



ECONOMIC DEVELOPMENT



ROI-24-A-026

Daniel Stevenson
Economic Development Director
Demetria Pellegrino
Economic Development Deputy Director
Robyn Saunders
Project Manager
2 York Street Westbrook, ME 04092
Phone: 207-591-8101

TO: USEPA Brownfield Assessment Grant Application Reviewers
FROM: Robyn Saunders, City of Westbrook Project Manager
CC: Daniel Stevenson, Economic + Community Development Director
Jerre Bryant, City Administrator
DATE: November 13, 2023
RE: EPA-I-OLEM-OBLR-23-12
Community-Wide Assessment Grant
Westbrook, Maine

1. **Applicant Identification:**

City of Westbrook | 2 York Street | Westbrook, ME 04092
EIN: 016000038 UEI: UESDJLMLFH45

2. **Funding Requested:**

- a. Grant Type: Community-Wide Assessment
- b. Federal Funds Requested: \$500,000

3. **Location: Westbrook, Cumberland County, Maine**

4. **Target Area and Priority Site Information:** The Target Area for this grant is the 0.25-mile area from both sides the Presumpscot River in the Westbrook Downtown (portions of Census Tracts ME005002600, ME005002700, ME005002800, and ME005002900). Priority Sites include:

- a. 921 Main Street (Map 32 Lot 105A)
- b. 10 Dana Street (Map 32 Lots 105B + 105C)
- c. 225 Warren Ave (a portion of Map 45 Lot 1)

5. **Contacts:**

- a. **Project Director:** **Robyn Saunders, Project Manager**
rsaunders@westbrook.me.us
2 York Street, Westbrook, ME 04092
Cell (preferred): (207) 233-6305 Office: (207) 854-0660 x3014
- b. **Chief Executive:** **Jerre Bryant, City Administrator** **Michael Foley, Mayor**
jbryant@westbrook.me.us mfoley@westbrook.me.us
City Hall, 2 York Street, Westbrook, ME 04092
(207) 854-9105

6. **Population:** City of Westbrook's population = **20,572**

7. Other Factors:

Other favorable USEPA Factors	Page #
a. Community population is 10,000 or less	N/A
b. The applicant assists federally recognized Indian tribe or United States Territory.	N/A
c. The proposed brownfield site(s) is impacted by mine-scarred land	N/A
d. Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the	4
e. The proposed site(s) is adjacent to a body of water (i.e., the border of the 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
f. The proposed site is in a federally designated flood plain.	2
g. The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	N/A
h. The reuse of the proposed cleanup site(s) incorporates energy efficiency.	N/A
i. The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	2-3
j. Project is located within a community w/recently closed coal-fired power plant.	N/A

8. Letter from the State or Tribal Environmental Authority – Attached after this summary

9. Releasing Copies of Application: N/A – No confidential, privileged, or sensitive information included.



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

November 1, 2023

City of Westbrook
Attn: Robyn Saunders
2 York Street
Westbrook, ME 04092

Dear Robyn Saunders:

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

Robyn Saunders of the City of Westbrook has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the City.

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

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

Sincerely,

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

cc: Katy Deng, EPA Brownfields Region 1

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

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

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

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

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: Ask residents of Southern Maine about Westbrook and two images inevitably come to mind – towering industrial smokestacks and “that horrible smell.” Situated in the southern coastal section of Maine, Westbrook is a small, historic “mill town” struggling with the legacies of its industrial heritage and falling short in its efforts to reclaim lost retail business from the region’s ever-expanding strip malls. The Presumpscot River, which flows through the City’s center, fueled Westbrook’s mill economy for more than two hundred years. Like so many older industrial communities, most of Westbrook’s lumber, textile, and pulp + paper mills have shut down in recent years, leaving a string of derelict, contaminated sites behind. The most significant of these closings is that of the SAPPI Fine Paper mill (also known as the S.D. Warren Mill), which had long served as the City’s largest employer. Initially started in the 1730s, the mill represented 50% of the municipal tax revenue base at one time. In April 1999, SAPPI Fine Paper of North America announced that it would cease all pulp operations and dramatically reduce its paper manufacturing capacity. This closure has had tremendous impacts on the local economy, including the elimination of approximately 3,500 jobs, the reduction in local tax revenue (from 50% in 1900s to less than 5% today), and the significant downsizing of more than 140 acres of prime industrial land situated in the heart of downtown Westbrook. In addition to the mills, there are numerous other hazardous waste sites in Westbrook, many of which are Brownfields. This demonstrates the extent of Brownfield challenges in our community, which have a host of economic, environmental and health impacts to its residents.

The Target Area for this grant is the 0.25-mile area from both sides the Presumpscot River in the Westbrook Downtown (portions of Census Tracts ME005002600, 2700, 2800, and 2900). These census tracts are designated as both disadvantaged and an environmental justice (EJ) community-based on EJScreen and the socioeconomic threshold set in the CEJST Tool. This Assessment Program will be used as a tool to help facilitate the creation of additional greenspace along the Presumpscot River through expansion of the River Walk and stimulation of economic development in the downtown.

1.a.ii. Description of the Priority Brownfield Sites: SAPPI currently owns and occupies over 140 acres of land in the Target Area including the main mill area (Map 45 Lot 1) and several ancillary lots along the river used to support former hydroelectric operations. Paper mill operations occupied these lands for almost 300 years. In addition to the paper mill lands, there are numerous other hazardous waste sites in Westbrook, many of which are Brownfields. The Maine DEP has over 30 sites in their Remedial Sites database, while EnviroAtlas shows 32 Inactive RCRA sites and 46 EPA UST sites. The following sites are a priority for assessment under this grant:

- a. River Walk West Site at 921 Main St (Map 32 Lot 105A) – Former SAPPI hydroelectric dam and power station that was removed in 2021. By virtue of an existing easement on the SAPPI-owned parcel, the City plans to extend the river walk over 1,000 feet along the western portion of the parcel along the Presumpscot River. The City is currently in negotiations with: (1) SAPPI to purchase this land; and (2) a private developer to create a public private partnership (P3) that will result in 100 units of work force housing and roughly 5,000 SF of commercial/retail property. However, environmental concerns and long-term liabilities associated with potential onsite contamination are complicating these projects from moving forward. Previous Limited Phase I/II Environmental Site Assessments (ESAs) completed by the City in 2020 (surficial soil sampling only) identified metals (arsenic and chromium) in surface soil in exceedance of residential standards. Additional assessment is required including assessment of soil, groundwater, and vapor in the former power plant area for PCBs, petroleum, PAHs, and chlorinated solvents (VOCs) as well as assessment of soil, groundwater, and vapor from an immediately upgradient gasoline station that had previously

leaking underground storage tanks (USTs) and an adjoining former dry cleaner for petroleum and chlorinated solvents.

- b. **SAPPI South Mill Lands at 225 Warren Ave (portion of Map 45 Lot 1) - Paper mill operations on this parcel date back to the 1700s. With the closure of the pulp mill and downsizing of paper making, the southern portion of the parcel (roughly 5-10 acres along the southern riverbank of the Presumpscot River) is not currently utilized by SAPPI. It is the City's intention to facilitate the subdivision of these lands, and transfer these lands to private entities for commercial or residential reuse (clean areas only) or create public private partnerships to facilitate redevelopment and reuse.** The Site was previously investigated under a RCRA Facility Investigation in the 1990s and concluded that VOCs were present in groundwater resulting from former solvent USTs. Monitoring has demonstrated a steep decline in concentrations following removal of the storage tanks. In 2007, a Declaration of Environmental Covenant was instituted to establish land use restrictions for roughly a 0.5-acre portion of the parcel that restricts groundwater extraction or residential use. Additional assessment is required to support redevelopment in regards to specific building reuse as well as hazardous building materials. No assessment will be conducted in regard to the RCRA Environmental Covenant or other RCRA requirements.
- c. **SAPPI Support Lands at 10 Dana St (Map 32 Lots 105B and 105C) - SAPPI owns additional 1.7 acres of vacant, undeveloped land associated with the former hydroelectric dam and power plant that abuts the River Walk West parcel above. These lands are targeted by the City to be acquired for additional greenspace as well as right of way to make Mill Lane a conforming City street. Portions of Mill Lane, a private road owned by SAPPI, require realignment to support the residents that live along this non-conforming street that is not regularly maintained to City standards for streets.** No previous environmental assessment has been done to date on these parcels. Environmental concerns include PCBs, PAHs and metals from former use as well as concerns from petroleum and chlorinated solvents from an upgradient gas station and dry cleaner.

1.a.iii. Identifying Additional Sites: Beyond the priority sites within the Target Area presented above, Westbrook will build off its existing inventory of Brownfields completed in conjunction with Greater Portland Council of Governments (GPCOG's) Brownfields inventory last updated in 2019. This will consist of updating the current inventory by reviewing current environmental databases, communicating with the target area residents, government officials, area stakeholders, and local developers as well as conducting a windshield survey. These properties will be included in a GIS layer that will be readily available to City staff, providing access to images, graphics, and information pertaining to each Brownfields location included in the GIS layer.

Prioritization of Sites for Assessment will be by the Brownfields Advisory Committee (BAC). Prioritization will be based on: (1) location in or near Target Area; (2) economic and community development potential; (3) community need and impacts to EJ Communities; (4) sustainable reuse; and (5) creation of greenspace. The Target Area is within EJ and socioeconomic disadvantaged census tracts. Prioritization will initially focus within the underserved census tracts (Target Area) and then will expand City-wide if funding is still available, specifically to help facilitate the creation of additional greenspace along the Presumpscot River through expansion of the River Walk and stimulation of economic development in the downtown.

1.b. Revitalization of the Target Area; 1.b.i. Reuse Strategy and Alignment with Revitalization Plans: This assessment grant will help facilitate expansion of greenspace, creation of workforce housing, and stimulation of economic development building off three previous planning studies completed in the Target Area.

- **City’s Riverfront Master Plan.** Dating back to 2000, this plan set out to create walkable loop of trails and boardwalk “*to create a new vibrant area for shopping, eating, gathering and strolling along the River’s edge.*” By 2003, the City had invested \$16M in the River Walk Trail on the southside of the Presumpscot River, which included an 800-ft long, raised, wooden boardwalk and over 10,000 ft of at-grade trails.
- **Downtown Westbrook Study Revitalization Plan.** In 2007, this plan echoed the need to continue to improve the livability and increase pedestrian connectivity around the City. It also focused on downtown revitalization, marketing and promotion, and utilization of a downtown TIF to facilitate economic development.
- **City of Westbrook Comprehensive Plan.** Known as the Comp Plan, in 2012 this plan built off the above plans including significant input from residents in the Target Area as well as with key partners like Westbrook Environmental Improvement Corporation and the Presumpscot Regional Land Trust. One of the outcomes of the public process (that included members of the target community and our partners) was to “*promote and protect the availability of outdoor recreation opportunities for all Maine citizens, including access to surface waters*”. One of the strategies for implementation of the plan is to “*continue to work with local and regional partners, including landowners, to extend and maintain a network of trails for motorized and non-motorized uses, where appropriate*”. To date, the City has focused on achieving this goal and has already added 11,600 feet of river walk along the south side of the Presumpscot River. Through continued community involvement of the Target Area and community partners, it has been made clear, the residents want more access to recreational opportunities and water access. The City’s Comprehensive Plan also focuses economic development stating “*through the 1990s, the city began to realize this identity focusing new economic development on technology based industry. This focus continued into the first decade of the 21st Century along with an increased focus on the downtown’s role as a regional service center*”.

This Assessment program will directly support the goals and recommendations of these previous plans by prioritizing sites for assessment, conducting environmental site assessments, developing reuse plans related to the highest priority brownfield sites, and other planning and community engagement activities to bring sites into productive reuse as greenspace and support economic development, vitality, and prosperity throughout downtown Westbrook.

1.b.ii. Outcomes and Benefits of Reuse Strategy: It is well known that the presence of a river in a community is a key driver of economic revitalization. In fact, in the City’s Comprehensive Plan, the Presumpscot River was specifically highlighted as a great asset to the community, its scenic environment, and its economic development. This Assessment Program will assist the City to further capitalize on a great and valued resource. The river was critical to the lives of the Abenaki people that lived along it for a millennium or more prior to colonization. In the early 1700s, the seeds of industrial growth were sown that built the current City of Westbrook. While industry has not been kind to the river, a new era of understanding, stewardship, and engagement relative to the river exists. Our project to prioritize Brownfields sites within the Target Area will maintain momentum as we continue to identify areas for assessment and eventual cleanup through P3 and other mechanisms that will beneficially redevelop sites to serve citizens and tourists alike bringing more people downtown to support area businesses. Finding beneficial uses for redevelopment sites within the Target Area will:

- Encourage and continue community engagement, especially those involving recreational activities.
- Promote environmental stewardship and raise positive environmental awareness in our community.
- Encourage conservation efforts for our river system, which in turn creates additional greenspace and/or outdoor recreational opportunities for citizens and visitors to our region.
- Offer indirect economic benefits by increased tourism and increased access to downtown businesses.
- Strengthen community vitality by diversifying the City’s overall health and wellness initiatives.

- Help the City adapt to climate change by introducing resiliency into redevelopment plans.
- Improve the livability for native and new residents, especially those in the heart of the downtown.

Many sites are located within the regulatory floodway. A successful assessment and eventual cleanup of our sites will help decrease the fear of contamination along our river system and ensure the safety of our freshwater system within the City. Successful assessment will also identify legacy environmental contamination at former mill sites and gas stations that will be addressed during redevelopment in order ensure that occupancy and reuse of these sites are safe and protective of human health as well as address any future impacts to the Presumpscot River.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The following resources will be leveraged as part of the project:

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
Westbrook Environmental Improvement Corp.	\$300,000 for Assessment and Reuse Activities	Secured (see Attachment 2)	WEIC funds were pledged in late 2022 to assess parcels along the northern side of the Presumpscot River, which is being used to extend the River Walk.
Downtown Tax Increment Financing (TIF)	Remediation and Reuse	Secured (see Attachment 2)	The City routinely works with private and public developers to provide credit enhancement agreements and/or tax increment financing to eligible projects or project components.
GPCOG & Maine DEP Brownfields Cleanup RLF	Remediation	Unsecured	As needed, the City will request additional cleanup funding from other area Brownfields RLFs.

1.c.ii. Use of Existing Infrastructure: The City currently maintains adequate capacity in water, sewer, roads, stormwater, etc. All existing infrastructure will be utilized and minimal infrastructure improvements are anticipated to be required as part of future redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need; 2.a.i. The Community’s Need for Funding: Westbrook is a struggling former mill town adjacent to the state’s largest City (Portland). All census tracts within the City of Westbrook are all designated LMI (low-to-moderate income). According to EJScreen, the residents in the Target Area:

- struggle to make ends meet with low income (37% of people w/in Target Area vs. 28% across ME);
- have limited English speaking households (94th percentile in Maine);
- include a high percentage of people of color (94th percentile in Maine); and
- include a high percentage of children (83th percentile in Maine).

The housing stock in the Target Area is aging rapidly (median year built is 1958 vs 1973 for the rest of Maine) and has an aging population (median age of 39 vs median age of 37 in US). The S. D. Warren Paper Mill (now SAPPI) was once the city's largest employer and taxpayer, employing over 3,000 people and representing over 50% of the city's tax base. However, foreign competition and the age of the mill have drastically reduced its workforce and production and it now only represents 2.3% of the tax base which has stressed the remaining tax base of our community.

In the face of these challenges, the City struggles to maintain core services of police and fire protection for a diverse and underserved population while the older home stock and aging demographics in our target areas create more demand for these services (i.e., ambulance, medical response, vandalism, fires, crime, etc.). Westbrook is already relying on leveraging several sources of funding to create economic opportunity in the City that will utilize any remaining general fund dollars. These assessment funds are necessary for the City to continue to move forward with addressing these stark environmental justice and socioeconomic disparities in our community. There are no additional funds from which we can draw upon.

2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: According to EJSCREEN, the City of Westbrook Target Area has higher percentages of disadvantaged populations, including low income and children (see stats above), as well as one of the highest percentages of People of Color in the State of Maine (94th percentile) and Limited English Speaking (94th percentile in state). Lastly there is an obesity epidemic throughout the State of Maine which has increased from 12% in 1990 to over 30% in 2020 (MaineHealth 2020). Data from America's Health Rankings (2019) indicate that in Maine, non-Hispanic Black adults had the highest age-adjusted prevalence of obesity (34.8%), and data also suggests that those with lower incomes tend to be at higher risk for having obesity. While no data is available specifically for the target community, it is expected to follow the same trend with obesity being a major health deterrent to the target community due to lower income and higher percentage of people of color. This combined data highlights how the health and welfare of our sensitive low-income populations are adversely impacted.

Within the past three years, the City has invested \$5M in recreational opportunities like a boat launch, four-season rink + futsal court, revitalization of multi-purpose outdoor recreational area that are all accessible to the public and are adjacent to some of the priority brownfields sites. The redevelopment of target sites (along with our other greenspace investments) will provide a greenspace for people to gather, exercise, and have fun at no cost. This intentional investment (including the Priority Brownfields Sites) combined with the City's growing and diverse community helps to reverse these health trends in the immediate and long-term future. Green spaces provide vital health services as well as environmental services; focused on reducing socioeconomic health inequalities, facilitating activity and promoting better mental and physical health. Creation of economic development opportunities within the Target Area will also help our sensitive populations by providing good-paying, stable employment. Many targeted new businesses will provide health insurance to help further improve upon these disadvantaged statistics.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the Climate and Economic Justice Screening Tool (CEJST), the Priority Brownfields Sites are located within disadvantaged census tracts (Tracts 002600, 002700, 002800, 002900) for purposes of Justice40 for health conditions due to it meeting both a burden threshold (**asthma** at 91st percentile) AND the associated socioeconomic threshold (low income at 66th percentile). While scientists continue to explore the causes of asthma, it is known that both obesity and air pollution are important contributors. In addition, **cancer** is the leading cause of death in Maine and has been since 2002. For the past 20 years, cancer death rates in Maine have been significantly higher than the U.S. rate. Currently, obesity and being overweight are associated with many different cancers. Given socioeconomic circumstances within our community, it is inferred that cancer is also disproportionately impacting Westbrook residents. Many cancers are impacted and can be avoided by modifying risk factors such as staying active being a major contributor.

The Assessment Program, which will identify contaminants for remediation within our community, will help address both asthma and cancer by providing recreation opportunities that will lead to increased recreational opportunities for exercise and spending more time outside to lower obesity, and lower the likelihood of asthma and cancer. For example, ESA reports conducted as part of the City's Assessment Program will likely identify elevated levels of PAHs, metals, and other contaminants on Priority

Brownfields Sites. This grant will facilitate identification of contaminants to remediate, which will directly reduce environmental threats to our low income, sensitive populations – thus improving the health and welfare of our target community by providing recreational opportunities for exercise, reduce obesity and improve overall health of the target community (and Presumpscot River).


(3) Environmental Justice: (a) Identification: As stated our above, per CEJST our Priority Brownfields Sites are located within a disadvantaged census tract for purposes of Justice40 due to it meeting both a burden threshold (asthma at 91st percentile, as well as proximity to Risk Management Plan facilities at 85th percentile, and housing cost at 84th percentile) AND the associated socioeconomic threshold (low income at 66th percentile, as well as poverty at 84th percentile, high minority populations at 18%, and high percentage of children under 10 at 17%). According to EJSCREEN, our community also suffers from high percentages of impacts from particulate matter (91st percentile in state), Superfund Proximity, and RMP Facility Proximity (both 91st percentile in state). This illustrates that residents in EJ disadvantaged tracts experience both a significantly high prevalence of environmental burdens, and are disproportionately low-income, people of color, no high school education, and/or Limited English proficiency (LEP).

(b) Advancing Environmental Justice: It is not the target community’s fault our industrial past is still affecting them today. This project will facilitate the creation of recreational opportunities in the target area, making this area more desirable for investment, leading to improved health outcomes as well as improved economic indicators within the Target Area. Messages around these improved environmental and economic benefits will be communicated to the target area as part of the Brownfields Program to capitalize on the new era of understanding, stewardship, and awareness relative to the river, brownfields programs, and these inherent injustices.

Located within the regulatory floodplain, our priority brownfields sites will assess feasibility for, and facilitate, a successful cleanup to help decrease the worry of contamination along our river system and ensure the safety of our freshwater system in the City. In addition, significant efforts have been taken by the City to increase workforce housing within the City including hundreds of new units of workforce housing in the past five years and hundreds of units planned to be built in the next five years. This is being done to stabilize the housing market in the area and prevent target area residents from being displaced, ensuring that native and new populations are able to remain living in the City of Westbrook.

2.b. Community Engagement; 2.b.i. Project Involvement and 2.b.ii Project Roles: Westbrook has continually engaged the community during the City’s planning process and will continue to involve the community throughout every aspect of this project from assessment to reuse. In addition to the programmatic and technical support provided by the Maine DEP and EPA the following project partners will also be leveraged:

<u>Partner Name</u>	<u>Point of Contact</u>	<u>Specific Role in the Project</u>
Westbrook Env. Improvement Corporation	Stephen Noyes snoyes@me.com 207-831-1999	Community outreach to area businesses, BAC participant, input on inventory and site selection, input on site reuse planning
Discover Downtown Westbrook	Amy Grommes Pulaski amy@downtwonwestbrook.com 207-272-7336	Community outreach to area businesses, BAC participant, input on inventory and site selection, input on site reuse planning
Presumpscot Regional Land Trust	Rachelle Curran Apse rachelle@prlt.org 207-839-4633	Community outreach regarding greenspace opportunities, BAC participant, input on inventory and site selection

Friends of Presumpscot River	Councilor Michael Shaugnessy mshaugnessy@westbrook.me.us 207-329-5042	Community outreach regarding greenspace opportunities, BAC participant, input on inventory and site selection
Westbrook Recreation + Conservation Commission	Paul Drinan  207-615-5202	Community outreach, BAC participant, input on inventory and site selection, input on site reuse planning

2.b.iii. Incorporating Community Input: The City utilizes a multi-media approach to ensure a broad cross-section of residents in the target area are engaged in the outreach, assessment, cleanup and redevelopment process. Like in the Brownfields Cleanup grant process, the City will:

- Continue community outreach by hosting informational workshops with the Brownfields Advisory Committee (BAC), project partners, and City staff.
- Attend/host public meetings and produce fliers and technical guides to be shared with the public. Meetings will be held:
 - during the outreach process and during 30 day comment period for ABCAs.
 - in convenient locations within the Target Area, accessible by public transit, and at a time when they can be attended by working residents
 - via alternative means (Zoom or Teams) if COVID concerns become an issue.
- Provide stakeholders with updates on the Brownfields Program through a combination of press releases, postings on its partners’ websites, placement of fliers at area businesses and organizations, e-newsletter articles (488 Constant Contact subscribers), social media (500 Twitter feed and 701 Facebook followers).
- Develop a dedicated Brownfields page on the City’s website, in addition to print media described above to be distributed through partner and area organizations, to highlight educational resources, engagement opportunities, and ongoing work.

Additionally, several partners (see above) have committed to help with the outreach and communication process. These established communication mechanisms will be used to announce events, meetings, and workshops, distribute technical guides, fliers, and other literature and web-based information. Input from the community will be solicited directly at each public meeting. In addition, contact information including phone and email will be placed prominently on all notices, presentations, reports, and web sites to directly solicit community input. Lastly, a community feedback form will be placed on the City’s 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 in writing on our website.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

<p>Task/Activity: Task 1 - Cooperative Agreement Oversight</p> <p>i. Project Implementation:</p> <ul style="list-style-type: none"> ▪ EPA-funded activities: City will be responsible for the programmatic implementation of the grant including EPA reporting as well as advertising and selecting a QEP to execute the Program; as well as quarterly EPA Reporting in ACRES, MBE/WBE reporting, and attending the Brownfields conference ▪ Non-EPA grant resources needed to carry out task/activity, if applicable: N/A <p>ii. Anticipated Project Schedule: Fall 2024 through Fall 2027 (quarterly reporting)</p> <p>iii. Task/Activity Lead(s): City Project Manager</p> <p>iv. Output(s): Request for Qualifications; ACRES/Quarterly Reports; MBE/WBE Reports</p>

Task/Activity: Task 2 – Outreach, Engagement, Inventory, and Site Selection

i. Project Implementation:

- EPA-funded activities: City and our QEP will work with our BAC, project partners and the Maine DEP to identify and expand our inventory of brownfields. The BAC will review/update site selection criteria and choose additional high priority sites for assessment. During this process we will consult with other City officials, business leaders, community organizations, other project partners, and the public about brownfields, brownfields redevelopment, and the City’s brownfields assessment program.
- Non-EPA grant resources needed to carry out task/activity, if applicable: N/A

ii. Anticipated Project Schedule: Fall 2024 through Fall 2027

iii. Task/Activity Lead(s): City Project Manager with QEP assistance

iv. Output(s): Inventory including maps, meeting materials and minutes, marketing material, website, and social media content.

Task/Activity: Task 3 – Phase I and II Environmental Site Assessments

i. Project Implementation:

- EPA-funded activities: Phase I ESAs will be performed on a minimum of 8 high priority sites. All Phase I ESA will be completed in accordance with ASTM 1527-13 and EPA’s “All Appropriate Inquiry” (AAI) rule. We also anticipate 10 high priority site QAPPs, and Phase II ESAs will be conducted as part of this task. Phase II ESAs will be done in accordance with ASTM 1903-11 and Maine DEP regulations.
- Non-EPA grant resources needed to carry out task/activity, if applicable: N/A

ii. Anticipated Project Schedule: Fall 2024 through Spring 2028

iii. Task/Activity Lead(s): QEP w/ support from City Project Manager

iv. Output(s): EPA eligibility documents, DEP petroleum eligibility determinations, and minimum eight (8) Phase I ESAs, 10 QAPPs, and 10 Phase II ESAs

Task/Activity: Task 4 – Remediation & Reuse Planning

i. Project Implementation:

- EPA-funded activities: We anticipate that a minimum of four (4) high priority sites will have Analysis of Brownfields Cleanup Alternatives (ABCAs) and Reuse Plans conducted as part of this task. ABCAs will be conducted in accordance with both Maine DEP and EPA guidelines.
- Non-EPA grant resources needed to carry out task/activity, if applicable: N/A

ii. Anticipated Project Schedule: Summer 2025 through Fall 2028

iii. Task/Activity Lead(s): QEP w/ support from City Project Manager

iv. Output(s): Minimum 4 ABCAs/Reuse Plans

3.b. Cost Estimates

Budget Categories	Project Tasks (\$)				Total
	(Task 1)	(Task 2)	(Task 3)	(Task 4)	
Personnel	\$10,000	\$10,000	\$8,000	\$5,000	\$33,000
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$3,500	\$0	\$0	\$0	\$3,500
Supplies	\$0	\$500	\$0	\$0	\$500
Contractual	\$0	\$25,000	\$378,000	\$60,000	\$463,000
Total Direct Costs	\$13,500	\$35,500	\$386,000	\$65,000	\$500,000
Total Ind. Costs	\$-	\$-	\$-	\$-	\$-
Total Budget	\$13,500	\$35,500	\$386,000	\$65,000	\$500,000

TASK 1: Cooperative Agreement Oversight: This task will include \$10,000 for programmatic management of the grant including procuring a QEP, quarterly reports, ACRES updates, and MBE/WBE reporting (200 hours at \$50 per hour staff), \$3,500 for travel for 2 people to the EPA Brownfields Conference (\$1,500 airfare, \$1,000 for 3 nights lodging, \$600 for 3 days per diem, \$400 for registration and other fees). Additional City staff time will be in-kind match for the project.

TASK 2: Outreach, Engagement, Inventory and Site Selection: It is estimated that \$10,000 will be necessary for City personnel to facilitate BAC, public, and community volunteer/partner meetings (200 hours at \$50 per hour), \$25,000 for QEP time to finalize the ABCA and prepare the Community Relations Plan, assist in community outreach, and participate at the BAC/public meetings (208 hours at \$120/hour); \$500 in supplies that will comprise a project sign, newspaper advertising, and presentation materials. Additional City staff time will be in-kind match for the project.

TASK 3: Phase I & II Environmental Site Assessments: It is estimated that \$8,000 will be used for coordination of Ph I and IIs (160 hours at \$50/hr); and includes QEP expenses of 8 x \$4,500 for each Phase I ESA, 10 x 3,500 for each SSQAPP, and 10 x \$30,700 for each Phase II ESA (\$378,000). Additional City staff time will be in-kind match for the project.

TASK 4: Remediation and Reuse Planning: It is estimated that \$5,000 will be used for coordination of ABCAs and Resue Plans (100 hours at \$50/hr); and includes QEP expenses of 4 x \$15,000 per RAP/Reuse Plan (\$60,000).

3.d. Plan to Measure and Evaluate Environmental Progress and Results: The QEP will be responsible for ensuring that all work conducted is compliant with State and Federal guidelines. The QEP and the City will be in constant contact throughout this project. The mechanism for tracking, measuring, and evaluating progress and achieving our program outcomes (short and long-term) will be measured through our quarterly EPA reports which are updated on a quarterly basis in the EPA ACRES database. Upon notification of award, the City will prepare the required Cooperative Agreement Work Plan with EPA that will outline the overall project schedule, project budget, identify various work tasks, benchmarks, and milestones that will be tracked and measured during grant implementation. Progress will be evaluated as part of our quarterly BAC meetings and modifications to the Work Plan will be completed if needed. Connecting the outputs to our work plan will provide a link to the results of grant funding within EPA's strategic plan as well as demonstrate to Congress the tangible results of the Brownfields grant program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability: 4.a.i. Organizational Capacity 4.a.ii Organizational Structure: With nearly 200 full-time municipal employees and an annual budget of over \$44 million, the City has sufficient staff capacity and experience to continue to implement a successful Brownfields program. The City provides a full range of municipal services ranging from Police, Fire, and emergency communication services, to health and welfare assistance, to planning and economic development opportunities. The City receives roughly \$2 million each year in grants from State and Federal agencies, including HUD, FAA, DOT, DOI and others. There are well defined and stringent management protocols, systems and oversight in place. Both procurement and payment systems are formal and structured. The City has a strong history of smart and effective competitive procurement of technical, professional and creative services, including engineering, legal, research, marketing and planning services.

4.a.iii Description of Key Staff

The City of Westbrook's team includes the following key staff:

- Project Director, Robyn Saunders, is a Project Manager with 25+ years' experience in engineering and environmental consulting, including brownfields remediation. In her 3.5 years with the City of Westbrook, she has implemented City-led projects totaling roughly \$30M. She meets weekly with the following members of City Administration to maintain momentum on all City-related matters:
 - Daniel Stevenson, Economic Development Director, her direct supervisor.

- Jerre Bryant, City Administrator, and Mayor Michael T. Foley, who communicate regularly with all seven (7) City Councilors.
- Eric Dudley, P.E., the City Engineer and Director of Engineering and Public Services, to coordinate long-term operation + maintenance of facilities and infrastructure.
- Jennie Franceschi, P.E., the City Planner and Director of Planning, Code Enforcement, and Assessing, to ensure that all local ordinances, permitting, and other considerations are properly applied to City projects.
- Tressina Germani, the Finance Director and City Treasurer, oversees all local, State, and Federal funding requirements are satisfied. She ensures there are no outstanding or adverse comments for the City's annual audit reports. .

Key staff will be augmented with other City staff, as needed, as well as the QEP, community partners, State + Federal agencies, and others to ensure the project fulfills all requirements.

iv. Acquiring Additional Resources: Westbrook believes in a competitive procurement process and will issue a Request for Proposals/Request for Qualifications (RFP/RFQs) to solicit QEP responses. The RFP/RFQs are reviewed by City staff and interviews of the top submittals/qualified firms are generally conducted. All bidding will comply with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.27 and other applicable rules governing labor and contracting. The selection of a QEP will provide Westbrook with the technical expertise and resources to continue a Brownfields Assessment Program to assess Priority Brownfields sites. If other resources are needed, such as legal support in the development of institutional controls, the City retains legal representation on a contract basis and other qualified vendors that can be utilized (as in-kind).

4.b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant; (1) Accomplishments: The City of Westbrook has received 6 separate EPA Brownfields grants from 2000 through 2007 including three assessment grants, two RLF grants, and one cleanup grant totaling \$2,050,000 in EPA funds. Our three most recent grants include the 2007 Cleanup of Haskell Silk site, the 2006 Community wide petroleum assessment grant and the 2005 Brownfields Cleanup Revolving Loan fund. The 2005 RLF funds were used to clean up the former Foye Mill site in Westbrook to include a 139,588-SF office building and 300-space parking garage. This project leveraged \$16 million in private investment, created 326 jobs in our downtown, and \$300,000 in annual property taxes to the City.

The 2006 Assessment grant included the assessment of two petroleum sites including the Larson's Junkyard and the Saccarappa Park (Former Haskell Silk) site. The Larsons junkyard Site has since been acquired and redeveloped into the BD Solar Properties, Inc. for solar sales and installation. The Saccarappa Park site is scheduled to be redeveloped in 2024 into a four-season pavilion to be used by the public. The Site will include a roughly 6,000 s.f. slab on grade pavilion that will be capable of being an ice rink in winter and open air event space in summer. The remainder of the parcel will be paved parking (estimated at 6,000 s.f.) and greenspace (including an extension of the Westbrook River Walk).

Unfortunately, the 2007 Haskell Silk Cleanup grant was cancelled by the City since the redevelopment fell through and the cleanup was linked to the overall redevelopment resulting in minimal drawdown of funds. Each of the above accomplishments were accurately reflected in ACRES.

(2) Compliance with Grant Requirements: For each of our grants the City has consistently followed our Cooperative Grant Agreement terms and conditions as well as our Work Plan commitments, and we have successfully completed financial status reports, Quarterly Reports, MBE/WBE reports on time as well as regularly updated ACRES. Except the Haskell Silk Cleanup grant (which was cancelled due to development not moving forward), all other expected results have been achieved and reported in ACRES.

ATTACHMENT A
THRESHOLD CRITERIA

ATTACHMENT 1 - THRESHOLD DOCUMENTATION

1. Applicant Eligibility

Eligible Entity: The City of Westbrook is a City and therefore an eligible entity

2. Community Involvement

The City utilizes a multi-media approach to ensure a broad cross-section of residents in the target area are engaged in the outreach, assessment, cleanup and redevelopment process. Like in the Brownfields Cleanup grant process, the City will:

- Continue community outreach by hosting informational workshops with the Brownfields Advisory Committee (BAC), project partners, and City staff.
- Attend/host public meetings and produce fliers and technical guides to be shared with the public. Meetings will be held:
 - during the outreach process and during 30 day comment period for ABCAs.
 - in convenient locations within the Target Area, accessible by public transit, and at a time when they can be attended by working residents
 - via alternative means (Zoom or Teams) if COVID concerns become an issue.
- Provide stakeholders with updates on the Brownfields Program through a combination of press releases, postings on its partners' websites, placement of fliers at area businesses and organizations, e-newsletter articles, social media (9,200 Facebook and 2,255 Instagram followers).
- Develop a dedicated Brownfields page on the City's website, in addition to print media described above to be distributed through partner and area organizations, to highlight educational resources, engagement opportunities, and ongoing work.

Additionally, several partners (see above) have committed to help with the outreach and communication process. These established communication mechanisms will be used to announce events, meetings, and workshops, distribute technical guides, fliers, and other literature and web-based information. Input from the community will be solicited directly at each public meeting. In addition, contact information including phone and email will be placed prominently on all notices, presentations, reports, and web sites to directly solicit community input. Lastly, a community feedback form will be placed on the City's 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 in writing on our website.

3. Expenditure of Existing Grant Funds

The City does not currently have an open Brownfields Assessment or Multi-Purpose Grant.

4. Contractors and Named Subrecipients

No contractors or subrecipients are proposed to conduct work as part of this application.