



# CITY OF BELFAST

City Hall  
131 Church Street  
Belfast, Maine 04915

## Narrative Information Sheet City of Belfast, Maine EPA FY22 Brownfield Assessment Grant Proposal

- 1. Applicant Identification:** City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915
- 2. Funding Requested:**
- a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested:
    - i. \$500,000
    - ii. Not requesting a waiver of the \$200,000 limit (not applicable)
- 3. Location:** a) City of Belfast; b) Waldo County; and c) State of Maine
- 4. Target Area and Priority Site/Property Information:** Target Area and Census Tract Numbers: The Target Area discussed in the Narrative is smaller than a single census tract; it is the union of two adjacent *census block groups*: Census Block Group 230270430001 and Census Block Group 230270430003. The Target Area is located entirely within the City of Belfast; the entirety and only the entirety of the City of Belfast is equivalent to Census Tract 23027043000. Addresses of Priority Sites: 126 Church Street, Belfast and 1 Miller Street, Belfast
- 5. Contacts:**
- a. Project Director: Thomas Kittredge  
Economic Development Director  
City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915  
Phone: (207) 338-3370, extension 116  
Email: economicdevelopment@cityofbelfast.org
  - b. Chief Executive: Eric Sanders  
Mayor  
City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915  
Phone: (207) 338-8660  
Email: mayor@cityofbelfast.org
- 6. Population:** 6,938 (City of Belfast; 2020 Census)

**7. Other Factors:**

<b>Yes/No</b>	<b>Factor</b>	<b>Page #</b>
Yes	Community Population is 10,000 or less	4
No	The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
No	The priority site(s) is impacted by mine-scarred land.	
No	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).	
No	The priority site(s) is in a federally designated flood plain.	
Yes	The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
Yes	The reuse of the priority site(s) will incorporate energy efficiency measures.	4
Yes	30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	9
No	The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	

**8. Letter from the State or Tribal Environmental Authority:**

An acknowledgement letter, dated November 17<sup>th</sup>, 2021, from the Maine Department of Environmental Protection is attached to this Narrative Information Sheet.

**9. Releasing Copies of Applications:**

Not applicable; this application does not have confidential, privileged, or sensitive information.

*Attachments: Maine Department of Environmental Protection Acknowledgement Letter*



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

November 17, 2021

Ms. Dorrie Paar  
EPA Region 1  
5 Post Office Square  
Suite 100, Mailcode: OSRR7-2  
Boston, Massachusetts 02109-3912

Dear Ms. Paar:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the City of Belfast plans to conduct site assessments and is applying for federal Brownfields grant funds.

Thomas Kittredge of the City of Belfast 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 contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

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

Sincerely,

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

Pc: Thomas Kittredge, City of Belfast

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## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a.i. Background and Description of Target Area:** The City of Belfast, located in Waldo County, Maine, was first settled in 1770 by Scottish-Irish families from Londonderry, New Hampshire. Taking advantage of its shoreline and safe year-round harbors in Penobscot Bay, along with its abundant timber and farmland, Belfast became a vibrant, prosperous market center for the region, enjoying the rise of industries such as shipbuilding, fishing, and maritime commerce in cargoes such as apples, hay, ice, and fertilizer. As the 20<sup>th</sup> century unfolded, these maritime-related industries which created the area's early wealth fell into decline, to be replaced by the nascent potato, sardine, shoe, and poultry industries. Unfortunately, Belfast was not spared the consequences when those same industries imploded during the late 20<sup>th</sup> century. Belfast's current economic recovery did not begin until 1995, when credit card company MBNA arrived and built a new campus that at its peak would employ 2,300 people. Today, Belfast possesses a modest economy that is fortunately diversified into many industries including healthcare, financial services, manufacturing, arts and culture, and agriculture. Belfast continues to be Waldo County's most populous municipality, serving as its seat of government, as its service center, as a location for most of its significant employers, as a tourism hub through which people experience and explore the rest of the county, and as one of its primary points of access to Penobscot Bay.

Remaining at the epicenter for the entire duration of Belfast's cultural and industrial history is the target area where the City of Belfast plans to perform assessment activities: the union of two adjacent census block groups: 230270430001 (Block Group 1) and 230270430003 (Block Group 3). These block groups have a combined area of 12.5 square miles, or 32.6% of Belfast's total area. Two features, one natural and one manmade, have exerted a tremendous influence on this target area's development history: 1) the Passagassawaukeag River, which bisects the target area along its southeast-northwest axis and forms Belfast's working waterfront; and 2) the United States (US) Route 1 Corridor, which serves as the chief development corridor for Block Group 1, bisecting it on its east-west axis, then shifting direction and becoming the inland boundary of Block Group 3, circumscribing the entirety of Belfast's downtown district. This target area has felt both the booms and the busts of the various industries that have operated in Belfast, from having served as the setting for their bustling facilities to now being the home to many known brownfields and their associated signs of distress, blight, and neglect. Nearly half (44.2%) of Belfast's residents, including members of its sensitive populations and disadvantaged communities, live in the target area and therefore also in proximity to these brownfields, which are in need of being cleaned up and reused. In addition, there are non-residents (5,351 in 2019) work in the community as well as an incalculable number of tourists who visit the community and who also may find themselves in proximity to these brownfields.

**1.a.ii. Description of the Priority Brownfield Sites:** Since late 2010, when it applied for its first Brownfield Assessment Grant, the City has developed and continuously maintained an extensive inventory of potential brownfields. Within the target area it is estimated that there are 57 potential brownfields with a total combined area of 369 acres; these range in area from 0.1 acres to 104 acres, with an average area of 6.5 acres. The majority of these brownfields, including the two priority brownfield sites, are each under 1 acre in size. Many of these brownfields are located adjacent to bodies of water and/or within federally designated flood plains, posing a risk of impairment to water quality. These brownfields include former: automobile parts stores, banks, batch plants, bowling alleys, brick yards, chicken coops, computer stores, courthouses, dry cleaners, electrical substations, gas stations, gravel pits, grocery stores, nursing homes, opera houses, restaurants, sawmills, schools, and shipyards, as well as current: automobile sales lots, freezer facilities, garages, junk yards, potato processing facilities, and theaters. These vacant or underutilized brownfields have left behind a legacy of real or perceived environmental contamination that have discouraged redevelopment, investment, and growth. Belfast's priority brownfield sites, which possess both the greatest concerns of contamination as well as the current highest likelihood of being successfully redeveloped in a timely manner, thus making them the highest priority for assessment and reuse, are the following:

**126 Church Street:** This 0.1-acre site is listed on the Maine Department of Environmental Protection's (MEDEP's) Remediation Sites List and its Resource Conservation Resource Act Hazardous Waste Generators List. Based on information from the MEDEP, soil and soil vapor beneath the site has been impacted by tetrachloroethylene (PCE) contamination associated with the site's previous use as a dry cleaning facility. Indoor air quality of the site building and/or the abutting commercial building may also be impacted by vapor intrusion of PCE migrating through soil vapor. Potential fuel oil releases associated with observed soil staining in the basement of the site building in the vicinity of the boiler were also identified. In addition, based on the building's age, hazardous building materials, including asbestos-containing materials, lead-based paint, polychlorinated biphenyl-containing fluorescent light ballasts, mercury-containing fluorescent lamps, and other potential universal wastes may be present in building construction materials, which will require proper assessment and abatement if disturbed during future site redevelopment.

**1 Miller Street:** Numerous environmental assessments have been conducted under the City's Brownfields Assessment Program for other properties located in the vicinity of this 0.5-acre site. Results of these prior assessments have identified widespread urban fill soils containing coal and/or wood ash with elevated concentrations of polycyclic aromatic hydrocarbons and metals, which may also be potentially present at the site as well. These urban fill soils were reportedly associated with destructive fires, historic coal-fired furnaces/boilers at various properties, and/or historical land-filling operations, which were common practice in Belfast during the site's initial development during the 1800s.

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans:** The current projected reuse for 126 Church Street, with an estimated construction cost of \$2,500,000, is to demolish the existing building, remediate the site, and construct upon it a new two-story mixed-use building of 1,975 usable square feet per floor, for a total usable area of 3,950 square feet, consisting of two units for retail or other commercial uses on the first floor and two rental housing units on the second floor. The current projected reuse for 1 Miller Street, with an estimated construction cost of \$2,800,000, is to build upon the site a hybrid two/three-story (taking advantage of the site's topography) mixed-use building, consisting of three commercial spaces of 1,000 usable square feet each, three rental housing units of 1,000 usable square feet each, and an additional residential unit for the building owner of 2,500 usable square feet, for a total usable area of 8,500 square feet.

These projected reuses are aligned with and advance several of the City's land use and revitalization plans. Most recently (earlier in 2021), both of these priority sites were considered for presentation (with financial modeling) in an Opportunity Zone prospectus that was developed as part of an EPA-funded technical assistance project, and both were included in the area that was the focus of a Brownfields Revitalization Study (Study) and a follow-up Community Revitalization Plan (Plan), both of which were funded through the City's FY19 Brownfield Assessment Grant.

The Study evaluated a variety of redevelopment scenarios, comparing costs for both new real property construction and existing real property rehabilitation against expected lease revenues across a variety of uses, including housing, offices, restaurants, and retail space. The Study identified an unmet and future demand for a variety of housing types and price points, and highlighted a portion of Block Group 3 as attractive for residential development due to its proximity and accessibility to amenities such as shopping, groceries, restaurants, and recreational spaces. The Study also quantified the demand for additional rental housing, at 66 new rental housing units over the next five years. Finally, the Study also identified several types of commercial uses for which there currently exists unmet demand over the next five years: retail space (14,600 square feet); restaurants; traditional office space (5,000 square feet); and medical office space (8,800 square feet).

The Plan, which succeeded and built upon the Study, identified a number of opportunities and challenges, and developed a series of goals and strategies to address them. Two housing-related opportunities that were identified in the Plan were that there is a significant number of in-commuters living in the surrounding region that could be attracted to live in Belfast if there were housing that aligned with their preferences and income levels, and, reinforcing the findings of the Study, that there was strong market demand for housing, including market-rate apartments, senior housing, and workforce housing. One of the Plan's goals, again echoing the Study, was to create a variety of housing at a variety of price points, and one of its strategies was to continue to partner with developers to create new housing. As detailed below, grant activities include further revitalization planning efforts for the priority sites, building upon the Study and the Plan, and also for the target area.

Prior to this, the City's 2012 Downtown and Waterfront Master Plan included recommendations to redevelop the areas surrounding each of the priority sites, and to pursue EPA Brownfields Assessment Grants to assist property owners to determine potential contamination, and also to pursue funds for remediation if needed.

Both priority sites are located in the City's Downtown Commercial Zoning District, a zoning district which encourages dense infill mixed-use redevelopment with upper floor residential uses, through eliminating structure setback requirements (thus allowing 100% lot coverage), not requiring on-site parking (126 Church Street) or having flexibility regarding on-site parking requirements (1 Miller Street), allowing building to a height of 48 feet (126 Church Street) or 38 feet (1 Miller Street), and not having minimum residential unit sizes or unit density maximums. The City could also consider implementing contract rezoning for 1 Miller Street to allow for even greater flexibility with regards to buildable height limits and on-site parking requirements. Belfast has worked hard to direct growth to where it has been successful in the past, and to imagine productive reuses for sites that are well located but may be compromised.

**1.b.ii. Outcomes and Benefits of Reuse Strategy:** Upon completion of the cleanup for the priority sites, the proposed projects have the potential to stimulate economic development in the target area in the following specific ways: 1) an increase in property values for nearby properties from the remediation of the priority sites (a 2017 study entitled *The Value of Brownfield Remediation* estimated an increase of 5.0% to 15.2% in the values of residential properties located within 1.29 miles of a remediated brownfield); 2) an expansion of the tax base within the City's Downtown Waterfront Tax Increment Financing (TIF) District, both from the construction of the actual priority site projects, and also from them helping to prove the market and thus spur additional, future investment in the form of similar developments, ones which would generate additional revenue to be used for implementing the City's development program for this district (and once the TIF district expired, would lower the City's property tax rate); and 3) an increase in employment opportunities, arising from an increased supply of spaces for new and existing businesses to start or expand operations. As is further explained below, the economic outcomes and benefits of increasing employment opportunities would both assist the identified disadvantaged communities in the target area, and would begin to address the challenges identified in 2.a., with particular emphasis on the community's need for funding and promoting environmental justice.

The proposed projects also have the potential for non-economic benefits, such as the inclusion of accessible greenspace as part of a central courtyard in the project proposed for 1 Miller Street, and the inclusion of a green roof (a contained greenspace) in the

project proposed for 126 Church Street; these greenspaces would reduce surface and air temperatures, reduce and filter stormwater runoff, absorb pollutants and carbon dioxide, provide natural habitat, and improve human health and comfort. The proposed projects also have the potential for the facilitation of renewable energy, such as for the project proposed for 1 Miller Street, which will integrate a rooftop solar panel array that will meet a portion of site’s electrical demand, and for the incorporation of energy efficiency measures, such as for the project proposed for 126 Church Street, which will have the aforementioned green roof and its benefit of reduced energy demand, but which will also be designed by a Leadership in Energy and Environmental Design (LEED)-accredited architect, who plans to incorporate LEED standards into the building’s design, and is considering utilizing hybrid mass timber construction (a sustainable building technique) in conjunction with a highly energy efficient outer envelope.

Additionally, the proposed projects will benefit disadvantaged communities located within the target area. The communities residing in the target area can be considered disadvantaged on the basis of low incomes, high poverty, and high unemployment, at levels disproportionately worse relative to EPA Region 1 and the US:

Disadvantaged Community	Target Area (Block Groups 1 and 3)	EPA Region 1	US
<i>Source: EJSCREEN Demographic Indicators</i>			
Low Income Population - EPA Region 1 Percentile	72 <sup>nd</sup>	n/a	n/a
Low Income Population - US Percentile	56 <sup>th</sup>	n/a	n/a
<i>Source: 2019 American Community Survey 5-Year Estimates</i>			
Median Household Income	Block Group 1: \$43,657 (= 69.5% of US); Block Group 3: \$44,049 (= 70.1% of US)	\$57,918 (Maine) to \$81,215 (Massachusetts)	\$62,843
Individuals 20-64 Years Old Below the Poverty Level	25.0% (= 203.3% of US)	9.7%	12.3%
Unemployed Individuals 16 Years and Older	10.7% (= 201.9% of US)	4.9%	5.3%

The proposed projects will specifically benefit these disadvantaged communities through their potential for the economic benefit of increasing the number of employment opportunities in the target area.

**1.c.i. Resources Needed for Site Reuse:** Both the City as well as the owners/developers of the aforementioned priority sites are eligible for monetary funding from other resources to support the completion of the assessment, remediation, and/or reuse strategy for the priority sites. Specifically, the key funding sources that the City will be considering seeking include: 1) to support the completion of the assessment for the priority sites, the MEDEP Brownfields Assessment Program; 2) to support the completion of the remediation for the priority sites, the MEDEP/Maine Department of Economic and Community Development (DECD) Brownfields Revolving Loan Fund Program; and 3) to support the completion of the reuse strategy (for real property construction as well as for supportive infrastructure) for the priority sites, the Economic Development Administration Public Works Program. The City has, in recognition of the value and redevelopment opportunities that these priority sites possess, already generated additional funding resources to support the completion of their reuse strategies, by having established a TIF District that encompasses the priority sites and can provide funds for supportive infrastructure, and by having secured a Maine Office of Community Development (MEOCD) Community Development Block Grant (CDBG) Downtown Revitalization Grant, which was used to make infrastructure enhancements (sidewalks, on-street parking, lighting, signage, and storm drainage) surrounding 1 Miller Street that were anticipated to catalyze the redevelopment of privately owned properties located there.

For the owners/developers of the priority sites, the key funding sources that they will be considering seeking include: 1) to support the completion of the assessment for the priority sites, the MEDEP Brownfields Assessment Program; 2) to support the completion of the remediation for the priority sites, the MEDEP/DECD Brownfields Revolving Loan Fund Program; and 3) to support the completion of the reuse strategy (for real property construction) for the priority sites: a) the Community Development Financial Institutions Fund/Internal Revenue Service (IRS) New Markets Tax Credit Program; b) the US Treasury Department/IRS Opportunity Zone Program; c) the MEOCD CDBG Economic Development Program; and d) a City of Belfast TIF Credit Enhancement Agreement.

The City of Belfast has been previously successful in directly securing funding from all of these programs for either itself or on behalf of an owner/developer (with the exception of the New Markets Tax Credit and Opportunity Zone Programs). All of these programs accept applications on a rolling basis, with the exception of the MEOCD CDBG Economic Development Program, applications for which are typically due each year in May, with grant awards being made in July. The environmental assessment of priority and other brownfield sites, made possible by this Brownfield Assessment Grant, will stimulate the availability of additional funds for environmental site assessment or remediation, and for subsequent reuse, by removing uncertainty with respect to environmental impacts and liabilities, developing a framework for securing funds for remediation, and creating momentum towards eventual redevelopment.

**1.c.ii. Use of Existing Infrastructure:** This grant will facilitate the use of existing infrastructure located at the priority sites and within the target area, which include existing streets, and on-street parking, and utilities including electric, sewer, water, and fiber internet. These priority sites and the target area will also be able to utilize, and benefit from, an additional network of pedestrian-focused infrastructure: the *Belfast Rail Trail Along the Passagassawaukeag* (a 2.3-mile forest-enclosed stone dust

path), the *Belfast Armistice Footbridge* (a 0.2-mile footbridge across the Passagassawaukeag River), and the *Belfast Harbor Walk* (a 0.7-mile paved working waterfront-adjacent path; this infrastructure forms a nexus with the border between Block Groups 1 and 3, and is also located within a relatively short (0.3 miles) walking distance of the priority sites. Currently there are no infrastructure deficiencies hindering the implementation of revitalization plans for either of the priority sites.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

**2.a.i. The Community's Need for Funding:** As seen in the tables presented above in 1.b.ii. and below, both the target area and the community possess smaller populations, and higher percentages of a variety of economically-impooverished sensitive populations and disadvantaged communities, compared to that of EPA Region 1 and the US:

Total Population, Sensitive Populations, Disadvantaged Communities	Target Area (Block Groups 1 and 3)	City of Belfast	EPA Region 1	US
<i>Source: 2019 American Community Survey 5-Year Estimates</i>				
Total Population	2,828 (= 0.001% of US)	6,688 (= 0.002% of US)	14,790,787	324,697,795
Per Capita Income	\$28,745 (= 84.3% of US)	\$32,722 (96.0% of US)	\$41,658	\$34,103
Households Below the Poverty Level	24.0% (= 186.0% of US)	16.0% (= 124.0% of US)	10.7%	12.9%
Households Receiving Social Security Income	47.6% (= 152.6% of US)	41.6% (= 133.3% of US)	27.9%	31.2%
Households with Supplemental Security Income	7.9% (= 149.0% of US)	6.5% (= 122.6% of US)	5.7%	5.3%

Also, as referenced above, redevelopment projects located within the City of Belfast are potentially eligible for funding from the New Markets Tax Credit and Opportunity Zone Programs; Census Tract 23027043000 (equivalent to the City of Belfast) had to meet certain thresholds for low incomes and high poverty rates to secure those designations. These statistics reveal a small population among whom many possess little or no discretionary income, due to receiving only a fixed income, having limited income-earning potential, earning too little income from work, or earning no income from work at all. Both the target area and the community have an inability to draw on other initial sources of funding to carry out environmental assessment, remediation, and/or subsequent reuse in the target area, demonstrating that the City truly needs this Brownfield Assessment Grant.

**2.a.ii.(1) Threats to Sensitive Populations - Health or Welfare of Sensitive Populations:** The target area possesses sensitive populations at higher-than-median percentiles within EPA Region 1 and the US. The City of Belfast utilized *EJSCREEN* to identify these most sensitive populations and their most pressing health issues:

Sensitive Population	Target Area (Block Groups 1 and 3)	
	EPA Region 1 Percentile	US Percentile
<i>Source: EJSCREEN Demographic Indicators</i>		
Population Over 64 Years of Age	92 <sup>nd</sup>	93 <sup>rd</sup>
Low Income Population	72 <sup>nd</sup>	56 <sup>th</sup>
<i>Source: EJSCREEN Environmental Indicators</i>		
Risk Management Plan Site Proximity	81 <sup>st</sup>	77 <sup>th</sup>
Lead Paint Indicator	51 <sup>st</sup>	72 <sup>nd</sup>

Research has documented that the risk from environmental contaminants can be greater for the elderly, due to having compromised biological systems, and for low income persons, due to greater amounts of exposure.

Regarding the issue of lead paint, both the likelihood that a housing unit contains lead paint as well as the concentration of lead in the paint that was used varies directly with the age of the structure. According to data from the 2019 American Community Survey 5-Year Estimates, somewhere between 51.5% and 54.5% of the target area's housing units were built prior to the banning of lead paint in 1978. Additionally, the proportion of older housing units within the target area, compared to EPA Region 1 and the US, becomes more pronounced as one looks at each successively older structure age cohort. Even though the target area does not possess a disproportionately high percentage of young children, these children can experience neurological damage even at low levels of exposure to lead.

Risk Management Plan Sites are facilities required to file risk management plans, such as industrial facilities storing substances regulated because of acute toxicity or because of their flammable or explosive potential. Populations living in close proximity to them may be more vulnerable to accidental releases of toxic substances and incidents involving fires and explosions resulting from the production, use, or transport of industrial materials, resulting in injuries or even death.

Environmental contaminants can also cause health problems including respiratory diseases, heart disease, and chronic obstructive pulmonary disease, such as the following ones found at higher rates in the target area than in the US:

Disease or Condition	Target Area (using Waldo County)	US
<i>Source: 2021 Waldo County Health Profile</i>		
Incidence of Chronic Obstructive Pulmonary Disease	8.0% (= 123.1% of US)	6.5%
Chronic Lower respiratory Disease Deaths (per 100,000)	49.0 (= 128.3% of US)	38.2
Heart Attack Deaths (per 100,000)	31.6 (= 123.9% of US)	25.5
Coronary Heart Disease Deaths (per 100,000)	95.0 (= 108.0% of US)	88.0
Overall Death Rate (per 100,000)	753.2 (= 105.3% of US)	715.2



The target area's small population prevents the generation of reliable health department statistics, and therefore an area with a larger population (in this case Waldo County) must be used as a proxy. This lack of statistics makes it more challenging to identify more direct relationships between present contaminants and adverse health impacts.

The specific contaminants that are most likely to be found in soil, in groundwater, and in building materials at the priority sites and at other brownfields located within the target area, and which through inhalation, ingestion, or direct contact pose a health threat to these sensitive populations include: arsenic, asbestos, chlorinated solvents, lead, petroleum products (gasoline and fuel oil), polycyclic aromatic hydrocarbons, perfluorooctane sulfonate, perfluorooctanoic acid, and universal wastes. It is anticipated that the performance of additional brownfield assessments, including the identification, evaluation, and quantification of environmental contaminants at both of the priority sites, but also at other brownfield sites within the target area, will likely lead to the remediation of the aforementioned contaminants, which will reduce the potential hazards and health impacts to the identified sensitive populations located in the target area.

In addition, though it is far more challenging to quantify and compare, brownfields have also negatively impacted the welfare of the target area's sensitive populations, by creating blighted areas, inviting vandalism and crime, discouraging adjacent property owners from maintaining or improving their properties, and causing emigration to surrounding communities. This grant will address or facilitate the identification and reduction of threats to the welfare of many of these aforementioned sensitive populations by complementing and facilitating the remediation and redevelopment plans for the identified priority sites, which will then generate important aforementioned outcomes and benefits; for both of the priority sites, their redevelopment would motivate adjacent property owners to maintain or improve their own properties.

**2.a.ii.(2) Threats to Sensitive Populations - Greater Than Normal Incidence of Disease and Adverse Health Conditions:**

As a high burden of environmental pollution is often borne by these aforementioned sensitive populations, the identified issues and types of contaminants typically found through prior environmental investigations of brownfields located within the target area have exerted a disproportionate impact upon the sensitive populations residing there. This is corroborated by data (obtained from consulting a number of Environmental Justice-focused geospatial mapping tools, including the *Maine Environmental Public Health Tracking Network*, the *National Environmental Public Health Tracking Network*, and *PLACES*, then augmented by public health reports) showing that populations in the target area have greater-than-normal incidences and/or mortality rates for diseases or conditions (in particular cancer, asthma, and birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum:

Cancer or Asthma	Target Area (using Waldo County)	US
<i>Source: 2020 Maine Annual Report of Cancer</i>		
Incidence of Lung and Bronchial Cancers (per 100,000)	69.5 (= 125.7% of US)	55.3
Mortality Rate for Lung and Bronchial Cancers (per 100,000)	43.2 (= 118.0% of US)	36.6
<i>Source: 2021 Waldo County Health Profile</i>		
Incidence of All Cancers (per 100,000)	466.9 (= 106.6% of US)	437.9
Mortality Rate for All Cancers (per 100,000)	163.3 (= 111.7% of US)	146.2
Incidence of Bladder Cancer (per 100,000)	27.8 (= 146.3% of US)	19.0
Current Adult Asthma	13.4% (= 142.6% of US)	9.4%
Birth Defect	Target Area (using Midcoast Public Health District)	US
<i>Sources: Maine Tracking Network - Environmental Public Health (Target Area); National Population-based Estimates for Major Birth Defects, 2010-2014 (US)</i>		
Incidence of Anencephaly (per 10,000 live births)	7.5 (= 348.8% of US)	2.15
Incidence of Cleft Palate Alone (per 10,000 live births)	7.5 (= 126.5% of US)	5.93
Incidence of Hypoplastic Left Heart Syndrome (per 10,000 live births)	3.0 (= 115.4% of US)	2.60
<i>Sources: Maine Tracking Network - Environmental Public Health (Target Area); Prevalence of Structural Birth Defects Among Infants with Down Syndrome, 2013-2017: A US Population-based Study (US)</i>		
Incidence of Down Syndrome (per 10,000 live births)	21.7 (= 170.9% of US)	12.70

As mentioned previously, either Waldo County or the Midcoast Public Health District (which consists of Waldo County as well as Knox, Lincoln, and Sagadahoc Counties) must be used as a proxy for the target area due to its small population.

While research has begun to identify linkages between exposure to certain environmental contaminants and increased chances of acquiring these aforementioned diseases or conditions (e.g., asbestos and lung cancer, air pollution and asthma, perfluorooctane sulfonate and cleft palate), these have generally not yet been conclusively determined. As mentioned previously, the performance of additional brownfield assessments will lead to the remediation of the aforementioned contaminants, reducing the potential hazards and health impacts to the identified sensitive populations located in the target area.

**2.a.ii.(3) Promoting Environmental Justice:** The City of Belfast consulted a number of Environmental Justice-focused geospatial mapping tools, including *EJSCREEN*, the Center for Diseases Control's/Agency for Toxic Substances & Disease Registry's *Social Vulnerability Index*, and the Neighborhood Atlas *Area Deprivation Index*, to identify environmental justice challenges and opportunities. It should be noted that the utility of applying the EJ Indexes to the community and the target area



is rather limited (and potentially understating environmental justice impacts) given that 50% of the EJ Index’s demographic component is attributable to the proportion of people of color, whereas this group represents a very small proportion (5%) of the actual community and the target area. This grant and the projected site reuses will promote environmental justice in the target area and will support populations in the target area that disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies. The projected site reuses will promote environmental justice and equitable development through the previously mentioned economic outcomes and benefits, namely increased access to jobs through business expansion and associated increased employment, and improved property values.

Additional indicators of environmental justice challenges, which could be potentially addressed through the projected site reuses include: 1) the *Social Vulnerability Index*, which reflects high poverty, low percentage of vehicle access, or crowded households, which may affect a community’s ability to prevent human suffering and financial loss in the event of disaster, and where Census Tract 23027043000 (equivalent to Belfast) is in a high US percentile (0.834) for the index’s housing/transportation component; and 2) the *Area Deprivation Index*, a ranking of census block groups by socioeconomic disadvantage with factors for income, education, employment, and housing quality, which can be used to inform health delivery and policy, and where Block Group 1 ranks in the 62<sup>nd</sup> US percentile.

**2.b.i. Project Involvement and 2.b.ii. Project Roles:** The following local community partners will have active, meaningful involvement in the performance of this project:

Partner Name, Mission	Point of Contact	Specific Role(s) in the Project
Belfast Bay Watershed Coalition (BBWC): to support conservation and stewardship of natural and public resources of the Belfast Bay watershed through research, community building, and education.	Cloe Chunn (Board Member); cloechunn@gmail.com; (207) 338-1147	Providing water quality technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information; hosting a public information meeting.
Belfast Public Health Nursing: to promote and strengthen the complex health needs of individuals and families through prevention, education, early intervention, and referral.	Susan Dupler (Belfast Public Health Nurse); sdupler@wcmh.org; (207) 505-4940	Assisting in presenting and conducting health-related monitoring and education for public meetings.
Our Town Belfast (OTB): to grow and sustain Belfast’s historic downtown while celebrating its unique cultural heritage.	Zachary Schmesser (Executive Director); director@ourtownbelfast.org; (207) 218-1158	Providing real estate development technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information.
Volunteers of America Northern New England (VOANNE): to strive to end homelessness, restore hope and build communities for children and young adults, veterans, seniors, adults living with mental illness, and adults in the criminal justice system.	Brian Sites (VP, Business Development and Implementation); brian.sites@voanne.org; (207) 373-1140	Providing housing (particularly senior housing) development technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information.
Waldo Community Action Partners (WCAP): to utilize and mobilize resources to assist low-income Waldo County residents in the alleviation of poverty and address its underlying causes.	Donna Kelley (President and CEO); dkelley@waldocap.org; (207) 338-6809	Providing housing (affordable housing) development technical assistance, participating on the Brownfields Selection Committee; distributing community engagement information.

These partners have been chosen because their own constituencies/clients include one or more of the target area’s identified sensitive populations or disadvantaged communities (e.g. VOANNE and population over 64 years of age, WCAP and low income population) and/or their own goals are well aligned with the goals of the EPA’s Brownfields Program as well as the redevelopment plans of one or more of the priority brownfield sites (e.g. BBWC and reducing pollution in water bodies, OTB and downtown mixed-use real estate development). The primary avenue for this active, meaningful involvement will be participation on the City’s already-existing Brownfields Selection Committee (all local community partners save for Belfast Public Health Nursing will be performing this role), which has decision making authority for the City’s Brownfields Assessment Program, including selecting brownfields for the program and authorizing the extent of environmental assessment activities to be conducted, and additionally advises regarding the cleanup and future reuse of brownfield sites, both priority sites and others.

**2.b.iii. Incorporating Community Input:** The City of Belfast and its local community partners will implement an aggressive, multipronged plan for communicating project progress to, and soliciting input from, the local community that will last throughout the duration of the project. Each of the below listed methods offers an alternative to in-person community engagement in the event of social distancing or other restrictions as a result of COVID-19:

Method	Description
E-Mails and E-Newsletters	BBWC, VOANNE, and WCAP will utilize their e-newsletter to provide project updates, and OTB will utilize both their e-newsletters and their e-mail distribution groups to provide project updates.
Facebook	The City, BBWC, OTB, VOANNE, and WCAP will promote and discuss the project on their Facebook pages.
Flyers	WCAP will distribute program flyers to their Housing and Home Repair Network.
Brochure	The City will update its Brownfields Assessment Program informational brochure.
Information Repository	The City will maintain an extensive repository of project-related documents, in the form of both hard copies (available for view during normal business hours) and electronic copies (available for download).
News Releases	The City will announce the program's launch and public meetings via news releases in local newspapers.
Project Websites	The City, BBWC, OTB, VOANNE, and WCAP will allocate portions of their respective websites towards regular project updates; City website will also include community input and City responses thereto.
Public Meetings	The City's Brownfields Selection Committee intends to meet publicly approximately once per quarter during the grant's three-year period of performance (12 meetings). The City will also hold at least two public program information meetings, the BBWC will hold one public program information meeting, and the City will hold additional site-specific public information meetings during key milestones of the assessment process. These meetings are expected to be held primarily via Zoom, for which the City has established robust capabilities that it has regularly and reliably used during the COVID-19 pandemic for various public meetings, and which can allow public participation via video or phone.
Television	Belfast Community Television will produce at least two segments on the Brownfields Assessment Program, and the local government television channel will run public service announcements containing program information.

For each of these communications methods, responses and community input will be solicited and encouraged, and information regarding the submission of that input will be included. The City will be prepared to receive community input via letter, e-mail, Facebook, Zoom, and phone, and will provide an appropriate and timely response from either the Project Manager or the Qualified Environmental Professional, depending on the subject matter, via the same method that the input was originally submitted unless otherwise requested. Additionally, the City intends to incorporate all input and responses made thereto into a document that will reside on the City's website and will be regularly updated. For those who may be unable to speak English or who have hearing or reading impairments, the City of Belfast will provide accommodations including, but not limited to: translators, document reading services, and access to assistive technologies such as teletypewriter relay services.

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

#### **3.a.i. Project Implementation, 3.a.ii. Anticipated Project Schedule, 3.a.iii. Task/Activity Lead, and 3.a.iv. Outputs:**

<b>Task 1: Cooperative Agreement Oversight</b>
<b>i. Implementation:</b> Belfast will continue where it left off with its FY19 Assessment Grant and will conduct programmatic oversight of its Brownfields Assessment Program. Based on a Request for Proposals (RFP) process, selection of a Qualified Environmental Professional (QEP). Reinvigorate Belfast's Brownfield Selection Committee (BSC). Attend at least two EPA National Brownfields Training Conferences and/or EPA/MEDEP training seminars. Perform general program management and communication with regulatory personnel, community officials, and the public. Track progress through performance and financial reports, quarterly reports, and updates to EPA's Assessment, Cleanup and Redevelopment Exchange System (ACRES) online database. Ensure that EPA Cooperative Agreement requirements are met. <i>Belfast will also provide additional in-kind oversight and planning at no cost to the grant.</i>
<b>ii. Schedule:</b> RFP and selection of the QEP and re-establish BSC within the first three months (1 <sup>st</sup> quarter) of funding award; quarterly reports and ACRES database updates each quarter during the three-year grant period.
<b>iii. Leads:</b> Belfast staff will lead all programmatic grant activities. Belfast will develop RFP for QEP selection and will reinvigorate BSC. The QEP will perform quarterly reporting and ACRES updates.
<b>iv. Outputs:</b> Competitive RFP and contract for QEP selection; 12 quarterly reports; and ongoing ACRES input/updates over three-year grant period.

<b>Task 2: Community Engagement</b>
<b>i. Implementation:</b> In conjunction with the community input program described in section 2.b.iii above, Belfast, its QEP, and its local community partners will: issue and distribute e-mails and e-newsletters; issue Facebook posts; create and distribute flyers; update the Brownfields Assessment Program informational brochure; develop an information repository; issue news releases; update websites with program information, community input, and responses; hold public program information meetings and site-specific public information meetings; conduct television segments with Belfast Community Television; and develop public service announcements. Additionally, they will also: notify residents, adjacent land owners, and target communities of public meetings and assessment schedules; and update the target communities regarding assessment, cleanup, and redevelopment activities. For each brownfield site, site-specific outreach, public meetings, and communications with the community will be conducted during a key milestone in the assessment process, such as after Phase II assessments and following development of cleanup and/or reuse plans, in order to be able to present key findings to target communities and

property owners. Public meetings will be held primarily via Zoom.

**ii. Schedule:** Updated informational brochure, public service announcement, first television segment, and first public program information meeting to take place/be completed within the 2<sup>nd</sup> quarter of the grant period, after selection of the QEP. Remaining community engagement activities and public meetings following key assessment milestones (e.g., Phase II ESAs) will occur throughout the remainder of the grant’s three-year period.

**iii. Leads:** Belfast and QEP, with local community partner assistance, will conduct community engagement activities. *Belfast will provide additional community engagement and economic development support at no cost to the grant.*

**iv. Outputs:** Updated informational brochure, updated websites, public service announcement, two television segments, two public program information meetings, information repository, site-specific public information meetings, and meetings with site owners (as needed).

### **Task 3: Site Selection and Phase I and Phase II Assessments**

**i. Implementation:** With its prior assessment grant work, Belfast already has identified priority sites, has a current inventory of potential brownfields, and routinely receives calls from site owners, developers, and prospective purchasers regarding its program. Belfast already has a site assessment application and established site selection criteria, used for prioritizing sites including the location of sites with respect to target areas, developer interest, need for assessment and cleanup, redevelopment potential, community benefits, and alignment with local reuse and revitalization plans. BSC meetings will be conducted on a quarterly basis and/or when site assessment applications are submitted.

**Priority Sites:** EPA eligibility and Phase I Environmental Site Assessments (ESAs) for the two priority sites (126 Church Street and 1 Miller Street) are already completed. Phase I ESA Updates will be completed and these sites within the target area are initially prioritized for supplemental Phase II assessments, due to their current redevelopment plans.

**Non-Priority Sites:** For each new site, an EPA Brownfields Assessment Site Eligibility Form will be completed for EPA’s approval (hazardous substance sites) or a petroleum eligibility determination from MEDEP (petroleum sites) and up to eight additional non-priority sites are anticipated to be selected within the target area for assessment, based on site selection criteria noted above. For each of the additional eight non-priority sites, the QEP will conduct a Phase I ESA in accordance with the ASTM International Standard E1527-13 and EPA’s “All Appropriate Inquiry” standards.

**Priority and Non-priority Sites:** For each site, a Site-Specific Quality Assurance Project Plan (SSQAPP), and a Phase II ESA with a Hazardous Building Materials Inventory (HBMI), if applicable, in accordance with ASTM E1903-11 or equivalent, will be completed. These reports will consist of a summary of “recognized environmental conditions” (RECs), evaluation of contamination, QEP opinions regarding site conditions, and recommended follow-up investigations and/or activities. The assessment documents will be submitted to EPA and MEDEP for review and approval. Access agreements for each site will also be obtained.

**ii. Schedule:** EPA eligibility approvals have already been completed for the two priority sites. Eligibility for the non-priority sites will be obtained prior to beginning each assessment. Phase I ESA Updates, SSQAPPs, and Phase II ESAs/HBMIs for the priority sites will be done within the first 6-12 months of grant award. Phase I ESAs, SSQAPPs, and Phase II ESAs/HBMIs for non-priority sites will be completed during years 2 and 3 of the three-year grant period.

**iii. Leads:** Belfast will coordinate quarterly meetings with the BSC and QEP. Upon approval by Belfast and its BSC, QEP will obtain site eligibility for each site. QEP will conduct site-specific assessments of the priority and non-priority sites with direct Belfast oversight.

**iv. Outputs:** At least 12 quarterly meetings between Belfast, BSC, and QEP. EPA/MEDEP eligibility determinations and site access agreements for 10 selected sites (two priority sites and eight non-priority sites), 10 Phase I ESA reports, 10 SSQAPPs, and 10 Phase II ESA/HBMI reports.

### **Task 4: Cleanup Planning and Area-wide Planning**

**i. Implementation:** The Phase II ESA data and the proposed site reuse plan will be analyzed by Belfast staff and its QEP, and at the direction of Belfast, the results will be used by the QEP to develop an Analysis of Brownfields Cleanup Alternatives (ABCA)/Remedial Action Plan (RAP) for each of the 10 selected sites (two initial priority sites plus eight additional non-priority sites). The ABCA/RAP will include remedial actions for each identified contaminant that exceeds applicable Maine risk-based cleanup standards. Cleanup alternatives will be evaluated, in part, based on cost, feasibility, and effectiveness in protecting human health and the environment. Based on this analysis, a proposed cleanup plan will be developed, considering the specific or potential reuse scenario(s) for the site. Belfast and its QEP anticipate submitting each site to the MEDEP’s Voluntary Response Action Program (VRAP). Concurrently, Belfast, its QEP, and specialty planning subcontractor(s) will complete reuse planning activities on the select sites and target areas, particularly the identified priority sites with high redevelopment potential. ***In accordance with EPA FY22 planning activity fact sheets, planning activities to be conducted on the priority sites and the target area will include Site Reuse Assessments with Market Studies for both 126 Church Street and 1 Miller Street sites and a Brownfields Revitalization Plan for the US Route 1 corridor within the Block Group 1 portion of the target area.*** During these planning activities, Belfast will provide support regarding land use assessments (Planning and Codes Department) and economic development goals (Economic Development Department) that are tied to the community’s Comprehensive Plan and master plans for the target area. Livability principles, design charettes, potential

redeveloper input, and the community's goals for site reuse will also be incorporated into these planning activities.

**ii. Schedule:** ABCAs/RAPs, cleanup planning, and MEDEP VRAP applications for the two priority sites are to be completed within year 1 of the grant period and ABCAs/RAPs, cleanup planning, and MEDEP VRAP applications for the additional eight non-priority sites will be completed during years 2 and 3 of the grant period and/or after the completion of each Phase II ESA. The two Site Reuse Assessments and Market Studies for the 126 Church Street and 1 Miller Street priority sites will be completed during year 1 of the grant period and the Brownfields Revitalization Plan for the US Route 1 corridor will be completed during year 2 of the three-year grant period.

**iii. Leads:** Belfast will direct all cleanup and reuse planning efforts. The QEP will conduct cleanup planning including preparation of ABCAs/RAPs and cleanup cost estimates with Belfast assistance and oversight and Belfast in conjunction with its QEP and planning subcontractor(s) will conduct the reuse and revitalization plans.

**iv. Outputs:** 10 ABCA/RAP reports and one public meeting for each site (10 total) after completing each ABCA/RAP/cleanup plan (two priority sites and eight non-priority sites); 10 MEDEP VRAP submittals; and up to four EPA-approved brownfields planning assessments including two Site-Specific Reuse Assessments with Market Studies for the 126 Church Street and 1 Miller Street priority sites, and one Brownfields Revitalization Plan for the US Route 1 corridor in the Block Group 1 portion of the target area.

**3.b.i. Development of Cost Estimates and 3.b.ii. Application of Cost Estimates:**

Budget Category		Task 1: Cooperative Agreement Oversight	Task 2: Community Engagement	Task 3: Site Selection and Phase I and Phase II Assessments	Task 4: Cleanup Planning and Area-wide Planning	Total
Direct Costs	Personnel	\$7,500	\$5,000	\$5,000	\$5,000	\$22,500
	Travel	\$4,750	\$250	\$250	\$250	\$5,500
	Supplies	\$250	\$250	\$250	\$250	\$1,000
	Contractual	\$7,500	\$7,000	\$306,500	\$150,000	\$471,000
<b>Total Direct Costs</b>		<b>\$20,000</b>	<b>\$12,500</b>	<b>\$312,000</b>	<b>\$155,500</b>	<b>\$500,000</b>
<b>Indirect Costs</b>		<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Total Budget</b>		<b>\$20,000</b>	<b>\$12,500</b>	<b>\$312,000</b>	<b>\$155,500</b>	<b>\$500,000</b>

*Please note that this budget shows that at least 60% of the funds are directly associated with site-specific work, at least 30% of the funds will be spent on eligible reuse/area-wide planning activities for priority sites within the target area, and that less than 5% of the funds will be spent on all administrative costs.*

Task 1: \$7,500 for Belfast personnel to oversee the program (150 hours @ \$50/hour); \$4,750 travel (\$1,250 airfare + \$2,250 hotel + \$1,250 food/per diem) for two Belfast personnel to attend two EPA National Brownfields Training Conferences and/or seminars; \$250 for supplies (copies, phone calls, contract documents); and \$7,500 contractual for QEP to assist Belfast with oversight. Total for Task 1 = \$20,000.

Task 2: \$5,000 for Belfast personnel to conduct public outreach and meetings (100 hours @ \$50/hour); \$250 for travel to meetings (mileage/tolls); \$250 for supplies (copies, brochures, postage); and \$7,000 contractual for QEP to assist Belfast on public outreach. Total for Task 2 = \$12,500.

Task 3: \$5,000 for Belfast personnel to oversee assessments (100 hours @ \$50/hour); \$250 for travel to meetings and sites (mileage/tolls); \$250 for supplies (copies, phone calls, postage); and \$306,500 contractual for QEP to conduct two site-specific Phase I ESA Updates for priority sites (2 @ \$3,250/each = \$6,500), eight site-specific Phase I ESAs for non-priority sites (8 @ \$5,000/each = \$40,000), and 10 SSQAPPs and Phase II ESAs/HBMs for two priority and eight non-priority sites (10 @ \$26,000/each = \$260,000). Total for Task 3 = \$312,000.

Task 4: \$5,000 for Belfast personnel to oversee cleanup and reuse planning (150 hours @ \$50/hour); \$250 for travel to meetings (mileage/tolls); \$250 for supplies (copies, planning documents, postage); \$150,000 contractual for QEP and subcontracted planning firm(s) to conduct 10 ABCAs/RAPs (10 @ \$5,000/each = \$50,000); complete two EPA-approved Site-Specific Reuse Plans with Market Studies (2 @ \$25,000 = \$50,000) for priority sites; and conduct one EPA-approved Brownfields Revitalization Plan (1 @ \$50,000/each = \$50,000) for the US Route 1 corridor in the Block Group 1 portion of the target area. Total for Task 4 = \$155,500.

**3.c. Measuring Environmental Results:** Consistent with the prior EPA Brownfields Grants awarded to Belfast, this project will be managed utilizing time-proven techniques to ensure project funds are expended timely and efficiently. Belfast and its QEP will hold monthly status meetings to review priority sites, schedule, and budget. ACRES will be utilized for preparing electronic quarterly reports and to monitor project progress. Our overall expected outcomes are to return the selected brownfields and nearby areas impacted by the stigma of perceived proximity to contamination and tangible blight back to economic vitality. Environmental assessment and cleanup of the brownfields will reduce exposure at the sites and at adjacent properties and, just as importantly, impacts on the target area. Additional expected outcomes of brownfields site assessment, cleanup, and

redevelopment will be the aforementioned economic ones including increased property values for nearby properties, an expanded tax base, and increased employment opportunities.

Completion of environmental reports (i.e., Phase I and II ESA reports, QAPPs, ABCAs/RAPs, and reuse/ redevelopment planning activities) will document the assessment progress at each site or at the target area. Reports will be internally tracked to ensure that each is distributed to stakeholders for comments before finalizing. Sites selected to participate in the City's Brownfields Assessment Program will be entered into the MEDEP VRAP program. The number of sites assessed and entered into the Brownfields Assessment Program and the details of each site (i.e., acres of site assessed or cleaned up, contaminants found, assessment/cleanup funds spent, leveraged funds, etc.) will also be tracked via EPA quarterly reports and EPA's ACRES online database. Completing the work described above will help transition these properties to the next step of redevelopment and are directly in line with the Belfast's aforementioned revitalization plans. These documents and work products will also provide the liability protections required to stimulate redevelopment, as tools like the Phase I ESA provide landowner defense provisions under the Comprehensive Environmental Response, Compensation, and Liability Act, completion of ABCAs/RAPs will help determine associated cleanup costs, and reuse and redevelopment planning activities will provide site evaluations to assist developers with their business plans for successful development and revitalization of the brownfield sites.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a.i. Organizational Capacity, 4.a.ii Organizational Structure, and 4.a.iii Description of Key Staff:** The City of Belfast has, and will continue to have, the organizational capacity to effectively carry out all of the programmatic, administrative, and financial requirements of the project and grant. This project and grant will be directly managed by the current director of the City's Brownfields Assessment Program, Belfast Economic Development Director Thomas Kittredge. During his fifteen-year career in economic development, Mr. Kittredge has secured and implemented \$1,699,994, and has secured on behalf of other applicants an additional \$1,550,000, in EPA Brownfields Assessment and Cleanup Grants. He will be supported by the aforementioned Brownfields Selection Committee, which has existed since 2011 when the City received its first Assessment Grant. The City's Finance Director, Theresa Butler, who possesses more than 20 years of progressively responsible experience in municipal finance, will assist in the financial management of the grant, including expenditure and reimbursement tracking. For legal assistance, including access agreements, the City will rely upon City Attorney Kristin Collins, who has practiced law since 2005 and currently practices with the Municipal Law and Finance Group of Preti Flaherty. Ms. Collins has a Bachelor of Arts from Colgate University and a Juris Doctor from the University of Maine School of Law, and is admitted to practice in Maine and the US District Court, District of Maine. The structure and the capacity of this team will ensure that this project and grant will be successfully managed and administered within its period of performance.

**4.a.iv. Acquiring Additional Resources:** Additional expertise and resources, particularly the QEP to carry out all environmental work and qualified firms to carry out planning activities, will be selected via a fair and competitive process (a Request for Qualifications, finalist interviews, and City Council approval) that will meet all relevant local, state, and federal regulations, and will be overseen by Mr. Kittredge and members of the Brownfields Selection Committee. If Mr. Kittredge were to leave his employment with the City of Belfast, direct management of the project and grant would pass to Jon Boynton, Belfast's City Planner and another active member of the Brownfields Selection Committee. If further personnel turnover should occur during the course of this project and grant, the City has an in-house human resources working group that can efficiently find new personnel to maintain momentum within its projects.

**4.b.i.(1) Currently has or Previously Received an EPA Brownfields Grant - Accomplishments:** The City's three most recent EPA Brownfields Grants are: 1) a \$200,000 FY14 Brownfields Cleanup Grant (hazardous substances); 2) a \$400,000 FY16 Assessment Grant (hazardous substances and petroleum; community-wide); and 3) a \$299,994 FY19 Assessment Grant (hazardous substances and petroleum; community-wide). With its FY16 and FY19 Assessment Grants, the City has managed and implemented an extraordinarily successful Brownfields Assessment Program, entering a total of 16 sites and completing 16 Phase I ESAs/ESA Updates, and eight Phase II ESAs. Additionally, cleanup planning including ABCAs and/or RAPs was conducted for six of these Phase II sites. The City's FY14 Cleanup Grant resulted in the cleanup of one site. Furthermore, the City secured MEDEP VRAP *No Further Action Assurance* or *No Action Assurance* letters for eight of these sites, and a \$50,000 petroleum subgrant from the MEDEP/DECD Brownfields Revolving Loan Fund Program that was used to augment its FY14 Cleanup Grant. All outputs and outcomes have been accurately reflected in ACRES at the time of this application submission.

**4.b.i.(2) Currently has or Previously Received an EPA Brownfields Grant - Compliance with Grant Requirements:** For all three of these grants, the City had an approved workplan and cooperative agreement with EPA and maintained full compliance with its schedules, terms, and conditions throughout the grant periods, and all required quarterly performance and financial status reports, and ACRES updates, were completed in a timely manner. All expected results for these three grants have been achieved and reported on in a timely manner. The only grant of these three that is currently open is its FY19 Brownfields Assessment Grant, which is its most recent Brownfields Assessment Grant. This grant's period of performance is 7/01/2019-9/30/2022, all funds have been expended as of 9/28/2021, and final closeout of this grant is currently underway. \$158,708.47, or 52.9% of its \$299,994 in total grant funds, were spent on direct assessment tasks/activities. The City's other two grants, its FY14 Brownfields Cleanup Grant and its FY16 Brownfields Assessment Grant, were both closed with no funds remaining.

# **ATTACHMENT A**

## **Threshold Criteria for Assessment Grants**

**City of Belfast, Maine  
EPA FY22 Brownfield Assessment Grant Proposal**

## **THRESHOLD CRITERIA FOR ASSESSMENT GRANTS**

City of Belfast, Maine EPA FY22 Brownfield Assessment Grant Proposal

### **1. Applicant Eligibility:**

The City of Belfast affirms that it is a General Purpose Unit of Local Government and is eligible to apply for an Assessment Grant from the EPA Brownfield Grant Program.

### **2. Community Involvement:**

The City of Belfast and its local community partners will implement an aggressive, multipronged plan for communicating project progress to, and soliciting input from, the local community that will last throughout the duration of the project.

This plan will include the following activities: e-mails and e-newsletters, Facebook postings, flyers, an information repository, news releases, updated websites, Brownfields Selection Committee meetings, public program information meetings, site-specific public information meetings, television segments, and public service announcements.

For those who may be unable to speak English or who have hearing or reading impairments, the City of Belfast will provide accommodations including, but not limited to: translators, document reading services, and access to assistive technologies such as teletypewriter relay services.

### **3. Named Contractors and Subrecipients:**

The City of Belfast affirms that no contractor or subrecipient has been procured or named.

### **4. Expenditure of Existing Grant Funds:**

The City of Belfast currently has one open Assessment Grant or Multipurpose Grant: an FY19 Brownfield Assessment Grant. For this cooperative agreement, the City of Belfast affirms that payment has been received from EPA and drawn down funds disbursed, for at more than 70.00% of the funding by October 1, 2021. A copy of an ASAP Account Statement Inquiry for this cooperative agreement, documenting that 100.00% of the funding was drawn down by September 28, 2021, is included in *Attachment B*.



# **ATTACHMENT B**

**Documentation of the Available Balance on  
Each Open Assessment Grant and Multipurpose Grant  
(FY19 Brownfield Assessment Grant)**

**City of Belfast, Maine  
EPA FY22 Brownfield Assessment Grant Proposal**



## Account Statement Inquiry

Date: 09/28/2021  
Time: 3:12 PM

<b>ALC/Region:</b> 68128933	<b>Agency Short Name:</b> RTP-Grants	<b>Account ID:</b> BF00A00529	<b>Account Detail:</b> G100NY00
<b>Recipient ID:</b> 1135253	<b>Recipient Short Name:</b> Belfast		

## Inquiry Results:

Beginning Date: 07/01/2019		Beginning Balance:		
Applied Date	Effective Date	Transaction Type	Increases	Decreases
05/29/2020	05/29/2020	Payment		- \$20.62
06/02/2020	06/02/2020	Payment		- \$3,522.41
06/09/2020	06/09/2020	Payment		- \$556.87
06/09/2020	06/09/2020	Payment		- \$316.25
06/09/2020	06/09/2020	Payment		- \$45,091.96
06/09/2020	06/09/2020	Payment		- \$381.56
06/09/2020	06/09/2020	Payment		- \$89.12
06/09/2020	06/09/2020	Payment		- \$2,418.16
06/09/2020	06/09/2020	Payment		- \$11,906.85
06/09/2020	06/09/2020	Payment		- \$712.13
06/10/2020	06/11/2020	Payment		- \$2,115.89
06/11/2020	06/11/2020	Payment		- \$4,967.50
07/15/2020	07/16/2020	Payment		- \$1,511.35
07/23/2020	07/24/2020	Payment		- \$16,463.40
08/28/2020	08/31/2020	Payment		- \$41.25
10/13/2020	10/13/2020	Payment		- \$906.81
10/13/2020	10/13/2020	Payment		- \$4,295.96
10/13/2020	10/13/2020	Payment		- \$906.81
10/13/2020	10/13/2020	Payment		- \$4,623.21
10/13/2020	10/13/2020	Payment		- \$1,461.50
11/19/2020	11/20/2020	Payment		- \$604.54
11/19/2020	11/20/2020	Payment		- \$13.12
01/07/2021	01/08/2021	Payment		- \$3,432.50



## Account Statement Inquiry

Date: 09/28/2021  
Time: 3:12 PM

Applied Date	Effective Date	Transaction Type	Increases	Decreases
01/07/2021	01/08/2021	Payment		- \$3,893.01
01/19/2021	01/20/2021	Payment		- \$5,018.03
01/19/2021	01/20/2021	Payment		- \$604.54
02/03/2021	02/03/2021	Payment		- \$408.37
02/03/2021	02/03/2021	Payment		- \$87.43
02/25/2021	02/25/2021	Payment		- \$604.54
03/02/2021	03/03/2021	Payment		- \$12,475.31
03/24/2021	03/24/2021	Payment		- \$604.54
04/15/2021	04/15/2021	Payment		- \$10,230.84
04/15/2021	04/15/2021	Payment		- \$906.81
04/20/2021	04/20/2021	Payment		- \$42,978.76
04/20/2021	04/21/2021	Payment		- \$295.62
04/20/2021	04/21/2021	Payment		- \$33.53
06/14/2021	06/14/2021	Payment		- \$21,208.60
07/15/2021	07/16/2021	Payment		- \$2,282.16
07/15/2021	07/16/2021	Payment		- \$1,276.87
07/15/2021	07/16/2021	Payment		- \$276.25
07/15/2021	07/16/2021	Payment		- \$4,289.80
07/15/2021	07/16/2021	Payment		- \$415.93
07/15/2021	07/16/2021	Payment		- \$81.45
08/24/2021	08/25/2021	Payment		- \$7,060.86
09/28/2021	09/28/2021	Payment		- \$3,600.98
<b>Ending Date:</b>	<b>09/28/2021</b>		<b>Ending Balance:</b>	