



THE CITY OF NASHUA

R01-24-M-003

"The Gate City"

Nashua, NH

Application for FY24 EPA Brownfields Multipurpose Application Narrative Information Sheet

1. Applicant Identification:

City of Nashua, NH
229 Main St.
P.O. Box 2019
Nashua, NH 03060

2. Funding Requested

- a. Grant Type:** Multipurpose
- b. Federal Funds Requested:** \$1,000,000

3. Location:

Nashua, Hillsborough County, NH

4. Target Area and Priority Site Information

The target area for this grant is in downtown Nashua (Census Tracts 0108.02)
Priority Sites include the following properties:

- a. Site 1:** NIMCO site, 1 Pine St Ext, Nashua, NH 03060
- b. Site 2:** Police Training facility, 82 Pine Street Ext, Nashua, NH 03060
- c. Site 3:** Adjacent parking lot, 7 Pine St Ext, Nashua, NH 03060

5. Contacts

a. Project Director:

Deb Chisholm
Sustainability Department Manager
City of Nashua
229 Main St
Nashua, NH 03060
Phone: (603) 589-3092
Fax: (603) 589-3119
ChisholmD@nashuanh.gov

b. Chief-Executive:

Mayor James Donchess
City of Nashua
229 Main St.

Nashua, NH 03060
 Phone: (603) 589-3260
 Fax: (603) 594-3450
NashuaMayor@nashuanh.gov

6. Population

City of Nashua: 91,322

7. Other Factors

Factors	Page #
Community Population is 10,000 or less	No. Page 1.
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site is impacted by mine-scarred land.	
The priority site is adjacent to a body of water (i.e. the border of the priority site 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.)	Yes, see Narrative, page 1.
The priority site is in a federally designated flood plain.	Yes, see Narrative, page 1.
The reuse of the priority site will facilitate renewable energy from wind, solar, or geothermal energy.	Yes, see Narrative, page 3.
The reuse of the priority site will incorporate energy efficiency measures.	Yes, see Narrative, page 3.
The reuse strategy or project reuse of the priority site considered climate adaptation and/ or mitigation measures.	
At least 20% of the project budget will be spent on eligible reuse/ area-wide planning activities, as described in Section I.B., for priority sites within the target areas.	
The target area is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

- 8. Letter from the State:** A letter from the New Hampshire Department of Environmental Services acknowledging that the City of Nashua is planning to apply for FY24 EPA Brownfields grant funding is attached.
- 9. Releasing Copies of Application:** Not applicable



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

November 6, 2023

Mayor James W. Donchess
City of Nashua
229 Main Street
Nashua, NH 03060

Subject: City of Nashua
FY24 Proposal for EPA Brownfields Multipurpose Grant

State Letter of Acknowledgement and Support

Dear Mayor Donchess:

The New Hampshire Department of Environmental Services (NHDES) hereby acknowledges and expresses our support for the City of Nashua's proposal for an EPA Brownfields Multipurpose Grant. Should your proposal be successful, NHDES will commit to providing a liaison for technical support. This assistance can include serving as a non-voting member of an advisory committee, helping evaluate projects, and reviewing the various technical documents prepared pursuant to the grant.

We look forward to continuing our working relationship with the City of Nashua. Please contact me should you have any questions.

Sincerely,

Scott Drew, P.G.
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-2890
Email: Scott.T.Drew@des.nh.gov

Waste
Management
Division

Digitally signed by
Waste Management
Division
Date: 2023.11.06
11:59:00 -05'00'

ec: Deb Chisholm, City of Nashua
Dorrie Paar, EPA New England – Region 1
Jeffrey Marts, P.G., Administrator, NHDES-HWRB
Amy Renzi, P.G., State Sites Supervisor, NHDES-HWRB
Melinda Bubier, NHDES-HWRB



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 Nashua, NH, with a population of approximately 91,000, was originally a mill town whose economy centered on the textile mills along the river, primarily concentrated in the city's downtown. As people and jobs left the downtown, the remaining residents were left with abandoned or underutilized industrial sites, contaminated soil, groundwater, and sediment. Downtown Nashua is home to over 2 million sq. ft of former industrial mill space. High levels of blight and vacancy, coupled with environmental challenges, have discouraged private investment in the area. The known and potential Brownfields sites in this community pose health risks to the disproportionately and underserved low-income, minority and elderly people who continue to live in the area. Almost 200 Brownfield sites have been identified in the Nashua Region through prior and ongoing assessments undertaken by the City of Nashua and the Nashua Regional Planning Commission (NRPC).

The target area for this grant request is located within the Nashua Manufacturing Historic District, in census tract 108.02 (33011010802.) EJScreen data indicates that this area is considered both a Justice40 and an EPA IRA Disadvantaged Community, is an Area of Persistent Poverty, and is also classified as one of two Opportunity Zones in Nashua. For all thirteen supplemental indexes in EJScreen, the target area is between the 99th and 97th percentile compared to the rest of New Hampshire. According to the 2020 census, 26.3% of residents in the target area live in poverty, and EJScreen data reveals an unequal burden in environmental health impacts.

ii. Description of the Priority Brownfield Site(s)

The City of Nashua is seeking this grant to assist with the assessment, cleanup, and redevelopment of three (3) priority, city-owned sites, all located in close proximity to one another: the 'NIMCO' site, the former Nashua Police Department training building, and the adjacent parking lot. These land parcels are a priority as they are a current health hazard, and are part of a larger comprehensive redevelopment plan to transform these unused spaces into multi-family housing or mixed-use development while also creating additional access to adjacent greenspaces such as Mine Falls Park's walking trails and vibrant riverfront area, which is currently the site of more than \$20 million of public infrastructure investment.

Target site #1: The NIMCO Site (1 Pine St Ext., Nashua) is a 2.3-acre site, including a 60,000 sq. ft. former machine shop, located on the banks of the Nashua River in the heart of Nashua's Millyard. Acquired by the City for back taxes, the site is well-suited for redevelopment to create housing supply, jobs and encourage live-work-play opportunities to decrease commute times for area residents. Brownfields assessments were undertaken as part of the NRPC's 2019 and 2021 assessment grants, with preliminary draft the recent Phase II Assessment work indicating presence of confirming PCBs, lead and asbestos in building materials, VOCs and PAHs in soil, VOCs and PFAS in groundwater, and VOCs in soil vapor. Further assessment work is recommended following building abatement/demolition to determine the source of the VOCs. This property is in an Industrial/Mixed Use zoning district which allows for commercial and

residential uses. The site is also located in the Nashua Manufacturing Company Historic District and is partially within the 100-year floodplain. It should be noted that the City has issued an RFP for development of the NIMCO site and plans to use cleanup funds for a portion of the cleanup to ready the site for further cleanup and redevelopment. It is the intent of the City to ensure through the development agreement that the developer commits to and has the financial capacity to complete the cleanup prior to the expenditure of Brownfields funds.

Target site #2: the Police Training Facility, located at 82 Pine Street Ext, totals approximately 1.25-acres with one approximately 4,025 square foot, two-story building constructed around 1920, bordered by the Nashua Power Canal. The remainder of the Site is gravel or asphalt parking, surrounded on the western and southern edges by vegetated area. The Site and surrounding area have a long history of industrial use, including use as an auto/machine repair shop from 1920 to at least 1955. A Phase I Environmental Site Assessment, completed in August 2023, identified two (1) recognized environmental conditions, one of which is also a vapor encroachment condition (REC/VEC), and three (3) environmental findings that may represent business environmental risk. A Phase II ESA and Hazardous Buildings Materials Survey, as well as the excavation and proper disposal of contaminated soil has been recommended.

Target site #3: Millyard Parking Lot Site, located at 7 Pine St Ext. North, totals approximately 1.8-acres and comprises a large asphalt parking lot with bordering areas of vegetation. This site was home to the Picker Building No 6., built in increments between 1890 and 1924, and home to various industrial concerns until 1998, when it was purchased by the City of Nashua, and demolished in 2003. A 2023 Phase I ESA identified one recognized environmental condition/vapor encroachment condition (REC/VEC), and recommended a Phase II assessment to aid with the cleanup/redevelopment planning of the site.

iii. Identifying Additional Sites

The City of Nashua works closely with the NRPC, and more than 200 Brownfields sites have been identified in the region with over 20 priority sites in Nashua alone; however, numerous additional Brownfields are present within the City. In the unlikely event that funding would remain once the priority areas for this grant have been addressed, efforts could be directed at the most pressing needs remaining in nearby sites with similar demographics and redevelopment opportunities. The target area is a Justice40 Disadvantaged Community, so any additional site located within the target area would similarly benefit the underserved community the already selected priority sites are targeting.

b. Revitalization of the Target Area

i. Overall Plan for Revitalization

The City of Nashua has targeted revitalization efforts at the downtown core for decades, including multiple projects aimed at the reactivation of former mill sites. A recent successful Brownfields-enabled project adjacent to our proposed priority site is the Broad Street Parkway, built in 2015, which was facilitated by 2007 Brownfields cleanup funding for the Nashua Manufacturing Boiler House site, and has been instrumental in opening up the area to further redevelopment by investing over \$20M in infrastructure improvements including a new bridge for the parkway, and the planned redevelopment of the former Mohawk Tannery Superfund site located along the new parkway that will create 546 units of housing, pedestrian connections, and

other public facilities. Because the original use of much of the property in the target area was industrial and generated environmental contamination, the need to rehabilitate properties prior to reuse complicates redevelopment, and assessment and cleanup funds will help the City to move forward with these planned projects.

A [2023 planning study](#) evaluated the NIMCO site and potential uses, taking into account stakeholder feedback, and recommended multi-family residential use. Access road improvements, public realm improvements, and new accessible walkways would provide residents and visitors direct linkage to the Riverwalk, Mine Falls Trail and a potential Dog Park. A network of pedestrian links and pathways will improve the safety and accessibility of the district.

Nashua's 2021 Master Plan, *Imagine Nashua*, identified multiple goals that would be advanced through the reuse of this property, including 1) The promotion of redevelopment that is mixed-use, multimodal, and sustainable in targeted areas with access to transit, infrastructure and amenities, 2) the creation of a greater mix of housing types that are accessible to Nashua residents at all life stages, household compositions, physical abilities, and socioeconomic levels as identified in the 2020 City Housing Study, and 3) the enhancement of access to Nashua's existing open space network for citizens of all ages, abilities, and incomes.

Other past planning for the target area includes a 2018 Economic Development Analysis of downtown, including the Millyard, commissioned from MIT by the City. It recommended redevelopment of three City-owned properties to serve as catalysts for private investment, including the NIMCO site, to promote entrepreneurship, create living-wage jobs and reduce poverty and unemployment. A 2020 Millyard Development Assessment conducted by the NRPC also prioritized redevelopment of the target area for mixed use residential/commercial use.

While a specific redevelopment use has not been determined, current studies and master planning work indicate a substantial need for residential or mixed-use development in this area. The NIMCO study represents a market indicator that will guide the City in seeking redevelopment proposers for all subject sites. An RFP for the NIMCO site has been issued by the City, with mixed-use or residential development identified as the top priority, as the City prepares to enter a partnership with a private developer to construct 150-300 units. For the adjacent sites, the City is considering legislation to transfer control of those properties to the City's Business Industrial Development Authority, which would create a redevelopment vision, seek permitting, and secure a private development partner. Assessment and cleanup funding will play a critical role in ensuring the viability of site redevelopment.

ii. Outcomes and Benefits of Overall Plan for Revitalization

Redevelopment of the NIMCO parcel and adjacent police training facility and parking lot sites will promote development of an entrepreneurial ecosystem creating well-paying jobs while reducing poverty and unemployment in the target area. It will also target local underserved residents and young professionals who can thereby both live and work in Nashua, creating a multiplier effect for other downtown businesses. Redevelopment of these blighted sites would stimulate investment in other vacant and underutilized properties in the vicinity. Within five years of completion, the initiative is expected to support and create over \$20 million in

investment in downtown and create 100 additional jobs. Once this startup network is established, it is predicted that the district will stimulate formation of a new type of development, an “experience district,” where visitors can come to the Millyard and participate in industrial and manufacturing businesses and services including brewing, distilling, crafts and art, and other light manufacturing along with tours and show rooms.

Multi-family residential use would take the fullest advantage of the site's riverfront location, and adds activation to the area west of Pine Street dominated by office/industrial use. Residents would provide “eyes on the street,” enhancing the security of the riverfront park, Mine Falls walking trails, and the planned dog park, and would expand demand for goods and services in the greater downtown area, and would include an affordable/workforce housing component. The local market shows a very strong demand for multi-family rentals, with very low vacancies and increasing rents. Nashua has been incorporating solar panels on public and private redevelopment sites to achieve climate goals set by the Environment and Energy Committee and approved by the Board of Aldermen in 2018, to source city energy from 100% renewable/clean sources by 2050.

C. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Nashua can leverage other resources to ensure the success of the Brownfields Program. 1) the Nashua Regional Planning Commission maintains a Brownfields assessment program who can provide assessment support, 2) Nashua, Capital Regional Development Council, and NHDES **Brownfields RLF Loans/Subgrants** – These RLFs can provide cleanup grants and/or loans in the region. 3) **Community Development Block Grants** – Nashua is a CDBG entitlement community, and can receive funds for cleanup and redevelopment. 4) Nashua Riverfront is part of the **Tax Increment Finance (TIF) District**, so revitalization plans for this area would be eligible for financing for improvements needed for economic development.

ii. Use of Existing Infrastructure

The target area is already developed, so cleanup and redevelopment of the sites will utilize existing infrastructure (public water, sewer, electric, high-speed internet, etc.) An active freight line is planned to be improved for passenger rail service and an abandoned line will support the extension of a multi-purpose trail. Downtown Nashua has direct connections to existing road infrastructure and City bus routes. High-speed internet availability makes the target area viable for high-tech and other business growth.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

With no state income or sales tax, property taxes serve as New Hampshire's primary source of funding for municipal budgets, making the need to return these properties to the City's tax rolls critical. With recent cost-shifting from the State government, municipal budgets face increased strain, compounded by increased costs exacerbated by the pandemic and subsequent recovery. All opportunities for the revitalization of the city's Brownfields are utilized, but need outstrips the resources. Without grants from the EPA, Brownfield sites will continue to hinder development.

Nashua's median income is \$78,501, compared to \$83,449 in the state as a whole, with the city ranking in the 58th percentile in the state for % of low-income residents, according to EJScreen data. The immediate target area (Census Tract 108) and neighboring census tracts (105 and 107) are in the 92nd, 90th, and 99th percentile for low median income according to CEJST.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Our target area, census tract 108.2, is a small, low-income community. Within this area, 44% of residents are low-income, versus 20% in Nashua as a whole and 7.2% in the state of New Hampshire. More than 28% of the residents of this census tract are under the age of 18, with 11.6% of residents being age five or younger. More than 10% of residents are 65 or older. 84% of target area residents rent, compared to 45% in Nashua, and 28% statewide. Education levels are low, with 24% of residents having less than a high school education, compared to 8% in the city of Nashua, and 6.4% statewide. Target area residents are in the 96th percentile for lack of health insurance in the state, and 80th percentile for the US, contributing to their vulnerability. It is notable that 44% of target area residents are people of color, compared to 27% citywide, and 7.4% in the State of New Hampshire, leading to the disproportionate negative impact of neighborhood burdens falling on people of color.

Within this neighborhood, blight is an ongoing concern, and the contamination of the area reinforces a negative perception of the neighborhood, contributing to an unequal burden on residents living in the target area. The city is hopeful that this funding would accelerate cleanup and redevelopment plans, creating new housing, improving access to outside recreation, and reducing environmental health risks, leading to improved health and quality of life outcomes for sensitive populations, as well as for all residents. The reduction of these long standing environmental and health issues and removal of blight sends a message that the city values area residents.

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

Downtown residents face significant health challenges, such as high asthma rates and lower life expectancy than the rest of the city and state. In the target area, these issues are particularly severe, with asthma rates ranking in the 98th percentile within the state. Addressing this situation through the remediation of the Nimco Brownfields and nearby sites and its transformation into essential housing and improved access to safe outdoor areas will not only reduce the exposure of vulnerable populations to toxic substances, but also align with the goal of promoting active and healthy living.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

This community bears a disproportionate burden of pollution and economic hardships, serving as a clear example of environmental injustice, as demonstrated by all 13 of EJSCREEN's EJ Indexes ranking between 97 and 99th percentile within the state. Furthermore, the Climate & Economic Justice Screening Tool (CEJST) identifies the priority sites as being in the 96th percentile nationally for asthma, the 95th percentile for proximity to Superfund sites, the 98th percentile for underground storage tanks and releases. The target area is in the 97th percentile for

housing costs, 92nd percentile for low median income (comparison of median income in the tract to median incomes in the area), and 78th for low income (income less than or equal to twice the federal poverty level.) Priority sites are all located within Census Tract 108.02, which is identified as disadvantaged according to the CEJST, meeting multiple burden thresholds and the associated socioeconomic threshold.

(b) Advancing Environmental Justice

The community outreach program will provide opportunities for meaningful resident involvement to ensure the reuse and redevelopment are consistent with the best interests of the targeted EJ population. The conversion of this site from a Brownfields site to housing and community greenspace, and the improved access to and safety of existing greenspace will have multiple benefits that advance environmental justice.

Reducing environmental health risks will result in better health outcomes for local residents, and the creation of new housing options, including affordable ones, is expected to alleviate housing costs in the area while enhancing the quality of existing housing stock. By enhancing access to the riverwalk and Mine Falls Park's walking trails, establishing a dog park, and bolstering security through increased surveillance of the currently underutilized parcel, more city residents are likely to feel comfortable accessing these green spaces. This, in turn, will broaden opportunities for outdoor, active living, ultimately leading to improved health. Anticipated benefits encompass an enhanced life expectancy and better health outcomes, especially among the vulnerable populations within the immediate target area.

b. Community Engagement

i. Prior/Ongoing Community Involvement

The City of Nashua updated their Master Plan between fall 2020 and summer 2021. Community leaders and stakeholders met regularly to aid in the planning process and ensure that a wide range of perspectives from as broad a range of residents as possible were collected. Due to the pandemic, much of the outreach was done digitally, though special care was taken to engage as broad a range of residents as possible, including in person with a concentration on harder to reach populations as that option was possible. Over 500 people voted, 29,944 votes were cast, and 237 statements were submitted. Feedback informed city goals on multiple topics directly related to this Brownfields cleanup and redevelopment plan, ranging from land use, housing, economic development, and open space/ natural resources.

The City of Nashua also held a public stakeholder meeting in February 2022 to gain feedback and to discuss potential redevelopment of the NIMCO site. The Millyard Association provided valuable local stakeholder input regarding plans for the target area and will continue to do so.

ii. and iii. Project Involvement and Project Roles

Name of organization	Point of contact (name, email, & phone)	Specific involvement in the project or assistance provided
Greater Nashua Chamber of Commerce	Wendy Hunt, Executive Dir. whunt@nashuachamber.com (603) 881-8333	Outreach to businesses, property owners and developers. Participate in quarterly meetings.

NeighborWorks Southern NH	Robert Tourigny, Executive Dir. rtourigny@nwsnh.org (603) 626-4663x1700	Assist in the identification of sites for redevelopment, assist in outreach efforts, attend quarterly meetings.
Nashua Regional Planning Commission	Jay Minkarah, Executive Dir. JayM@nashuarpc.org , (603) 424-2230 x28	Assist in the identification of sites, outreach efforts, attend quarterly meetings, provide additional Brownfields assessment funding support.
Great American Downtown	Paul Shea, Executive Dir. PShea@downtownnashua.org , (603) 883-5700	Assist in community outreach efforts.

iv. Incorporating Community Input

The City of Nashua has extensive experience with community outreach, and will use a multi-media approach to ensure a broad cross-section of residents are engaged in the inventory, assessment, and redevelopment planning process, hosting meetings and producing fliers and technical guides in English, Spanish, and other languages as may be necessary. Meetings will be accessible by public transit, and at a time when they can be attended by working residents, and with an option to attend virtually. Stakeholders will receive updates through press releases, postings on the City website and social media, and the placement of flyers at area businesses and organizations. Community partners have committed to help with the outreach and communication. In addition, contact information including phone and email will be placed prominently on all notices, presentations, reports, and web sites to directly solicit community input.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

The following tasks are critical to: (1) establishing a successful program, (2) involving the community, (3) implementing site assessment, and (4) implementing cleanup for reuse in line with our community vision.

Task/Activity 1: Cooperative Agreement Oversight
<u>i. Project Implementation:</u> Formally assemble BAC, establish a schedule and meet with BAC, EPA, and DES (Q1, Q2 and Q4) then twice each year); select a contractor through a competitive process, per 40 CFR 30; develop, organize and administer Brownfields initiatives including: coordinating public outreach and education; provide ongoing grant management, quarterly reporting and ACRES updates, and annual MBE/WBE reporting.
<u>ii. Anticipated Project Schedule:</u> Form BAC and select contractor (Q1); ongoing Q1 through Q20
<u>iii. Task/Activity Lead:</u> City of Nashua with contractor support.

iv. Outputs – Form BAC, RFQ and contract, BAC meeting minutes/notes, ACRES inputs, quarterly and MBE/WBE reporting.

Task/Activity 2: Community Outreach and Involvement

i. Project Implementation: Establish site selection criteria and engage stakeholder organizations in BAC meetings; provide brochures and program information at City Hall and through various social media platforms; perform direct outreach meetings to property owners, developers, and realtors; develop updated site inventory. Meeting minutes, responses to inquiries, reports and plans will be available at City Hall and updates and notifications will be publicly advertised, ADA compliant, provide language accommodations, and provide remote attendance options.

ii. Anticipated Project Schedule: BAC and outreach materials – Q1; initial outreach and inventory – Q2; ongoing direct outreach/meetings and inventory updates as needed through Q20

iii. Task/Activity Lead: Nashua with contractor support.

iv. Outputs: Brochure, flyers, social media posts, meeting notes, fact sheets, press releases, inventory.

Task/Activity 3: Assessment/Cleanup Planning Activities

i. Project Implementation: Obtain access to selected sites and complete eligibility determinations. Complete PHI ESAs, SSQAPPs, ABCA/RAP and VCP applications for assessment/cleanup sites in accordance with EPA and DES program requirements.

ii. Anticipated Project Schedule: Q2 to Q20

iii. Task/Activity Lead: Contractor with oversight by Nashua

iv. Outputs: 6 access agreements, 6 eligibility determinations, 6 PH I ESAs, 6 SSQAPPs, 6 PH II ESAs, 2 ABCA/RAPs, 2 VCP applications

Task/Activity 4: Cleanup Activities

i. Project Implementation: The contractor will prepare plans and specs for the abatement of asbestos at the NIMCO site, oversee bidding, contracting, and abatement/disposal activities, provide ongoing construction reports, perform Davis-Bacon compliance, and prepare a cleanup report. Cleanup at other sites will be similar, and may include additional waste characterization, excavation/disposal, etc. pending PH II results. Public meetings will be held prior to each cleanup, and public involvement/updates will continue through each cleanup phase.

ii. Anticipated Project Schedule: NIMCO: prepare plans and specs winter 2025; bidding spring 2025; abatement spring/summer 2025; cleanup report summer/fall 2025. The Police Training facility cleanup is anticipated to follow a similar schedule following Phase II results (expected summer of 2024; funded by NRPC).

iii. <u>Task/Activity Lead</u> : Contractor with oversight by Nashua
iv. <u>Outputs</u> : Plans/specs/bidding for 2 sites, construction reports, 2 cleanup reports/VCP COC

b. Cost Estimates

Task 1 – Cooperative Agreement Oversight – City staff time and fringe will be provided as an in-kind service. The City’s Sustainability Manager will attend two EPA national Brownfield conventions; the assumed cost for travel, lodging and expenses is \$4,000. Contractor programmatic support (general assistance, ACRES, up to 25 quarterly reports, etc.) is estimated at 100 hours at \$120/hr (\$12,000).

Task 2 – Community Outreach and Involvement – City staff time, fringe, and community outreach supplies will be provided as an in-kind service. Selected contractor support is estimated at 150 hours at \$120/hr (\$18,000) to attend and facilitate up to 20 quarterly BAC meetings, site inventory work, other community/site owner outreach meetings, and up to two meetings to solicit public input on ABCA/RAPs.

Task 3 – Assessment/Cleanup Planning Activities – City staff time and fringe will be provided as an in-kind service. \$288,000 is budgeted for the selected contractor to complete six Phase I ESAs (\$6,000 each), six SSQAPPs (\$4,000 each), six Phase II ESAs (average cost of \$35,000 each); and with the expectation that cleanup activities will occur at two sites, two ABCA/RAPs (\$7,500 each), and two DES VCP applications (\$1,500 each).

Task 4 – Cleanup Activities – City staff time and fringe will be provided as an in-kind service. \$12,000 construction is budgeted for the selected contractor to prepare bidding plans and specifications, and to conduct bidding and subcontracting (\$6,000 per site). Based on subcontractor estimates, \$600,000 construction is budgeted for the abatement of asbestos at the Nimco site in order to facilitate subsequent building demolition and further cleanup (by others); including approx. 8,000 sqft of flooring, 200 lf of caulks, 7,500 lf of flashing compound, 24,000 sqft of built up roofing, and other misc. materials. \$66,000 construction will be reserved for future abatement/cleanup activities at the Police Training Facility (Phase II pending). Preparation of NH Remedial Action Implementation Reports are included above (approx. \$6,000 each).

Budget Categories	Project Tasks (\$)				
	Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Involvement	Task 3 Assessment/ Cleanup Plan. Activities	Task 4 Cleanup Activities	Total

Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$4,000	\$0	\$0	\$0	\$4,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$12,000	\$18,000	\$288,000	\$0	\$318,000
	Construction	\$0	\$0	\$0	\$678,000	\$678,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$16,000	\$18,000	\$288,000	\$678,000	\$1,000,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Budget (TDC+IC)		\$16,000	\$18,000	\$288,000	\$678,000	\$1,000,000

c. Plan to Measure and Evaluate Environmental Progress and Results

Upon award, the City will prepare the required Cooperative Agreement Work Plan with the EPA, outlining the overall project schedule/ budget, identifying tasks, benchmarks, and milestones that will be tracked and measured. The selected contractor will be responsible for ensuring that all

work conducted is compliant with State and Federal guidelines including Davis-Bacon compliance for cleanups, and will provide the City and the EPA with quarterly reports, updates to ACRES, and financial reporting. During cleanups, the contractor will also provide weekly construction updates to ensure projects remain on task/schedule.

Outputs will be documented in reports prepared by the contractor, and shared with the City, the public, and NHDES. These will include site assessments, reuse planning, and cleanup. Reports will also summarize assessment findings, remedial actions, and remediation closeout reporting.

Outcomes will be tracked and included in reports, and include an increase in available housing, new employment opportunities, expansion of tax bases, enhanced revenue for local businesses, elevated property valuations in the target area and a healthier and safer downtown, facilitated by the improved access to communal greenspace.

Progress will be evaluated in quarterly BAC meetings and modifications to the Work Plan will be completed if needed. Connecting outputs to our work plan will provide a links to EPA's strategic plan, demonstrate tangible results of the Brownfields grant program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. – iii. Organizational Capacity, Structure, and Key Staff

Organizational Capacity: The City of Nashua has the knowledge, experience, and capacity to implement and manage complex federal grants, such as this one. The City's FY24 budget is \$316,690,512, with a minimum of \$18,803,771 in grant funding, and the City of Nashua's Financial Services Division has been awarded the Certificate of Achievement for Excellence in Financial Reporting by the Government Financial Officers Association every year since 2005 for its CAFR. This demonstrates the capacity to manage and execute the programmatic, administrative, and financial requirements of the grant.

Organizational Structure/ Key Staff: The City of Nashua's Community Development Division includes staff with extensive experience in managing Brownfields Assessments as well as land use development, environmental planning, and grants management.

The City's Sustainability Manager, Deb Chisholm, who has been in her current role since 2018, successfully served as the City's Brownfields Manager from 2005-2012 and will be responsible for this grant once awarded: creating and then ensuring the work plan is adhered to, preparing all reports, and tracking the progress of the selected contractor and cross checking all invoices for proper payment. The Community Development Division's Comptroller, Rose Evans, who has been in this role since 2007 and has extensive experience with federal grants and reporting, processes all invoices for payment through the City's accounts payable department and tracks all accounts, invoices, and reimbursement from EPA. Reporting and financial oversight will be provided by the City's Financial Services Division.

iv. Acquiring Additional Resources Once approved, the City will initiate the program by soliciting and hiring a qualified environmental professional (QEP) following procurement policies using a competitive bid process. Nashua's Purchasing Department is experienced with purchasing and hiring contractors in accordance with local, State and/or Federal requirements

including proper advertising, selection and award and in accordance with 2 CFR Part 2, as required. The City does not anticipate the need for subawards. Nashua has been awarded the Outstanding Agency Accreditation Achievement from the National Institute of Governmental Purchasing recognizing our implementation of best practices. The City of Nashua provides local preference for contractor selection within its Purchasing Ordinance and will proactively work to select local qualified firms, particularly those with a MBE or WBE status.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments The City of Nashua has been extremely successful with the EPA Brownfields program, receiving over \$2.5M dollars in the form of four assessment, two cleanup, and one revolving loan fund grants. The most recent awards were a 2007 assessment grant, 2007 cleanup grant for the Boiler House, and the 2010 revolving loan fund. Additional rounds of supplemental funding were provided in 2013 and 2014 for the ongoing RLF, which were a catalyst for several successful redevelopment and housing projects in the City of Nashua, including the Cotton Mill Square, and have been nearly fully expended.

As part of the 2007 assessment grant, 13 properties were assessed, leading to the City providing revolving loan funds to one of the properties to clean up asbestos from their preschool playground. Two assessed properties were redeveloped to become part of a new YMCA; one lot was converted to be the new home for a commuter rail station; and another lot now houses a non-profit agency. The 2007 cleanup grant resulted in the remediation of the Boiler House property, paving the way for the largest municipally run transportation project in the State of NH: The Veteran Memorial Parkway. Constructed as a second road crossing of the Nashua River, it now relieves congestion and improves air quality in the downtown area. Initial assessment and clean up planning of the Boiler House property was performed under the Nashua Regional Planning Commission's 2004 Brownfields Assessment grant. While all previous Brownfield grants have been successfully closed out, during the time of implementation of grant funds, the City was very effective with providing all required reporting whether it was quarterly reports, ACRES updates, or MBE/WBE updates. The City will build on previous successes with FY23 funding.

(2) Compliance with Grant Requirements The City was successful with compliance with grant requirements on all previous grants. The most recent initial RLF grant was successful, allowing for the award of supplemental funding for additional projects. The Cleanup Grant was issued in 2007 and all funds were expended by Q1 of 2012. The Assessment Grant was issued in 2007 and the final property was assessed in April 2013. The City requested and received approval for no cost time extensions for this grant to ensure the remainder of assessment funding was spent on properties with the greatest chance for leveraging additional funding for reuse and redevelopment, particularly the Crown Street property that was purchased by the City and prepared for use as a commuter rail station. Quarterly reporting, ACRES reporting and MBE/WBE disclosures were delivered on time under all grants, and Work Plan compliance for assessment and cleanup work was achieved. No funds were remaining at the end of the periods of performance.

The City of Nashua, NH Threshold Criteria

1. APPLICANT ELIGIBILITY

The City of Nashua, NH was incorporated in 1853, and is an entity eligible to apply for this EPA Brownfields Multipurpose Grant.

2. COMMUNITY INVOLVEMENT

The City of Nashua has extensive experience with community outreach, and will use a multi-media approach to ensure a broad cross-section of residents are engaged in the inventory, assessment, and redevelopment planning process, hosting meetings and producing fliers and technical guides in both English and Spanish and other languages as needed. Meetings will be held in convenient locations, accessible by public transit, and at a time when they can be attended by working residents, with a remote/ online option. The City of Nashua will provide stakeholders with updates on the Brownfields Program through a combination of press releases, postings on the City website and social media, and the placement of fliers at area businesses and organizations. The City also has several partners committed to help with the outreach and communication process, such as the Greater Nashua Chamber of Commerce with over 600 members in their network. These approaches will be used to announce events, meetings, and workshops, distribute technical guides, fliers, and other literature and web-based information. Input from the community will be solicited directly at each public meeting. In addition, contact information including phone and email will be placed prominently on all notices, presentations, reports, and web sites to directly solicit community input.

3. TARGET AREA

The Target Area for this grant application is NH Census Tract 108.

4. AFFIRMATION OF BROWNFIELD SITE OWNERSHIP

The City of Nashua owns all identified priority sites listed in this grant application.

5. USE OF GRANT FUNDS

The City of Nashua plans to complete at least one Phase II environmental site assessment (Page 8), remediate at least one site (Page 9), and an overall plan for revitalization of the target area that includes a feasible reuse strategy for at least one priority site already exists.

6. EXPENDITURE OF EXISTING GRANT FUNDS

The City of Nashua does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

7. CONTRACTORS AND NAMED SUB RECIPIENTS

No named contractors or subrecipients are included in this application.