

1. Applicant Identification:

Greater Portland Council of Governments
970 Baxter Boulevard, Suite 201
Portland, ME 04013

2. Funding Requested:

- a. **Assessment Grant Type:** Community-wide
- b. **Federal Funds Requested:** \$500,000.00

3. Location: In Cumberland County, Maine, GPCOG serves the cities of Portland, South Portland, and Westbrook, and 23 towns including Bridgton, Cape Elizabeth, Casco, Chebeague Island, Cumberland, Durham, Falmouth, Freeport, Frye Island, Gorham, Gray, Harrison, Long Island, Naples, New Gloucester, North Yarmouth, Pownal, Raymond, Scarborough, Sebago, Standish, Windham, and Yarmouth.

4. Target Area and Priority Site/Property Information:

Target Area 1: Portland Peninsula (Census tracts 23005000100, 23005000200, 23005000300, 23005000500, 23005000600, 23005001000, 23005001100, 23005001200, 23005001300)

Priority Sites #1-4: Street addresses confidential. Priority sites are located in Census Tracts 23005000300, 23005000500, and 23005000600 in Portland, Maine 04101 and 04102

Target Area 2: Westbrook Downtown/Riverwalk (Census tracts 23005002700, 23005002600, 23005002800, and 23005002900)

Priority Site #1: Westbrook Riverwalk (Tax Map 32 Lots 72, 105A, 108, 223; Tax Map 39 Lot 31, Westbrook, Maine)

Priority Site #2: Sappi Paper Mill Campus, 300 Warren Avenue, Westbrook, ME 04072

5. Contacts:

a. Project Director:

Paul Johnson, Senior Economic Development Manager
Greater Portland Council of Governments
970 Baxter Boulevard, Suite 201
Portland, ME 04103
Phone: (207) 749-4888
Fax: (207)774-7149
pjohnson@gpcog.org

b. Chief Executive:

Kristina Egan, Executive Director
Greater Portland Council of Governments
970 Baxter Boulevard, Suite 201
Portland, ME 04103
Phone: (207)774-9891 x214
Fax: (207)774-7149
kegan@gpcog.org

Population: Total population of the GPCOG region is 335,092 (2020 Decennial Census).

Population of the target area communities are as follows:

- City of Portland: 68,409
- City of Westbrook: 20,645

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	No
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No
The priority brownfield 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).	1, 2
The priority site(s) is in a federally designated flood plain.	1, 2, 3
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	No
The reuse of the priority site(s) will incorporate energy efficiency measures	No
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
30% or more of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	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.	No

8. Letter from the State Environmental Authority: A letter from the Maine Department of Environmental Protection acknowledging that GPCOG plans to conduct assessment activities and is planning to apply for FY2024 federal brownfields grant funds is attached.

9. Releasing Copies of Applications: not applicable.



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

October 24, 2023

Greater Portland Council of Governments
Attn: Paul Johnson
970 Baxter Boulevard
Portland, ME 04103

Dear Paul Johnson:

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

Paul Johnson of the Greater Portland Council of Governments has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in their service area.

If the Greater Portland Council of Governments 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
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PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

GPCOG Brownfield Assessment Grant Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The Greater Portland Council of Governments serves 24 communities in Cumberland County, Maine and the town of Durham, in Androscoggin County. These 25 municipalities comprise 335,092 people – nearly one-quarter of Maine’s total population (2020 Decennial Census). Historically, Greater Portland served as a trade gateway and a center for shipbuilding and manufacturing. These heavy industrial uses required rail and fossil fuel infrastructure, which has left behind a legacy of vacant contaminated commercial and industrial sites. There is opportunity to convert these contaminated sites to affordable housing and more resilient mixed-use structures, but with building costs up 23% in the last 5 years (Turner Building Cost Index, 2023 Q2 Forecast), and costs projected to continue escalating at a higher-than-average rate (CBRE Construction Cost Index, 8/16/2023), the expense of assessing and remediating brownfield sites is cost-prohibitive without funding assistance. And yet, **the need to assess, clean-up, and redevelop these sites is urgent.**

Recently, the State of Maine released a [Housing Production Needs Study](#) indicating the state will need 80,000 new homes by 2030 to meet community and workforce demands for housing, with 24,000 of those homes needed in the GPCOG region. At present, with limited affordable housing in the urbanized area, individuals can’t live where they work. Instead, they must seek housing in rural towns outside the urban core, where they pay more for transportation, and their commutes – often in single passenger vehicles – contribute to congestion, air quality issues, and greenhouse gas emissions. Additionally, the number of people who are housing-insecure or homeless in the region has increased dramatically in the last four years. The creation of new affordable housing and mixed-use developments in the urban core is essential to addressing homelessness, housing insecurity, and sustainability challenges.

TARGET AREA #1: The Portland Peninsula

The State’s remediation site list recognizes 30 known open remediation sites on the Portland Peninsula, the result of historical industrial uses as well as ash and demolition debris left behind by the Great Fire of 1866, which destroyed 1,800 buildings. Debris from the fire was used to backfill the southern section of the Back Cove, expanding neighborhoods on the northern side of the peninsula. Thus, urban fill in this area contains the usual suspects (metals, petroleum, and petroleum related compounds) mixed with demolition debris, asphalt, and ash. Low lying areas on the northern and southern sides of the peninsula are in flood zones.

TARGET AREA #2: The City of Westbrook

For years, people primarily associated Westbrook with the dank smell of paper production, but with the gradual conversion of the Sappi Paper Mill from paper production to new uses, the City has been working to revitalize the community. West Westbrook, as it is delineated in the City’s 2012 comprehensive plan, includes the downtown business district, mill yard, and adjacent residential neighborhoods along a stretch of the Presumpscot River. The area has been developed since the early 1700’s with various mills and manufacturing and has experienced fires and flooding that contributed to the spread of contamination and debris.

ii. Description of the Priority Brownfields Sites:

Priority Site ID	Census Tract	Size	Description: Environmental Concerns, Reason for Priority
	CEJST Class		
Target Area #1: Portland Peninsula			
Number of Sites: Maine's Remediation Site list identifies 30 known open remediation sites on the Portland Peninsula; 8 are Brownfield sites awaiting assessment resources.			
Environmental Concerns: 100+ year history of industrial use, including rail, commercial shipping, manufacturing, lumberyards, and city fleet operations. This area was also impacted by the Great Fire of 1866. Nearby assessments have found high concentrations of arsenic, lead, coal, cinders, ash, demolition debris, petroleum and related compounds, asphalt, and metals.			
Priority Site #1: Bayside	23005000600	.7 acre	Known brownfield site with blighted building. REASON FOR PRIORITY: Planned mixed-use development with 100+ units of housing and office space.
	Disadvantaged		
Priority Site #2: Bayside	23005000600	.34 acre	Known brownfield site located on backfilled land. Infill development of 4-5 stories would require steel pilings. REASON FOR PRIORITY: 50 affordable housing units.
	Disadvantaged		
Priority Site #3: Downtown	23005000300	.56 acre	Historic building (vacant office space) and parking lot. Urban fill, fire debris, lead paint, asbestos. REASON FOR PRIORITY: 30+ units of affordable housing and rehab/renovation of historic property.
	Disadvantaged		
Priority Site #4: East Bayside	23005000500	3.3 acre	Known brownfield site. Currently low-to-moderate income housing in disrepair and parking lots. REASON FOR PRIORITY: Master redevelopment plan would double housing units and include 1 st floor mixed uses while remediating vacant land.
	Disadvantaged		
Target Area #2: West Westbrook			
Number of Sites: Maine's Remediation Site list identifies 7 known open remediation sites in Westbrook; 3 are Brownfield sites awaiting assessment resources.			
Environmental Concerns: History of industrial uses along the Presumpscot River. Assessments of river-adjacent properties have revealed PCB levels exceeding hazardous waste regulations. Arsenic, lead, and benzoapyrene exceeding thresholds have also been found in this area.			
Priority Site #1: River Walk	23005002902	~1.5 acre	Three (3) downtown city parking lots along the Presumpscot at River Walk. Nearby assessments indicate high levels of contamination, requiring remediation. REASON FOR PRIORITY: City issuing RFPs for housing, mixed-use development as part of revitalization plans.
	Not Disadvantaged		
Priority Site #2: West Westbrook Parcel	23005002600	~3 acres	Known brownfield sites in/around Sappi Paper Mill campus. Parking lots, vacant land. REASON FOR PRIORITY: City downtown revitalization work in collaboration with Sappi has potential for housing and mixed-use development.
	Not Disadvantaged		

iii. Identifying Additional Sites

GPCOG will assemble a Brownfield Advisory Group (BAG) to help identify and prioritize brownfield sites in the region and provide guidance in areas such as future land use, housing and community development, public health and safety, and environmental justice. Members will include representatives from municipalities, financial institutions, housing authorities, public health agencies, educational institutions, chambers of commerce, nonprofits, and CBOs. All meetings of the Group will be noticed and open to the public. With administrative support from GPCOG, the group will create a Prioritized Regional Brownfield Site Inventory. The group will prioritize the list by scoring sites on criteria including likelihood of contamination; potential for housing or mixed-use development; proximity to sensitive locations; location in an underserved community; location in a disadvantaged community. The resulting site inventory will be used to identify additional sites should grant funds remain after addressing the target areas/priority sites described in 1.a.i., above.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: In Portland, the City's Comprehensive Plan [Portland's Plan 2030](#) calls for increased housing and mixed-use development along transit corridors and near transit hubs, with a focus on reinforcing the city center on the peninsula. In recent years, the City relocated its fleet services off-peninsula, freeing up large lots downtown for housing and economic development. With a severe housing shortage, the redevelopment of these brownfield sites has become increasingly urgent. The reuse of the four priority sites will create housing and mixed-use development in line with the Comprehensive Plan's goals of creating complete, walkable neighborhoods. Further, as 3 of the 4 priority sites are in flood zones, they will be developed in conjunction with resiliency strategies to reduce impacts of flooding in the area. This is consistent with the stated goal of encouraging "housing that is resilient in the face of climate change, severe weather events, and storm surges, especially in vulnerable low-lying areas." One of the four priority projects will preserve a historic property, consistent with the City's goal of encouraging "rehabilitation of existing historic buildings and materials."

The [City of Westbrook 2012 Comprehensive Plan](#) outlines a vision for the city's downtown business district, mill yard, and adjacent residential neighborhoods to enhance the sense of community and contribution to the city's recreational, education, and economic visibility. Mini parks connected by sidewalks, improved streetscapes, and the city's Riverwalk will make the area more walkable and support increased residential density. Both priority sites identified are consistent with this vision, helping to boost residential density downtown and create jobs while improving the pedestrian experience and maximizing public use of public spaces.

ii. Outcomes and Benefits of Reuse Strategy: Reuse of sites in the target areas will remove blighted properties and create affordable housing and mixed-use development in complete neighborhoods that can be navigated via multimodal transportation. This will enhance the sense of community and connection, attract further investment, promote entrepreneurship, create good-paying jobs, and reduce poverty and unemployment in the region. It will also make living and working closer to home more viable and attractive to residents and newly arrived young professionals, a demographic highly sought after and very much needed in a rapidly aging state. Bringing more people into the urban city centers also helps prevent sprawl and preserve open space while improving health and equity throughout the region by reducing congestion and air pollution, increasing

physical activity, and improving access to essential services. These outcomes align with the region's strategic focus on recovery and resilience, which is supported by directing housing, transit, and broadband investments into areas capable of supporting equitable new growth.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse:

The six priority sites are under development by entities experienced at pulling together capital stacks including private investment dollars, financing, municipal funding, and other governmental sources, grants, and loans. Portland and Westbrook both utilize TIF funds and TIF districts to incentivize affordable housing development and enter into Credit Enhancing Agreements (CEAs) with affordable housing developers whereby a portion of future tax revenue is returned to the developer, decreasing expenses. CEAs also help affordable housing developers to access state funds, as projects with CEAs score higher on the Maine State Housing Authority's funding application. At least one priority site will be able to use historic preservation credits, and 5 of the projects will be eligible for Low Income Housing Tax Credits. These funding sources combine to make the projects possible, but many of these sources are only available for construction activities – not predevelopment costs such as assessing and remediating sites to prepare them for development.

This is why the brownfields assessment funds are essential: they catalyze development, stimulating additional funds to support further assessment, remediation, and construction. According to local affordable housing developer AVESTA, assessment funding for a 40-unit affordable housing project would help leverage \$5M to \$15M in private investment. Finally, GPCOG was awarded \$3.9 million in Brownfields revolving loan funds in 2022. To date we have committed just over 30% of the funds. The remaining funds in the Brownfield Revolving Loan fund are available to assist projects that receive assessment funds with remediation, helping them get to the finish line.

ii. Use of Existing Infrastructure: The target areas in Westbrook and Portland are already developed. As a result, cleanup and redevelopment of these sites will use existing infrastructure instead of building additional roads, sewers, and utilities. Both target areas have direct connections to existing road infrastructure as well as air and rail service. GPCOG has been working with regional transit providers to make the system easier to use and viable for more riders. High speed internet availability and plans to further strengthen broadband capability make the target areas attractive for high tech and other business growth.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for the Funding:

Portland and Westbrook are central to the region's urban core – ideal locations for expanded housing and mixed-use development. Unfortunately, both municipalities are struggling to maintain core constituent services while keeping property taxes affordable for low-income residents, particularly those who are older and on fixed incomes. Because the state of Maine does not allow municipalities to impose local option taxes, property taxes are the primary revenue source for providing services such as police, fire, EMS, trash and recycling, and plowing as well as operating and maintaining facilities and programs including public schools, parks, emergency shelters, and general assistance. Portland spends more on General Assistance (GA) than any other city or town in the state and, as the state's largest service center community, has the largest numbers of people experiencing homelessness. Westbrook is also struggling to maintain core services with limited

revenues. To accommodate rising labor rates and new hires – particularly in the public school system – Westbrook’s FY24 budget increased property taxes by 8.8%, an amount that more than one city councilor acknowledged would create hardship for some residents. Together, the cities have over 30 known brownfield sites at the investigation stage awaiting resources, and not enough funding to address them. As the regional planning agency, GPCOG helps its member communities to address the region’s key challenges, but GPCOG receives limited member dues (only \$2 per capita) and must rely on funding from other sources to execute its mission. As a result, GPCOG has no budget to conduct environmental assessments and no mechanism to generate additional revenue. The region does not have adequate resources to assess Brownfields without support from GPCOG’s program, which is currently on hold due to lack of funding.

ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: The level of food insecurity, a measure of a household’s inability to afford enough food throughout the year, has remained stubbornly high in Maine. According to the USDA Economic Research Service nearly 14% of Maine households are food-insecure, with Maine ranking 7th in the nation and 1st in New England for food insecurity for 2016-2018. Rates are even higher for people of color (28%) and especially Black families (40%). The abundance of Brownfields sites within the target areas has perpetuated a cycle of low wages and poverty, contributing to food insecurity and disinvestment in safe and affordable housing. In a 2015 Workforce Housing Demand study GPCOG found that, of the new housing constructed from 2010-2014, just 29% was affordable to families earning the median income. Housing prices have continued to rise as demand outpaces supply. Without Brownfields funding, the region will struggle to narrow the affordable housing gap. The poverty and minority rates in the target areas are also significantly higher than State and national rates. According to EPA EJScreen data, there are high concentrations of air, water, waste, and toxics sites in the target areas. By contrast, North Deering, Portland’s wealthiest neighborhood, which is 99% white, contains none. This data shows the disproportionate impact of Brownfields on our sensitive low-income and immigrant citizens (i.e., New Mainers) and bears out the concerns expressed in Objective 6.1 of the FY 2022-2026 EPA Strategic Plan, that “fenceline communities, often with environmental justice concerns, bear a disproportionate risk of exposure” to toxins. Brownfields funds will help identify, characterize, and lead to the remediation of property that exposes these populations to environmental health risks. This will clear the way for beneficial redevelopment to help accomplish Goal 6 of the EPA’s Strategic Plan: Safeguard and Revitalize Communities.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: Industry and decades of building activity has left behind a legacy of contamination in air, soil and water. Cancer is the leading cause of death in Cumberland County. According to EPA’s EJScreen tool, areas in or near the target areas are at significantly higher cancer risk, ranging from the 70th to 100th percentile compared to the state. Brownfields funds will help identify and lead to the removal of toxic substances in the target area that contribute to increased cancer risk.

(3) Environmental Justice:

(a) Identification of Environmental Justice Issues

The health of communities of color is disproportionately impacted by environmental issues. According to EPA’s EJScreen, neighborhoods in and adjacent to the target areas range from the 60th to 100th percentile in population of people of color for Maine, meaning they are disproportionately affected by environmental factors in these areas. Often built on soils containing debris and ash,

housing options in the Portland priority areas expose residents, many of whom are immigrants or refugees, to the highest average soil concentration of lead in the City, more than four times the EPA standard. Lead inhibits learning in young children, who may ingest soil, dust or paint chips; EPA’s EJScreen EJ Index Lead Paint Indicator shows the target areas range from the 80th to 100th percentile for Maine. Brownfields funds will help identify and lead to the removal of lead, reducing exposure, and reducing adverse impacts on children.

(b) Advancing Environmental Justice

The priority sites in both target areas have all been identified for projects that will add affordable housing. New affordable housing units, established in urban areas where car ownership is not required, will help ensure that low- and middle-income individuals and families will be able to live in these urban areas where they can access essential services such as education, medicine, and healthy food without the burden of greater transportation costs incurred when they are forced to move to outlying areas. In target area #1, the Portland Peninsula, all four priority sites are in disadvantaged census tracts per CEJST. And in target area #2, Westbrook, although the two priority sites are not in disadvantaged census tracts, they abut a disadvantaged census tract (23005002700), making it highly likely that residents in that disadvantaged census tract will benefit from the reuse strategies – through the removal of hazardous toxins from the environment and the creation of new housing options in the community. Remediating and redeveloping brownfield sites that impede private investment will mitigate health risks for populations disproportionately impacted, attract new commercial and residential development, and create more jobs. This will attract younger workers while improving access to good jobs for existing residents.

b. Community Engagement

i. Project Involvement and ii. Project Roles: Project team partners include the following:

Organization/ Group	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Brownfield Advisory Group	15-20 members representing municipalities, financial institutions, housing authorities, public health agencies, education, business, nonprofits, CBOs.	Help identify and prioritize brownfield sites in the region and provide guidance in areas such as future land use, housing and community development, public health and safety, and environmental justice
Maine Immigrant Welcome Center (CBO)	Stella Hernandez stella@welcomeimmigrant.org Business Hub Director	Consult on equitable use of target sites as well as help identify appropriate partners for redevelopment.
AVESTA Housing (CBO)	Nate Howes 207-232-1021 nhowes@avestahousing.org	Contact for redevelopment sites, outreach to businesses, residents, property owners, developers; attend community meetings
Portland Housing Authority (CBO)	Brian Frost 207-221-8001 bfrost@porthouse.org	Help identify sites for redevelopment; do outreach to businesses; residents, property owners, developers; and attend meetings
Greater Portland Chamber of Commerce	Quincy Hentzel 207-233-9151 qhentzel@portlandregion.com	Contact for redevelopment sites, outreach to businesses, residents, property owners, developers; attend community meetings

Westbrook Economic Development Department	Daniel Stevenson 207-591-8101 dstevenson@westbrook.me.us	Help identify sites for redevelopment; do outreach to businesses; residents, property owners, developers; and attend meetings
Portland Housing & Economic Development Department	Lori Paulette 207-874-8683 ljn@portlandmaine.gov	Help identify sites for redevelopment; do outreach to businesses; residents, property owners, developers; and attend meetings

iii. Incorporating Community Input: In addition to establishing the Brownfields Advisory Group (BAG), GPCOG will host and attend public meetings and produce fliers and technical guides in English and other languages. Contact information will be displayed prominently on all notices, presentations, reports, and web sites, and a community feedback form will be placed on the GPCOG Brownfields website. Meetings will be held in convenient locations for the affected communities, accessible by public transit, and at a time when working residents can attend. Input from the community will be solicited directly at each public meeting, and used to help focus assessment, remediation planning, and redevelopment efforts. All comments and feedback received from the community will be formally responded to by program staff. The results of the community input process will be shared with attendees, the BAG, and the public at large, demonstrating alignment with local values and priorities. GPCOG will keep stakeholders updated on the Brownfields Program through a combination of press releases, website postings, fliers, e-newsletters, and social media.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1 - Cooperative Agreement Oversight
i. Project Implementation
<ul style="list-style-type: none"> EPA-funded activities: EPA reporting, procuring the services of a Qualified Environmental Professional (QEP), quarterly EPA reporting in ACRES, MBE/WBE reporting, attending the Brownfields conference Non-EPA grant resources: N/A
ii. Anticipated Project Schedule: Fall 2024 through Fall 2028 (quarterly reporting)
iii. Task/Activity Lead: Paul Johnson (GPCOG) with QEP assistance
iv. Outputs: Request for Qualifications; ACRES/Quarterly Reports; MBE/WBE Reports
Task 2 – Outreach, Engagement, Inventory, and Site Selection
i. Project Implementation
<ul style="list-style-type: none"> EPA-funded activities: Establishing a Brownfield Advisory Group (BAG); quarterly BAG meetings; development of comprehensive site inventory list (see 1.a.iii. for full description of BAG and method for identifying additional sites); public meetings. Non-EPA grant resources: In-kind time of BAG members, in-kind meeting space
ii. Anticipated Project Schedule: Fall 2024 through Fall 2028 (quarterly reporting)
iii. Task/Activity Lead: Paul Johnson & Emily Hamm (GPCOG) with QEP assistance
iv. Outputs: Site inventory including database and maps; meeting materials and minutes from quarterly BAG meetings and at least four (4) additional community meetings; marketing materials; website and social media content.

Task 3 – Phase I and II Environmental Site Assessments	
i. Project Implementation	<ul style="list-style-type: none"> ▪ EPA-funded activities: Phase I ESAs for priority sites, all completed in accordance with ASTM 1527-13 and EPA’s “All Appropriate Inquiry” (AAI) rule. Also QAPPs and Phase II ESAs for priority sites done in accordance with ASTM 1903-11 and MDEP regulations. • Non-EPA grant resources: N/A
ii. Anticipated Project Schedule:	Summer 2025 through Fall 2028
iii. Task/Activity Lead:	QEP w/ support from Paul Johnson (GPCOG)
iv. Outputs:	EPA eligibility documents, MDEP petroleum eligibility determinations, five (5) Phase I ESAs, four (4) QAPPS and six (6) Phase II ESAs
Task 4 – Remediation & Reuse Planning	
i. Project Implementation	<ul style="list-style-type: none"> • EPA-funded activities: Analysis of Brownfields Cleanup Alternatives (ABCAs) and Reuse Plans for priority sites; ABCAs conducted in accordance with MDEP and EPA guidelines. • Non-EPA grant resources: N/A
ii. Anticipated Project Schedule:	Fall/winter 2024 through Fall 2028, (ongoing)
iii. Task/Activity Lead:	QEP with support from Paul Johnson (GPCOG)
iv. Outputs:	Target of 6 ABCAs/Reuse Plans

b. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Cooperative Agreement Oversight	Outreach, Inventory, Selection	Phase I & II Assessments	Remediation & Reuse Planning	
Direct Costs	Personnel	\$ 31,630	\$ 30,080	\$ 1,715	\$ 2,450	\$ 65,875
	Fringe Benefits	6,421	6,106	348	497	13,373
	Travel	5,999	1,769	0	0	7,768
	Supplies	500	2,000	500	481	3,481
	Contractual	19,200	20,000	277,500	51,000	367,700
Total Direct Costs		\$ 63,750	\$ 59,955	\$ 280,063	\$ 54,447	\$ 458,215
Total Ind. Costs		20,072	19,088	1,088	1,555	41,803
TOTAL BUDGET		\$ 83,822	\$ 79,043	\$ 281,151	\$ 56,002	\$ 500,000

Cost Explanations with Costs Per Unit as appropriate

TASK 1: Cooperative Agreement Oversight:

- *Personnel*: 4 employees - 610 total hours at an average rate of \$51.85/hour = \$31,630
- *Fringe Benefits*: \$31,630 @ 20.3% = \$6,421
- *Travel*: 1,800 miles at \$0.655/mile (\$1,179) + conference costs (airfare, hotel, meals – pricing based on previous year’s expenses and current airfare/hotel rates) for 2 staff (\$4,820) = \$5999
- *Supplies*: copies, postage (pricing based previous experience) = \$500
- *Contractual*: QEP 96 hours at going rate of \$200/hour = \$19,200
- *Indirect Expense*: @ 52.75% of personnel and fringe benefits = \$20,072

TASK 2: Outreach, Engagement, Inventory and Site Selection:

- Personnel: 5 employees - 660 total hours at an average rate of \$45.58/hour = \$30,080
- Fringe Benefits: \$30,080 @ 20.3% = \$6,106
- Travel: 2,700 miles at \$0.655/mi = \$1,769
- Supplies: copies, postage, advertising (based on past experience) = \$2,000
- Contractual: QEP 100 hours at going rate of \$200/hour = \$20,000
- Indirect Expense: @ 52.75% of personnel and fringe benefits = \$19,088

TASK 3: Phase I & II Environmental Site Assessments:

- Personnel: 1 employee - 35 hours at \$49/hour = \$1,715
- Fringe Benefits: \$1,715 @ 20.3% = \$348
- Supplies: copies, postage (based on past experience) = \$500
- Contractual: QEP expenses for five (5) Phase I ESA @ going rate of \$7,500 each and six (6) Phase II ESA at going rate of \$40,000 = \$277,500
- Indirect Expense: @ 52.75% of personnel and fringe benefits = \$1,088

TASK 4: Remediation and Reuse Planning:

- Personnel: 1 employee - 50 hours at \$49/hour = \$2,450
- Fringe Benefits: \$2,450 @ 20.3% = \$497
- Supplies: copies, postage, noticing (based on past experience) = \$481
- Contractual: QEP expenses for six (6) reuse plans at going rate of \$8,500 each = \$59,500
- Indirect Expense: @ 52.75% of personnel and fringe benefits = \$1,555

c. Plan to Measure and Evaluate Environmental Progress and Results

All program outputs and outcomes will be documented and communicated to the EPA as part of GPCOG’s quarterly progress reports and ACRES information updates, and to the region at large through GPCOG’s project task obligations. At the outset of the project, GPCOG will develop a detailed project timeline that will incorporate all task expectations, project outputs, and staffing considerations to guide project progress. This timeline will be shared with the EPA and QEP and reviewed during BAG meetings to aid in communicating the project vision and tracking results.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity and ii. Organizational Structure: GPCOG has the knowledge, experience, and capacity to implement and manage the FY24 Brownfields Assessment Grant successfully. GPCOG’s total budget for FY24 is \$5,223,772; approximately 83% is grants and state and federal contracts that are consistently and successfully managed. GPCOG is the federally designated Metropolitan Planning Organization for the greater Portland area, managing over \$20,000,000 in federal funds annually in this role. GPCOG has received federal funding through the EPA, Federal Transit Administration, Federal Highway Administration, HUD, EDA, Department of Energy, Department of Transportation, and USDA, and has not had any adverse audit findings. As planning needs in the region have become more sophisticated, GPCOG has responded by raising the level of technical skill required of its staff and adding expertise as needed. Management of the program, its finances and compliance are the responsibility of two members of the senior management team, reporting directly to the Executive Director. Senior management team members report to the Executive Director weekly and convene weekly to address agency management and strategy.

iii. Description of Key Staff

Kristina Egan, Executive Director, will provide strategic direction for GPCOG’s program. She was previously the Director of the Massachusetts Smart Growth Alliance, successfully securing \$30 million to clean up properties for redevelopment. Kristina has an MA in international relations and international economics from Johns Hopkins and a BA in history from Wesleyan.

Paul Johnson, Senior Economic Development Manager, is part of an expanded economic development team at GPCOG and will serve as program manager. Paul actively engages GPCOG’s contacts – municipal staff, elected officials, and local developers – to promote the brownfields program.

Joshua Kochis, CPA, Finance Director, will maintain financial records, process invoices and payments, manage vendor contracts and grant agreements and provide general administrative oversight. Josh has over 12 years of local government auditing and accounting experience. He received a BS in Accounting from the University of Maine and is a Maine Certified Public Accountant.

Emily Ham, Engagement Coordinator, manages GPCOG’s community outreach and engagement efforts. Emily works with project teams across the organization to implement best practices of engagement with members of the public, community groups and organizations.

iv. Acquiring Additional Resources: Upon receipt of the grant, GPCOG will solicit proposals for and hire QEPs. This process will be conducted in accordance with GPCOG’s procurement policies utilizing a competitive bid process consistent with Uniform Guidance 2 CFR §200.317 through §200.326. GPCOG considers MBE/WBE status during the RFP evaluation process.

b. Past Performance and Accomplishments

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

(1) Accomplishments: GPCOG has received Brownfields Areawide Planning, Assessment, and Revolving Loan Fund grants from the since 2009. These funds were used to identify community needs, assess 39 high priority sites across the region, leveraging more than \$35.6M in direct cleanup and redevelopment, and an estimated \$100M in additional redevelopment. ACRES has been continuously updated through each grant and accurately reflects GPCOG’s accomplishments. The FY23 GPCOG Brownfields Program will continue to identify brownfield sites, assess the extent and degree of contamination, and conduct remediation and reuse planning.

(2) Compliance with Grant Requirements:

FY 2016 Hazardous Substances/Petroleum Brownfields Assessment Grant (BF00A00234) – *Grant Period: 10/1/2016-9/30/2019. Funds Expenditure: \$0 grant funds remaining at end of grant period. Compliance with Grant Requirements:* GPCOG complied with all quarterly reporting, MBE/WBE disclosures, financial status reports, ACRES updates, and progress monitoring. *Compliance with Work Plan:* 8 Phase I and 12 Phase II ESAs were completed. \$35.6M in leveraged funds has been generated to date.

FY 2014 Brownfields Revolving Loan Fund Grant (BF96174501) – *Grant Period: 10/1/2013-9/30/2024. Funds Expenditure:* Fully committed (approximately 25% subawards/75% loans). Upon completion of a project at Thompson’s Point in Portland, Maine we will closeout BF96174501. *Compliance with Grant Requirements:* GPCOG has complied with all quarterly reporting, MBE/WBE disclosures, financial status reports, and progress monitoring.

FY 2023 Brownfields Revolving Loan Fund Grant (4B-00A00907-0) – *Grant Period: 7/1/2022-9/30/2027. Funds Expenditure:* 5% of funds are committed in loans; 26% have been granted as subawards. *Compliance with Grant Requirements:* GPCOG has complied with all quarterly reporting, MBE/WBE disclosures, financial status reports, and progress monitoring.

GPCOG Brownfields Assessment Threshold Criteria FY24

1. APPLICANT ELIGIBILITY

The Greater Portland Council of Governments (GPCOG) is an IRS 501(c)(1) council of governments established pursuant to state law. It serves as a regional planning commission, federally designated economic development district (EDA) and metropolitan planning organization (FHWA/FTA), and quasi-municipal multipurpose agency. As such, GPCOG is an entity eligible to apply for this EPA Brownfields Assessments grant. GPCOG was formed in 1969 pursuant to Maine statute. Copies of GPCOG's Articles of Incorporation, bylaws, relevant statute and state acknowledgement letter are included as documentation of our eligibility.

2. COMMUNITY INVOLVEMENT

GPCOG utilizes a multifaceted approach to ensure a broad cross-section of residents are engaged in the inventory, assessment, and redevelopment planning process. GPCOG will host informational workshops, meet with municipal boards, attend/host public meetings, and produce fliers and technical guides in English and other languages for the neighborhood or community they are intended to reach. Meetings will be held in convenient locations to the affected communities, accessible by public transit, and at a time when they can be attended by working residents. We will utilize a hybrid meeting approach allowing in person and online attendance as appropriate to provide greater flexibility for attendees and attract a wider audience. Further, GPCOG will also schedule and hold one-on-one or small conversations with stakeholders as needed.

GPCOG will provide stakeholders with updates on the Brownfields Program through a combination of press releases, website postings, placement of fliers at area establishments, e-newsletters, and social media. All meetings of the Brownfields Advisory Group which comprises representatives from municipalities, financial institutions, housing authorities, public health agencies, educational institutions, chambers of commerce, nonprofits, and CBOs, will be noticed and open to the public. In addition, a dedicated Brownfields page on the GPCOG website highlights educational resources, engagement opportunities, and ongoing work.

Input from the community will be solicited directly at each public meeting. In addition, contact information will be displayed prominently on all notices, presentations, reports, and web sites to invite community input. A community feedback form also will be placed on the GPCOG Brownfields website that can serve to directly provide input by the community. All comments and feedback received from the community will be formally responded to by program staff.

3. EXPENDITURE OF EXISTING GRANT FUNDS

GPCOG does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. CONTRACTORS AND NAMED SUBRECIPIENTS

GPCOG has included no named procurement contractors, consultants, or subrecipients in this application and hereby acknowledges its obligation to comply with applicable procurement requirements in 2 CFR part 200 and Appendix A of EPA's Subaward Policy after any cooperative agreement is awarded.