

**COMMUNITY RELATIONS PLAN
PORTLAND HOUSING AUTHORITY
37 AND 63 FRONT STREET
PORTLAND, MAINE**

Prepared for:

Portland Housing Authority
14 Baxter Boulevard
Portland, Maine

Prepared by:

Ransom Consulting, LLC
400 Commercial Street, Suite 404
Portland, Maine 04101
(207) 772-2891

Project 191.06103
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1.0 OVERVIEW OF THE COMMUNITY RELATIONS PLAN

The Portland Housing Authority (PHA) has been awarded U.S. Environmental Protection Agency (U.S. EPA) Brownfield Cleanup Grant #BF00A00517 for environmental remediation and cleanup of the property located at 37 and 63 Front Street in the City of Portland, Cumberland County, Maine (the “Site”). PHA has also received a Brownfields Cleanup Revolving Loan Fund (RLF) Subgrant from the Portland Development Corporation, who are administering a Brownfield RLF Program under Agreement Number BF00A00199-1. PHA plans to replace the existing 50 apartment units with a new multi-family apartment project containing a total of 105 new apartments in five separate buildings. The project will provide a mix of affordable and market-rate apartments focusing on integrating the residents into the existing neighborhood.

The purpose of this Community Relations Plan (CRP) is to describe the PHA’s strategy to address the needs and concerns of the community, residents, and stakeholders who may potentially be affected by the proposed remediation and redevelopment at the Site. This CRP outlines how the PHA has involved, and will continue to involve, affected residents, City officials, and local organizations in the proposed cleanup and redevelopment activities at the Site.

Active residents and community organizations (COs) involved in neighborhood and/or local community issues are important resources for the success of the CRP because they have an understanding of the Site area and they hold positions of responsibility within the community. The Project Team regards these citizens as key points of contact and communication. The long-term success of the redevelopment of the Site will be enhanced by informed citizen involvement during each step of the cleanup and redevelopment process.

2.0 SPOKESPERSON AND INFORMATION REPOSITORY

The primary spokesperson for this project is Jay Waterman, Development Director for the PHA; and the secondary spokesperson for this project is Stephen Dyer, Senior Project Manager for Ransom Consulting, LLC (Ransom), the PHA's Qualified Environmental Professional (QEP). Contact information for these individuals is as follows:

Jay Waterman, Director
14 Baxter Blvd, Portland, ME 04101
Phone: 207-221-8009
Email: jwaterman@porthouse.org

Stephen Dyer, Senior Project Manager
400 Commercial St., Suite 404 Portland, Maine 04101
Phone: 207-772-2891
Email: stephen.dyer@ransomenv.com

The information repository for this project, including the environmental assessments, remediation plans, and other environmental information is located at the PHA office. Due to the current coronavirus pandemic, access to the PHA offices are restricted and controlled, and the preferred method for review of these documents is via the PHA website: <https://www.porthouse.org/>. However, if necessary, the information pertaining to this project can be provided by contacting PHA's offices Monday through Friday, from 9:00 a.m. until 4:00 p.m. (closed noon to 1 p.m.).

Portland Housing Authority c/o Jay Waterman
14 Baxter Boulevard, Portland, Maine 04101
Phone: 207-221-8009
Hours: Monday through Friday, from 9:00 a.m. to 4:00 p.m. (closed noon to 1:00 p.m.)

Under Maine's Freedom of Access Law and Maine Department of Environmental Protection (MEDEP) policies, copies of environmental assessments, remediation plans, and other environmental information submitted to the Voluntary Remedial Action Plan (VRAP) Program is available at the MEDEP. Due to the current coronavirus pandemic, the MEDEP offices are currently not open to the public. Information regarding this project can be provided by the MEDEP Project Manager identified below:

MEDEP, Attn: Mr. Ted Wolfertz, Brownfields Project Manager
17 State House Station, Augusta, Maine 04333-0017
Phone: 207- 629-8130
Email: ted.wolfertz@maine.gov

Copies of environmental assessments, remediation plans, and other environmental information may also be obtained from Ransom Consulting, LLC by contacting the Project Manager identified below:

Stephen Dyer, P.E.
Ransom Consulting, LLC
400 Commercial Street, Suite 404, Portland, Maine 04101
Phone: 207-450-5474
Email: stephen.dyer@ransomenv.com

Due to social distancing orders in place as a result of the coronavirus pandemic, a public meeting will be held via Zoom Video conferencing. A link to the Zoom Video Call will be provided in the public meeting notice and will be advertised in accordance with procedures outlined in **Section 5.1**.

3.0 SITE DESCRIPTION

3.1 Site Description and Setting

The Site consists of two adjoining properties, comprising approximately 3.94 acres, located at the northeast and northwest corners of the intersection of Front Street and West Presumpscot Street in the City of Portland. The Site is located in a primarily residential area of Portland, provided with municipal sewer and water service. The property is currently occupied by a public housing complex and associated grounds, which are owned and operated by the PHA. The Site is currently improved with 19 buildings (the "Site buildings"), which include 18 multi-unit residential buildings, and one building used as a community center and for facilities equipment storage purposes. A Site Location map is provided as **Figure 1**.

Prior to circa 1956, the Site existed as undeveloped land, and consisted of tidal flats of Hansom's Creek and Back Cove before being filled with debris to allow for development. Beginning circa 1956, the Site was improved by a single building, which appears in historic aerial photographs to be a barn. The Site was redeveloped in 1971, for its current use as the Front Street Apartments complex, which are owned and managed by PHA. Surrounding properties have been utilized for residential purposes dating back to the 1800s. Refer to **Figure 2** for Site features.

3.2 Future Site Use

The proposed future development of the Site includes demolition of the existing Site structures, and construction of seven new residential apartment buildings. The proposed redevelopment will occur in three phases. Phase I will involve redevelopment of the eastern portion of the Site (identified as 37 Front Street) with four new buildings including 60 residential units and a community center space. Phase II will involve redevelopment of the southwestern portion of the Site (identified as 63 Front Street) with one building including 45 residential units and a community center space. Phase III of the project will include redevelopment of the northern-central portion of the Site with two buildings including 8 residential units. Portions of the property not occupied by the residential buildings will consist of landscaped lawn areas and paved parking and driveway areas.

3.3 Nature of Threat to Public Health and the Environment

The following previous environmental assessments, investigations, and cleanup plans have been completed for the Site:

1. "Phase I Environmental Site Assessment, Front Street Apartments, 37 and 63 Front Street, Portland, Maine," prepared by Ransom Consulting, Inc., dated January 25, 2016;
2. "Preliminary Environmental Testing Results, Front Street Redevelopment, 37 and 63 Front Street, Portland, Maine," prepared by Ransom Consulting, Inc., dated September 16, 2016;
3. "Limited Subsurface Environmental Assessment, Front Street Apartments, 37 and 63 Front Street, Portland, Maine," prepared by Ransom Consulting, Inc., dated October 24, 2016;

4. “Preliminary Hazardous Building Materials Inventory, Front Street Apartments, 37 and 63 Front Street, Portland, Maine,” prepared by Ransom Consulting, Inc., dated September 16, 2016;
5. “No Action Assurance Letter – Voluntary Response Action Program,” prepared by the MEDEP, dated January 29, 2018; and
6. “Analysis of Brownfields Cleanup Alternatives & Conceptual Remedial Action Plan, Front Street Apartments, 37 and 63 Front Street, Portland, Maine, Rev. 0” Prepared by Ransom, dated June 17, 2020.

Copies of these reports are available in the information repository (see Section 2.0).

These historic environmental investigations have identified environmental conditions which require cleanup actions, including the fact that surficial and potentially-accessible soils throughout the Site contain urban fill materials that include concentrations of arsenic, lead and polycyclic aromatic hydrocarbons (PAHs) which exceed the October 19, 2018 MEDEP Remedial Action Guidelines (RAGs) for the “Residential” exposure scenario, and currently represent an exposure risk to future residential occupants and construction workers. Depth of fill ranges from 8 to approximately 14 feet bgs.

Additionally, asbestos was determined to be present in certain building materials associated with the Site Buildings. No lead-based paint or polychlorinated biphenyls (PCB) materials were identified. The previous hazardous building materials survey was limited both in scope, as well as in inspection and sampling techniques, therefore, it does not constitute a fully compliant pre-demolition survey under MEDEP or U.S. EPA requirements. Prior to initiating demolition activities, each interior area must be inspected for materials not previously encountered, as well as to further quantify and delineate the already-identified asbestos containing materials. All asbestos containing materials will require abatement and proper disposal prior to any building demolition or renovations.

3.4 Proposed Cleanup Plan

Ransom prepared an Analysis of Brownfields Cleanup Alternatives & Conceptual Remedial Action Plan (ABCA/RAP) to evaluate potential cleanup alternatives for the Site (this document is included in the information repository for the Site). Based on the potential exposure pathways identified for the Site, the remedial actions proposed for the Site will minimize the potential for direct contact, incidental ingestion, or inhalation of contaminated soils located throughout the Site; and eliminate the potential for human exposure to hazardous building materials.

The ABCA recommended a remedial plan which included: removal and abatement of hazardous building materials prior to demolition of the current Site buildings; the construction of engineered cover systems across the entire Site to prevent human contact with the impacted surficial soils; and targeted soil excavation in the area of proposed building foundation footings and subsurface utilities to abate contaminated subsurface soils and prevent worker exposure to contaminants during redevelopment. Additional institutional controls will also be implemented to ensure that future construction, remediation, or landscaping at the property would not disturb the engineered cover systems or underlying residual contaminated soil. These would likely include Deed Restrictions, a Soil and Groundwater Management Plan, and a Post-Closure Cover System Maintenance Plan.

4.0 COMMUNITY AND SITE BACKGROUND

The City of Portland is Maine's most populous city, with approximately 67,000 people, and the Greater Portland metropolitan area is home to over half a million people, more than one-third of Maine's total population. Portland was founded in 1623 and permanently settled in 1632 as a fishing and trading village named Casco. Portland is Maine's economic center, with an economy that relies on the service sector and tourism. Marine industry still plays an important role in the city's economy, with an active waterfront that supports fishing and commercial shipping. The Port of Portland is the largest tonnage seaport in New England.

The Front Street Site is located in the East Deering neighborhood of Portland, adjacent to Back Cove and Payson Park. In the early 1900's, the area between Front Street and Back Cove, including portions of the Site, were completely covered by the waters of Back Cove. In the early and mid-1900s, the area of the Site was filled to facilitate development; as was typical at that time, brickyards and quarries provided fill material, and urban fill was a commonly used affordable media for filling large areas of land. Historical information reviewed during the Phase I ESA and later confirmed during the Phase II ESA indicted that portions of the Site were also used as a city dump.

The Front Street Housing Complex was constructed in 1971 as part of Portland's Urban Renewal effort; at that time, over 200 blighted residential structures in Portland's Bayside neighborhood were taken by eminent domain and demolished to facilitate the construction of office buildings, public housing and parking garages in an effort to improve the Bayside neighborhood and make the City of Portland more economically viable. Many of the families that were displaced during this urban renewal project were moved to "temporary housing" in the Front Street Housing Complex at the Site. Forty-nine years later, this "temporary housing" is still being used to house displaced and at-need populations. The Front Street Housing Complex was identified in PHA's 2015 Strategic Vision Plan as the top priority for redevelopment. A 2012 Physical Needs Assessment completed by PHA concluded that the Site buildings are at the end of their useful life.

5.0 COMMUNITY INVOLVEMENT

5.1 Public Meeting and 30-Day Public Comment Period

In an effort to involve the community and address potential concerns, PHA will initiate a 30-day public comment period. As part of the public comment period, a public meeting will be held to outline the proposed cleanup activities at the Site. Due to the public health concerns associated with the current coronavirus pandemic, the public meeting will be held via Zoom Video conference. Provisions for telephone call-in to the meeting will be provided.

The public Video-conference meeting will be scheduled once the final/updated ABCA has received review and approval by the U.S. EPA and MEDEP. The purpose of the public meeting will be to discuss the general Brownfields process, the results of site assessment work completed to date, the recommendations of the ABCA, the proposed cleanup actions, and the potential benefits of Brownfield site redevelopment. The PHA and project stakeholders will also solicit input from the public on their concerns and desires for the Site.

The public meeting announcement and availability of the ABCA will be advertised in the local newspaper (Portland Press Herald). The advertisement will also include information on how to access the public meeting videoconference. This legal advertisement will announce the start of the 30-day public comment period on the remedial alternatives presented in the ABCA for the Site.

5.2 Accommodations

The ABCA will be translated from English to other languages, if requested. While 96% of Portland's population speaks English, the Front Street neighborhood represent a more diverse group of languages. At the public Video-conference, the PHA will accommodate those who speak languages other than English and/or may have hearing/reading impairments (such as the elderly and the disabled), by providing translators, and providing access to assistive technologies such as teletypewriter relay (TTY) services as needed.

5.3 Key Community Concerns

The PHA and the rest of the Project Team believes community concerns are valuable and do not take them lightly. The Project Team looks forward to getting feedback from the community and taking these concerns into account when finalizing cleanup and redevelopment plans and throughout construction.

6.0 CONTINUED COMMUNITY INVOLVEMENT

PHA and its Project Team will work to provide continued community involvement for the project. The U.S. EPA and MEDEP have previously provided regulatory oversight and guidance and will continue to oversee and provide supplemental guidance during the proposed Brownfields cleanup activities. Additionally, the City of Portland may provide oversight and guidance during proposed abatement activities at the Site.

Public notices will be placed in the Portland Press Herald and on the PHA's website announcing the intended and ongoing cleanup activities at the Site and to notify residents of the public Video-conference meeting regarding the cleanup efforts. Public notices will also announce that the information repository on this project, including the environmental assessments, investigations, cleanup plans, and other environmental information, is available for review by contacting PHA and/or Ransom.

In conformance with the Brownfields Cleanup Grant requirements, the public notice of the public Video-conference meeting will also announce that the information repository for this project, including for environmental assessments, ABCA / RAP, and other project information (meeting minutes, etc.), is located on PHA's website.

Public comments regarding the project can be submitted during the public Video-conference meeting or directly to Jay Waterman, Development Director of the PHA, via email or regular mail utilizing the contact information found in Section 2 of this CRP.

7.0 PROJECT SCHEDULE

The following schedule presents the tentative or proposed timeline related to the public outreach and involvement for the proposed cleanup at the Site:

June 2020 – PHA and Ransom submit the Community Relations Plan for review and approval.

June 2020 – PHA will announce notice of availability of the ABCA and other environmental reports/project documents for public review to be maintained within the information repository for the Site. A legal/public notice announcing the availability of plans/environmental documents for the Site and the scheduled public meeting will be published in the local paper (Portland Press Herald) as well as the PHA website.

July 2020 – PHA will hold a public Video-conference meeting to present the proposed cleanup plans and solicit comments.

Fall 2020 – Completion of final permitting, work plans, construction design, and bid specification package, and solicitation of competitive cleanup construction bids.

Fall 2020 – Select a cleanup contractor(s), and the construction project begins.

Winter 2020 – Complete soil removal activities and begin construction of multi-unit buildings.

Spring/Summer/Fall 2021 – Apartment building construction including construction of the soil cover system.

Please note that this schedule has inherent flexibility and it may be modified or negotiated at the request or direction of PHDC and the rest of the Project Team, in order to accommodate the potential to dovetail final cleanup actions with proposed Site restoration activities. Periodic public notices will be published in local newspapers and on the PHA website regarding the overall project status and/or changes to the proposed project schedule, as necessary.