



# CITY OF BELFAST

City Hall  
131 Church Street  
Maine 04915

## Narrative Information Sheet City of Belfast, Maine EPA FY22 Brownfield Revolving Loan Fund Grant Proposal

1. **Applicant Identification:** City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915
  
2. **Funding Requested:**
  - a. Grant Type: Individual RLF
  - b. Federal Funds Requested:
    - i. \$1,000,000
    - ii. Not requesting a waiver of the 20% cost share requirement
  
3. **RLF Boundaries:** City of Belfast
  
4. **Target Area and Priority Site Information:** Target Area and Census Tract Numbers: The Target Area discussed in the Narrative is smaller than a single census tract; it is the union of two adjacent *census block groups*: Census Block Group 230270430001 and Census Block Group 230270430003. The Target Area is located entirely within the City of Belfast; the entirety and only the entirety of the City of Belfast is equivalent to Census Tract 23027043000. Addresses of Priority Sites: 126 Church Street, Belfast and 1 Miller Street, Belfast
  
5. **Contacts:**
  - a. Project Director: Thomas Kittredge  
Economic Development Director  
City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915  
Phone: (207) 338-3370, extension 116  
Email: economicdevelopment@cityofbelfast.org
  
  - b. Chief Executive: Eric Sanders  
Mayor  
City of Belfast  
Belfast City Hall  
131 Church Street  
Belfast, Maine 04915  
Phone: (207) 338-8660  
Email: mayor@cityofbelfast.org
  
6. **Population:** 6,938 (City of Belfast; 2020 Census)

**7. Other Factors:**

Yes/No	Factor	Page #s
Yes	Community Population is 10,000 or less.	4
No	The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
No	The priority site(s) is impacted by mine-scarred land.	
No	The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
No	The priority site(s) is in a federally designated flood plain.	
Yes	The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3-4
Yes	The reuse of the priority site(s) will incorporate energy efficiency measures.	4
No	The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	

**8. Letter from the State or Tribal Environmental Authority:**

An acknowledgement letter, dated November 17<sup>th</sup>, 2021, from the Maine Department of Environmental Protection is attached to this Narrative Information Sheet.

**9. Releasing Copies of Applications:**

Not applicable; this application does not have confidential, privileged, or sensitive information.

*Attachments: Maine Department of Environmental Protection Acknowledgement Letter*



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

November 17, 2021

Ms. Dorrie Paar  
EPA Region 1  
5 Post Office Square  
Suite 100, Mailcode: OSRR7-2  
Boston, Massachusetts 02109-3912

Dear Ms. Paar:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the City of Belfast plans to conduct cleanups and is applying for federal Brownfields grant funds.

Thomas Kittredge of Belfast has developed an application requesting federal Brownfields Revolving Loan Fund money for cleanup of Brownfields properties in Belfast.

If the city receives funding, the Department will assign project management staff to provide review and comment on all remedial workplans generated using the funding, and the Department's Voluntary Response Action Program ("VRAP") will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion for the remedial activities completed to the Department's satisfaction.

Please feel free to call me directly at (207) 592-0882 should you have any questions regarding this letter.

Sincerely,

Nicholas J. Hodgkins  
Voluntary Response Action Program  
Division of Remediation  
Maine Department of Environmental Protection

Pc: Thomas Kittredge, City of Belfast

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## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a.i. Background and Description of Target Area:** The City of Belfast, located in Waldo County, Maine, was first settled in 1770 by Scottish-Irish families from Londonderry, New Hampshire. Taking advantage of its shoreline and safe year-round harbors in Penobscot Bay, along with its abundant timber and farmland, Belfast became a vibrant, prosperous market center for the region, enjoying the rise of industries such as shipbuilding, fishing, and maritime commerce in cargoes such as apples, hay, ice, and fertilizer. As the 20<sup>th</sup> century unfolded, these maritime-related industries which created the area's early wealth fell into decline, to be replaced by the nascent potato, sardine, shoe, and poultry industries. Unfortunately, Belfast was not spared the consequences when those same industries imploded during the late 20<sup>th</sup> century. Belfast's current economic recovery did not begin until 1995, when credit card company MBNA arrived and built a new campus that at its peak would employ 2,300 people. Today, Belfast possesses a modest economy that is fortunately diversified into many industries including healthcare, financial services, manufacturing, arts and culture, and agriculture. Belfast continues to be Waldo County's most populous municipality, serving as its seat of government, as its service center, as a location for most of its significant employers, as a tourism hub through which people experience and explore the rest of the county, and as one of its primary points of access to Penobscot Bay.

Remaining at the epicenter for the entire duration of Belfast's cultural and industrial history is the target area where the City of Belfast plans to perform revolving loan fund activities: the union of two adjacent census block groups: 230270430001 (Block Group 1) and 230270430003 (Block Group 3). These block groups have a combined area of 12.5 square miles, or 32.6% of Belfast's total area. Two features, one natural and one manmade, have exerted a tremendous influence on this target area's development history: 1) the Passagassawaukeag River, which bisects the target area along its southeast-northwest axis and forms Belfast's working waterfront; and 2) the United States (US) Route 1 Corridor, which serves as the chief development corridor for Block Group 1, bisecting it on its east-west axis, then shifting direction and becoming the inland boundary of Block Group 3, circumscribing the entirety of Belfast's downtown district. This target area has felt both the booms and the busts of the various industries that have operated in Belfast, from having served as the setting for their bustling facilities to now being the home to many known brownfields and their associated signs of distress, blight, and neglect. Nearly half (44.2%) of Belfast's residents, including members of its sensitive populations and disadvantaged communities, live in the target area and therefore also in proximity to these brownfields, which are in need of being cleaned up and reused. In addition, there are non-residents (5,351 in 2019) work in the community as well as an incalculable number of tourists who visit the community and who also may find themselves in proximity to these brownfields.

**1.a.ii. Description of the Priority Brownfield Sites:** Since late 2010, when it applied for its first Brownfield Assessment Grant, the City has developed and continuously maintained an extensive inventory of potential brownfields. Within the target area it is estimated that there are 57 potential brownfields with a total combined area of 369 acres; these range in area from 0.1 acres to 104 acres, with an average area of 6.5 acres. The majority of these brownfields, including the two priority brownfield sites, are each under 1 acre in size. Many of these brownfields are located adjacent to bodies of water and/or within federally designated flood plains, posing a risk of impairment to water quality. These brownfields include former: automobile parts stores, banks, batch plants, bowling alleys, brick yards, chicken coops, computer stores, courthouses, dry cleaners, electrical substations, gas stations, gravel pits, grocery stores, nursing homes, opera houses, restaurants, sawmills, schools, and shipyards, as well as current: automobile sales lots, freezer facilities, garages, junk yards, potato processing facilities, and theaters. These vacant or underutilized brownfields have left behind a legacy of real or perceived environmental contamination that have discouraged redevelopment, investment, and growth. Belfast's priority brownfield sites, which possess both the greatest concerns of contamination as well as the current highest likelihood of being successfully redeveloped in a timely manner, thus making them the highest priority for cleanup and reuse, are the following:

126 Church Street: This 0.1-acre site is listed on the Maine Department of Environmental Protection's (MEDEP's) Remediation Sites List and its Resource Conservation Resource Act Hazardous Waste Generators List. Based on information from the MEDEP, soil and soil vapor beneath the site has been impacted by tetrachloroethylene (PCE) contamination associated with the site's previous use as a dry cleaning facility. Indoor air quality of the site building and/or the abutting commercial building may also be impacted by vapor intrusion of PCE migrating through soil vapor. Potential fuel oil releases associated with observed soil staining in the basement of the site building in the vicinity of the boiler were also identified. In addition, based on the building's age, hazardous building materials, including asbestos-containing materials, lead-based paint, polychlorinated biphenyl-containing fluorescent light ballasts, mercury-containing fluorescent lamps, and other potential universal wastes may be present in building construction materials, which will require proper abatement if disturbed during future site redevelopment.

1 Miller Street: Numerous environmental assessments have been conducted under the City's Brownfields Assessment Program for other properties located in the vicinity of this 0.5-acre site. Results of these prior assessments have identified widespread urban fill soils containing coal and/or wood ash with elevated concentrations of polycyclic aromatic hydrocarbons and metals, which may also be potentially present at the site as well. These urban fill soils were reportedly associated with destructive fires, historic coal-fired furnaces/boilers at various properties, and/or historical land-filling operations, which were common practice in Belfast during the site's initial development during the 1800s.

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans:** The current projected reuse for 126 Church Street, with an estimated construction cost of \$2,500,000, is to demolish the existing building, remediate the site, and construct upon it a new two-story mixed-use building of 1,975 usable square feet per floor, for a total usable area of 3,950 square feet, consisting of two units for retail or other commercial uses on the first floor and two rental housing units on the second floor. The current projected reuse for 1 Miller Street, with an estimated construction cost of \$2,800,000, is to build upon the site a hybrid two/three-story (taking advantage of the site's topography) mixed-use building, consisting of three commercial spaces of 1,000 usable square feet each, three rental housing units of 1,000 usable square feet each, and an additional residential unit for the building owner of 2,500 usable square feet, for a total usable area of 8,500 square feet.

These projected reuses are aligned with and advance several of the City's land use and revitalization plans. Most recently (earlier in 2021), both of these priority sites were considered for presentation (with financial modeling) in an Opportunity Zone prospectus that was developed as part of an EPA-funded technical assistance project, and both were included in the area that was the focus of a Brownfields Revitalization Study (Study) and a follow-up Community Revitalization Plan (Plan), both of which were funded through the City's FY19 Brownfield Assessment Grant.

The Study evaluated a variety of redevelopment scenarios, comparing costs for both new real property construction and existing real property rehabilitation against expected lease revenues across a variety of uses, including housing, offices, restaurants, and retail space. The Study identified an unmet and future demand for a variety of housing types and price points, and highlighted a portion of Block Group 3 as attractive for residential development due to its proximity and accessibility to amenities such as shopping, groceries, restaurants, and recreational spaces. The Study also quantified the demand for additional rental housing, at 66 new rental housing units over the next five years. Finally, the Study also identified several types of commercial uses for which there currently exists unmet demand over the next five years: retail space (14,600 square feet); restaurants; traditional office space (5,000 square feet); and medical office space (8,800 square feet).

The Plan, which succeeded and built upon the Study, identified a number of opportunities and challenges, and developed a series of goals and strategies to address them. Two housing-related opportunities that were identified in the Plan were that there is a significant number of in-commuters living in the surrounding region that could be attracted to live in Belfast if there were housing that aligned with their preferences and income levels, and, reinforcing the findings of the Study, that there was strong market demand for housing, including market-rate apartments, senior housing, and workforce housing. One of the Plan's goals, again echoing the Study, was to create a variety of housing at a variety of price points, and one of its strategies was to continue to partner with developers to create new housing.

Prior to this, the City's 2012 Downtown and Waterfront Master Plan included recommendations to redevelop the areas surrounding each of the priority sites, and to pursue funds for brownfields remediation if needed.

Both priority sites are located in the City's Downtown Commercial Zoning District, a zoning district which encourages dense infill mixed-use redevelopment with upper floor residential uses, through eliminating structure setback requirements (thus allowing 100% lot coverage), not requiring on-site parking (126 Church Street) or having flexibility regarding on-site parking requirements (1 Miller Street), allowing building to a height of 48 feet (126 Church Street) or 38 feet (1 Miller Street), and not having minimum residential unit sizes or unit density maximums. The City could also consider implementing contract rezoning for 1 Miller Street to allow for even greater flexibility with regards to buildable height limits and on-site parking requirements. Belfast has worked hard to direct growth to where it has been successful in the past, and to imagine productive reuses for sites that are well located but may be compromised.

**1.b.ii. Outcomes and Benefits of Reuse Strategy:** Upon completion of the cleanup for the priority sites, the proposed projects have the potential to stimulate economic development in the target area in the following specific ways: 1) an increase in property values for nearby properties from the remediation of the priority sites (a 2017 study entitled *The Value of Brownfield Remediation* estimated an increase of 5.0% to 15.2% in the values of residential properties located within 1.29 miles of a remediated brownfield); 2) an expansion of the tax base within the City's Downtown Waterfront Tax Increment Financing (TIF) District, both from the construction of the actual priority site projects, and also from them helping to prove the market and thus spur additional, future investment in the form of similar developments, ones which would generate additional revenue to be used for implementing the City's development program for this district (and once the TIF district expired, would lower the City's property tax rate); and 3) an increase in employment opportunities, arising from an increased supply of spaces for new and existing businesses to start or expand operations. As is further explained below, the economic outcomes and benefits of increasing employment opportunities would both assist the identified disadvantaged communities in the target area, and would begin to address the challenges identified in 2.a., with particular emphasis on the community's need for funding and promoting environmental justice.

The proposed projects also have the potential for non-economic benefits, such as the inclusion of accessible greenspace as part of a central courtyard in the project proposed for 1 Miller Street, and the inclusion of a green roof (a contained greenspace) in the project proposed for 126 Church Street; these greenspaces would reduce surface and air temperatures, reduce and filter stormwater runoff, absorb pollutants and carbon dioxide, provide natural habitat, and improve human health and comfort. The proposed projects also have the potential for the facilitation of renewable energy, such as for the project proposed for 1 Miller

Street, which will integrate a rooftop solar panel array that will meet a portion of site’s electrical demand, and for the incorporation of energy efficiency measures, such as for the project proposed for 126 Church Street, which will have the aforementioned green roof and its benefit of reduced energy demand, but which will also be designed by a Leadership in Energy and Environmental Design (LEED)-accredited architect, who plans to incorporate LEED standards into the building’s design, and is considering utilizing hybrid mass timber construction (a sustainable building technique) in conjunction with a highly energy efficient outer envelope.

Additionally, the proposed projects will benefit disadvantaged communities located within the target area. The communities residing in the target area can be considered disadvantaged on the basis of low incomes, high poverty, and high unemployment, at levels disproportionately worse relative to EPA Region 1 and the US:

Disadvantaged Community	Target Area (Block Groups 1 and 3)	EPA Region 1	US
<i>Source: EJSCREEN Demographic Indicators</i>			
Low Income Population - EPA Region 1 Percentile	72 <sup>nd</sup>	n/a	n/a
Low Income Population - US Percentile	56 <sup>th</sup>	n/a	n/a
<i>Source: 2019 American Community Survey 5-Year Estimates</i>			
Median Household Income	Block Group 1: \$43,657 (= 69.5% of US); Block Group 3: \$44,049 (= 70.1% of US)	\$57,918 (Maine) to \$81,215 (Massachusetts)	\$62,843
Individuals 20-64 Years Old Below the Poverty Level	25.0% (= 203.3% of US)	9.7%	12.3%
Unemployed Individuals 16 Years and Older	10.7% (= 201.9% of US)	4.9%	5.3%

The proposed projects will specifically benefit these disadvantaged communities through their potential for the economic benefit of increasing the number of employment opportunities in the target area.

**1.c.i. Resources Needed for Site Reuse:** Both the City as well as the owners/developers of the aforementioned priority sites are eligible for monetary funding from other resources to support the completion of the remediation and/or reuse strategy for the priority sites. Specifically, the key funding sources that the City will be considering seeking include: 1) to support the completion of the remediation for the priority sites, the MEDEP/Maine Department of Economic and Community Development (DECD) Brownfields Revolving Loan Fund (RLF) Program; and 2) to support the completion of the reuse strategy (for real property construction as well as for supportive infrastructure) for the priority sites, the Economic Development Administration Public Works Program. The City has, in recognition of the value and redevelopment opportunities that these priority sites possess, already generated additional funding resources to support the completion of their reuse strategies, by having established a TIF District that encompasses the priority sites and can provide funds for supportive infrastructure, and by having secured a Maine Office of Community Development (MEOCD) Community Development Block Grant (CDBG) Downtown Revitalization Grant, which was used to make infrastructure enhancements (sidewalks, on-street parking, lighting, signage, and storm drainage) surrounding 1 Miller Street that were anticipated to catalyze the redevelopment of privately owned properties located there.

For the owners/developers of the priority sites, the key funding sources that they will be considering seeking include: 1) to support the completion of the remediation for the priority sites, the MEDEP/DECD Brownfields RLF Program; and 2) to support the completion of the reuse strategy (for real property construction) for the priority sites: a) the Community Development Financial Institutions Fund/Internal Revenue Service (IRS) New Markets Tax Credit Program; b) the US Treasury Department/IRS Opportunity Zone Program; c) the MEOCD CDBG Economic Development Program; and d) a City of Belfast TIF Credit Enhancement Agreement.

The City of Belfast has been previously successful in directly securing funding from all of these programs for either itself or on behalf of an owner/developer (with the exception of the New Markets Tax Credit and Opportunity Zone Programs). All of these programs accept applications on a rolling basis, with the exception of the MEOCD CDBG Economic Development Program, applications for which are typically due each year in May, with grant awards being made in July. The environmental assessment of priority and other brownfield sites, made possible by this Brownfield Assessment Grant, will stimulate the availability of additional funds for environmental site assessment or remediation, and for subsequent reuse, by removing uncertainty with respect to environmental impacts and liabilities, developing a framework for securing funds for remediation, and creating momentum towards eventual redevelopment.

**1.c.ii. Use of Existing Infrastructure:** This grant will facilitate the use of existing infrastructure located at the priority sites and within the target area, which include existing streets, and on-street parking, and utilities including electric, sewer, water, and fiber internet. These priority sites and the target area will also be able to utilize, and benefit from, an additional network of pedestrian-focused infrastructure: the *Belfast Rail Trail Along the Passagassawaukeag* (a 2.3-mile forest-enclosed stone dust path), the *Belfast Armistice Footbridge* (a 0.2-mile footbridge across the Passagassawaukeag River), and the *Belfast Harbor Walk* (a 0.7-mile paved working waterfront-adjacent path; this infrastructure forms a nexus with the border between Block Groups 1 and 3, and is also located within a relatively short (0.3 miles) walking distance of the priority sites. Currently there are no infrastructure deficiencies hindering the implementation of revitalization plans for either of the priority sites.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

**2.a.i. The Community's Need for Funding:** As seen in the tables presented above in 1.b.ii. and below, both the target area and the community possess smaller populations, and higher percentages of a variety of economically-impooverished sensitive populations and disadvantaged communities, compared to that of EPA Region 1 and the US:

Total Population, Sensitive Populations, Disadvantaged Communities	Target Area (Block Groups 1 and 3)	City of Belfast	EPA Region 1	US
<i>Source: 2019 American Community Survey 5-Year Estimates</i>				
Total Population	2,828 (= 0.001% of US)	6,688 (= 0.002% of US)	14,790,787	324,697,795
Per Capita Income	\$28,745 (= 84.3% of US)	\$32,722 (96.0% of US)	\$41,658	\$34,103
Households Below the Poverty Level	24.0% (= 186.0% of US)	16.0% (= 124.0% of US)	10.7%	12.9%
Households Receiving Social Security Income	47.6% (= 152.6% of US)	41.6% (= 133.3% of US)	27.9%	31.2%
Households with Supplemental Security Income	7.9% (= 149.0% of US)	6.5% (= 122.6% of US)	5.7%	5.3%

Also, as referenced above, redevelopment projects located within the City of Belfast are potentially eligible for funding from the New Markets Tax Credit and Opportunity Zone Programs; Census Tract 23027043000 (equivalent to the City of Belfast) had to meet certain thresholds for low incomes and high poverty rates to secure those designations. These statistics reveal a small population among whom many possess little or no discretionary income, due to receiving only a fixed income, having limited income-earning potential, earning too little income from work, or earning no income from work at all. Both the target area and the community have an inability to draw on other initial sources of funding to carry out environmental remediation and subsequent reuse in the target area, demonstrating that the City truly needs this Brownfield RLF Grant.

**2.a.ii.(1) Threats to Sensitive Populations - Health or Welfare of Sensitive Populations:** The target area possesses sensitive populations at higher-than-median percentiles within EPA Region 1 and the US. The City of Belfast utilized *EJSCREEN* to identify these most sensitive populations and their most pressing health issues:

Sensitive Population	Target Area (Block Groups 1 and 3)	
	EPA Region 1 Percentile	US Percentile
<i>Source: EJSCREEN Demographic Indicators</i>		
Population Over 64 Years of Age	92 <sup>nd</sup>	93 <sup>rd</sup>
Low Income Population	72 <sup>nd</sup>	56 <sup>th</sup>
<i>Source: EJSCREEN Environmental Indicators</i>		
Risk Management Plan Site Proximity	81 <sup>st</sup>	77 <sup>th</sup>
Lead Paint Indicator	51 <sup>st</sup>	72 <sup>nd</sup>

Research has documented that the risk from environmental contaminants can be greater for the elderly, due to having compromised biological systems, and for low income persons, due to greater amounts of exposure.

Regarding the issue of lead paint, both the likelihood that a housing unit contains lead paint as well as the concentration of lead in the paint that was used varies directly with the age of the structure. According to data from the 2019 American Community Survey 5-Year Estimates, somewhere between 51.5% and 54.5% of the target area's housing units were built prior to the banning of lead paint in 1978. Additionally, the proportion of older housing units within the target area, compared to EPA Region 1 and the US, becomes more pronounced as one looks at each successively older structure age cohort. Even though the target area does not possess a disproportionately high percentage of young children, these children can experience neurological damage even at low levels of exposure to lead.

Risk Management Plan Sites are facilities required to file risk management plans, such as industrial facilities storing substances regulated because of acute toxicity or because of their flammable or explosive potential. Populations living in close proximity to them may be more vulnerable to accidental releases of toxic substances and incidents involving fires and explosions resulting from the production, use, or transport of industrial materials, resulting in injuries or even death.

Environmental contaminants can also cause health problems including respiratory diseases, heart disease, and chronic obstructive pulmonary disease, such as the following ones found at higher rates in the target area than in the US:

Disease or Condition	Target Area (using Waldo County)	US
<i>Source: 2021 Waldo County Health Profile</i>		
Incidence of Chronic Obstructive Pulmonary Disease	8.0% (= 123.1% of US)	6.5%
Chronic Lower respiratory Disease Deaths (per 100,000)	49.0 (= 128.3% of US)	38.2
Heart Attack Deaths (per 100,000)	31.6 (= 123.9% of US)	25.5
Coronary Heart Disease Deaths (per 100,000)	95.0 (= 108.0% of US)	88.0
Overall Death Rate (per 100,000)	753.2 (= 105.3% of US)	715.2

The target area's small population prevents the generation of reliable health department statistics, and therefore an area with a larger population (in this case Waldo County) must be used as a proxy. This lack of statistics makes it more challenging to identify more direct relationships between present contaminants and adverse health impacts.

The specific contaminants that are most likely to be found in soil, in groundwater, and in building materials at the priority sites and at other brownfields located within the target area, and which through inhalation, ingestion, or direct contact pose a health threat to these sensitive populations include: arsenic, asbestos, chlorinated solvents, lead, petroleum products (gasoline and fuel oil), polycyclic aromatic hydrocarbons, perfluorooctane sulfonate, perfluorooctanoic acid, and universal wastes. It is anticipated that the performance of additional brownfield assessments, including the identification, evaluation, and quantification of environmental contaminants at both of the priority sites, but also at other brownfield sites within the target area, will likely lead to the remediation of the aforementioned contaminants, which will reduce the potential hazards and health impacts to the identified sensitive populations located in the target area.

In addition, though it is far more challenging to quantify and compare, brownfields have also negatively impacted the welfare of the target area’s sensitive populations, by creating blighted areas, inviting vandalism and crime, discouraging adjacent property owners from maintaining or improving their properties, and causing emigration to surrounding communities. This grant will address or facilitate the identification and reduction of threats to the welfare of many of these aforementioned sensitive populations by complementing and facilitating the remediation and redevelopment plans for the identified priority sites, which will then generate important aforementioned outcomes and benefits; for both of the priority sites, their redevelopment would motivate adjacent property owners to maintain or improve their own properties.

**2.a.ii.(2) Threats to Sensitive Populations - Greater Than Normal Incidence of Disease and Adverse Health Conditions:**

As a high burden of environmental pollution is often borne by these aforementioned sensitive populations, the identified issues and types of contaminants typically found through prior environmental investigations of brownfields located within the target area have exerted a disproportionate impact upon the sensitive populations residing there. This is corroborated by data (obtained from consulting a number of Environmental Justice-focused geospatial mapping tools, including the *Maine Environmental Public Health Tracking Network*, the *National Environmental Public Health Tracking Network*, and *PLACES*, then augmented by public health reports) showing that populations in the target area have greater-than-normal incidences and/or mortality rates for diseases or conditions (in particular cancer, asthma, and birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum:

Cancer or Asthma	Target Area (using Waldo County)	US
<i>Source: 2020 Maine Annual Report of Cancer</i>		
Incidence of Lung and Bronchial Cancers (per 100,000)	69.5 (= 125.7% of US)	55.3
Mortality Rate for Lung and Bronchial Cancers (per 100,000)	43.2 (= 118.0% of US)	36.6
<i>Source: 2021 Waldo County Health Profile</i>		
Incidence of All Cancers (per 100,000)	466.9 (= 106.6% of US)	437.9
Mortality Rate for All Cancers (per 100,000)	163.3 (= 111.7% of US)	146.2
Incidence of Bladder Cancer (per 100,000)	27.8 (= 146.3% of US)	19.0
Current Adult Asthma	13.4% (= 142.6% of US)	9.4%
Birth Defect	Target Area (using Midcoast Public Health District)	US
<i>Sources: Maine Tracking Network - Environmental Public Health (Target Area); National Population-based Estimates for Major Birth Defects, 2010-2014 (US)</i>		
Incidence of Anencephaly (per 10,000 live births)	7.5 (= 348.8% of US)	2.15
Incidence of Cleft Palate Alone (per 10,000 live births)	7.5 (= 126.5% of US)	5.93
Incidence of Hypoplastic Left Heart Syndrome (per 10,000 live births)	3.0 (= 115.4% of US)	2.60
<i>Sources: Maine Tracking Network - Environmental Public Health (Target Area); Prevalence of Structural Birth Defects Among Infants with Down Syndrome, 2013-2017: A US Population-based Study (US)</i>		
Incidence of Down Syndrome (per 10,000 live births)	21.7 (= 170.9% of US)	12.70

As mentioned previously, either Waldo County or the Midcoast Public Health District (which consists of Waldo County as well as Knox, Lincoln, and Sagadahoc Counties) must be used as a proxy for the target area due to its small population.

While research has begun to identify linkages between exposure to certain environmental contaminants and increased chances of acquiring these aforementioned diseases or conditions (e.g., asbestos and lung cancer, air pollution and asthma, perfluorooctane sulfonate and cleft palate), these have generally not yet been conclusively determined. As mentioned previously, the performance of additional brownfield assessments will lead to the remediation of the aforementioned contaminants, reducing the potential hazards and health impacts to the identified sensitive populations located in the target area.

**2.a.ii.(3) Promoting Environmental Justice:** The City of Belfast consulted a number of Environmental Justice-focused geospatial mapping tools, including *EJSCREEN*, the Center for Diseases Control’s/Agency for Toxic Substances & Disease Registry’s *Social Vulnerability Index*, and the Neighborhood Atlas *Area Deprivation Index*, to identify environmental justice challenges and opportunities. It should be noted that the utility of applying the EJ Indexes to the community and the target area is rather limited (and potentially understating environmental justice impacts) given that 50% of the EJ Index’s demographic component is attributable to the proportion of people of color, whereas this group represents a very small proportion (5%) of the actual community and the target area. This grant and the projected site reuses will promote environmental justice in the target



area and will support populations in the target area that disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies. The projected site reuses will promote environmental justice and equitable development through the previously mentioned economic outcomes and benefits, namely increased access to jobs through business expansion and associated increased employment, and improved property values.

Additional indicators of environmental justice challenges, which could be potentially addressed through the projected site reuses include: 1) the *Social Vulnerability Index*, which reflects high poverty, low percentage of vehicle access, or crowded households, which may affect a community’s ability to prevent human suffering and financial loss in the event of disaster, and where Census Tract 23027043000 (equivalent to Belfast) is in a high US percentile (0.834) for the index’s housing/transportation component; and 2) the *Area Deprivation Index*, a ranking of census block groups by socioeconomic disadvantage with factors for income, education, employment, and housing quality, which can be used to inform health delivery and policy, and where Block Group 1 ranks in the 62<sup>nd</sup> US percentile.

**2.b.i. Project Involvement and 2.b.ii. Project Roles:** The following local community partners will have active, meaningful involvement in the performance of the Brownfields RLF Program:

Partner Name, Mission	Point of Contact	Specific Role(s) in the Project
Belfast Bay Watershed Coalition (BBWC): to support conservation and stewardship of natural and public resources of the Belfast Bay watershed through research, community building, and education.	Cloe Chunn (Board Member); [REDACTED] (207) 338-1147	Providing water quality technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information; hosting a public information meeting.
Belfast Public Health Nursing: to promote and strengthen the complex health needs of individuals and families through prevention, education, early intervention, and referral.	Susan Dupler (Belfast Public Health Nurse); sdupler@wcgh.org; (207) 505-4940	Assisting in presenting and conducting health-related monitoring and education for public meetings.
Our Town Belfast (OTB): to grow and sustain Belfast’s historic downtown while celebrating its unique cultural heritage.	Zachary Schmesser (Executive Director); director@ourtownbelfast.org; (207) 218-1158	Providing real estate development technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information.
Volunteers of America Northern New England (VOANNE): to strive to end homelessness, restore hope and build communities for children and young adults, veterans, seniors, adults living with mental illness, and adults in the criminal justice system.	Brian Sites (VP, Business Development and Implementation); brian.sites@voanne.org; (207) 373-1140	Providing housing (particularly senior housing) development technical assistance; participating on the Brownfields Selection Committee; distributing community engagement information.
Waldo Community Action Partners (WCAP): to utilize and mobilize resources to assist low-income Waldo County residents in the alleviation of poverty and address its underlying causes.	Donna Kelley (President and CEO); dkelley@waldocap.org; (207) 338-6809	Providing housing (affordable housing) development technical assistance, participating on the Brownfields Selection Committee; distributing community engagement information.

These partners have been chosen because their own constituencies/clients include one or more of the target area’s identified sensitive populations or disadvantaged communities (e.g. VOANNE and population over 64 years of age, WCAP and low income population) and/or their own goals are well aligned with the goals of the EPA’s Brownfields Program as well as the redevelopment plans of one or more of the priority brownfield sites (e.g. BBWC and reducing pollution in water bodies, OTB and downtown mixed-use real estate development). The primary avenue for this active, meaningful involvement will be participation on the City’s already-existing Brownfields Selection Committee (all local community partners save for Belfast Public Health Nursing will be performing this role), which will acquire decision making authority for the City’s Brownfields RLF Program, including selecting brownfields for the program, advising regarding the scope, extent, and costs of remediation projects, offering loans and awarding subgrants, and also advising regarding the future reuses of brownfield sites, both priority sites and others.

**2.b.iii. Incorporating Community Input:** The City of Belfast and its local community partners will implement an aggressive, multipronged plan for communicating program progress to, and soliciting input from, the local community, including residents and groups impacted by the sites, that will last throughout the length of the program. Each of the below listed methods offers an alternative to in-person community engagement in the event of social distancing or other restrictions as a result of COVID-19:

Method	Description
E-Mails and E-Newsletters	BBWC, VOANNE, and WCAP will utilize their e-newsletter to provide program updates, and OTB will utilize both their e-newsletters and their e-mail distribution groups to provide program updates.
Facebook	The City, BBWC, OTB, VOANNE, and WCAP will promote and discuss the program on their Facebook pages.
Flyers	WCAP will distribute program flyers to their Housing and Home Repair Network.

Brochure	The City will create a Brownfields RLF Program informational brochure.
Information Repository	The City will maintain an extensive repository of program-related documents, in the form of both hard copies (available for view during normal business hours) and electronic copies (available for download).
News Releases	The City will announce the program's launch and public meetings via news releases in local newspapers.
Project Websites	The City, BBWC, OTB, VOANNE, and WCAP will allocate portions of their respective websites towards regular program updates; City website will also include community input and City responses thereto.
Public Meetings	The City's Brownfields Selection Committee intends to meet publicly approximately once per quarter during the grant's three-year period of performance (12 meetings). The City will also hold at least two public program information meetings, the BBWC will hold one public program information meeting, and the City will hold additional site-specific public information meetings during key milestones of the cleanup process. These meetings are expected to be held primarily via Zoom, for which the City has established robust capabilities that it has regularly and reliably used during the COVID-19 pandemic for various public meetings, and which can allow public participation via video or phone.
Television	Belfast Community Television will produce at least two segments on the Brownfields RLF Program, and the local government television channel will run public service announcements containing program information.

For each of these communication methods, responses and community input will be solicited and encouraged, and information regarding the submission of that input will be included. The City will be prepared to receive community input via letter, e-mail, Facebook, Zoom, and phone, and will provide an appropriate and timely response from either the Program Manager or the Qualified Environmental Professional, depending on the subject matter, via the same method that the input was originally submitted unless otherwise requested. Additionally, the City intends to incorporate all input and responses made thereto into a document that will reside on the City's website and will be regularly updated. For those who may be unable to speak English or who have hearing or reading impairments, the City of Belfast will provide accommodations including, but not limited to: translators, document reading services, and access to assistive technologies such as teletypewriter relay services.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

#### **3.a.i. Program Management:**

**Build and Maintain a Competent Team:** Belfast has over 12 years of experience in executing successful brownfields programs and is poised to begin a sustainable Brownfields RLF Program. The City has successfully completed FY11, FY13, FY16, and FY19 Brownfields Assessment Grants, and is applying for another FY22 Brownfields Assessment Grant to coincide with this FY22 Brownfields RLF Grant. The addition of a Brownfields RLF Program will continue to build upon those assessment efforts in implementing a successful and sustainable Brownfields program in the City.

We have reviewed and are already familiar with EPA's RLF Administrative Manual and RLF Loan and Subgrant Review Checklist for the successful implementation of an RLF program. City of Belfast staff will lead all Brownfields RLF activities, and it will utilize its already-existing Brownfields Selection Committee, to now also handle loan and subgrant responsibilities and develop an RLF operational plan. The Brownfields Selection Committee will include the City's Economic Development Director (overall RLF project manager for cooperative agreement oversight and management of the RLF program), the City's Finance Director (ensures funds are managed appropriately), City Attorney (assists with development and review of subgrant/loan agreements), and stakeholders from local business and community leaders. Through a competitive selection process (Request for Proposals), we will select of a qualified environmental professional (QEP) and will partner with a bank or other financial lending institution for underwriting services. The selected QEP will assist Belfast with environmental risk management and will perform the required third-party environmental reviews, assistance, and programmatic reporting. The selected bank or other financial lending institution will assist with prudent loan agreements and underwriting. The City of Belfast, Brownfields Selection Committee, selected QEP, and the selected financial lending institution will work collaboratively on Brownfields loans and subgrants to ensure that the cleanups are environmentally sound, cost effective, and that loans will be repaid, so that funds can effectively revolve to other applicants.

Belfast will also work with EPA and MEDEP as partners, who will review projects for eligibility. Belfast will actively work with the various stakeholders to identify, prioritize, and provide RLF funds for priority cleanup projects in the target area. Sites will be required to be enrolled in MEDEP Voluntary Response Action Program (VRAP).

**Select Borrowers/Subgrantees and Projects:** The City, Brownfields Selection Committee, QEP, and financial partner will develop a RLF subgrant/loan application will be developed for prospective applicants along with a set of selection criteria to evaluate applications. The Brownfields Selection Committee will use site selection criteria based on two overall goals: redevelopment potential and sustainability. Sites that have participated in the City's Brownfields Assessment Program and community outreach meetings will be given priority. In addition, sites with developer interest but stalled due, in total or in part, to environmental stigma will also be given a high priority. Other criteria will include:

1. What has the highest likelihood for successful redevelopment?
2. How does the site fit in with the community's growth strategy?

3. Will the site provide greenspace and/or affordable housing?
4. What is the economic and employment benefit to the overall community and region?
5. Is there a local and regional value to the project?
6. Can the project be used as a model for other communities?
7. What is the public's opinion of the project?
8. Providing gap financing to address a high-risk site(s) in a vulnerable community?

In general, once a prospective site application has been submitted to Belfast's RLF Program and eligibility approvals have been granted by EPA, the environmental and financial documents, submitted as part of the initial loan/subgrant application will be reviewed by the environmental professional and financial partner, respectively. Based on recommendations from the environmental and financial professionals including loan terms, the Brownfields Committee will convene to discuss and evaluate additional selection criteria and will review and approve the loan/subgrant, pending final approval by the Brownfields Selection Committee.

**Structure and Administer Loans/Subgrants and Facilitate Financial Underwriting:** The City's Brownfields RLF operational and marketing plans will be consistent with EPA program rules in establishing eligibility, loan terms and conditions, procurement rules, procedures for funds disbursement, and other procedures. The City's plan will include providing low or no interest flexible loans to eligible owners. These loans will cover up to 80% of the cleanup costs (at least 20% cost share will be required by applicants). Based on the City's experience with other loan programs, it realizes the need to be flexible look at each project on a case-by-case basis, but it expects to write low-interest loans at terms of 5 to 10 years with the possibility of some form of deferred payments in the first 1 to 2 years, if necessary for cash flow on a given redevelopment project. In addition, the City's operational plan will include up to 50% of the RLF for grants to municipalities and non-profit organizations. The selected bank or financial lending institution will evaluate financial risk management and will conduct property title searches, loan application reviews, credit checks, development of loan/subgrant agreements, that include all applicable federal environmental and cross-cutting requirements.

Funds for completed cleanup work will be paid/reimbursed on an accrual basis following review and approval of the submitted reimbursement requests and backup documentation from the subgrantee/borrower. Acceptable cleanup documentation including Davis-Bacon Act, Minority Business Enterprise/Woman Business Enterprise, waste disposal documentation, and other Brownfields and site cleanup requirements will be reviewed prior to making reimbursement payments.

The City will utilize its existing loan program experiences; relationships with the community and business owners/leaders, experienced regional stakeholders, developers, and consultants; and its demonstrated past successes, to make a Brownfields RLF Program an enduring source of cleanup funds to provide a crucial bridge between Brownfields assessment and redevelopment. The overall goal of the program is to support cleanup and reuse of Brownfields to revitalize the targeted areas, consistent with the City's Revitalization Plans.

**3.a.ii. Revolution of the RLF Program:** The City understands the Brownfields program requirements and what it takes to be an effective resource to the communities and support their visions for cleanup and redevelopment over the long term; even long after the RLF grant period expires. Belfast's operational plan will be designed for long-term sustainability and will ensure reasonable and prudent lending practice. The Brownfields Selection Committee are committed to awarding loan funds to projects that are financially sound and will be able to repay the funds in a timely basis to continue to recapitalize and revolve the program. All loan and subgrant proposals will be reviewed not only for their redevelopment potential and impact, but also for financial stability. In addition, the City will maintain and dedicate itself to a consistent and sustainable RLF program that will continue to receive and manage program income, in accordance with the Brownfields programmatic requirements, long after the City's cooperative agreement has ended.

Through development of its operational plan for the RLF, the City will develop innovative approaches for lending to high-risk properties. This includes accepting alternative forms of collateral and partnering with other local, state, and federal agencies to provide multiple sources of revenues and spread the risk among participating agencies. Belfast staff will work with developers to secure additional sources of funding to ensure the successful redevelopment of the project, not just successful cleanup. This practice ensures that we can leverage all redevelopment costs, ensure the RLF continues to revolve, and assists the borrower with addressing all project financing, not just cleanup financing. **The City will maintain a long-term commitment of resources to sustain the program even after the 5-year project period and for the life of loan payback periods. RLF subgrant and loan outputs and outcomes information will still be tracked long-term, and information will continue to be reported through EPA's ACRES database.**

**3.a.iii. Marketing Strategy:** The City's targeted marketing strategy for cleanup includes the aforementioned target area, which coincides with the focus areas of its past assessments. Consistent with the needs and vision of its communities, these types of projects have the highest potential to fulfill the goals of downtown revitalization, infill development, affordable housing creation, economic growth, and job creation. The City will combine its community engagement outreach and marketing plans and efforts to further promote the Brownfields RLF Program to its community members including property and business owners/leaders, developers, real estate companies, banks, non-profit development entities, and other local business forums.

The City will market its Brownfields RLF Program to both non-profit, as well as for-profit developers and will focus on the following three types of applicants:

1. Belfast’s Brownfields Assessment Program has a proven track record with for-profit developers and commercial business property owner, such as Developers Collaborative, Realty Resources, and Avesta who have previously worked with the City on assessing and redeveloping Brownfield properties. Due to this success, the City remains in direct contact with Maine-based and out-of-state developers who are looking for potential brownfields sites to redevelop and inquiring as to the availability of funds for these projects. A major marketing strategy for these funds will be direct one-on-one marketing calls and emails with developers to let them know that the City has funds available for their projects.
2. Non-profit development corporations have shown significant interest in Belfast and an RLF program to help leverage other tax credits in the development of affordable housing in the target area. The redevelopment of Brownfields sites for affordable housing encourages in-fill development (reduce sprawl), allow communities to access affordable housing that they could not develop on their own, and will help reuse existing infrastructure.
3. Non-profits can leverage the City’s subgrants to conduct remediation on sites that no one else is stepping forward to implement. The City’s selection criteria for projects will also emphasize or focus on funding packages for cleanup that combine both subgrant funding and low-interest loan funding for non-profits, such that non-profits don’t eat up only subgrant funding.

Belfast has implemented a successful Brownfields Assessment Program and will continue discussions with non-profits and business owners that are interested in funding cleanup and redevelopment projects. Projects in the local communities focus on commercial, affordable housing, parks, and greenspace to support economic redevelopment with a total identified project need of over \$1M in cleanup funding. On the private sector side, Belfast continues to have dialogue with the private sector building owners and developers in its Brownfields Assessment Program and has identified the following unmet needs for cleanup and redevelopment in the target area: 126 Church Street, 1 Miller Street, and the Home Supply Center Warehouse site on Washington Street, which are all current Brownfields Assessment Program participants. Estimated total remediation costs for these initial projects is over \$1.5 million and total potential private investment of over \$15 million.

**3.b.i. Program Implementation, 3.b.ii. Anticipated Project Schedule, 3.b.iii. Task/Activity Lead, and 3.b.iv. Outputs:**

<b>Task 1: Cooperative Agreement Oversight</b>
<b>i. Implementation:</b> Belfast will conduct programmatic oversight of its Brownfields RLF Program like similar to its prior successful Brownfields Assessment Programs. Based on a Request for Proposals (RFP), selection of a Qualified Environmental Professional (QEP) and financial partner. Establish Belfast’s Brownfield RLF Loan Committee. Attend at least 2 EPA National Brownfields conferences and/or EPA/MEDEP training seminars. Perform general program management and communication with regulatory personnel, community officials, and the public. Track progress through performance and financial reports, quarterly reports, and updates to EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES) online database. Ensure that requirements of the EPA Cooperative Agreement are met. <i>Belfast will also provide additional in-kind oversight and planning at no cost to the grant.</i>
<b>ii. Schedule:</b> RFP and selection of the QEP and financial partner and enhance Brownfields Selection Committee within the first three months (1 <sup>st</sup> quarter) of funding award; quarterly reports and ACRES database updates each quarter during the five-year grant period.
<b>iii. Leads:</b> Belfast staff will lead all programmatic grant activities. Belfast will develop RFP for QEP selection and will enhance Brownfields Selection Committee. The QEP will perform quarterly reporting and ACRES updates.
<b>iv. Outputs:</b> Brownfields Selection Committee will meet at least semi-annually (10 meetings); competitive RFP and contract for QEP selection; 20 quarterly reports; and ongoing ACRES input/updates over 5-year grant.
<b>Task 2: Community Engagement</b>
<b>i. Implementation:</b> In conjunction with the community input plan described in section 2.b.iii above, Belfast, its QEP, and its local community partners will: issue and distribute e-mails and e-newsletters; issue Facebook posts; create and distribute flyers; create a Brownfields RLF Program informational brochure; develop an information repository; issue news release/public service announcements; update websites with program information, community input, and responses; and hold public program information meetings and site-specific public information meetings. Additionally, they will also notify residents, adjacent landowners, and target communities of public meetings and cleanup schedules; and update the target communities regarding assessment, cleanup, and redevelopment activities. For each brownfield site, site-specific outreach, public meetings, and communications with the community will also be conducted during key milestones in the cleanup process, such as after final cleanup and/or reuse plans are completed and prior to initiating site cleanup work to present key information to target communities, neighbors, and property owners. Public meetings will be held primarily via Zoom.
<b>ii. Schedule:</b> Informational brochure, news release/public service announcement, and first public information meeting will be completed within the 2 <sup>nd</sup> quarter of the grant period after selection of the QEP. Remaining community engagement activities

and public meetings following key site-specific cleanup milestones (e.g., final cleanup plans or pre-construction) will occur throughout the remainder of the 5-year grant period.

**iii. Leads:** Belfast, QEP, and local community partners will conduct community engagement activities. *Belfast will provide additional public outreach and economic development support at no cost to the grant.*

**iv. Outputs:** Brownfields RLF Informational brochure, news release/public service announcement, two public program information meetings, information repository, site-specific public information meetings, and meetings with site owners, as needed. Meetings likely to be held via Zoom teleconferencing.

**Task 3: Make Loans and Subgrants**

**i. Implementation:** Belfast, Brownfields Selection Committee, and QEP will develop a RLF site application form and site selection criteria for prioritizing sites. Funds will be made available to the borrower or subgrantee for completing required site cleanups; at least 50% of available RLF funds will be loans. Applications for the two priority sites are anticipated within 2<sup>nd</sup> quarter of the grant period. Belfast and its QEP will work with EPA and MEDEP to determine site and borrower eligibility; determination of Section 106 historic preservation applicability; site review, evaluation, and selection; ensuring sites are entered into the MEDEP Voluntary Response Action Program (VRAP); preparing loan/subgrant documents; and legal reviews. Belfast will seek a cost share of at least 20% of all loan and subgrant funds and will provide an additional in-kind meeting space and loan servicing and management toward the overall cost share requirement. Belfast also routinely receives calls from site owners, developers, and prospective purchasers about availability of cleanup funding following site assessment work. RLF Committee meetings will be conducted on a quarterly basis and/or when site RLF applications are submitted.

**ii. Schedule:** RLF site application and criteria will be developed with 1<sup>st</sup> and 2<sup>nd</sup> quarters of the grant. Eligibility for each site submitted to the program will be obtained prior to beginning review of each subgrant/loan application. Following project approval by the RLF Committee, Belfast and its financial partner, legal counsel, and QEP will draft the subgrant/loan agreements for execution with the site owners. Making loans and subgrants will be completed over the course of the 5-year grant period.

**iii. Leads:** Belfast will coordinate semi-annual meetings with the Brownfields Selection Committee and QEP and project-specific meetings when site applications are received. Upon approval by Belfast and the Brownfields Selection Committee, QEP will obtain site eligibility for each site. Belfast, financial partner, legal counsel, and QEP will prepare subgrant/loan agreement and associated loan documents.

**iv. Outputs:** At least 10 semi-annual meetings between Belfast, Brownfields Selection Committee, and QEP. EPA/MEDEP eligibility determinations and site access agreements. Site-specific subgrant and loan agreement/documents.

**Task 4: Oversee Site Cleanups**

**i. Implementation:** For each site, Belfast and its QEP will review cleanup plans (ABCAs and RAPs) for general conformance with Maine cleanup criteria and regulations, and the respective community plans and redevelopment goals. Cleanup alternatives will be evaluated, in part, based on cost, feasibility, and effectiveness in protecting human health and the environment. Belfast and its QEP will conduct periodic site visits and status meetings during cleanup, attend one meeting with MEDEP and/or EPA following cleanup, and will prepare and submit required closeout documentation for the grant and MEDEP VRAP program. During site-specific cleanup activities, Belfast will provide support regarding land use (Planning Department) and economic development goals (Economic Development Department) that are tied to the project goals and City's Comprehensive/Master Plans for the target area.

**ii. Schedule:** It is anticipated that ABCAs/RAPs and/or cleanup plans will be submitted to the Brownfields RLF Program with each site application. The cleanup plans will be reviewed for general conformance with MEDEP VRAP requirements prior to initiating site cleanup activities. Oversight of site-specific cleanups will be completed following approval of each subgrant/loan agreement during the 5-year grant period.

**iii. Leads:** Belfast will direct all cleanup and reuse oversight efforts. The QEP will conduct site-specific cleanup oversight including routing site inspections and project status summaries and will review completed cleanup work with costs/expenses submitted for reimbursement from the program. The QEP will also meet with MEDEP VRAP staff to confirm the cleanup work is satisfactory with MEDEP VRAP as well.

**iv. Outputs:** Review of site-specific ABCA/RAP or other cleanup plans and at least one public meeting for each site prior to initiation of site cleanup work; MEDEP VRAP applications/submittals; MEDEP VRAP Closure Reports and Certificate of Completion for each cleanup site.

**3.c. Cost Estimates:** Budgets broken down by task and a summary budget table are provided below:

Budget Categories		Task 1: Cooperative Agreement Oversight	Task 2: Community Engagement	Task 3: Make Loans and Subgrants	Task 4: Oversee Site Cleanup	Total
Direct Costs	Personnel	\$15,000	\$5,000	\$15,000	\$5,000	\$40,000
	Travel	\$4,250	\$250	\$250	\$250	\$5,000
	Supplies	\$2,000	\$250	\$250	\$0	\$2,500
	Contractual	\$10,000	\$5,000	\$27,500	\$30,000	\$72,500
	Other – Loans	\$0	\$0	\$440,000	\$0	\$440,000
	Other - Subgrants	\$0	\$0	\$440,000	\$0	\$440,000
<b>Total Direct Costs</b>		<b>\$31,250</b>	<b>\$10,500</b>	<b>\$923,000</b>	<b>\$35,250</b>	<b>\$1,000,000</b>
Indirect Costs		\$0	\$0	\$0	\$0	\$0
<b>Total Federal Funding</b>		<b>\$31,250</b>	<b>\$10,500</b>	<b>\$923,000</b>	<b>\$35,250</b>	<b>\$1,000,000</b>
Cost Share		\$0	\$0	\$200,000	\$0	\$0
<b>Total Budget</b>		<b>\$31,250</b>	<b>\$10,500</b>	<b>\$1,123,000</b>	<b>\$35,250</b>	<b>\$1,200,000</b>

**Task 1: Cooperative Agreement Oversight: \$15,000** for Belfast personnel to oversee the program (300 hours @ \$50/hour); **\$4,250** for travel (\$1,000 airfare + \$2,000 hotel + \$1,250 food/per diem) for 2 Belfast staff to attend 2 EPA national Brownfields conferences and/or seminars; **\$2,000** for supplies (\$1,750 to purchase laptop/tablet + \$250 for copies, phone calls, contract documents); and **\$10,000** contractual for QEP to assist Belfast with programmatic oversight. **Total for Task 1 = \$31,250.**

**Task 2: Community Engagement: \$5,000** for Belfast personnel to conduct public outreach and meetings (100 hours @ \$50/hour); **\$250** for travel to meetings (mileage/tolls); **\$250** for supplies (copies, brochures, mailings); and **\$5,000** contractual for QEP to assist Belfast on public outreach. **Total for Task 2 = \$10,500.**

**Task 3: Make Loans and Subgrants: \$15,000** for Belfast personnel for overseeing the assessments (300 hours @ \$50/hour); **\$250** for travel to meetings and sites (mileage/tolls); **\$250** for supplies (copies, phone calls, mailings); **\$27,500** contractual for QEP, Financial Partner and Legal Counsel to assist City with preparing and reviewing subgrant/loan agreements and supporting documents and underwriting the loans. **\$440,000** for subgrants and **\$440,000** for loans to eligible applicants. **\$200,000** in cost share; Belfast will seek the entire RLF 20% cost share through all loan and subgrant funds (total \$200,000). **Total for Task 3 = \$923,000 Federal Funding and \$1,123,000 overall with required cost share.**

**Task 4: Oversee Site Cleanup: \$5,000** for Belfast personnel for overseeing the cleanup & reuse/redevelopment (100 hours @ \$50/hour); **\$250** for travel to meetings (mileage/tolls); **\$30,000** contractual for QEP to conduct review of ABCA/RAPs and/or cleanup plans, site inspections, meetings with City, MEDEP, and EPA during and after cleanup, and preparing required closeout documentation for the grant and MEDEP VRAP program. **Total for Task 4 = \$32,250.**

**3.d. Measuring Environmental Results:** Consistent with the prior EPA Brownfields Grants awarded to Belfast, this project will be managed utilizing time-proven techniques to ensure project funds are expended timely and efficiently. Belfast and its QEP will hold monthly status meetings to review priority sites, schedule, and budget. ACRES will be utilized for preparing electronic quarterly reports and to monitor project progress. The City’s overall expected outcomes are to return the selected brownfields and nearby areas impacted by the stigma of perceived proximity to contamination and tangible blight back to economic vitality. Environmental assessment and ultimate cleanup of the Brownfields will minimize exposure at the sites and adjacent properties and, just as importantly, impacts on the downtown and waterfront target areas. Additional expected outcomes of Brownfields site assessment, cleanup, and redevelopment will be new job creation and increased tax base accompanying the revitalization of the priority sites within the target areas.

Completion of environmental cleanup reports (i.e., MEDEP VRAP Closure Reports) will document the final cleanup and progress at each site/target area. Reports will be internally tracked to ensure that each is distributed to stakeholders for comments before finalizing. Sites selected to participate in the Brownfield RLF program will be entered into the MEDEP VRAP program. The number of sites cleaned up and entered into Belfast Brownfields program and the details of each site (i.e., acres of site cleaned up, contaminants found, cleanup money spent, leveraged redevelopment funding, etc.) will also be tracked via EPA quarterly reports and EPA’s ACRES online database. Completing the work described above will help transition these properties to the next step of redevelopment and are directly in-line with the Belfast’s Master and Comprehensive Plans. These documents and work products will also provide the liability protections required to stimulate redevelopment.

The City of Belfast will benefit from this Brownfields RLF Program by using the funds to provide affordable housing, offer redevelopment opportunities for investors, jobs for residents, and ultimately revitalize local economies of the target communities. This Brownfields RLF Program is the critical component in the City's immediate and long-term plans to support cleanup efforts of environmentally contaminated sites, improve public health, and creating economic, social, and recreational opportunities. It is imperative that the City continues to cleanup properties to provide opportunities for redevelopment for affordable housing and economic development.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a.i. Organizational Structure and 4.a.ii Description of Key Staff:** The City of Belfast has, and will continue to have, the organizational capacity to effectively carry out all of the programmatic, administrative, and financial requirements of the grant. This program and grant will be directly managed by the Belfast Economic Development Director Thomas Kittredge. During his fifteen-year career in economic development, Mr. Kittredge has secured and implemented \$1,699,994, and has secured on behalf of other applicants an additional \$1,550,000, in EPA Brownfields Assessment and Cleanup Grants, and has served as the director of the City's Brownfields Assessment Program since its inception in 2011. He will be supported by the aforementioned Brownfields Selection Committee, which has existed since 2011 when the City received its first Assessment Grant. Mr. Kittredge has also been an active member of the Knox County (Maine) Microloan Committee since 2010. Mr. Kittredge also has responsibility for all of the City's TIF programs, which includes the implementation of development programs which include the creation of revolving loan funds, and the negotiation and development of credit enhancement agreements with private entities, which include payment/transfer processes and conditions for repayment/recapture. He will be supported by the aforementioned Brownfields Selection Committee, which has existed since 2011 when the City received its first Assessment Grant. The City's Finance Director, Theresa Butler, who possesses more than 20 years of progressively responsible experience in municipal finance, will serve as the financial manager of the grant, including tracking of expenditures, draw downs, and loan repayments. Ms. Butler and the rest of the City's Finance Department has experience in executing and managing a wide variety of financial agreements with outside entities, including: short-term borrowing agreements, bonding, awarding subgrants, issuing sewer extension/connection loans, short-term renting of City properties, long-term leasing of City properties, selling of City properties, the Property Assessed Clean Energy Program, and extending payment plans for property taxes and sewer fees. For legal assistance, including access agreements, the City will rely upon City Attorney Kristin Collins, who has practiced law since 2005 and currently practices with the Municipal Law and Finance Group of Preti Flaherty. Ms. Collins has a Bachelor of Arts from Colgate University and a Juris Doctor from the University of Maine School of Law, and is admitted to practice in Maine and the US District Court, District of Maine. The structure and the capacity of this team will ensure that this grant and revolving loan fund program will be successfully implemented within its period of performance.

**4.a.iii. Acquiring Additional Resources:** Additional expertise and resources, particularly the QEP to oversee all environmental remediation work on behalf of the City, and a financial institution for underwriting services, will be selected via a fair and competitive procurement process (a Request for Qualifications, finalist interviews, and City Council approval) that will meet all relevant local, state, and federal regulations, and will be overseen by Mr. Kittredge and members of the Brownfields Selection Committee. If Mr. Kittredge were to leave his employment with the City of Belfast, direct management of the program and grant would pass to Jon Boynton, Belfast's City Planner and another active member of the Brownfields Selection Committee. If further personnel turnover should occur during the course of this program and grant, the City has an in-house human resources working group that can efficiently find new personnel to maintain momentum within its projects.

**4.b.i.(1) Currently has or Previously Received an EPA Brownfields Grant - Accomplishments:** The City's three most recent EPA Brownfields Grants are: 1) a \$200,000 FY14 Brownfields Cleanup Grant (hazardous substances); 2) a \$400,000 FY16 Assessment Grant (hazardous substances and petroleum; community-wide); and 3) a \$299,994 FY19 Assessment Grant (hazardous substances and petroleum; community-wide). With its FY16 and FY19 Assessment Grants, the City has managed and implemented an extraordinarily successful Brownfields Assessment Program, entering a total of 16 sites and completing 16 Phase I ESAs/ESA Updates, and eight Phase II ESAs. Additionally, cleanup planning including ABCAs and/or RAPs was conducted for six of these Phase II sites. The City's FY14 Cleanup Grant resulted in the cleanup of one site. Furthermore, the City secured MEDEP VRAP *No Further Action Assurance* or *No Action Assurance* letters for eight of these sites, and a \$50,000 petroleum subgrant from the MEDEP/DECD Brownfields Revolving Loan Fund Program that was used to augment its FY14 Cleanup Grant. All outputs and outcomes have been accurately reflected in ACRES at the time of this application submission.

**4.b.i.(2) Currently has or Previously Received an EPA Brownfields Grant - Compliance with Grant Requirements:** For all three of these grants, the City had an approved workplan and cooperative agreement with EPA and maintained full compliance with its schedules, terms, and conditions throughout the grant periods, and all required quarterly performance and financial status reports, and ACRES updates, were completed in a timely manner. All expected results for these three grants have been achieved and reported on in a timely manner. The only grant of these three that is currently open is its FY19 Brownfields Assessment Grant, which is its most recent Brownfields Assessment Grant. This grant's period of performance is 7/01/2019-9/30/2022, all funds have been expended as of 9/28/2021, and final closeout of this grant is currently underway. The City's other two grants, its FY14 Brownfields Cleanup Grant and its FY16 Brownfields Assessment Grant, were both closed with no funds remaining.

# **ATTACHMENT A**

## **Threshold Criteria for Revolving Loan Fund Grants**

**City of Belfast, Maine  
EPA FY22 Brownfield Revolving Loan Fund  
Grant Proposal**



## THRESHOLD CRITERIA FOR REVOLVING LOAN FUND (RLF) GRANTS

City of Belfast, Maine EPA FY22 Brownfield Revolving Loan Fund (RLF) Grant Application

### 1. Applicant Eligibility:

The City of Belfast affirms that it is a General Purpose Unit of Local Government and is eligible to apply for a Revolving Loan Fund (RLF) Grant from the EPA Brownfield Grant Program.

### 2. Demonstration of Previous Grant Status

The City of Belfast affirms that it has not had, or been a part of, a cooperative agreement for a Brownfields RLF Grant in the past.

### 3. Expenditure of Existing Multipurpose Grant Funds

The City of Belfast affirms that it does not have an open EPA Brownfields Multipurpose Grant.

### 4. Description of the RLF Boundaries

The geographic boundaries for this Brownfields Revolving Loan Fund Grant are the city limits of the City of Belfast, Maine.

### 5. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund

- a. Through a competitive selection process (Request for Proposals), the City will procure a Qualified Environmental Professional (QEP) at the very beginning of the grant period. The selected QEP will assist the City with environmental risk management and will perform the required 3<sup>rd</sup> party environmental reviews, assistance, and programmatic reporting. Belfast will also work with EPA and Maine Department of Environmental Protection (MEDEP) as partners, who will review projects for eligibility. Sites will be required to be enrolled in the MEDEP Voluntary Response Action Program (VRAP).
- b. A copy of the legal opinion from the City of Belfast's legal counsel is included in **Attachment B**. This legal opinion demonstrates that (1) the City of Belfast has legal authority to access and secure sites in the event of an emergency or default of a loan agreement or non-performance under a subgrant and (2) the City of Belfast has legal authority to perform the actions necessary to manage a revolving loan fund. This legal authority allows the City to hold funds, make loans, enter into loan agreements, and collect repayments.

### 6. Statutory Cost Share

- a. The City of Belfast plans to seek and require at least 20% cost share for eligible and allowable expenses (e.g., in-kind services, labor, materials, or other eligible services) from each subgrantee or borrower on subgrants and loans through the program. The cost share requirement will be included as a condition in each subgrant/loan agreement with subgrantees or borrowers. Any potential gaps in the overall required cost share, not made up by the subgrantees or borrowers, will be provided by the City through a combination of in-kind, labor, materials, or other eligible services to the grant.
- b. Not Applicable – a hardship waiver of the cost share is not requested.

### 7. Named Contractors and Subrecipients (other than borrowers and site cleanup subgrantees)

- **Contractors:** Not Applicable
- **Subrecipients:** Not Applicable