

NARRATIVE REVIEW INFORMATION

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target area and Brownfields

i. Background and Description of Target Area

Bethlehem, New Hampshire is located in northern Grafton County, 52.8% of which is situated in the White Mountain National Forest including the Appalachian Trail. Formerly known as Lloyd Hills, from a 1774 land grant by a Loyalist Governor, the town of Bethlehem incorporated on December 27, 1799. Today, Bethlehem has a population of approximately 2,500 residents. We're a small community spread over a large 90 square mile area.

In the 19th century, Bethlehem became a regional destination of choice among vacationers from New York and Boston for its clean air and natural beauty. There were 30 “grand hotels” and guests included several sitting U.S. Presidents, authors and industrialists. As automobiles replaced rail as a primary form of travel, the hotels faced significant declines in attendance. Many closed, were demolished or otherwise fell into disrepair. As a typical New England town, Bethlehem also had several textile mills who were once major employers but now remain as vacant, underutilized properties leaving behind the remnants of the textile industry.

Our project property, on the site of the former Sinclair Hotel, is within the EPA Region 1 3309602002 Block Group. The hotel was destroyed by fire in 1978 which similarly left behind lead, asbestos and polycyclic aromatic hydrocarbon (PAH) contamination in its soil and groundwater. For the last forty-three years, the site has been an empty, largely unused, overgrown eyesore that has been a blight on our downtown. The Bethlehem Block Group has a low-income population (86th percentile in New Hampshire) and a significant population with less than a high school education (75th percentile in New Hampshire) and the cost to repair and maintain structures and land properly is prohibitive for some property owners. Downtown Bethlehem is a mix of newer buildings, older buildings in need of substantial renovation and long-standing vacant lots, many of which are also affected by hazardous materials such as asbestos, lead, PCBs, or other contaminants.

ii. Description of the Target Area

The site is comprised of one 4.8-acre parcel of land, which is identified as Lot 20 on Town of Bethlehem Tax Map 205. The site fronts both Main Street (US Route 302) and Agassiz Street (NH Route 142). Abutting property usage is developed, and ranges from private single-family residential, multi-family residential, assisted low-income housing, recreational and commercial uses.

Most of the ash and charred debris from the 1978 fire was left on-site and graded across the northern/northeastern area of the site, possibly used to fill in the basement. Operations at the site included a small manufactured gas plant (MGP) operation which consisted of one 250-gallon, one 500-gallon, and one 1,100-gallon underground storage tank (UST), which were removed from the site and disposed of in 2017. Since 2011, numerous Environmental Site Assessments (ESA) have been performed at the site by different organizations, most recently by Sanborn Head & Associates Inc. of Concord, NH (Sanborn Head). These studies estimate 3,200 tons of lead and asbestos soil contamination on the site. Sanborn Head performed a Phase II ESA in August 2021 to assess Recognized Environmental Conditions identified in the July 2021 Phase I ESA, as well as to address two of the requests made by New Hampshire Department of

Environmental Services (NHDES) in their January 2020 comment letter issued in response to a 2020 Remedial Action Plan. During the Phase II site investigation, soil and groundwater samples were analyzed. The findings from the Phase II ESA indicated that PAH and lead impacts appear to be limited to the surficial soils and do not appear to extend off-site to the east. X-Ray Fluorescence screening data collected as part of the Phase II ESA identified an exceedance of the NHDES Soil Remediation Standards (SRS) for lead in the topsoil layer collected located in the northeastern corner of the site. Concentrations of lead were also detected in the topsoil layers just below the SRS of 400 mg/kg. Groundwater results from newly installed monitoring wells, as well as additional groundwater samples did not indicate impacts related to historical laundry operations, cyanide from former MGP operations, or concentrations of PAHs and lead above laboratory reporting limits.

1. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Among the key priorities identified by Bethlehem residents as part of its 2016 Master Plan are the town's high property tax rate, health concerns from a local landfill and preserving the town's unique character downtown. Nearly 68% of respondents from the town survey would like to see more commercial development, with an emphasis on bringing more small businesses to Main Street to accommodate residents and invite more tourism. The top survey suggestions for new businesses included restaurants, recreation, professional offices, healthcare facilities, hospitality, cottage and home industries. Respondents least wanted to see big box chain stores, fast food establishments, gambling, storage units and heavy industry. The town's Master Plan identifies several key goals including protecting property values through new economic development, planning for future population increases, and address zoning strategies to protect the town's scenic and natural resources.

BRI Development, LLC's (BRI) strategy fully aligns with Bethlehem's goals to maintain a small-town feel, to market and promote Bethlehem to visitors and investors, and support availability of new housing. Our primary goal is to remediate the site for development, mitigating any and all public health concerns due to site exposure. Enticing commercial and residential development, including expansion of a senior housing complex adjoining the site will be our next area of focus. The owner of the complex, Housing Initiatives of New England Corp. (HINEC), has expressed interest in acquiring a portion of the property. We are planning a mixed-use, solar powered structure for the remaining contaminated portion of the site including ground-level retail space, residential apartments where possible in an architectural style consistent with the former Sinclair Hotel and parking. Ultimately, we want to ensure reuse addresses the stated interests of residents to support new business investment, providing additional tax revenue to the town, while maintaining the quality of character and charm that is unique to downtown Bethlehem. The site is not in a federally designated flood plain.

ii. Outcomes and Benefits of Reuse Strategy

As a rural, disadvantaged community, with a 9.4% poverty rate and a median household income level 72% of the state household median (\$55,556/\$76,768 per ACS 2019), the benefits of our reuse strategy are significant. We believe the project will benefit disadvantaged people by providing access to new business start-ups and corresponding employment opportunities that do not currently exist. We anticipate lasting new job creation in property management, retail, professional services and hospitality. The project would also help increase housing availability for individuals and families looking to work and live in the area while growing our tax base.

Public health benefits are evident. Many site abutters are elderly including those of the Hill View Apartments (owned by HINEC), an adjoining senior living complex. The public sidewalk on the northern boundary very close to severe contamination is used regularly by the public. Downgrade, the town swimming pool is nearby to the northeast and there is a large playground across Agassiz Street to the east.

Our strategy is designed exclusively for the benefit of Bethlehem, its residents and visitors to the extent that any economic windfall to BRI as a result of property sale, development or net operating income would be used to fund new initiatives and programs locally consistent with BRI's and the town's visions. BRI is committed to leading Bethlehem by attracting reinvesting in new opportunities to continue to grow the town's economic base.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

New Hampshire Department of Environmental Services (NHDES) has funded the full cost to complete Phase I and Phase II site assessments through CERCLA 128(a).

Our relationship with Housing Initiatives of New England is key to our leveraging strategy. Since 1990, HINEC has been serving Maine, Vermont and New Hampshire's seniors by providing affordable housing solutions, specializing in housing for independent living. This funding resource will be likely a result of purchase and sale via lot line adjustment.

We're planning a robust capital campaign in 2022 to secure donations (cash and in-kind services) from a select group of area residents with financial resources who share our commitment to this project. We are receiving consulting advice on a pro bono basis to define and execute this element of our funding strategy. We will also initiate a crowdfunding initiative to capture community-wide financial support. Regarding subsequent reuse, these costs will be the responsibility of any prospective developer who aligns with our vision for the site. We are planning to solicit interest from potential developers in early 2022.

1.c.ii. Use of Existing Infrastructure

The site is centrally located in Bethlehem's Village District at the intersection of US Rte. 302 and NH Rte. 142. These roads and sidewalk are maintained by the Town and New Hampshire Department of Transportation (NHDOT). There are water, sewer, electricity and internet services available and can be easily connected to the site during redevelopment and new building construction.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

As of 2019 (per ACS), Bethlehem's median household income was \$55,556 (72% of the NH median) with 9.4% of individuals living below the poverty level. Our low-income population ranks in the 83rd percentile state-wide, 75th percentile regionally and 60th percentile nationally.

Bethlehem also has a relatively high cost of living. Its property tax rate is historically among the highest in the state (currently \$25.20 per \$1,000 valuation versus \$20.29 state average). As a result, many property owners are reluctant to make repairs or improvements only to see their property tax liability increase as a result of increased valuations. The largest taxpayer in

Bethlehem, has pursued an abatement to reduce their liability and there are several private schools, churches, non-profit organizations and low-income housing units that pay relatively little or no property taxes to the town. Bethlehem's annual \$3M municipal budget and \$5M school budget puts significant pressure on property owners to maintain quality town services. Some taxpayers find themselves in an ongoing state of arrears to the town. There are also examples of owners simply "walking away" from their properties, leaving the town to take possession and auction the property to satisfy outstanding liens.

In the case of our project, the scale of clean-up cost was far too high for the previous site owner and became prohibitive for prospective commercial buyers (i.e., Dollar General) leading the property to remain vacant and the owner retaining the tax liability. As a result, BRI purchased the property at a substantial discount and we are grateful for the previous owners' generosity and vision to return the property to one that is viable and marketable.

The clean-up grant and cost share will be used exclusively for site remediation. Revitalization of this important location will fully support key elements of Bethlehem's Master Plan and expand opportunities for more positive socio-economic outcomes. Otherwise, the site, in a central downtown location, will continue to languish as an environmental hazard to residents and public as it has for the past forty-three years.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Most recent available data provided by the EPA, show 22% of Bethlehem's resident population is over age 64, compared to 17% in NH and 15% nationally. Bethlehem's low-income population is 38%, compared to 20% across the state. Bethlehem also has a high Lead Paint Indicator (pre-1960s housing) in the 75th percentile for New Hampshire and 73rd percentile nationally.

In 2009, the New Hampshire Department of Health and Human Services (DHHS), Division of Public Health Services (DPHS), Office of Health Statistics and Data Management (HSDM) began an investigation of a suspected cancer cluster in Bethlehem in response to community concerns. The results of their analysis, discussed further in the following section show a higher-than-expected incidence of five different cancer types in Bethlehem and eight surrounding towns. Although their conclusions did not draw a correlation between cancer incidence and environmental hazards, their recommendation suggested "members of the community should keep themselves informed about toxic substances, human exposure, and public health hazards associated with the environment. As an important public health measure, everyone should also follow prescribed cancer prevention and screening guidelines including regular screenings for breast, cervical and colon cancer".

Given the site location, centrally in Bethlehem, adjacent to senior housing and proximate to the town pool and playground where our youth congregate, the potential for site-related lead, asbestos and PAH exposure to sensitive populations through direct contact with or ingestion of dusts from surface soils, or the potential for lead or other contaminants to leach to area groundwater is noteworthy.

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

It is our expectation this grant and subsequent reuse strategy will help mitigate the threat of certain cancers that have been identified in Bethlehem and surrounding towns. Bethlehem’s EJ Index for Air Toxics Cancer Risk ranks at the 85th percentile in the state and 47th percentile nationally. Our EJ Index for NATA Diesel PM is in the 90th percentile compared to 54th percentile in the US. Our EJ Respiratory Hazard Index is in the 86th percentile state-wide.

The results of the December 14, 2009 Cancer Incidence and Cancer Mortality: Bethlehem NH and Surrounding Towns Follow-Up Analysis and Medical Records Review conducted by the NH DHHS identified 170 cases of primary malignant cancer occurring from 1991 to 2005. A preliminary comparative analysis identified female breast cancer and pancreatic cancer as having elevated incidence in Bethlehem. The most commonly diagnosed cancers for adult males are prostate cancer, lung and bronchus cancer, and colorectal cancer. For women, the most common cancer types diagnosed are breast, lung and bronchus, and colorectal. These accounted for 53% of the 170 cases diagnosed in residents of Bethlehem, both male and female, from 1991 through 2005. Cancers determined to be elevated in Bethlehem or the surrounding towns are pancreatic, female breast, leukemia, bladder, NHL, and melanoma. Remediation of the site will represent a very visible, positive step toward addressing the reduction of cancer incidences locally.

3) Promoting Environmental Justice

At its core, risk-free public access to previously contaminated sites are not only worth promoting, but celebrating! Our environmental justice approach will be one of transparency, inclusiveness and recognition of success.

We rely on technical expertise to support scientific and engineering transparency to the public. It’s our intent to make sure there are “no surprises” and ensure residents are informed of “what’s happening” and “what’s next” through our website, regular town meeting updates, ad hoc individual and group discussion, public meetings and door to door, if necessary. We will seek support and guidance from Bethlehem residents, government officials, business community and schools. Our approach to transparency will be key to opening lines of communication to all interested stakeholders. The good people of Bethlehem are community active and forthcoming with their opinions. We commit to educate, collaborate and above all, be great listeners to those who want to improve soil and water issues, promote new jobs, increase property values and help alleviate local disinvestment.

With ongoing community support we will track, and at times, together celebrate our mutual progress. Achievements, no matter how modest will be recognized. Disappointing news will be shared as well. Regardless, progress will be measured by achievement of well-defined project goals and articulated in a way where we can all agree environmental justice is served through equitable distribution of environmental benefits.

1. **Community Engagement**
 - i. **Project Involvement/ ii. Project Roles**

Name of Organization/Entity/Group	Point of Contact (name, email, phone)	Specific involvement in the project or assistance provided
New Hampshire Department of Environmental Services	Melinda Bubier; Melinda.s.bubier@des.nh.gov; 603-271-1169	Regulator; project overview, technical review; CERCLA 128(a) assessment funding

North Country Council Regional Planning and Economic Development District	Michelle Moren-Grey; mmoren@nccouncil.org; 603-444-6303	Brownfield's advisor and technical assistance
UConn/TAB	Nefeli Bompoti, PhD; nefeli.bompoti@uconn.edu; 860-486-0611	Technical assistance to this clean-up grant application
Housing Initiatives of New England Corp.	Cyndy Taylor; ctaylor@hinec.org; 207-831-5394	Potential redevelopment partner
Mascoma Bank	Chad Stearns; chad.stearns@mascomabank.com ; 603-442-4649	Extending Line of Credit to BRI
New Hampshire Community Loan Fund	Betsy Segal; bsegal@communityloanfund.org; 603-856-0725	Letter of Intent to provide loan funding upon EPA approval
MLK & Company	Mary Lou Krambeer; maryloukrambeer@gmail.com; 603-444-7705	Fundraising consultant (pro bono)

iii. Incorporating Community Input

The Bethlehem community will have active, open, ongoing, real-time input to us throughout the scope of this project. All stakeholders, will have direct access to BRI's Board members for all project activities. At times, stakeholders may receive preliminary communications directly from BRI before releasing information to the general public. We will also solicit real-time community feedback to help drive project success including open all communication channels to the public and engage in dialogue to inform, educate and listen. Upon the achievement of certain milestones, we will communicate publicly through press releases, regularly scheduled open town meeting updates (including Zoom meetings due to COVID-19), and local media channels. BRI's website (bethlehemreimagined.org), will provide progress updates against project goals, providing links to EPA and NHDES websites and establishing a "Frequently Asked Questions" page that is reviewed updated weekly. The opportunity to submit emails to BRI through our website is currently available.

TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Sanborn Head's recommends excavation of lead-impacted soil at concentrations greater than 4,000 mg/kg, implementation of a clean soil cover system and an Activity and Use Restriction (AUR). This approach would remove lead-impacted soil identified during previous investigations that would be considered "grossly contaminated", consolidate and cap the remaining lead and PAH-impacted soils that exceed the SRS and asbestos-impacted soils detected at greater than 1% by volume, and implement an AUR for the portion of the site where exceedances of the SRS remain.

Prior to excavation, a chemical additive (EnviroBlend® CS) would be directly applied to the grossly contaminated soils to bind the lead particles making them less likely to leach, so that they could be handled as non-hazardous waste for off-site disposal. A treatability study and

additional sampling is also required to further delineate the extent of the grossly contaminated soils. Assuming an approximate 3-foot-deep excavation in this area, the amount of soil to be stabilized and removed is approximately 800 tons (550 CY) and transported as non-hazardous waste to the North Country Environmental Services facility in Coventry, Vermont for disposal.

Where areas of impacted soil remaining across the Site at concentrations above the SRS, but less than 4,000 mg/kg, this recommendation includes placing a geotextile marker fabric to separate the contaminated soil remaining in place and importing approximately 2,250 CY of a clean, granular backfill and 750 CY of loam to provide a 2-foot-thick cap over an approximately 40,000 sq. ft area where exceedances of the NHDES SRS for lead and PAHs have been observed in the surficial and shallow soils. An additional 550 CY of granular fill has also been included to backfill the excavation in the former building foundation. Prior to placement of the soil cap, additional areas where lead impacts have been identified at concentrations above the S-1 Soil Standard (SRS) of 400 mg/kg will be excavated and consolidated within the former building footprint prior to capping.

This project is shovel ready and a draft Analysis of Brownfield Clean-up Alternatives (ABCA) has been prepared. If awarded the grant, pre-award funds will be requested to finalize these documents so that cleanup can begin promptly in May 2023. Cleanup completion is expected October 2023. The following tasks are anticipated:

Task Activity: 1. Cooperative Agreement Oversight *Discussion of EPA-funded tasks/activities: N/A. Discussion of non-EPA-grant resources:*

Project Implementation: The following EPA-funded activities will ensure the grant is effectively implemented and cleanup completed in a timely manner

1. Competitively Procure Qualified Environmental Professional (QEP)
2. Quarterly ACRES Reporting and Annual MBE/WBE Reports
3. Attend Brownfields workshops and seminars
4. Ongoing personal and financial management and coordination with key stakeholders
5. Enroll site in NHDES' Brownfields Covenant Not to Sue Program (VCP)
6. Finalize CRP and establish information repository

Anticipated Project Schedule: Starting April 2022 through project completion December 2023

Task/Activity Lead(s): BRI and QEP

Outputs: EPA Quarterly Reports, MBE/WBE Reports, RFQ

Task Activity: 2. Community Involvement

Project Implementation: The following EPA-funded activities will be performed to continually involve the public and our project partners in the cleanup of the site:

1. Host public meeting for draft ABCA and finalize ABCA
2. Host public charrette for final design
3. Provide updates at Board of Selectman's Meetings and Town Hall
4. Notify and update community of cleanup schedule
5. Prepare informational materials and surveys to ensure community engagement

Anticipated Project Schedule: November 10, 2021 to December 2023

Task/Activity Lead(s): BRI and QEP

Outputs: CRP, ABCA, public notices, survey results, meeting minutes, handouts, news articles,

mailings, revised design concepts
<p>Task Activity: 3. Cleanup Activities</p> <p>Project Implementation: The following EPA-funded activities will be performed to cleanup and redevelop the site:</p> <ol style="list-style-type: none"> 1. Prepare Remedial Action Plan (RAP) and receive NHDES Notice of Approved Remedial Action Plan (NARAP) 2. Prepare Site-Specific Quality Assurance Project Plan (SSQAPP) 3. Finalize Bid Specifications 4. Remediation and removal of contaminated soil above 4,000 mg/kg 5. Consolidation/re-grading of soils meeting final design 6. Site restoration and installation of engineered barrier systems <p>Anticipated Project Schedule: May 15, 2023 to October 15, 2023</p> <p>Task/Activity Lead(s): QEP</p> <p>Outputs: NARAP, SSQAPP, Bid Specifications, Daily Reports, Certified Payrolls, Davis-Bacon Interviews, Disposal Documentation</p>
<p>Task Activity: 4. Coordination and Final Reporting</p> <p>Project Implementation: The following non-EPA-funded and EPA-funded activities will be performed following completion of cleanup activities:</p> <ol style="list-style-type: none"> 1. Coordinate with regulatory agencies 2. Submit Remediation Summary Report for NHDES Certificate of Completion 3. Prepare and implement institutional controls (i.e., deed covenant) <p>Anticipated Project Schedule: October 15, 2023 to March 31, 2024</p> <p>Task/Activity Lead(s): QEP</p> <p>Outputs: Remediation Summary Report, Certificate of Completion from NHDES, Deed Covenant</p>

The proposed tasks and associated budgets are included in the following summary table:

Budget Categories		Project Tasks (\$)				Total
		Coop. Agreement Oversight	Community Involvement	Cleanup Activities	Coordination and Final Reporting	
Direct Costs	Personnel					
	Fringe Benefits					
	Travel					
	Equipment					
	Supplies		\$ 3,000			\$ 3,000
	Contractual		\$ 5,000	\$ 557,000	\$ 5,000	\$ 567,000
	Other 5% total project cost in-kind match	\$ 10,000	\$ 10,000		\$ 10,000	\$ 30,000
Total Direct Costs		\$ 10,000	\$ 18,000	\$ 557,000	\$ 15,000	\$ 600,000
Indirect Costs						\$ -
Total Federal Funding				\$ 500,000		\$ 500,000
Cost Share		\$ 10,000	\$ 18,000	\$ 57,000	\$ 15,000	\$ 100,000
Total Budget		\$ 10,000	\$ 18,000	\$ 557,000	\$ 15,000	\$ 600,000

Task I: Cooperative Agreement Oversight: This task will include \$10,000 cost-share for programmatic management of the grant including procuring a QEP, quarterly reports, ACRES

updates, and MBE/WBE reporting. It is estimated BRI will provide grant management oversight and QEP coordination as an in-kind service at an estimated amount of \$10,000 (200 hours at \$50/hr.).

Task II: Community Involvement: It is estimated that \$18,000 will be necessary to facilitate public, and community volunteer/partner meetings. This includes a \$10,000 cost-share from BRI, (200 hours at \$50/hr.), and \$5,000 QEP time (100 hours x \$50/hr.) plus \$3,000 marketing supplies to finalize the ABCA and prepare the Community Relations Plan, QAPP and VCP documents (i.e. NHDES Brownfields Covenant Not To Sue application), community outreach, and participate at public meetings.

Task III: Cleanup Activities: Preliminary estimates indicate approximately \$557,000 will be necessary for the abatement, excavation and disposal of hazardous materials, and soil cap installation. We have allocated \$185,606 contractual for excavation and disposal services, \$191,716 for soil capping services, \$82,678 for scope and bid contingencies, and \$97,000 for engineering services. BRI will contribute a cost-share of \$57,000 of the total direct expenditure.

Task IV: Coordination and Final Reporting: BRI will coordinate with the QEP on all required communications reporting with the EPA and NHDES including a remediation summary report. We estimate BRI time at \$10,000 (200 hours at \$50 per hour) cost share and \$5,000 QEP time (100 hours x \$50/hr.) to complete all project communications a reporting.

d. Measuring Environmental Results

If awarded the grant, the BRI will prepare a Cooperative Agreement Work Plan that will outline the overall project schedule, project budget, identify various work tasks, benchmarks, and milestones that will be tracked and measured during grant implementation. A QEP will be procured and be responsible for ensuring that all work is compliant with State and Federal guidelines including Davis-Bacon compliance. The BRI and QEP, and any cleanup contractors will be in constant contact throughout the project to ensure the project remains on schedule to achieve the desired outcomes. The mechanism for tracking, measuring, and evaluating progress and achieving program outcomes will be through our quarterly EPA reports and regular updates in the EPA ACRES database. Connecting outputs to our work plan will provide a link to the results of grant funding within EPA's strategic plan as well as demonstrate to Congress the tangible results of a successful Brownfields grant program.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic capability

i. Organizational Structure

BRI is a community-based, economic development group with federal grant management experience. The BRI team is staffed by members of the Board, collaborating on all key project decisions, and structured as follows:

ii. Description of Key Staff

President (PG) has leadership management for all BRI's business activities. The President is a life-long resident of Bethlehem and a successful business owner regionally.

Vice President (ER) reports to the President and executes all day-to-day operational and financial activities agreed to by the Board including planning and executing against project goals, financial reporting and recordkeeping. The Vice President has thirty years of management experience in manufacturing, management consulting and biotechnology industries.

Board Member (MMG) works closely with the Vice President as a key operational and technical expert who drives project activities forward in concert with established goals and

priorities. Board Member (MMG) is Executive Director of North Country Council Regional Planning Commission and Economic Development District serving 50 communities and 25 unincorporated places in the northern third of New Hampshire working in an advisory role to local governments in order to promote coordinated planning, orderly growth, efficient land use, transportation access, and environmental protection, including Brownfields.

Board Member (LA) works closely with the President and Vice President on all financial/legal matters. Board Member (LA) is an internationally recognized attorney and twenty-five-year partner of a prestigious law firm practicing primarily in the areas of mergers and acquisitions, investment advisor and broker-dealer compliance, banking and finance.

Board Member (DL) works with the President and is expert on technical matters related to local zoning and town governance. Board Member (DL) is a life-long resident of Bethlehem and runs a successful local business.

Board Member (CK) works with the Board on all strategic and operational activities as well as real estate matters for BRI. Board Member (CK) is a licensed NH real estate broker, has over twenty years of corporate management experience and runs a nationally acclaimed Bed and Breakfast in Bethlehem.

iii. Acquiring Additional Resources

BRI has developed a robust network of professional, technical and operational expertise including marketing, public relations and fundraising support. In the case where additional expertise is required (i.e., QEP and environmental contracting), BRI utilizes competitive procurement process for obtaining needed expertise. This consists of a proposal review, receiving proposals from multiple firms, evaluating the firms based on established criteria, and awarding the contract to the firm that best meets those criteria.

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Nonfederal Assistance Agreements

(1) Purpose and Accomplishments

BRI was awarded a Rural Business Development Grant from the United States Department of Agriculture (10.351 RBDG). The purpose was to conduct a feasibility study and determine whether a new co-working business in Bethlehem was viable, sustainable and could improve the quality of our business community. The COVID pandemic nearly stopped the study, however we received extension approval from the USDA and pivoted the study design focusing on co-working “systems” vs. co-working “spaces” in an effort to better understand co-working in a post-pandemic world. We shared full study results with the Women’s Rural Entrepreneurial Network (WREN), an important local business group. Within months, WREN began repurposing a portion of their commercial space into desks and offices and now support a valuable venue for local and non-local professionals working and learning remotely.

(2) Compliance with Grant Requirements

BRI operated in full compliance with grant requirements including all planning, performance against goals and scheduled updates and financial reporting. The study was completed in approximately eighteen months and there were no issues associated with our performance for this grant. Consultant invoices were paid on time and related expense reimbursements from the USDA to BRI were promptly approved and paid.