



CITY OF CONCORD
New Hampshire's Main Street™
Community Development Department
City Hall • 41 Green Street • Concord, NH 03301

Thomas J. Aspell, Jr.
City Manager

Narrative Information Sheet

1. Applicant Identification:
City of Concord
41 Green Street
Concord, NH 03301
2. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$1,270,000
3. Location:
 - a. City: Concord
 - b. County: Merrimack
 - c. State: New Hampshire
4. Property Information:
Former Concord Stables
111.5 Warren Street
Concord, NH 03301
5. Contacts:
 - a. Project Director:
Beth Fenstermacher, Director of Special Projects & Strategic Initiatives,
41 Green Street, Concord, NH 03301
(603) 230-3635
bfenstermacher@concordnh.gov
 - b. Highest Ranking Official:
Thomas J. Aspell, Jr., City Manager
41 Green Street, Concord, NH 03301
(603) 225-8570
CityManager@concordnh.gov
6. Population: 44,503

7. Other Factors:

Other Factors	Page #
Community Population is 10,000 or less	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	n/a
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	n/a
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	p. 3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	p. 3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	n/a
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	n/a

8. Releasing Copies of Applications

Not Applicable.



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

November 8, 2023

Beth Fenstermacher, PLA, LEED AP
Director of Special Projects & Strategic Initiatives
Community Development Department, City of Concord
41 Green Street
Concord, NH 03301

Subject: City of Concord
FY24 Proposal for EPA Brownfields Cleanup Grant
Former Concord Stables Building, Concord, NH

State Letter of Acknowledgement and Support

Dear Beth Fenstermacher:

The New Hampshire Department of Environmental Services (NHDES) acknowledges that the City of Concord plans to conduct the cleanup of a brownfield site and is applying for a FY24 EPA Brownfields Cleanup Grant.

The City of Concord has developed an application requesting site-specific federal Brownfields Cleanup funding for the property known as the Former Concord Stables Building, located at 111.5 Warren Steet in Concord, New Hampshire.

NHDES affirms that the Former Concord Stables Building:

- i. Is eligible to be enrolled in the NHDES voluntary response program;
- ii. Is currently enrolled in the NHDES voluntary response program;
- iii. Has a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

Should your proposal be successful, NHDES will commit to providing a liaison for technical support, facilitate the process of reviewing and approving all cleanup related submittals to NHDES, and participate in any community outreach efforts.

We look forward to working with the City of Concord on this important project within your community. Please contact me should you have any questions.

Sincerely,

Melinda S. Bubier
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-1169
Email: Melinda.S.Bubier@des.nh.gov

Beth Fenstermacher
City of Concord
November 8, 2023
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ec: Jim Byrne, EPA New England – Region 1
Dorrie Paar, EPA New England – Region 1
Jeffrey Marts, P.G., Administrator, NHDES-HWRB
Amy Renzi, P.G., State Sites Supervisor, NHDES-HWRB
Scott Drew, P.G., NHDES-HWRB

EPA Cleanup Proposal 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 City of Concord is New Hampshire's state capital with a population of 44,503 and is New Hampshire's third highest populated city. The City covers a wide land space of 67.49 square miles. With the City's central location in the northeast business corridor, coupled with high-quality business support services, Concord has been consistently touted as one of the most desirable communities in New Hampshire in which to live and work, and **the City has made significant investment in the Downtown to improve economic development growth and affordable residential development.** The Target Area is located just outside the Downtown area in the part of the City known as the North/West End. The North/West End **houses nearly ¼ of the City's population**, most of which live in group quarters or rental units. The Target Area is also **within the largest Institutional District in the City**, with Concord Public High School, the NH State Hospital, State office grounds, Concord Hospital, and 6th Circuit District Court all within walking distance. The Site is uniquely situated on the edge of the Institutional District and dense downtown residential areas, and is visible along the corridor that connects to the vibrant Downtown. The Site has been vacant for approximately 30 years, and it has been subject to vandalism and illegal dumping. With further neglect, the building is at risk of continued decline, misuse, and eventual demolition. It is important to note that **the building is of historic significance** and Concord's **Master Plan calls on our community to safeguard the heritage of Concord by providing for the protection of structures representing significant elements of the City's cultural, social, economic, political, and architectural history.** The Brownfield Cleanup Grant is essential for the cleanup of the Site to prepare it for restoration and eventual redevelopment. This **blighted building can become a historical preservation show piece that the City can take pride in.**

ii. Description of the Priority Brownfield Site(s)

The Site is 0.52 acre parcel developed with an approximately 8,690-square-foot, 1-1/2 story masonry structure first developed in 1905 with stables for City work horses. The Concord Public Works Department continued to employ draft horses for a variety of types of work for forty-five years after the City Stable was completed, finally replacing the remaining horses by motor vehicles in 1950.¹⁵ Ultimately, with a number of Public Works functions moved to other sites in the city, the City of Concord conveyed the City Stable lot to the Union School District of Concord for conversion to a parking lot for the nearby Concord High School in 1994. The building was subsequently converted to office space for the Concord Public Works Department. The Site and adjoining property to the south remained occupied by the Concord Department of Public Works until 1989 when the City sold the property to the Concord School District. The Site building has been vacant since 1990. The buildings on the adjoining property were razed and the Concord Public School District has used the adjoining property to the south as a parking lot since 1994. The parcel was subsequently subdivided, forming the present-day Site boundaries. The City purchased the Site from the

Concord Public School District in 2021. The building has remained vacant, and the remainder of the parcel is asphalt pavement and overgrown vegetation.

The State of New Hampshire Division of Historic Resources has determined that the Site building is significant under National Register Criterion A for its role in transportation and the maintenance of the urban infrastructure of a municipality. It is also significant under Criterion C for its architectural design as a large, brick, Late Victorian style horse stable designed by the firm of Randlett & Griffin. Architect-designed urban stables for municipally-owned work horses survive only rarely in New England. The Concord City Stable is therefore an unusual survivor of a building type that was commonly swept aside as machines and motor vehicles supplanted horses in the early twentieth century. The stable is especially significant in the context of Concord's history as a center of horse-drawn transportation and as a site of the specialized manufacture of horse-drawn vehicles, harnesses, and carriage hardware that earned the city an international reputation in the nineteenth century.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

In 2017, the City was approached by the Abbot-Downing Historical Society (ADHS) with a request to find a suitable location to establish a new museum devoted to celebrating and displaying coaches, carriages, wagons and other artifacts manufactured by, or associated with, the former Abbot-Downing Company. Based in Concord, the Abbot-Downing Company was the one of the world's premiere coach builders of the 19th Century. They manufactured a variety of horse drawn vehicles, including iconic stage coaches utilized by Wells Fargo. In addition to display areas, it is envisioned that the museum will include display areas for vehicles and artifacts, as well as spaces for educational seminars, and associated offices, and storage. The former Concord Stables property was identified as the preferred location for the museum. Following negotiations with the Concord Union School District, 0.52 acres of land, together with the former DPW building, were subdivided by the School District from the parent parcel and conveyed to the City of Concord on November 29, 2021. The City has is considering options to enter into a long-term lease with the Abbot-Downing Society for the museum; however, the Society is also exploring potential fee simple acquisition of the property from the City. The Abbot-Downing Historical Society is embarking on a multi-million-dollar fundraising effort to renovate the property and establish the museum.

ii. Outcomes and Benefits of the Reuse Strategy

Grant funds will help facilitate the preservation and renovation of a historic property into a non-profit museum to preserve and display historic coaches, carriages, and wagons, and other artifacts. Establishment of the museum will help the City preserve these important cultural artifacts, as well as educate the community about the important role the Abbot-Downing Company played not only in Concord as a local business, but globally as one of the preeminent coach builders of its time. In addition to cultural and educational benefits, it is anticipated that the museum will also provide **positive economic development benefits** stemming from **increased tourism to the community, and associated tourist spending on fuel, lodging, restaurant dining, and related retail shopping**. Tourist spending on fuel, meals and lodging associated with visits to the museum will also **generate revenues for the State** in the form of gasoline tax, as well as rooms and meals taxes.

The City of Concord has adopted a 100% Renewable Energy Goal for the community. For all new projects, the City will be studying the feasibility of **utilizing renewable energy on the Site in the form of solar panels on the roof**. Given the age and historical significance of the structure, we can not fully commit to renewable energy use on the Site until a full structural analysis is completed. However, we note that the City of Concord purchases 100% of its energy from renewable energy sources for all City-owned buildings. Further, the redevelopment **will incorporate energy-efficient fixtures**. Efficient interior climate control and air quality is extremely important for the protection of the antique coaches that will be displayed and stored in the redeveloped building; the City will direct the Architect and MEP consultants to **utilize electrified sources and reduce the reliance on hydrocarbon sources**.

c. Strategy for Leveraging Resource

i. Resources Needed for Site Characterization

The City is the currently a recipient in the **USEPA Targeted Brownfields Assessment Program** that is being administered through EPA Region 1. EPA Region 1 has contracted with KOMAN Government Services, LLC, to fully characterize the Site and fill in any gaps identified in the initial Phase I and II site investigations.

ii. Resources Needed for Site Remediation

The Site’s redevelopment will be supported through additional grants that the City and ADHS will pursue. Additional remediation costs that might exceed the EPA requested funds will be covered by other grants the Site is eligible for, including the **New Hampshire Department of Environmental Services Brownfields Cleanup Grant**.

iii. Resources Needed for Site Reuse

Due to the Site’s eligibility to be listed on the State and National Historic Inventories, additional grant opportunities through the **New Hampshire Preservation Alliance (NHPA), New Hampshire Land & Community Heritage Investment Program (LCHIP), the 1772 Foundation**, and others will be sought. Further, **fundraising campaign to solicit private donations** may be pursued by ADHS. Securing the funding for the Site's cleanup through the EPA Cleanup funding would increase the success of securing additional funding in the future.

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
USEPA Targeted Brownfields Assessment Program	1.c.i. Assessment	Secured	In process for early 2024 completion
NHDES DES Brownfields Cleanup Grant	1.c.ii Remediation	Unsecured	City has had preliminary discussions to confirm project is eligible

NH Preservation Alliance	1.c.iii.	Unsecured	City has had preliminary discussion, NHPA is supportive; however, need to confirm funding is available
NH LCHIP	1.c.iii.	Unsecured	Confirmed that Site meets criteria for Historic Rehabilitation Grant due to being publicly owned and eligible for listing on State or National Register of Historic Places.
1772 Foundation	1.c.iii.	Unsecured	Program for “landmark buildings”, Site is eligible. Will not apply until Cleanup is underway and restoration plan is completed.

iv. Use of Existing Infrastructure

The proposed cleanup will facilitate the use of the entire existing building structure. The Site is currently served by electricity, and municipal water and sewer. Interstate 93 is within 1.2 miles of the Site. In addition, three stops on a local bus route are within ¼-mile, and Downtown Concord is within ¾ mile along pedestrian and bicycle friendly routes.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

Being the historical center of industrial manufacturing in central New Hampshire, Concord contains numerous Brownfields sites. A 1997 study commissioned by the City using US Environmental Protection Agency PILOT Brownfields grant funds identified over 500 acres of Brownfields land within the City’s downtown area alone comprised in some 72 different sites within downtown Concord. Brownfields, while often not contributing to the City’s tax base in a significant way, have been a drain on City resources. In many cases, they have become a haven for the homeless as well as criminal activities. For example, a fire, later ruled arson, in an abandoned building at another Brownfield site within Concord required a response from over 40 fire fighters from Concord and 5 surrounding towns. Beyond **the financial outlay of having to provide police and fire services to such sites**, since 2003 the City has invested in excess of \$3.5 million of its own funds to assess, acquire, cleanup, and remediate Brownfields properties in order to position these properties for final redevelopment by the private sector. Given fiscal

pressures, the City cannot continue to afford making this level of investment without assistance from other entities such as the US Environmental Protection Agency.

The City Council approved restoration of the Site in the Capital Improvement Program with the understanding that it would utilize funding through grants and donations. Preservation and historic restoration grants do not provide large enough funding opportunities to cover the full cost. Given the cost of abatement and remediation, the City must rely on Cleanup Funds to prepare the Site for restoration and reuse and become eligible for preservation grants.

ii. Threats to sensitive populations

(1) Health or Welfare of Sensitive Populations

Many Brownfields within Concord are associated with the City's role as the historical center for manufacturing (textiles, printers, and later tanneries), transportation (rail roads), and other related services (gas stations, dry cleaners, etc.). Each of these sites poses a significant risk to human health through exposure to vapors as well as contaminated soils and groundwater. Many of the human health and environmental threats associated with these sites stems from the use of dyes, solvents, heavy metals, asbestos, as well as fuels (petroleum and coal based) for over 170 years within Concord. Contaminants include volatiles and asbestos that can cause a threat through inhalation, heavy metals used in dyeing processes that can cause exposure through ingestion and dermal contact. The EJScreen Tool indicates that the Target Area (1/4-mile around Site) is in the **93rd percentile in the State for Toxic Releases to Air; in the 94th percentile for Lead Paint (% Pre-1960 housing); 77th percentile for RMP Facility Proximity; 96th percentile for Hazardous Waste Proximity; and 90th percentile for Wastewater Discharge.**

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

Those that live in Concord suffer from higher than State averages of some medical conditions. Data provided by the NH Department of Health and Human Services (NHDHHS) for the years 2001 – 2007 (*latest report currently available*) indicated that the City of Concord has **higher rates of asthma** as compared to the rest of Merrimack County and the State of New Hampshire for 2003-2007. In 2007, **Concord's rates were 54% higher than the State and 43% higher than the County.** In addition, the same data set from the NHDHHS indicates that the City has a **higher rate of heart disease, as measured by inpatient heart attack related hospital discharges,** as compared to the rest of Merrimack County and the State of New Hampshire.

The Site, as well as other Brownfields in Concord, pose significant potential health risks to those living in close proximity to such properties due to their documented levels of contaminants. Though additional study would be required, the higher than average instances of asthma and heart related illness in Concord may have a correlation to the number of Brownfields located in close proximity to residential areas throughout the City.

(3) Promoting Environmental Justice

a. Identification of Environmental Justice Issues

The EJScreen Tool indicates that the Target Area contains an **EPA IRA Disadvantaged Community.** The City of Concord is a community without a large minority population. This is typical for most municipalities in New Hampshire as the State lacks a large minority population due to geography. However, for socioeconomic indicators the EJScreen Tool indicates the Target

Area is **89th percentile in the State for Limited English-Speaking Households; and 84th percentile for Low Life Expectancy.**

b. Advancing Environmental Justice

The grant and reuse strategy will clean up a contaminated site that currently contributes to the high percentage of risks to nearby residents. Further, this project will eliminate a vandalism target and provide a cultural center in this Target Area.

b. Community Engagement

i. Project Involvement and ii. Project Roles

Name of Organization/Entity/Group	Point of Contact (name, email & phone)	Specific Involvement in the Project or Assistance Provided
Abbot-Downing Historical Society	David Baer davidb@milestonenh.com 603-226-3877	Partner to support the redevelopment and help with preparing cost estimates and engaging potential contractors.
NH Preservation Alliance	Jennifer Goodman, Executive Director jg@nhpreservation.org	Advisement of historical resources/preservation, help with leveraging resources
Concord Heritage Commission	Heather Shank hshank@concordnh.gov 603-225-8515	Advisement of historical resources/preservation, regulatory review
Greater Concord Chamber of Commerce	Tim Sink, President 603-224-2508	Assist with identifying and contacting potential developers for the site as well as hosting forums to help inform the community about the project

iii. Incorporating Community Input

Public meetings will be held to receive input on the projected use of the Concord Stables Building and to inform and finalize plans for development; these will be broadcast remotely to accommodate citizens that are not able to attend public meetings. The City has a partnership with **ConcordTV**, and will work with their team to create videos that can be viewed anytime and for residents to **watch at home or online through the City’s YouTube channel**. In addition, **the Community Development office in City Hall**, will serve as the location for hard copies of all program-related documents for review by the public.

The City is equipped with many strategies for community involvement; with a primary focus on disseminating project-related communications and hosting open meetings at the City Council Chambers, a centralized location. The City’s Public Information Officer will create a plan for sending out information via press releases, the weekly City Manager’s Newsletters, and regular social media posts. Working with Concord-based groups identified above, as well as the City Council, Planning Board, and Architectural Design Review Committee, Concord will further ensure meaningful and wide-spread involvement of local

leaders, residents, staff, and stakeholders. The Community Development Office will be the **collection point for all public comments and questions.**

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The Site is not suitable for redevelopment and reuse without the removal of asbestos-containing materials (ACM), various PCB-containing hazardous building materials (HBM), and lead- painted surfaces of the building. The proposed cleanup activities to remediate the Site include (Alternative #3 of the DRAFT ABCA): removal and/or remediation of all identified ACM, lead based paint, PCB paint, and miscellaneous hazardous materials; encapsulate surfaces where PCB-based paint was present and seal brick where ACM mortar was present to eliminate any potential exposure if full abatement is not feasible due to the nature of the materials and risk of migration to substrate. Abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to applicable USEPA, NHDES, and OSHA regulations. Third-party area air clearance air testing must be performed at the conclusion of the abatement activities and prior to re-occupancy of the removal areas.

b. Description of Tasks/Activities and Outputs

Task/Activity 1: Program Management
i. <u>Project Implementation:</u> <i>EPA-funded tasks/activities:</i> QEP/LEP Project Management requirements and reporting <i>Non-EPA grant resources:</i> City will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted
ii. <u>Anticipated Project Schedule:</u> Months 1-36. QEP/LEP procurement (October – December 2024); quarterly progress reports; continuous ACRES updates; regular meetings as needed with EPA/NHDES/Project partners.
iii. <u>Task/Activity Lead:</u> City Staff
iv. <u>Outputs:</u> QEP/LEP procurement; quarterly progress reports; ACRES updates; meeting minutes
Task/Activity 2: Community Engagement
i. Project Implementation: <i>EPA-funded tasks/activities:</i> Preparation of informational materials for public outreach. <i>Non-EPA grant resources:</i> City staff and project partners will conduct community engagement including producing content for public outreach; at least 1 public meeting plus informational sessions with City Council, Architectural Design Review Committee, Heritage Commission; incorporation of public input (City in-kind contribution)
ii. Anticipated Project Schedule: Months 1-36. Continuous public outreach, first public meeting November 2024, additional meetings as needed.
iii. Task/Activity Lead: City staff and project partners
iv. Outputs: Informational materials; flyers; website updates; meeting minutes; sign-in sheets.
Task/Activity 3: Cleanup Planning
i. Project Implementation: <i>EPA-funded tasks/activities:</i> Preparation of the final ABCA, quality assurance project plan (QAPP), and enrollment in State’s Brownfield program. <i>Non-EPA grant resources:</i> Additional activities include the bidding documents and permitting to receive necessary regulatory approvals.

ii. Anticipated Project Schedule: Months 3-9. Finalize ABCA and develop QAPP (Jan-Apr 2025), bidding documents (Apr-Jun 2025), and permitting (Jun-Aug 2025).
iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from City staff
iv. Outputs: Final ABCA; QAPP; bidding documents; permits
Task/Activity 4: Cleanup Activities and Reporting
i. Project Implementation: <i>EPA-funded tasks/activities:</i> The cleanup activities include: a) removal/remediation of ACM, including sealing brick where ACM mortar is present; b) removal of Lead based paint; c) removal of PCB-based paint and encapsulate surfaces; d) removal of any other universal waste materials present; and e) field oversight and air-quality sampling/monitoring. <i>Non-EPA grant resources:</i> Additional activities include ACRES verification and grant closure reports.
ii. Anticipated Project Schedule: Months 10-36 Cleanup activities (a, b, c, d and e). Post-remedial verification and closure reports (months 30-36)
iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from City staff
iv. Outputs: Abatement and cleanup in accordance with ABCA; Site preparation; Verification and closure reports

c. Cost Estimates

Budget Categories		Task 1	Task 2	Task 3	Task 4	Totals
Direct Costs	Personnel					
	Fringe Benefits					
	Travel					
	Equipment					
	Supplies					
	Contractual	\$70,500	\$2000	\$20,000	\$1,175,000	\$1,267,500
	Construction					
	Other (meeting expenses, participant support cost)		\$2500			\$2,500
	Total	\$70,500	\$4,500	\$20,000	\$1,175,000	
Total Direct Costs	\$70,500	\$4,500	\$20,000	\$1,175,000		
Indirect Costs	-	-	-	-	-	
Total Budget	\$70,500	\$4,500	\$20,000	\$1,175,000	\$1,270,000	

Cost Breakdown
Task/Activity 1: Project Management
Task 1 activities covered under EPA costs include all Project Management related items for the QEP/LEP following award (project initiative up through project closeout) for \$70,500. All other costs associated with this task will be covered by City
Task/Activity 2: Community Engagement
A total of \$2500 is budgeted for outreach materials (fliers, fact sheets) and meeting costs. It is anticipated that the QEP will participate in meetings, \$2000 has been budgeted for meeting prep and attendance.
Task/Activity 3: Cleanup Planning

Task 3 activities include preparation of final ABCA and quality assurance project plan, and any State related permitting costs at \$20,000. All other costs for City staff time will be covered by the City and are not included in the calculation.

Task/Activity 4: Cleanup Activities and Reporting

\$100,000 for QEP/LEP costs for monitoring and project closeout. Removal and disposal, and encapsulation are estimated to cost \$1,075,000. This includes 25% contingency to account for unexpected abatement difficulties. All other costs for City staff time will be covered by the City and are not included in the calculation

d. Plan to Measure and Evaluate Environmental Progress and Results

City staff will track and evaluate the project’s progress. The project schedule and goals will be met in accordance with the agreement and cleanup plan, and entering Site information into the ACRES database. **An output tracking spreadsheet report will be created and charted on a monthly basis throughout the grant period to track project milestones including contract bidding, remedial tasks, and community meetings. Progress will also be reported through quarterly project management and financial reports.** Progress meetings will be held with the end user (Abbot Downing Historical Society); at the same time the City will explore other reuse plans if fundraising is unsuccessful for the museum as a feasible end user. Project outcomes will be tracked by **opportunities to leverage funding for preservation through the economic reuse of site; increased tourism to the community, and associated tourist spending on fuel, lodging, restaurant dining, and related retail shopping; 8,600 sf ± building made ready for reuse as a cultural/historical center; restoring blighted building often targeted by vandals, decreasing financial outlay of having to provide police and fire services; and minimized exposure to hazardous substances by area residents.**

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff

The City will utilize an interdepartmental approach to administer the project to ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project and grant. **Beth Fenstermacher**, Director of Special Projects & Strategic Initiatives within the Community Development Department, **will serve as Project Manager** and will have direct oversight of the program. She has proven ability to effectively manage and administer State and Federal grants, including Land & Water Conservation Fund grants and NHDES Aquatic Resource Mitigation and Source Water Protection Grants. She has over 25 years’ experience in land use and brownfield remediation in both private and public sectors. **Tina Waterman is the City’s Purchasing Director**, will be responsible for ensuring procurement policies are followed. **Katie Graff, Assistant Finance Director** - will be responsible for accounting practices to ensure compliance, and that funds are expended and drawn down in a timely and efficient manner. She has a working knowledge of reporting and financial procedures for state and federal grant processes. Brian Santiago, Health & Licensing Officer, will be responsible for ensuring the Qualified Environmental Professional is following appropriate health and safety protocols and monitoring that are in compliance with local and State regulations.

iii. Acquiring Additional Resources

A Qualified Environmental Professional contractor will be hired through procurement for direct clean up activity oversight. All remediation procurement will comply with City, State, and Federal policies, to ensure that services are procured at the best available price consistent with high quality, that sound business and ethical practices are adhered to, and that all transactions are completed in a manner that provides for open and free competition while promoting local hiring/procurement. In addition, the City has an active relationship with the NH DES Brownfields Program, and DES has committed to providing a liaison for technical support, facilitate the process of reviewing and approving all cleanup related submittals to NHDES, and participate in any community outreach efforts. Further, EPA Region 1 staff are managing additional site characterization through the TBA program and have visited the Site, expressing support for the project. The City will continue to seek programmatic support and advice from that office.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

The City of Concord received a FY2011 USEPA Brownfield Cleanup Grant Funds for the environmental remediation of a portion of the Former Allied Leather Tannery Complex located at 27, 31, and 35 East Street in Penacook Village (City of Concord).

(1) Accomplishments

The Site consisted of 3 separate parcels and was utilized for tannery operations between 1942 and 1987. Site investigations identified soils and groundwater impacted with chromium, as well as buried leather material. The project goal was to remediate the site for commercial and residential development, and for a public riverfront park. The clean-up under the EPA Cleanup Grant consisted of excavation and off-site disposal of chromium-impacted soils, dewatering and off-site disposal of waters, confirmatory soil sampling, and periodic groundwater sampling. Additional cleanup work was funded through NHDES Brownfield funding and American Recovery and Reinvestment Act (ARRA) funding. Annual groundwater monitoring is still conducted under a NHDES Groundwater Monitoring Permit to ensure groundwater is not impacted with Chromium. The ACREs database was regularly updated throughout the project, and with final update in 2015 reflecting final conditions of the parcels, post cleanup prior to project closeout. Following successful cleanup, the **Site was developed with 14,000 sf of commercial/retail space, 54 units of affordable housing, and the riverfront park is currently under construction** with grant assistance from LWCF.

(2) Compliance with Grant Requirements

The City complied with the workplan, schedule, and terms and conditions under the grant. Quarterly performance reports were submitted throughout the term of the grant, as well as ongoing ACREs reporting. Additional contamination was identified during the remediation; however, the City was able to secure additional funds through the ARRA program and through money available through Tax Increment Financing to ensure the cleanup could be completed within the Brownfield Cleanup Grant workplan schedule. The grant period was from October 1, 2011 through September 30, 2015. The USEPA issued a letter dated March 28, 2016 acknowledging receipt and acceptance of all reports required to close out the Assistance Agreements (# BF-96150901). There was \$22.35 remaining when the grant closed (\$600,000 authorized, \$599,977.65 dispersed).

ATTACHMENT A:

THRESHOLD CRITERIA and

STATE OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES LETTER

FY24 EPA Cleanup Grant Application

Threshold Criteria

1. Applicant Eligibility

- a. City of Concord is eligible under General Purpose Unit of Local Government – City

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant

3. Expenditure of Existing Multipurpose Grant Funds

Not applicable – Applicant does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

City of Concord is the sole owner of the Site since November 29, 2021

Deed reference: Merrimack County Registry of Deeds Book 3770, page 2902.

5. Basic Site Information

Concord Stables, 111.5 Warren Street, Concord, NH 03301

6. Status and History of Contamination at the Site

- a. First developed in 1905 with stables for City work horses. The building was subsequently converted to office and storage space for the Concord Public Works Department. The Site and adjoining property to the south remained occupied by the Concord Department of Public Works until 1989 when the City sold the property to the Concord School District. The Site building has been vacant since 1990. The City re-acquired the site in 2021.
- b. Multiple Underground Storage Tanks (USTs) were removed from the Site and adjoining property to the south in 1989 and 1994. Releases from the USTs impacted soil and groundwater with petroleum products. Cleanup and monitoring activities associated with the impacted soil and groundwater occurred between 1990 and 2018, and NH Department of Environmental Services (NHDES) issued a Certificate of No Further Action for the UST releases in 2019.
- c. GZA GeoEnvironmental, Inc. performed a Phase I Environmental Site Assessment (ESA) in accordance with ASTM E1527-13 for the site, dated August 8, 2022. The Phase I ESA did not identify any evidence of recognized environmental conditions (RECs) or controlled recognized environmental conditions (CRECs) in connection with the Site. The Phase I ESA revealed an historic recognized environmental condition (HREC) in connection with the Site: the Site is listed on the UST and LUST databases for petroleum releases from the former USTs on the Site. Impacted soil was excavated and disposed of off-site and groundwater was monitored under the terms of a Groundwater Monitoring Permit. GZA identified this as an HREC as NHDES issued a Certificate of No Further Action in 2019 for the Site regarding this historical release. The Phase I ESA revealed the following *de minimis* conditions in connection with the Site: GZA observed *de minimis* staining on the concrete flooring of the south basement near

the “Sunoco Prestige 742 E.P.” grease drum, the “Lubricants Inc.” drum, and the buckets labeled as corrosive.

- d. Phase II Hazardous Building Material Survey in 2022 identified the following:
 - i. Laboratory analysis of the samples collected during the asbestos survey confirmed the presence of asbestos containing materials (ACMs) in the Site building, including the pipe insulation, joint compound, window glazing, and brick mortar. GZA recommended that an additional investigation of the brick mortar identified as ACM be conducted with the intent to further quantify the ACM mortar, and that roof materials be sampled, as the roof was not accessible during the HBMS;
 - ii. The lead chip paint (LCP) sampling identified paint with lead content to be present in the eleven paint samples collected from the Site, including the dark and light gray paints observed on the basement perimeter walls, the beige paint observed in the first-floor northwest corner office, the silver paint observed on the walls and ceiling of the northwest staircase, the white, blue and red paints observed on the walls in the first-floor main storage room, the white paint observed on the first-floor ceiling; yellow/teal paint observed on the entry walls, and the brown paint observed on the entry door components;
 - iii. The PCB concentration in the submitted basement paint samples, including the sample of light gray paint collected along from the top upper section of the perimeter walls and the red floor paint, were analyzed to contain greater than 50 parts per million (ppm) and therefore are defined as PCB bulk product waste by the USEPA. Porous materials in contact with this caulking may be contaminated with PCBs and must be handled as PCB remediation waste in accordance with 40 CFR 761.61 of TSCA. PCB concentrations of less than 50 PPM were identified in the other paint and window glaze samples submitted for analysis;
 - iv. During the survey, universal wastes (UW) were visually observed to be present in the building, including but not limited to fluorescent light bulbs, ballasts, mercury-containing switches, drums, paints, unknown chemical containers, thermostats, lead-acid batteries, hydraulic door closers, above-ground storage tanks, generator fuel, and oil tanks, and CFC refrigerants.

7. Brownfields Site Definition

The site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government. (Please refer to CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k).)

8. Environmental Assessment Required for Cleanup Grant Applications

Based on findings of a Phase 1 Environmental Site Assessment (ESA), a Phase II Hazardous Building Materials Survey (HBMS), dated August 8, 2022 (prepared by GZA GeoEnvironmental, Inc.), to survey the nature and extent of suspected contamination within the building.

9. Site Characterization

See attached letter from NH Department of Environmental Protection Brownfields Program asserting that the Site is eligible to be enrolled in the NHDES voluntary response program; is currently enrolled in the NHDES voluntary response program; and has sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The Site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

The City of Concord originally acquired the Site in approximately 1905 for development as work horse stables. The Site operated as a municipal facility until 1989. The City transferred ownership to the Concord Public School District in 1990. A portion of the site was redeveloped as a parking lot for the nearby high school; the Stables building remained vacant and unused. The City re-acquired the Site on November 29, 2021, as the School District determined there was no use for the building. The adjacent parking lot was subdivided and retained by the School District.

The hazardous building materials contributing the Brownfield qualification were part of the initial building construction and ongoing maintenance of the property; the identified materials were common construction materials of the time. **The Applicant affirms that we have not caused or contributed to any release of hazardous substances at the site. Further, the applicant affirms that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.**

The affirms a commitment to:

- (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- (ii) assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The City of Concord, as the current property owner, will undertake responsibility to remediate contaminated building materials. The City will retain a third-party environmental consultant to assist with the preparation of project technical specifications, contractor bidding, and technical oversight during the performance of the project. The third-party consultant will also provide project air monitoring services to evaluate the efficacy of engineering controls utilized during asbestos removal activities to protect workers and the public, and monitor work methods comparative to applicable state and federal asbestos work regulatory requirements. Abatement and monitoring of hazardous building materials will be conducted under State certified and licensed personnel.
- b. The City does not currently plan to enroll in a State response program, and will consult with EPA to ensure the cleanup is protective of human health and the environment.
- c. Third party technical experts will be procured prior to clean-up activities utilizing current procurement policies. The City of Concord adopted Procurement Policy and Procedures, latest revision date October 3, 2019, states that all procurements made with Federal Funds shall be consistent with 2 CFR §§ 200.317 through 200.326. Per the Policy, the Deputy City Manager – Finance, and Purchasing Manager shall ensure compliance with the policy, and will review all contracts and bids.
- d. Access to the Site through the adjacent property may be required. The adjacent property is owned by the Concord School District, and District Administration is aware of the project and has been cooperative to date when access is needed. The City will continue to communicate with the School District and acquire any temporary access easements, if required.

14. Community Notification

Community notice of City's intent to apply for an EPA Brownfields Cleanup Grant was posted on **October 27, 2023**. No public comments were received.

a. Draft Analysis of Brownfield Cleanup Alternatives

A hard copy of the Draft ABCA was available at the Public Meeting and also in the City of Concord Community Development Office for review by the Public (see Community Notice). Digital copies were available upon request.

b. Community Notification Ad

Community notice of City's intent to apply for an EPA Brownfields Cleanup Grant was posted on **October 27, 2023** in the City Manager's Newsletter and on the City's Facebook page. The Public Information Officer for the City identified these avenues as the most successful notification platforms. The notice included:

- Notice that a copy of this grant application, including the draft ABCA(s), is available for public review and comment;
- how to comment on the draft application;

- where the draft application is located (e.g., town hall, library, website); and
- the date, time, and location of the public meeting(s).

No public comments were received.

c. Public Meeting

An in-person Public Meeting was held on Monday, November 6, 2023 at 5 pm in City Council Chambers, which is an accessible facility. Per City policy (advertised on City Calendar):

All City of Concord public meetings are accessible for persons with disabilities. Any person who feels that he or she may be unable to participate in a City of Concord public meeting due to a disability should, to the extent possible, call (603) 225-8570 at least 48 hours prior to the meeting so that a reasonable accommodation can be arranged.

For meetings held in the City Council Chambers, any person who is unable to access the upper level of the Council Chambers to address the City Council or any other public body may use the podium and/or microphone located at the lower level of the Council Chambers. Other reasonable accommodations may be available upon request.

Beth Fenstermacher, Director of Special Projects & Strategic Initiatives, led the public meeting. One member of the public showed up. Sign-in sheet is attached. No public comments were received. A copy of the PowerPoint presentation is attached as a record of the meeting content.

In addition, the Application was an Agenda Item for discussion at the November 2, 2023 Heritage Commission meeting, which is a public meeting. No comments were received at this meeting.

d. Submission of Community Notification Documents

The following items are attached to the application submitted to EPA:

- a copy of the draft ABCA;
- a copy of the notice; the City Manager's Newsletter dated October 27, 2023; the Facebook post; and, indication that the event was posted on the City calendar.
- Copy of the PowerPoint presentation, which acts as the meeting summary from the public meeting; and
- meeting sign-in sheet/participant list.

The following items are not attached as no public comments were received:

- the comments or a summary of the comments received;
- the applicant's response to those public comments.

15. Contractors and Named Subrecipients

- a. Contractors: Not applicable. A contractor has not been procured.
- b. Subrecipients. Not applicable.