

200 Common Street Room 309 Lawrence, MA 01840

NARRATIVE INFORMATION SHEET

1. Applicant Identification:

City of Lawrence 200 Common Street Lawrence, Massachusetts 01840

- 2. Funding Requested:
 - **a.** Grant Type: Multipurpose
 - **b.** Federal Funds Request: \$1,000,000
- 3. Location:
 - a. Lawrence
 - **b.** Essex County
 - c. Massachusetts
- 4. Target Areas and Priority Site Information:
 - a. Census Tracts of Target Area: MA009250100, MA009250300, MA009250800, and MA009251600
 - b. Priority site addresses listed in narrative:
 - i. Florence Street Garage 9-11 Florence Street, Lawrence, Massachusetts 01840
 - j. Bennington Triangle Site 246 Lawrence Street, Lawrence, Massachusetts 01840

CITY OF LAWRENCE ROI-24-M-002

Office of Planning & Community Development 12 Methuen Street Lawrence, MA 01840 Tel# 978-620-3510 www.cityoflawrence.com

k. Anchor Used Auto Junkyard – 140 West Street, Lawrence, Massachusetts 01840

DANIEL MCCARTHY Acting Director of Planning & Development

AWILDA PIMENTEL Community Development Director

FRANCISCO SURILLO Acting Director of Economic Development

12 Methuen Street 1st Floor Lawrence, MA 01840

PETER BLANCHETTE Acting Inspectional Services Director

200 Common Street Room 210 Lawrence, MA 01840

5. <u>Contacts</u>:

- a. <u>Project Director:</u> Daniel McCarthy (978) 620 – 9430 <u>DMcCarthy@CITYOFLAWRENCE.COM</u> Acting Director of Planning & Development City of Lawrence 12 Methuen Street Lawrence, Massachusetts 01840
- <u>Chief Executive/Highest Ranking Elected Official:</u> Brian Depena, Mayor (978) 620 - 3010 <u>mayordepena@cityoflawrence.com</u> City of Lawrence 200 Common Street Lawrence, Massachusetts 01840

6. Population

- a. Population of Lawrence, Massachusetts is 87,798
- 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	n/a
States Territory.	
The priority site(s) is impacted by mine-scarred land.	n/a
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or	n/a
other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the priority site(s) will incorporate energy efficiency measures.	n/a
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4,5
At least 20% of the overall project budget will be spent on eligible reuse/ area- wide planning activities, as described in Section I.B., for priority site(s) within the target area.	n/a
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	n/a

8. Letter from the State or Tribal Environmental Authority:

A November 7, 2023, letter from Mr. David Foss of MassDEP supporting the City's application for this EPA Multipurpose grant is attached.

9. <u>Releasing Copies of Applications:</u>

Not Applicable. This grant application contains no trade secrets or commercial or financial information that is confidential or privileged, or sensitive information, if disclosed, that would invade another individual's personal privacy.



Department of Environmental Protection

100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Maura T. Healey Governor

Kimberley Driscoll Lieutenant Governor Rebecca L. Tepper Secretary

Bonnie Heiple Commissioner

November 7, 2023

Via Email

Daniel A. McCarthy, Land Use Planner / Conservation Agent City of Lawrence - Office of Planning and Development 12 Methuen Street Lawrence, MA 01840

RE: STATE LETTER OF ACKNOWLEDGMENT

City of Lawrence – Brownfields Multipurpose Grant Multiple Parcels Including: 9-11 Florence Street Lots (RTN 3- 35593) Bennington Triangle Site, 246 Lawrence Street, (RTNs 3-10319 & 3-29603)

Dear Mr. McCarthy:

I am writing to support the application submitted by the City of Lawrence under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Multipurpose Grant Program. We understand that the City of Lawrence is proposing to undertake assessment, redevelopment planning, and cleanup of multiple properties. And based on information provided by the City, adequate assessment data exists to support cleanup planning and the initiation of cleanup at proposed remediation sites.

Potential redevelopment options include a park (open space) at the Bennington Triangle property, and residential or parking to support the future rail trail corridor which will be developed with the City's \$26M green infrastructure grant. The multipurpose grant will also be used to assess and/or cleanup the junk yards proximal to the future rail trail. The Brownfields funds will leverage private funding from interested developers that wish to do additional housing and or commercial redevelopments in the target area.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available resources and incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to support the City of Lawrence to help make this project a success. We very much appreciate EPA's continued support of Brownfield efforts in Massachusetts.

Sincerely,

David Føss, CPG, LSP Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Dorrie Paar, US EPA Ilialis Reyes, City of Lawrence - Grant Writer / Manager Brad Buschur, Groundwork Lawrence Joanne Fagan, MassDEP Northeast Regional Office

> This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282. TTY# MassRelay Service 1-800-439-2370 MassDEP Website: www.mass.gov/dep

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION a. Target Area and Brownfields: *i*. Overview of Brownfield Challenges and Description of

Target Area: Located 30 miles north of Boston, Lawrence, MA is New England's largest immigrant city (82% Hispanic). It houses 87,798 people in 7.4 sq. mi. Formed as a manufacturing city, Lawrence provided jobs to an influx of immigrants in its massive textile mills. Mills closed in the 1940s-50s, precipitating years of disinvestment, and leaving behind a mostly immigrant population living in "persistent" poverty and facing pollution from a century of unregulated industrial development. As a result, EJ Screen has identified seven hazardous waste treatment storage and disposal facilities (TSDs), 48 Brownfields and >20 auto repair/junkyards within the City, making Lawrence a Justice40 Disadvantaged Community, an EPA IRA disadvantaged community, and an Economically Distressed Area eligible for targeted assistance under MA's Brownfields Act based on unemployment, poverty, job loss, and commercial vacancy. Lawrence has Opportunity Zone designation in four Census Tracts MA009250100, MA009250300, MA009250800, and MA009251600 (simplified below) and is actively engaged with investors to use the financial incentives to invest in economic and housing development.

The target area for our project is the area surrounding the Lawrence Manchester Rail Corridor in downtown Lawrence, a 1.4-mile former railroad line slated for redevelopment into a rail trail (census tracts 2501, 2503, and 2513). The target area begins on the south side of the City at Merrimack Street and extends northward where it links with Manchester Street Park, the Methuen Rail Trail, the Spicket River Greenway, and the Arlington Mill District. This area faces significant challenges_with 8 listed priority junkyards, four hazardous waste TSDs, vacant industrial buildings, pollution, vandalism, and homelessness. A majority of these priority sites are in the federal 100-year flood plain. Disinvestment, low education attainment, and language barriers contribute to unemployment, poverty, and homelessness. The area has safety issues, limited alternate transportation infrastructure, little green space, and few amenities. These challenges precipitate disparate rates of obesity, chronic disease, and a poor quality of life. Being located along a major north-south thorough fare loaded with traffic/diesel fumes paired with old unkept multi-family rentals contributes to high childhood asthma rates and elevated child blood lead levels.

This grant will help address these above challenges by creating recreational opportunities as well as facilitate the assessment and cleanup of Brownfields that can help alleviate the high obesity and chronic disease within the area. It will also help create mixed-use developments including workforce housing and commercial businesses.

ii. <u>Description of the Priority Brownfield Sites:</u> According to EJ Screen, the City of Lawrence has 7 hazardous waste TSDs and 48 listed Brownfields. The target area contains 4 of these TSDs as well as several Brownfields adjoining the rail trail including six auto repair sites/junkyards, the Merrimac Paper Site (currently under EPA Cleanup), the Flametech Steel site, and the Downtown Crossing Block (five junk yards, five auto repair facilities, and numerous other potential Brownfields). In 2022, the City in collaboration with Merrimack Valley Planning Commission (MVPC's) Brownfields program, conducted a City-wide inventory and identified at least nine priority Brownfields Sites within the City. Of these nine, five are located in the target area and include the Florence St Garage at 9-11 Florence St (former auto repair facility), the Anchor Used Auto junkyard at 142 West St (current auto junkyard), the Hilton Chrome Corporation site located at 246 Lawrence Street (former a metal finishing/electroplating facility), Bennington Triangle located at 246 Lawrence Street (former gas station), and the Lewis Mill at 65 South Canal Street (former E. Frank Lewis Wool Scouring and Carbonizing Mills). While all of these above sites are targeted for this grant, three of these sites are highlighted for assessment and cleanup under this grant:

<u>Florence St Garage (Map 190, Lots 76, 78, 79, 80)</u> – This site contains four downtown lots totaling 0.6 acres containing a vacant delipidated 10,360 s.f. former auto repair building containing hundreds of tires, office furniture, tools and supplies for the former repair business. The exterior area behind the building is a paved parking area containing additional miscellaneous building materials and auto repair waste (55-gallon drums, tires). Florence Garage & Tow Service operated at the site beginning in the 1980s. The use and storage of hazardous materials and petroleum including waste oil, parts cleaner, flammable liquids, and oxyacetylene are documented dating back to 1991. Several notices of violations were issued by the City Inspections Department through the 1990s and early 2000s for storage of junk cars, an unapproved paint spray booth, fire code and safety issues, sanitary conditions, and flammable liquids. In 2005 and 2006, the City acquired three lots and the fourth lot in 2010 through tax foreclosure.

In 2019 and 2020, a Phase II Investigation and hazardous building materials survey identified several polycyclic aromatic hydrocarbons (PAHs) and lead detected in Site soil above applicable cleanup Standards but were attributed to historic urban fill conditions. Soil beneath and surrounding the southern portion of the building had concentrations of volatile petroleum hydrocarbons (VPH) above applicable cleanup standards. The source is likely several floor drains in the building with unknown discharge locations. In addition, lead containing paint was identified throughout the interior and exterior of the Site building. The City intends to complete supplemental assessment and cleanup of the site and market the property for for work force housing or a use to support the nearby rail trail.

<u>Bennington Triangle Site</u> (Map 150 Lot 74) - The property is a vacant, undeveloped triangular shaped parcel of less than an acre. It is currently an informal park. The property was formerly a gasoline station. Past gas station operations impacted the soil and groundwater with petroleum (VOCs, PAHs and metals) from releases from multiple former tanks that stored various products. The City acquired the property for back taxes and has plans to redevelop the lot into a small formal park with shade, landscaping, and domino tables where community members can gather. Funds are needed to advance cleanup of the property and redevelop it into a formal park. The City and Brownfields partners have been doing community engagement to understand better what amenities/facilities the park should include. While located on the outskirts of the target area, it serves as a connector to the target area including the rail trail.

<u>Anchor Auto Junkyard</u> (Map 190, Lot 17) - The property consists of one parcel of land encompassing 1.5-acres that is used as an automobile salvage yard. The site abuts the rail trail corridor and is intended to be acquired by the City to establish a neighborhood connection to the rail trail and expand Bourgoin Park to increase the size of the park's soccer field. The site is currently privately owned, but an access agreement has been provided to the City for Assessment activities. According to historical documents, the property was used as a coal storage facility from approximately 1888 to 1960, and as an automobile salvage yard since approximately 1971. During the previous Phase I ESA conducted in 2019, the site contained a vehicle crusher, several junk cars, and numerous stored automobile parts. Surficial soil staining was also observed. No soil or groundwater sampling has been conducted to date, but the site is likely contaminated with petroleum related VOCs, PAHs, metals, and PCBs. Phase II assessment work will be funded by this grant. Cleanup funds will also be needed for this site.

iii. Identifying Additional Sites: Beyond the priority sites within the Target Area presented above, the City of Lawrence will build off its existing inventory of Brownfields completed in conjunction with MVPC's Brownfields inventory last updated in 2022. Additionally, MVPC recently offered the City of Lawrence to develop a viewer/mobile application technology that will allow the city to keep track of all brownfields. The Lawrence Brownfield Viewer (LBV) mobile application and data editor

will be for use by MVPC and the City staff providing access to images, graphics, and information pertaining to each Brownfields location entered into the system. This application will be available in the near future for the city (on or about Dec 2023). 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. Prioritization of Sites for Assessment and Cleanup will be by the City's Economic Development Department. Prioritization will be based on 1) Economic and community development potential; 2) Community need and impacts to EJ Communities; 3) Sustainable reuse; 4) Creation of greenspace; and 5) Reduction of threats. Please note that all of Lawrence is within underserved or disadvantaged census tracks. Prioritization will initially focus within the underserved census tracts within the rail trail corridor and then will expand City wide.

b. Revitalization of the Target Area: <u>i. Overall Plan for Revitalization</u>: In 2015, the City of Lawrence received an EPA Brownfields Area Wide Planning grant that focused on the Lawrence Manchester Rail Corridor (LMRC) right-of-way that consists of approximately 13 acres of former rail yards along a 1.4-mile-long linear open space adjacent to Lawrence's Broadway commercial corridor and the lower Tower Hill neighborhood (the target area of this grant). Through an intense public outreach effort, the Plan realized the placemaking and healthy living opportunities as well as specific strategies and actions to advance the City's overall goals of economic development, job creation, improved quality of life, and fiscal stability. The final Report (April 2017) documented the analysis, community input, planning and design recommendations and implementation strategies for assessment, cleanup and reuse of both the rail corridor and two square blocks of adjacent underutilized industrial parcels (the Flametech Steel site and the Downtown Crossing Block mentioned above).

The Plan identified that there is a substantial desire by area residents for recreation opportunities. The market study completed as part of the report identified a need for workforce housing. It also identified that housing redevelopment can be a key catalyst for downtown revitalization and "anti-blighting agent for the area". However, the study did indicate that the finances for workforce housing do not work unless there is some form of outside support or subsidy in the form of tax credits to reduce construction costs, Brownfields funds to reduce assessment and cleanup costs, and Tax Increment Financing (TIF) to reduce area infrastructure costs. These will all have measurable outcomes and benefits outlined below.

In 2020, Groundwork Lawrence and the City of Lawrence began a resident led planning effort, Lawrence Pa'Lante, to help the city develop and implement strategies to address the climate crisis. We hypothesized that successful implementation of the Resilient Corridors concept would help bridge the gap between the interrelated goals of health, equity, and climate resilience in Lawrence by addressing multi-modal street infrastructure, extreme heat, and air quality. Over the course of 30 months, GWL, the City, and the Pa'lante Resident Taskforce members engaged in extensive data collection, city and neighborhood-level planning, and carried out two pilot projects. The first pilot project, Bennington Triangle, focused on transforming underutilized space in an urban heat island in Lawrence to a "cool island" or public green space. Our second pilot project was to develop a campaign for "cool roofs" throughout the city as a strategy for reducing the effects of extreme heat in Lawrence's most at-risk neighborhoods.

Lastly, the Mayor, in collaboration with the Lawrence Redevelopment Authority, has created an Equitable Compact Transit-Oriented Development (ECTOD) Plan for the community. The ECTOD envisions mixed-income housing, commercial spaces, and public amenities in proximity to public

transportation via rails and buses. By implementing balanced real estate/housing, community engagement, environmental sustainability, and social equity principles, the ECTOD aims to benefit everyone in the community with improved transportation, reduced environmental impacts, and increased access to opportunities while addressing social, economic, and environmental concerns.

ii. <u>Outcomes and Benefits of Reuse Strategy:</u> The LMRC Reuse Plan outlines achievable steps to create the rail trail within the heart of the City as well as spur mixed use economic development. Specific outcomes of the Plan include a 1.4-mile rail trail and redevelopment of two blocks, the Flametech Steel site and the Downtown Crossing Block. To date, more than \$27 million in MassDOT funds have been encumbered to clean up the site and construct the rail trail and associated access points. This has been supported by \$750,000 in funds to support the project from AARPA funding. The City will also build off the construction of the rail trail to assess, cleanup and redevelop other Brownfields sites in the corridor, and connections to the corridor, including the Florence St Garage, Anchor Used Auto, and Bennington Triangle property as well as the two other targeted sites (the Hilton Chrome site located at 75 Holly Street and the Lewis Mill at 65 South Canal Street) to further support recreational and economic development opportunities including the blight removal, greenspace, and work force housing.

The area also has tremendous potential for commercial development and small business growth as the target area is located <u>in</u> the Merrimack St. Gateway-Opportunity Zone 25009251600 which provides economic incentives to support Brownfields redevelopment in the target area; and accessible to the rail trail and public transportation. Demand by private investors is strong for this program. In fact, private investors have reached out to the City to show interest in redeveloping sites around these junk yards but are hindered by the specter of environmental contamination. Once assessed and cleaned, these Sites will substantially stimulate economic and non-economic development of the target area and transform the blighted area to an attractive asset that benefits the City and neighborhood/residents.

In addition, Lawrence has a Green Communities designation and has adopted stretch codes that require higher efficiency in construction. The City will encourage development that integrates **LEED** certification and green building design and the potential for renewable energy. Project will likely include the creation of greenspace thus reducing the heat island effect. The rail trail will increase attractiveness to live and work in the area, increase connectivity to both sides of Lawrence including the closest grocery store, and increase opportunities for recreation and exercise.

Lastly, the ECTOD aims at redesigning several locations in the city to enable residents to access transportation easily, including job centers, which will help break the poverty cycle. This investment in transportation infrastructure will reduce traffic congestion, shorten commuting times, and enable more people to access job centers, schools, and essential services. These improvements will breathe new life into the city's neglected areas, attract new businesses and residents, stimulate local tourism, support existing residents to move up the self-sufficiency continuum, and increase the city's tax base. The ECTOD is a collaborative effort towards creating a better community that benefits everyone.

c. Strategy for Leveraging Resources: i. <u>Resources Needed for Site Reuse</u>: The City has secured more than \$27,738,600 from MassDOT for the cleanup and construction of the rail trail along with over \$750,000 to support design, permitting, and right of way acquisition. In addition, \$286,000 loan/subgrant has been secured from MVPC's Brownfields Cleanup RLF for the abatement and demolition of existing building at 9 Florence Place to access the subsurface soil under the building for additional assessment and cleanup utilizing this grant; however, more funds will be needed to

complete the project. In addition, other secured funding to be leveraged include \$30,000 secured from the Build to Belong Foundation for the Bennington Triangle project and we envision leveraging these funds with a \$500,000 request from the Massachusetts Parkland Acquisitions and Renovations for Communities (PARC) Grant Program. Lastly, the target area is in an Opportunity Zone that investors can leverage as part of any site redevelopment. All of the identified project areas are located within qualified HUBZones which makes the city eligible for specific federal contracting opportunities and can attract more businesses and investments. See **Attachment 2** for Secured Leveraged Funds Documentation.

ii. <u>Use of Existing Infrastructure:</u> The target area is currently well served by existing utilities and each of the Sites takes advantage of existing street infrastructure. Water/sewer/electrical/gas/ telecommunications are available along the corridor and will be easily connected via underground utility corridors during redevelopment. Based on the proposed project, no new or expanded utilities are anticipated to be required as part of the project.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. <u>The Community Need for Funding</u>: The LMRC corridor is a prime location for new economic development, but since the City does not have assessment and remediation funds, the area has remained idle, unproductive and a health/safety burden for the surrounding neighborhoods. The economic upheaval of recent decades and 2008 recession weakened Lawrence's manufacturing sector/social safety nets and eroded economic gains. Median household income in the Site's neighborhood is 40% lower than MA's. Local business loss and factory shutdowns/downsizing contributed to job losses of 500 and 1000+ vacant/ underutilized City lots. In Sept. 2018, a gas explosion resulted in death and disability, and forced the evacuation of 30,000 residents. Many homeowners and businesses never recovered and are now facing record hardship post COVID. Lawrence currently has MA's highest unemployment rate (see chart below). During COVID, Lawrence spent millions in unbudgeted funds to mitigate/protect residents. This, on top of a limited tax base from a low-income population, and \$16,120,675 of delinquent property taxes, further strains the tight City budget. This grant eliminates a barrier to the Site's economic development potential by funding the assessment and cleanup of contaminated groundwater and soil that the City just doesn't have the funds to complete on our own.

ii <u>Threats to Sensitive Populations</u>: 1) <u>Health or Welfare of Sensitive Populations</u>: The LMRC corridor contains several contaminated parcels that negatively impacts the welfare of all residents, especially young children, elders, pregnant women, minority, low-income, and homeless people given Lawrence's compact nature. Based on current EJ Screen data, residents in the target area have severely compromised social determinants of health:

Demographics & Indicators of Need Summary:	Target Area	Lawrence	<u>MA</u>
Population:	<u>9,640</u>	87,798	6,657,291
<u>Unemployment</u> :	<u>12%</u>	<u>10%</u>	<u>5%</u>
Percent Low Income:	<u>54%</u>	<u>47%</u>	<u>22%</u>
Percent People of Color:	<u>95%</u>	<u>87%</u>	<u>30%</u>
Per Capita Income:	<u>\$19,456</u>	<u>\$23,096</u>	<u>\$36,441</u>
Total Non-English Spoken at Home:	<u>86%</u>	<u>80%</u>	24%
Less Than HS Education:	<u>42%</u>	<u>30%</u>	<u>9%</u>

Residents cite unemployment, low income, lack of green space and crime as barriers to removing the welfare concerns. The target area directly contributes to these impacts by serving as a blighted area with disinvestment and a lack of jobs. Unsafe walking/biking and neighborhood conditions in the area (drugs substance abuse/prostitution/sex work/homelessness/displacement) further contribute to

lack of activity, poor mental health, and stress. Three public meetings held as part of the Rail Trail Study provided concrete directions from abutters that access to meaningful open space at the Site is a priority. The assessment and cleanup of Brownfields in the target area directly addresses these health and welfare concerns. Redevelopment will reverse blight, provide direct river/greenspace/rail trail access, provide jobs, and safe/affordable housing. Public meetings during assessment, cleanup and reuse will address resident health, safety, and community disruption concerns. Our remedial approach to cleanup activities will be protective of these sensitive populations, which include: LSP oversight, fence around the properties during cleanup, multi-language warning signs, and monitoring of fugitive dust emissions. The Project Manager will serve as the point of contact to address concerns.

2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Studies suggest a link between PAH, VOC, PCB and metals exposure and a higher risk of cancer, respiratory problems, obesity, and low birth weight babies. Living near to these brownfield sites impacts mental health including stress and induces physical/physiological effects. Per the MA Dept. of Public Health (MA DPH), Lawrence has a higher prevalence of low-birth weight babies than MA (9.3% vs. 7.5%). Chronic diseases, (e.g. diabetes, obesity, mental health, asthma) were top health concerns identified in a 2019 Lawrence General Hospital Community Health Needs Assessment (e.g., diabetes 11.5% Lawrence/7.5% MA and obesity 34.4% Lawrence/25.8% MA). Older housing (72% built before 1940) and high traffic emissions put children at increased risk for lead poisoning and asthma (per EJ Screen the target area has a health value for asthma of 12.1 compared to 10.8 for state and 10 for use ave [92nd percentile]). Per the heath assessment, our youth are twice as likely to be admitted to the Emergency Room for asthma than MA's rate (149.8 visits vs 66.5 visits per 10,000). Pediatric asthma prevalence for K-8 students is 16.6 per 100K Lawrence vs. 2.4 MA. The MA DPH Childhood Lead Poisoning Prevention Program ranks Lawrence 7 of 19 high risk communities, tract 2516 is a lead hot spot. The assessment and cleanup of our Brownfields in the target area eliminates/manages the risks to human and environmental health through proper management, mitigation and/or disposal of the contaminants (i.e., asbestos abatement, removal/disposal of lead containing building materials and soil-based petroleum/PAH removal/ covering). The redevelopment into a rail trail connector increases exposure to green space, and improves resident's mental and physical health (obesity, diabetes and asthma).

3) <u>Environmental Justice:</u> (a) Identification of Environmental Justice Issues: **100% of Lawrence is an EJ community including our 3 priority sites** vs. 12.1% average for MA communities. <u>Lawrence's chief environmental problems are exposure to hazardous sites.</u> This has led to pollution (land/water/air) with increased exposure to lead, asbestos, PAHs, heavy metals, chlorinated solvents, petroleum, VOCs, and other toxins. The Site is surrounded by four Hazard Waste Treatment Storage and Disposal Facilities. Transportation (gas/diesel emissions) contributes to the pollution: the commuter rail is nearby and I-495 (~1 mile east) has an average daily traffic volume of 126,074. The nearby South Broadway corridor adds to emissions/noise levels (2017 daily traffic volume: 17,183). These emissions are likely a contributing factor to the high childhood asthma rates (2008 MA DPH study 'Air pollution and Pediatric Asthma in the Merrimack Valley'). Complicating matters, MA's Attorney General reports that communities of color disproportionately breathe polluted air.

(b) Advancing Environmental Justice: Environmental concerns, sociodemographic and health disparities make health equity and sustainability an important consideration in our Brownfields program to improve quality of life for the target community. Site reuse for a rail trail decreases household transportation costs, improves air quality, creates a safer more walkable/bikeable neighborhood and promotes public health. The trail also connects residents to services like area supermarket, Boys and Girls Club and a State Park) all located along the rail trail. A new park/green

space reduces noise/ air pollution and the heat island effect, mitigates stormwater, and provides physical activity opportunities. Lasty, our Brownfields program is expected to bring in more underserved, disadvantaged populations into the target area, not displace them. The focus on workforce housing and economic development will provide better housing and job opportunities for the underserved and disadvantaged community, remove blight, provide recreation opportunities, and provide long-term health benefits from both environmental improvement, socio economic improvement, and increased exercise.

b. Community Engagement: *i.* Prior/Ongoing Community Involvement: Over the course of the past three years, Groundwork Lawrence has cultivated Lawrence Pa'Lante, a Resident Taskforce develop a community-led vision for climate, health, and equity in Lawrence, and implement pilot projects and campaigns in service of that vision. Pa'Lante engaged in extensive data collection, city and neighborhood-level planning, and carried out two pilot projects. The first pilot project, Bennington Triangle, focused on transforming a former fueling station in an urban heat island into an accessible greenspace for the community. Lawrence Pa'lante supplemented the popup park with two public meetings held over the summer of 2023 at which residents learned about brownfields in Lawrence, the brownfield constraints at the Bennington Triangle, and gave residents a voice in the redevelopment of the space into a park. Today, the Bennington Triangle popup park is still being actively used by residents and the City has used EPA assessment funds to conduct a brownfield assessment to jumpstart remedial planning. With funding from the EPA we will be able to continue this important engagement with residents.

Partner	Contact	Role
Merrimack Valley Planning Commission	Jerrard Whitten, Exec. Dir. 978.374.0519 ext.12 jjwhitten@mvpc.org	Advisory Committee member. Assist w/ reuse plans & developer recruitment. Assist with grant management and partner with funding support EPA RLF and Assessment Grants.
Groundwork Lawrence (GWL)	Lesly Melendez, Exec. Director, 978- 974-0770x7009 hmcmann@groundworklawrence.org	Advisory Committee member. Outreach/education, coordinate public meeting, contribute to assessment, planning, implementation.
Arlington Community Trabajando	978-685-6274 ehernandez@actlawrence.org	Advisory Committee member. Outreach/education to Outreach/education to neighborhood families , meeting time/space.
Lawrence Partnership	George Ramirez, 978-655-5824, gramirez@lawrencepartnership.org	Advisory Committee member. Outreach/education to neighborhood businesses and developers , meeting time/space.
Lawrence Pa'Lante	Eve Rodriguez, 978-242-6679, erodriguez@mylmcc.org	Advisory Committee member. Outreach/education to residents , meeting time.
Tower Hill Neighbor Assoc.	Elsa Sanchez, 978-387-7619, THNALawrence407@gmail.com	Advisory Committee member. Outreach/education to neighborhood

ii. **Project Involvement** *and iii.* **Project Partner Roles**: We have strategically engaged local organizations/stakeholders that are relevant to our Brownfields <u>projects and connection to meaningfully</u> engage the local community.

	residents (without children in the
	school system).

iv. Incorporating Community Input: The City has a solid history of meaningful community engagement as part of our community projects. The previous Rail Trail Reuse Study engaged the community through three public meetings and incorporated their input and priorities. For this grant, the Project Manager will be a continual point of contact with the public to address public health, safety, and reuse plan concerns. All communication will be in Spanish & English. Our Community Outreach approach for this grant will include: 1) Public meetings: Several public meetings will be held during the course of this grant. One public meeting will be held at the beginning of the grant period to educate both the target area residents and City employees of the brownfields program, solicit their ideas for priority sites within the updated inventory, solicit reuse alternatives for the priority sites, and respond to any environmental and health concerns within the target area. An additional public meeting will be held for each assessment site once Site data is obtained and the roadmap to cleanup and redevelopment is being developed to solicit public feedback. Once a site is under cleanup, two additional public meetings will be held per Site. The first public meeting will occur to present and discuss the draft Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanups that move forward. This meeting will be in person with options for remote/virtual participation and will address health, safety, and community disruption concerns as well as update the public about any new assessment findings. The second meeting, after cleanup is complete, will focus on project outcomes and discuss reuse planning efforts. This meeting will be socially distanced inperson with participants organized in small groups that visit a series of locations to learn about and consider key questions about each project. Locations have semi-structured/open ended interview prompts that participants respond to facilitate quantitative data collection. 2) Direct Outreach: Community partners (listed above) will assist with targeted outreach and education to target sensitive populations. Communication with residents living near the sites via quarterly canvassing by a bilingual, multicultural team. The team updates residents about the project, answers questions, and allays concerns. Bilingual flyers are left at houses with contact information and canvassing is after 3:30 pm on weeknights when families are most likely to be home. 3) Neighborhood Association meetings (in person or virtual): Team members attend meetings of the Tower Hill Neighborhood Association and Arlington Breakfast Club to provide updates/answer questions. 4) Social media and project website: The City website page shares project updates. Twitter, Facebook, Instagram updated quarterly raise awareness. 5) Outreach to developers: The Economic Development Officer has an existing rapport with local businesses interested in redeveloping sites in the target area and outreach will expand as the program progresses. Input will be posted on the City's website and reported in ACRES. Collective input will continuously be shared with the project team and become part of the on-going project management and strategic Site redevelopment.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs: EPA funds will be used to conduct extensive community engagement, complete six (6) Phase I and four (4) Phase II assessments, four (4) Analysis of Brownfields Cleanup Activities (ABCAs), and cleanup of four (4) brownfield sites.

Task/Activity 1: Cooperative Agreement Oversight (\$12,000)

i. Project Implementation: EPA Funds: The Project Manager will oversee grant activities with the support of the Finance Team and MVPC, who will ensure compliance with grant requirements, and who will oversee coordination with stakeholders. Tasks include Competitively procuring a Qualified Environmental Professional (QEP); convening and expanding the Brownfield Advisory Committee (BAC); attending two National Brownfields Conferences; completing programmatic reporting requirements (e.g., quarterly reports, ACRES, MBE/WBE, and financial reports); and budget tracking. The City will also perform general programmatic management and communication with EPA, City officials, and the BAC. Non-EPA Funds: Groundwork Lawrence and MVPC Administrative Support

ii. Anticipated Project Schedule: Procure qualified contractors in Fall 2024; conduct programmatic management and coordination throughout the grant period; undertake reporting and budget tracking throughout the grant period.

iii. Task/Activity Lead: City Project Manager; with assistance from Groundwork Lawrence and MVPC.

iv. Outputs: Formation of BAC project teams; procure QEP; 20 quarterly reports; ACRES data entry; annual MBE/WBE and financial reports; attendance at the National Brownfields Conference; and final grant closeout report.

Task/Activity 2: Community Engagement (\$42,500)

i. Project Implementation: EPA Funds: The City with support from our QEP, Groundworks Lawrence, and MVPC will execute the community outreach program as outlined in Section 2b. The inventory will be updated by the QEP and priority sites and reuse options will be selected through quarterly BAC meetings. The City will connect with the community through quarterly meetings, newsletters, web sites, and social media. The QEP will help prepare a community involvement plan and present information and gather input at public events. Non-EPA Funds: MVPC Outreach Support

ii. Anticipated Project Schedule: Outreach for community engagement opportunities in Fall 2024 and continue to end of the project Summer 2028 (anticipate completion in 4 years, not 5) including quarterly Steering Committee meetings w/ public input and outreach to owners and developers.

iii. Task/Activity Lead: City Project Manager; QEP, Groundwork Lawrence and MVPC.

iv. Outputs: Community engagement plan; quarterly BAC meetings and meeting minutes; newsletters/fact sheets; outreach and presentation materials; public notification advertisement and other media updates; and establishment of the administrative record

Task/Activity 3: Assessments (\$200,000)

i. Project Implementation: With oversight and support from the City, the QEP will complete six (6) Phase I assessments and four (4) Phase II assessments at each of the priority sites in accordance with current ASTM standards and comply with the All-Appropriate Inquiries Final Rule. Site Specific Quality Assurance Project Plans (SSQAPPs) will be completed for each site and reviewed by and approved by EPA prior to initiation of Phase II activities.

ii. Anticipated Project Schedule: Assessment activities will begin in Fall 2024 and be continuous through Summer 2028.

iii. Task/Activity Lead: QEP with support from the City Project Manager

iv. Outputs: 6 Phase Is, 4 Phase IIs; and 4 SSQAPPs

Task/Activity 4: Cleanup/Reuse Planning (\$70,000)

i. Project Implementation: The QEPs will develop four (4) Analysis of Brownfields Cleanup Alternatives in accordance with EPA guidance. At least three cleanup alternatives will be evaluated and compared to the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness. The ABCA will be subject to a 30-day public comment period. In addition, in support of cleanup, the QEP will submit SSQAPP for cleanup, develop bid package (e.g. design Specifications and Drawings), and prepare State regulatory submittals. Non-EPA Funds: Groundwork Lawrence engages community and incorporates input into final documents.

ii. Anticipated Project Schedule: Cleanup and Reuse planning activities will begin immediately for two highlighted priority sites (Bennington Triangle and 9-11 Florence Street in Fall 2024 and be continuous throughout grant period.

iii. Task/Activity Lead: QEP with support from the City Project Manager

iv. Outputs: ABCAs, SSQAPP, Bidding Documents, Community charrettes; market analysis identifying prospects for mixed-use development; sustainable land use plan; implementation strategy; final ABCAs; cleanup plans.

Task/Activity 5: Remediation (\$675,500)

i. Project Implementation: EPA Funds: Cleanup will be conducted at up to four (4) sites. Costs include (as necessary) haz. build. Mat. abatement, haz. waste removal and disposal, and excavation with off-site disposal. Major expenses include transportation and disposal of regulated soils. QEPs will oversee these cleanup activities including dust and erosion controls/air monitoring, and temporary site fencing and closeout reporting. Non-EPA Funds: Groundwork Lawrence engages community and incorporates input into final documents.

ii. Anticipated Project Schedule: Cleanup activities will begin in spring 2025 and continue through the end of Year 5.

iii. Task/Activity Lead: QEP with support from the City Project Manager and remediation contractor

iv. Outputs: Cleanup Completion and Closure Reports for up to 4 sites, Activity and Use Limitations (if required) and State Regulatory Submittals.

	Project Tasks					TOTAL
Budget Categories	Cooperative Agreement Oversight	Community Engagement	Assessments	Cleanup/ Reuse Planning	Remediation	Total
Personnel	\$8,000	\$7,500	\$5,000	\$7,500	\$12,000	\$40,000
Fringe	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$4,000	\$0	\$0	\$0	\$0	\$4,000
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$0	\$35,000	\$195,000	\$62,500	\$72,000	\$364,500
Construction	\$0	\$0	\$0	\$0	\$591,500	\$591,500
Direct Costs	\$12,000	\$42,500	\$200,000	\$70,000	\$675,500	\$1,000,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$12,000	\$42,500	\$200,000	\$70,000	\$675,500	\$1,000,000

Task 1: Cooperative Agreement Oversight (\$12,000) – City staff will provide oversight services (50/hour for 160 hours = \$8,000). Additional staff time will be in-kind. Two staff with travel to the two National Brownfields Conference (\$1,000/2 people airfare and hotel x 2 = \$4,000).

Task 2: Community Engagement (\$42,500) – City staff conduct outreach and oversee the

community engagement process (\$50/hour for 150 hours = \$7,500) with Community Engagement Plan, Community Engagement Services, Support Public Meeting Participation and the QEP will assist with quarterly BAC mtgs, etc. (\$100/hr x 350 hrs = \$35,000). Additional City staff time will be in kind.

- Task 3: Assessments (\$200,000) City staff to assist with assessment activities (\$50/hour for 100 hours = \$5,000). Additional City time is in kind. The QEPs will conduct Phase Is at six (6) priority sites (est. at \$4,500 each = \$27,000), four (4) SSQAPPs (est. at \$3,500 each = \$14,000) and four (4) Phase IIs (est at \$38,500 each = \$154,000) totaling \$195,000.
- Task 4: Cleanup/Reuse Planning (\$70,000) City staff to assist with cleanup planning activities at \$50/hour for 150 hours = \$7,500 plus \$62,500 (625 hours x \$100/hr) in contractual costs for QEP cleanup/reuse planning, SSQAPP, and bidding
- Task 5: Remediation (\$675,500) City staff to assist with cleanup execution at \$50/hour for 120 hours = \$12,000. Additional City time is in kind. The selected remediation contractor will undertake remediation of up to four (4) sites at an estimated \$147,875/site totaling \$591,500, The QEP will provide oversight at the 4 sites at \$72k (180 hrs/site x \$100/hr x 4 sites).

d. Measuring Environmental Results: The City PM in cooperation with EPA will complete a workplan to serve as a tracking tool to monitor progress. Indicators will tie back to outputs listed above and will include additional data from resident input and assessment/cleanup activities (e.g., soil tests). The City will hold quarterly BAC meetings to check workplan status, project schedule, and outputs. If deficiencies are identified, corrective actions will be discussed internally and with EPA. Progress toward outcomes/outputs will be documented in quarterly reports tracked via ACRES. Broader benchmarks will track economic, environmental, and social/health outcomes specific to the Site's revitalization. (i.e., jobs created; taxes gained; acres land remediated, greenspace created; housing created; improved rates asthma, lead poisoning, and obesity.).

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability: <u>*i*</u>. Organizational Capacity, <u>*ii*</u>. Organizational Structure and <u>*iii*</u>. <u>Description of Key Staff</u> - The grant will be managed by the Office of Planning and Development (OPD). OPD successfully manages federal, state, and private grants totaling more than \$200 million. We are currently managing \$37.5M in Federal Grants and have successfully developed and executed detailed grant work plans for grant execution that had clear milestones and responsibilities that aid in the successful execution of federal grants. Thus, we recently have developed robust systems and experienced staff with the capacity to ensure timely and successful expenditure of funds and completion of all technical/administrative requirements. The OPD is led by Dan McCarthy and staff from who will oversee the overall grant execution.

<u>Key staff</u> have experience managing the current EPA Brownfield Assessment & Cleanup grants. <u>Director of Planning</u>- Daniel McCarthy: *Role*- Project Manager (PM): Overall responsibility to assure partner/sub-recipient commitments are met; coordinate with City Depts, internal team and EPA Program Officer; interface with local businesses/developers; community liaison; informs Mayor. *Experience*- Administered \$10M+ of public/other infrastructure projects; developed relationships with Mass Development, EPA Region I staff, MVPC. <u>Mgr. of Finance & Admin.</u> <u>Services</u>- <u>Susan Fink</u>: *Role*- Grant **Financial oversight;** oversee bid process. *Experience*-Responsible for admin/financial requirements of recent EPA Brownfield grants. City employee since 1995. Manages many state/ federal grants. <u>Economic Development Officer II- Kenny La Marche</u>: *Role*- Prepare quarterly EPA **reports & ACRES updates;** Document Davis-Bacon Wage compliance; QEP procurement. *Experience*- Trained in ACRES and past experience supporting EPA brownfield grants. *iv.* <u>Acquiring Additional Resources:</u> Merrimack Valley Planning Commission (MVPC) will provide monthly support to the City and assist with quarterly reporting via ACRES updates by their QEP and project management assistance. The OPD is poised to collaborate with a strong team of subcontractors and community partners. The **Manager of Finance & Admin** oversees procurement, following MA procurement laws and will procure contractors in accordance with the EPA's procurement guidelines.

b. Past Performance and Accomplishments: i. Currently Has or Previously Received an EPA Brownfields Grant 1) Accomplishments: The City has received over 13 EPA funded Brownfields

Brownfields Grant 1) Accomplishments: The City has received over 13 EPA funded Brownfields grants (assessment, cleanup, RLF, and job training). Through the years we have achieved significant accomplishments including Brownfield Award for Social Impact for the conversion of a rail yard and trash incinerator into Manchester Street Park, completion of the Lawrence Gateway project—a decades long effort to transform multiple industrial properties into parks and affordable housing that leveraged over \$3.6 million in EPA Brownfields funds with \$200M+ in private investment. Accomplishments in ACRES for 3 recent grants include:

(1) – 2021 Cleanup Grant (BF00A00774), Cleanup of Lots 1 and 2 of the Merrimac Paper Site, 7 and 9 South Canal Street.

Outputs: 1-acre park with green infrastructure, excavation and offsite disposal of soil contaminated with petroleum and hazardous materials and eventually the construction of buildings with housing and commercial space.

(2) – 2020 Cleanup of Grant (BF00A00544), Cleanup of Tombarello Site - Lot #2, 207 Marston Street. \$109,000 drawn down. Cleanup is currently under way and expected to be completed within next 3 months. Entire grant amounts expected to be fully drawn down by March 2024. Outputs: Offsite disposal of 825 tons of PCB contaminated soils and re-use planning to facilitate private investment for site closure.

(3) \$350k 2017 Site Specific Assessment Grant (FY18 BF00A00376) Tombarello Site - Lot #2, 207 Marston Street. Project completed and closed out. Outputs: QAPP approved,

and investigations conducted. Two public meetings will be conducted in Nov 2019 and June 2020 (Virtual Meeting). Lot 2 assessment included collection of soil samples from 97 berm, 31 soil pile, and 43 "at-grade" locations. Assessment July 2019 through March 2020. Remediation work began in June 2020. Interim Phase 2 report **Outcomes**: Phase 2 Comp. Report; Area of contamination understood; Secured \$750,000 funding for cleanup. PCB cleanup framework was established to facilitate redevelopment.

2) Compliance with Grant: Since 1996 the City has successfully managed at least 13 EPA Brownfield grants totaling over \$4 M in funding. While the City did have some lapses in quarterly ACRES reporting, we have taken proactive steps to ensure that these lapses do not recur. This includes primarily working closer with MVPC Brownfields Program and their Qualified Environmental Professional that has provided regular interaction, guidance and support to ensure we are in compliance with grant terms, workplan, schedule, programmatic and financial reports, and ACRES. All funds were fully expended on all closed grants. Current grants are on track to achieve expected results and be spent down. Activities remaining on the grants is for the city to submit the Phase II, close out the contract with the remedial contractor (10-23-20), and hold a final public meeting to present residents with the outcomes of the assessment and cleanup grants.

ATTACHMENT 1

THRESHOLD CRITERIA

ATTACHMENT 1 - THRESHOLD DOCUMENTATION

1. <u>Applicant Eligibility:</u>

Lawrence is a city in the Commonwealth of Massachusetts and therefore an eligible entity for a Multipurpose Grant.

2. Community Involvement:

The City will use the following partners to execute the community involvement portion of this grant.

Partner	Contact	Role	
Merrimack Valley Planning	Jerrard Whitten, Exec. Dir. 978.374.0519 ext.12	Advisory Committee member. Assist w/ reuse plans & developer recruitment.	
Commission	jjwhitten@mvpc.org	Assist with grant management and partner with funding support EPA RLF and Assessment Grants.	
Groundwork	Lesly Melendez, Exec. Director, 978-	Advisory Committee member.	
Lawrence (GWL)	974-0770x7009	Outreach/education, coordinate public	
	hmcmann@groundworklawrence.org	meeting, contribute to assessment, planning, implementation.	
Arlington	978-685-6274	Advisory Committee member.	
Community	ehernandez@actlawrence.org	Outreach/education to	
Trabajando		Outreach/education to neighborhood	
-		families, meeting	
		time/space.	
Lawrence	George Ramirez, 978-655-5824,	Advisory Committee member.	
Partnership	gramirez@lawrencepartnership.org	Outreach/education to neighborhood	
		businesses and developers , meeting time/space.	
Lawrence Pa'Lante	Eve Rodriguez, 978-242-6679,	Advisory Committee member.	
	erodriguez@mylmcc.org	Outreach/education to residents , meeting time.	
Tower Hill	Elsa Sanchez, 978-387-7619,	Advisory Committee member.	
Neighbor Assoc.	THNALawrence407@gmail.com	Outreach/education to neighborhood	
		residents (without children in the	
		school system).	

The City has a solid history of meaningful community engagement as part of our community projects and our other successful Brownfields projects. The previous EPA Brownfields Funded Rail Trail Reuse Study engaged the community through three public meetings and incorporated their input and priorities. For this Multipurpose grant, the Project Manager will be a continual point of contact with the public to address public health, safety, and reuse plan concerns. All communications will be in bilingual, because a dominant portion of our most sensitive communities are native Spanish speakers. Our Community Outreach approach for this grant will be multifaceted and will include the enumerated items below. This approach is detailed in our grant narrative:

1) <u>Public meetings</u>: A public meeting will be held at the beginning of the grant period to educate both the target area residents, solicit their ideas for additional sites, solicit reuse options for the priority sites, and respond to any environmental and health concerns within the target area. An additional public meeting will be held once Site assessment/cleanup data becomes available and to engage on the roadmap to cleanup and redevelopment. Once a site is in cleanup, two additional public meetings will be held per Site. The first public meeting will occur to present and discuss the draft Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanups that move forward. This meeting will be in person with options for remote/virtual participation and will address health, safety, and community disruption concerns as well as update the public

about any new assessment findings. The second meeting, after cleanup is complete, will focus on project outcomes and discuss reuse planning efforts. This meeting will have participants organized in small groups (i.e., café style) to facilitate engaging about key questions about each project. Meetings will have semi-structured/open ended interview prompts that participants can respond to facilitate interactive quantitative data collection.

2) <u>Direct Outreach</u>: Community partners (listed above) will assist with targeted outreach and education to target sensitive populations. Communication with residents living near the sites via quarterly canvassing by a bilingual, multicultural team. The team updates residents about the project, answers questions, and allays concerns. Bilingual flyers are left at houses with contact information and canvassing will be performed after 3:30 pm on weeknights when families are most likely to be home.

3) <u>Neighborhood Association meetings (in person or virtual)</u>: Project team members will attend meetings of the Tower Hill Neighborhood Association and Arlington Breakfast Club to provide updates/answer questions.

4) <u>Social media and project website</u>: The City website page shares project updates. Twitter, Facebook, Instagram are updated quarterly to raise awareness.

5) <u>Outreach to developers</u>: Economic Development Officer has existing rapport with local businesses interested in redeveloping sites in the target area and outreach will expand as the program progresses. Input will be posted on the City's website and reported in quarterly reports. Collective input will continuously be shared with the project team and become part of the on-going project management and strategic Site redevelopment.

3. <u>Target Area</u>

- a. Census Tracts of Target Area: MA009250100, MA009250300, MA009250800, and MA009251600
- b. Priority site addresses listed in narrative:
 - i. Florence Street Garage 9-11 Florence Street, Lawrence, Massachusetts 01840
 - j. Bennington Triangle Site 246 Lawrence Street, Lawrence, Massachusetts 01840
 - k. Anchor Used Auto Junkyard 140 West Street, Lawrence, Massachusetts 01840

4. Affirmation of Brownfields Site Ownership:

The City of Lawrence owns both the Florence Street Garage Site (9-11 Florence Street) and the Bennington Triangle sites. Both properties were acquired through tax foreclosure. Both properties are ready for cleanup. The following provides additional details of the tax takings:

Florence Street Garage – 4 Lots (9-11 Florence Street)

Current Owner:	City of Lawrence, 200 Common St, Lawrence, MA 01840
Date of Acquisition:	October 12, 2005 (Lot 78)
	October 26, 2005 (Lot 79)
	May 31, 2006 (Lot 76)
	September 16, 2010 (Lot 80)
Nature of Acquisition:	Tax Foreclosure

Bennington Triangle (246 Lawrence Street)

City of Lawrence, 200 Common	St, Lawrence, MA 01840
Date of Acquisition:	February 21, 2006
Nature of Acquisition:	Tax Foreclosure

Lawrence affirms that both of the above sites are a) not listed on the NPL; 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.

5. Use of Grant Funds:

The Multipurpose Grant was applied for to continue the planning work accomplished with Lawrence's EPA Planning Grant by assessing more in and proximal to the rail trail. The output of the EPA Planning Grant was the 2017 LMRC Brownfields Area-Wide Plan. The Plan identified that there is a substantial desire by area residents for recreation opportunities. The market study completed as part of the report identified a need for workforce housing. It also identified that housing redevelopment can be a key catalyst for downtown revitalization and "anti-blighting agent for the area". However, the study did indicate that the finances for workforce housing do not work unless there is some form of outside support or subsidy in the form of tax credits to reduce construction costs, Brownfields funds to reduce assessment and cleanup costs, and Tax Increment Financing (TIF) to reduce area infrastructure costs. Additionally, in 2020, the City with assistance from Groundwork Lawrence led another planning effort (Lawrence Pa'Lante). One of our cleanup sites listed in this grant, Bennington Triangle is the first pilot project, which is focused on transforming an underutilized space in an urban heat island to a "cool island".

Item to Complete	Proposed	Narrative
	number to be	Page
	completed	Reference
Phase I Environmental Site Assessments	6	10
Phase II Environmental Site Assessments	4	10
Remediation	4	10
Plan for Revitalization of Target Area	N/A	3,4

Requested references to the grant narrative are provided in the table below:

6. Expenditure of Existing Grant Funds:

The City of Lawrence affirms that we do not have an open EPA Brownfields Multipurpose Grant or Assessment Grant.

7. Contractors and Named Subrecipients

Not applicable.