 every year, alternating years, for the 4 year grant period).</p> <p><i>iii. Task/Activity Lead:</i> City will oversee cooperative agreement with technical support from QEP</p> <p><i>iv. Outputs:</i> Contract with QEP (Q1 2025), quarterly reports (1 per qtr, total of 16), meeting minutes/agendas for discussions with QEP (3 per qtr, total of 48), 1 technical closure report, attend up to 4 Brownfields meetings/conferences.</p>
<p>Task 2: Community Outreach</p> <p><i>i. Project Implementation</i></p> <ul style="list-style-type: none"> EPA-funded tasks/activities: Meetings with interested parties (site owners, developers, community members, etc.), participate in City Council meetings, general public information meetings, notices in local newspapers/email, press releases, and handouts, maintain a Brownfields inventory. Non-EPA grant resources needed to carry out tasks/activities: City funds in-kind costs, including time for economic development staff and legal services. City to host meetings at City Hall at no cost to the grant. Community organizations to assist with outreach. <p><i>ii. Anticipated Project Schedule:</i> Attend various meetings with interested parties (at least 1 per qtr for all 4 years, actual quarter dependent on interest/availability), attend a minimum of 4 City Council meetings and 4 general public information meetings (each to be conducted separately in Q1 2025 for program kick off, Q1 2026 for program update, Q1 2027 for program update, Q1 2028 for program update/closeout), generate Brownfields inventory in Q1 2025 and update once per qtr.</p> <p><i>iii. Task/Activity Lead:</i> City with technical support from QEP and outreach support from community organizations (including translation).</p> <p><i>iv. Outputs:</i> PowerPoint presentations (total of 2-3), flyers (total of at least 4), newspaper and email publications (total of at least 4), meeting minutes/agendas for discussions with City Council, public, and site owners (approximately 20), Brownfields inventory.</p>
<p>Task 3: Phase I and Phase II Assessment Activities</p> <p><i>i. Project Implementation</i></p> <ul style="list-style-type: none"> EPA-funded tasks/activities: Generation of Brownfields application form used to identify new sites and prioritize sites for assessment. We anticipate Phase I ESAs (per ASTM E1527-21 and AAI) for 10 sites. Of those sites, we anticipate 7 will need site-specific Quality Assurance Project Plans (QAPPs), and Phase II ESAs / Hazardous Building Material Surveys (HBMS). Depending on the recognized

<p>environmental conditions (RECs) identified in the Phase I ESA, the Phase II ESA may include soil, groundwater, and/or air sampling and building material sampling.</p> <ul style="list-style-type: none"> • Non-EPA grant resources to carry out tasks/activities: City funds in-kind costs, including time for planning and economic development staff and legal services. City will generate access agreements, solicit new Brownfields sites, and prioritize sites for assessment using criteria such as health impacts, location in disadvantaged community, and prospects for redevelopment/leveraged funds. City will work with EPA and DEP staff during assessment.
<p>ii. <i>Anticipated Project Schedule:</i> Phase I ESAs – 2 in Q1 2025, 1 in Q3 2025, 1 in Q1 2026, 1 in Q3 2026, 1 in Q2 2027, 1 in Q1 2028, 1 in Q4 2028, 1 in Q2 2029 (total of 10); QAPPs – 1 anticipated to be completed in each of the following quarters: Q3 2025, Q2 2026, Q3 2026, Q1 2027, Q2 2027, Q4 2027, Q2 2028 (total of 7); Phase II ESAs/HBMSs – 1 anticipated to be completed in each of the following quarters: Q4 2025, Q3 2026, Q4 2026, Q2 2027, Q3 2027, Q1 2028, Q1 2029 (total of 7)</p>
<p>iii. <i>Task/Activity Lead:</i> QEP (oversee field work/technical report) with City support.</p>
<p>iv. <i>Outputs:</i> 10 Phase I ESAs (including Access Agreements and Site Eligibility Concurrence Checklists), 7 QAPPs, 7 Phase II ESAs, including Hazardous Building Material Surveys (HBMS). Periodic project/field work updates provided by QEP via e-mail.</p>

Task 4: Site Reuse and Cleanup Planning

<p>i. <i>Project Implementation</i></p> <ul style="list-style-type: none"> • EPA-funded tasks/activities: Based on the Phase II ESA/HBMS findings, we anticipate that 4 sites will proceed to site reuse and cleanup planning to prepare the site for cleanup and eventual redevelopment. Selection will be based on severity of contamination and associated health impacts, location in a disadvantaged community, and prospects for redevelopment/leveraged funds. This task includes site reuse and cleanup planning per the goals in our Comprehensive Plan and/or Mill Yard AWP, Analysis of Brownfields Cleanup Alternatives (ABCA), and MEDEP Voluntary Response Action Program (VRAP) Applications. • Non-EPA grant resources needed to carry out tasks/activities: City funds in-kind costs, including time for planning and economic development staff and legal services. Community based organizations and local community will be consulted during cleanup planning. Site owners/developers will fund VRAP application fee (10% of assessed value capped at \$15,000). City will work with EPA and DEP staff during assessment.
<p>ii. <i>Anticipated Project Schedule:</i> ABCAs - 1 anticipated to be completed in each of the following quarters, dependent on completion of Phase II ESAs in Task 3: Q2 2027, Q4 2027, Q2 2028, Q2 2029 (total of 4); MEDEP VRAP Applications – 1 anticipated to be completed in each of the following quarters, dependent on completion of ABCAs: Q3 2026, Q3 2027, Q3 2028, Q4 2029 (total of 4)</p>
<p>iii. <i>Task/Activity Lead:</i> City and QEP partnership. City will ensure that cleanup/reuse planning is aligned with area-wide/City plans and QEP will prepare technical reports.</p>
<p>iv. <i>Outputs:</i> 4 ABCA reports and 4 MEDEP VRAP Applications</p>

3.b.i - iii Cost Estimates:

Budget Categories		Project Tasks (\$)				Total
		Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach	Task 3: Phase I and Phase II	Task 4: Site Reuse and Cleanup Planning	
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$5,000	\$0	\$0	\$0	\$5,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$5,000	\$0	\$0	\$5,000
	Contractual	\$31,000	\$13,000	\$360,000	\$86,000	\$490,000
	Construction	\$0	\$0	\$0	\$0	\$0

Budget Categories	Project Tasks (\$)				Total
	Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach	Task 3: Phase I and Phase II	Task 4: Site Reuse and Cleanup Planning	
Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs	\$36,000	\$18,000	\$360,000	\$86,000	\$500,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$36,000	\$18,000	\$360,000	\$86,000	\$500,000

Detailed Costs Per Unit are based on previous grant activities and QEP estimates. At least 40% of the funds are directly associated with site-specific work (i.e., Phase I and Phase II ESAs and site-specific cleanup planning). **Note: the City has elected to fund all personnel/fringe legal costs through City funds in order to use as much grant funding as possible for assessment and cleanup/site reuse planning for the benefit of the community.**

Task 1: Cooperative Agreement Oversight: Total \$36,000

- *Travel Costs:* 1 person, 2 Brownfields regional mtgs, estimate \$800 lodging/per diem = \$1,600 total; 1 person, 2 Brownfields national mtgs, estimate \$1,700 airfare/lodging/per diem = \$3,400 total
- *Contractual Costs:* \$31,000 for QEP assistance (including preparation of Quarterly Reports and agendas/meeting minutes over 4 years)

Task 2: Community Outreach: Total \$18,000

- *Supplies:* 2 newspaper ads at \$500 each = \$1,000 total, 4 press releases at \$400 each = \$1,600, 4 handouts at \$600 each = \$2,400; \$5,000 total
- *Contractual Costs:* \$13,000 for QEP assistance (including attending meetings, preparing PowerPoint presentations and agendas/minutes over 4 years)

Task 3: Phase I and Phase II Assessment Activities: Total \$360,000

- *Contractual Costs:* Phase I ESAs: 10 at \$4,000 each = \$40,000 total; QAPPs: 7 at \$5,000 each = \$35,000 total; Phase II ESAs (incl. HBMS): 7 at \$40,000 each = \$280,000 total; Meetings with City, EPA/MEDEP, and site owners; periodic updates: \$5,000 total

Task 4: Site Reuse and Cleanup Planning: Total \$86,000

- *Contractual Costs:* ABCAs: 4 at \$15,000 = \$60,000 total; VRAP Applications: 4 at \$5,500 = \$22,000 total; Meetings with City, EPA/MEDEP, and site owners = \$4,000 total

3.c. Plan to Measure and Evaluate Environmental Progress and Results: The City and QEP will meet at least monthly to track grant/project progress. At meetings, each site, activity, overall budget, and funds expended/remaining will be reviewed. The City and QEP will continually track, measure, and evaluate assessment/redevelopment work to ensure grant dollars are directed towards projects with most significant environmental/economic impact with the greatest importance to the community. The City and QEP and stakeholders (including community members) will discuss adding additional sites as grant progresses and underserved communities become aware of availability of funds. Information on properties assessed/jobs leveraged and dollars leveraged will be recorded in Quarterly Reports in ACRES. Other tools used to measure progress will include budget tracking sheets and a milestone chart, for overall grant and each specific site. The City has implemented these practices for City’s existing FY19 Multipurpose Grant with great success.

4. PROGRAMMATIC CAPABILITY and PAST PERFORMANCE

4.a.i. - 4.a.iii. Organizational Capacity, Structure, and Key Staff

Our Brownfields team has the capacity to administer this new assessment grant as we have done with our prior grants, including the active FY19 Multipurpose Grant. The City’s Brownfields Program will be managed and administered by Mr. Ian Houseal, Community Development Director. He holds degrees in regional planning, architecture, and environmental science, and has worked in Sanford, Lewiston, and Portland, ME with a focus on housing development and community betterment for over 15 years. Mr. Houseal successfully manages numerous state and federal grants, including City’s most recent Brownfields grant. He will work closely with Mr. Steve Buck, City Manager in Sanford for over 10 years, the Planning

and Code Enforcement Departments, and Mr. Keith McBride, Executive Director of SREGC, which has been instrumental in working with property owners/prospective developers in structuring Brownfields redevelopment projects. Ms. Erin McMann, City Treasurer, will be responsible for financial management, tracking, and reporting for this grant. She currently oversees financial management of our Multipurpose Grant. These staff manage the current Brownfields program and will continue to ensure the timely and successful expenditure of funds and completion of all project/grant requirements.

4.a.iv. Acquiring Additional Resources: The City will contract with a QEP using federal guidelines for procurement and qualifications-based competitive bid process. The City will evaluate potential QEPs' knowledge/ability/experience with local Brownfields programs/grants in ME, EPA requirements, applicable laws/regulations, environmental due diligence, transactions on environmentally impaired property, reuse/cleanup work, redevelopment/financing, and community outreach, with a focus on firms with a proven equitable track record and strong labor practices. Our procurement process will be conducted in accordance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and as provided in EPA guidance and other applicable state and federal laws. The City's law firm, Bernstein Shur, is experienced with Brownfields/environmental regulations and will assist with document review/consultation. The City will seek financial assistance from MEDEP and SMPDC's Brownfields Revolving Loan Funds, and other loan/grant programs, as needed, to supplement and ensure the success of this grant. Where possible, the City will link members of the community to potential employment opportunities in Brownfields.

4.b.i.(1) Currently Has or Previously Received an EPA Brownfields Grant – Accomplishments: The City has received multiple Brownfields grants since 2012, including Planning, Assessment, Cleanup, and Multipurpose Grants. The 3 most recent grants include a \$400,000 FY12 Assessment Grant (BF 96165901), \$300,000 FY18 Assessment Grant (BF 00A00457), and \$800,000 FY19 Multipurpose Grant (BF 00A00430). The City has a successful track record over the past 10 years of managing Brownfields funds. The City has completed all quarterly reports and updated information in ACRES relative to the closed and current grants. The outputs of last 3 grants include 12 Phase I ESAs, 12 QAPPs, 11 Phase II ESAs/HBMSs, 4 ABCAs, 3 VRAP applications, and 1 closure report. *All 3 grants provided funding for assessment and cleanup planning at the IW Mill*, positioning the parcels for redevelopment; though the assessment at these parcels is far from complete.

The grants funded assessment and cleanup planning and a **successful cleanup/redevelopment project** at the CGA Site, a former circuit board manufacturer and chemical dumping ground, which posed a serious human health and environmental hazard to the community. The CGA Site remediation achieved regulatory closure with MEDEP and EPA, and the site is being redeveloped with grid-scale solar, providing renewable energy to the grid, specifically to the Mill Yard. The City leveraged \$475,000 for this cleanup, including municipal, MEDEP, ME Department of Economic and Community Development, and private developer funding. In addition, these grants allowed for assessment and cleanup at the Stenton Trust Mill. Under the Multipurpose Grant, 2 USTs were assessed/removed, a PCB oil spill assessed/remediated, and an HBMS was completed to provide necessary cost estimates for cleanup, where previously unknown costs deterred redevelopment. Winn Companies has initiated local permitting to cleanup and transform the Stenton Trust Mill into 90 new residential units and commercial storefronts in the Mill Yard. Additional assessment funds must be secured to continue our forward progress in the target area.

4.b.i.(2) Currently Has or Previously Received an EPA Brownfields Grant – Compliance with Grant Requirements: The City successfully completed all required reporting obligations for the 3 most recent closed and current grants, including quarterly reports, ACRES updates, and grant closeout reports. All grants and associated deliverables were completed well before end of performance period demonstrating the ongoing need for assessment funds and our capacity to perform. The City complied with the workplans and terms and conditions for all 3 grants. ACRES updating and quarterly reporting for the FY19 Multipurpose Grant is ongoing. The City, QEP, and our EPA Project Officer meet periodically to discuss grant compliance/forecasting. The FY12 and FY18 Assessment Grants were fully expended within grant period. The FY19 Multipurpose Grant is open with \$59,402.84 remaining (93% expended) as of 10/1/2023). Remaining funds will be spent on cleanup planning for both the IW Mill Boiler House and Alexsons Cleaners in the Mill Yard, community outreach, and 1-2 Phase I ESAs in underserved communities. We expect to expend the remaining funds in early 2024, well before the end of the grant period.

**Attachment A – Threshold Criteria for Assessment Grants – City of Sanford, Maine
USEPA FY2024 Brownfields Assessment Grant Application**

1. Applicant Eligibility

The City of Sanford, Maine (City) is a municipality (General Purpose Unit of Local Government) eligible to apply for Brownfields Assessment funding from the U.S. Environmental Protection Agency (EPA) Brownfields Grant Program.

2. Community Involvement

The City will use the following tools, which have been successful in current and past Brownfields efforts to solicit community involvement in its Brownfields Program. We will hold four public meetings (available in person and via Zoom) to provide information about the assessment grant and associated activities. One meeting will be held at the beginning of the period of performance to kick off the program and introduce the public to the grant, and one meeting will be held each year thereafter to provide program updates and solicit input. Additionally, information regarding the Brownfields program will be presented at a minimum of four public City Council meetings. Site-specific public meetings will occur to present key findings, health & environmental data, and proposed cleanup/redevelopment plans. We will solicit general comments and feedback from the public, including adding additional sites and prioritizing sites in our Brownfields program, and respond to comments both in person and in writing. The meetings will be advertised via the City's website, email list, social media, newspapers, and flyers. We will also request that our partners & community organizations post information about the meetings. Meeting agendas, meeting minutes, and PowerPoint presentations will be made available electronically and via print.

Brownfields program and/or site-specific flyers and brochures will be developed and provided at City Hall, the community organization locations throughout the City, and on the City website/social media. Program flyers/postings will be generated at least once per year. We will provide regular updates on the City website and in email distributions. Paper and electronic copies of all environmental reports will be available through the City website, at City Hall, and through the selected Qualified Environmental Professional (QEP), as a secondary information repository. Information will be translated/interpreted as requested by the public. Our community partners, York County Community Action Corp. (YCCAC), will provide translation, and we will publicize the state TYY line.

As with our current and prior Brownfields grants, the City will hold discussions with site owners, potential buyers/developers, and other interested parties about the Brownfields program and availability of funding. We encourage this outreach via the methods described above and our partners at the Sanford Regional Economic Growth Council & Sanford Chamber of Commerce will advocate on our behalf to ensure that members of the community are connected to available funding and information.

All comments and requests will be responded to in writing using the methods listed above, and we will set up additional meetings/postings/publications, as necessary. Additional details regarding proposed community involvement can be found in Section 2 of the Narrative and Ranking Criteria.

**Attachment A – Threshold Criteria for Assessment Grants – City of Sanford, Maine
USEPA FY2024 Brownfields Assessment Grant Application**

3. Expenditures of Assessment Grant Funds

The City of Sanford affirms that it does not have an open EPA Brownfields Assessment Grant. The City of Sanford has an open FY2019 Multipurpose Grant (BF 00A00430) with \$59,402.84 remaining (93% expended) as of 10/1/2023. Documentation of the funds drawn down and remaining balance is attached.

4. Named Contractors and Subrecipients

- **Contractors:** Not applicable.
 - **Subrecipients:** Not applicable.
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