



BILLERICA PLANNING and COMMUNITY DEVELOPMENT

R01-24-A-012

Town Hall
365 Boston Road Billerica, MA 01821
978-671-0962

Narrative Information Sheet

IV.D. Narrative Information Sheet

1. Applicant Identification

Town of Billerica, Massachusetts
365 Boston Road
Billerica, MA 01821

2. Funding Requested

- a. Assessment Grant Type. The Town is seeking a *Community-Wide Assessment Grant*.
- b. Federal Funds Requested. The Town is requesting **\$500,000**.

3. Location

The Town of Billerica is located in Middlesex County in the state of Massachusetts.

4. Target Area and Priority Site Property Information

The Target Area within the Town of Billerica is North Billerica, and it includes our historic mills and Middlesex Canal area. The Census Tract is:

- 3165

5. Contacts

Project Director: Erika Oliver Jerram, AICP
(978) 671-0962
ejerram@town.billerica.ma.us
365 Boston Road, Rm 105
Billerica, MA 01821

Chief Executive: John Curran
(978) 671-0942
jcurran@town.billerica.ma.us
365 Boston Road, Rm 207
Billerica, MA 01821

6. Population

Town wide: 42,119
Target Area: 5,877

7. Other Factors

The Town of Billerica claims other applicable factors as identified in the table below, to include priority site(s) being adjacent to a body of water and within a federally designated flood plain; that reuse of the priority site(s) will facilitate renewable energy and incorporate energy efficient measures with consideration of climate adaptation; and that at least 30% of the budget will be spent on eligible reuse-area-wide planning activities.

Factors	Narrative Page #
Community population is 10,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The priority site(s) is impacted by mine-scarred land.	n/a
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 5, 6
The priority site(s) is in a federally designated flood plain.	1, 5
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2, 3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3 (MA Stretch code), 4
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	1, 3, 6
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	n/a
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	n/a

8. Letter from the State or Tribal Environmental Authority

See attached letter from State of Massachusetts.

9. Releasing Copies of Applications

N/A. This application does not contain confidential, privileged, or sensitive information.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

November 3, 2023

Via Email

Erika Oliver Jerram
Director of Planning and Community Development
Town of Billerica
365 Boston Road
Billerica, MA 01821

**RE: STATE LETTER OF ACKNOWLEDGMENT
Town of Billerica
*Brownfields Community-Wide Assessment Grant***

Dear Ms. Jerram:

I am writing to support the application submitted by the Town of Billerica under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. We understand that the Town is currently undertaking several assessment projects to promote redevelopment across the community. EPA funding will facilitate Brownfields redevelopment by providing resources to assess properties, conduct cleanup planning and redevelopment planning at properties where actual and perceived contamination exist that inhibit potential future development within the Town's target areas.

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

We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.

Sincerely,

David Foss, CPG, LSP

Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Dorrie Paar, US EPA
John Curran, Town Manager
Joanne Fagan, MassDEP Northeast Regional Office

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area: The Town of Billerica, Massachusetts lies twenty miles northwest of Boston. Billerica, a suburban community of 42,119 people is the original home of Thomas Ditson, who was the inspiration for “Yankee Doodle.” Its proximity to Boston and the regional highway system has driven postwar suburban growth in the past half century. However, the community has an industrial legacy, centered around the historic Talbot and Faulkner Mills and the early 20th century rail maintenance facility at Iron Horse Park, a superfund site. The **Target Area** (US Census Tract 25017316500) is in the northern part of Town, bisected by the Concord River and the active commuter rail line, and has high rates of poverty and an industrial legacy. The area has many vacant, blighted, underutilized, and abandoned properties; a higher percentage of low-income, minority, and non-English-speaking populations; concentrated industrial uses; high profile contaminated sites; 277 identified, known release sites with the Massachusetts Department of Environmental Protection (MassDEP) and many other sites with suspected or confirmed contamination. The blighted and unattractive area surrounding Iron Horse Park is seen as dangerous. Retail businesses struggle to attract a customer base and developers have difficulty finding shovel-ready sites that suit their needs.

The historic industrial core of the Target Area has largely been left out of the region’s economic growth and is home to Billerica’s most vulnerable, sensitive, and underserved populations. Over 81% of the Target Area meets **Environmental Justice (EJ)** threshold criteria for concentrations of minority populations and poverty¹. Additionally, though Billerica unemployment is currently at 3.4%, the town has lost over 2,000 jobs since its pre-pandemic high, including major companies like Raytheon. Housing costs are at record highs and almost 47% of rental and 31% of owner households are rent burdened (rent > than 30% of income²). According to the *EPA EJScreen Tool*, North Billerica is in the 60th or higher percentile for diesel particulate matter, air toxics, cancer risk, traffic proximity, and 70th or higher percentile for lead paint, RMP Facility proximity, hazardous waste and superfund proximity, underground storage tanks, and wastewater discharge. In addition, the Town’s industrial legacy created many potential Brownfields in the Concord and Shawsheen Rivers floodplains, where reoccurring flooding is expected to worsen due to climate change. The flooding, coupled with blight and disinvestment, has contributed to poor property values and a diminished tax base. Disinvestment is furthered by owners who are unaware, unable, or unwilling to undertake environmental assessments on their sites. Many owners in this Environmental Justice community run low-margin businesses or are members of a minority group who cannot afford the cost of assessment and remediation or may be hesitant to investigate. Contamination raises redevelopment costs, compounding site deterioration and negatively impacting nearby properties. Addressing the environmental legacy with this grant will spur investment that raises property values and addresses sustainability and stormwater.

ii. Description of the Priority Brownfield Site(s): Of the Town’s hundreds of known release sites, more than half are in the northern part of the Town. ***Target Area Sites have been prioritized by the Town and community due to having the greatest potential to be assessed and redeveloped*** to meet the community’s vision for equitable growth, including transit-oriented development (TOD), mixed-use, and climate resiliency efforts while serving its vulnerable populations. Brownfields range from small <1 acre parcels to large former mills, railyards, gas stations, junkyards, and others that are contaminated with volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), metals (lead and arsenic),

¹ *MA EJ Information*: <https://www.mass.gov/environmental-justice> identifies block groups that have high minority populations (>40%), low median household incomes (25% of households < 150% of MA median),

² <http://www.housing.ma/billerica/report> - generated by the Metropolitan Area Planning Council from 2020 Census and ACS data

petroleum, as well as hazardous building materials (HBM), including asbestos, lead-based paint (LBP) and polychlorinated biphenyls (PCBs). The Target Area community is exposed to these substances every day. All sites require Phase I/II Environmental Site Assessments (ESAs) and cleanup/reuse planning activities to implement the Town’s revitalization vision for the Target Area.

Priority Site	Historic / Current Use	Potential / Known Environmental Risk & Activities Required	Planned Reuse / Priority Need
**176-184 Boston Road 1.40acres (5,597 Sq. Ft.)	Abandoned gas station & vacant strip club	Petroleum/Metals/PAHs/VOCs Phase I / II ESA & Reuse Plan	Mixed-use w/ housing
*Jack’s Auto Salvage – 24 Town Farm Lane 25.4 acres (15,000 Sq. Ft.)	Auto salvage yard & adjacent industrial uses	Metals/VOCs/PAHs/PCBs adjacent to Concord River Phase I / II ESA & Reuse Plan	Ind / Commercial with open space / trail along river
** Faulkner/Talbot Mills – 1 Old Elm & 71 Faulkner 126.2 acres (353k Sq. Ft.)	Former textile mill and dyeworks, current metal die-casting facility	VOCs/SVOCs /Metals/Petroleum, on Concord River, adjacent to neighborhoods Phase I / II ESA – Cleanup/Reuse Plan	TOD / MBTA Communities-Affordable Housing Middlesex Canal Trail
*Holland Used Auto Parts (junkyard) - 1 Winning Rd 13.7 acres (3,656 Sq. Ft.)	Auto salvage yard	Metals/VOCs/PAHs – Adjacent to State Forest & conservation land / Residences – Phase I/ II ESA, etc.	Solar/Renewable Energy, Open Space & Trails (adj. to state park)
*Station Street/Letchworth Ave/Billerica Ave (mostly state/municipal owned) 24.2 acres (~13k Sq. Ft.)	Underutilized parking lot properties adjacent to active rail line	PAHs/Metals/ PCBs/Pesticides Adj. to Concord River and Residences - Phase I/II ESA and Cleanup / Reuse Planning	TOD / MBTA Communities-Affordable housing / TOD / mixed use

*** Located in Commonwealth of Massachusetts EJ Area*

** Adjacent to Commonwealth of Massachusetts EJ area*

iii. Identifying Additional Sites: Using GIS, MassDEP, Assessor, and other data, the Town will use the grant to update its inventory of potential sites, ranking each by a series of weighted criteria to both identify and prioritize potential assessments and/or cleanup and reuse planning using the same criteria as the initial inventory. Criteria will include perceived and/or actual environmental concerns and health risks, community needs, redevelopment potential, potential impact/benefits to underserved communities, tax title takings, EPA Brownfields eligibility and access, location (e.g. near transit) and input from the community. Properties in or near underserved, EJ, and/or disadvantaged communities will be weighted more to indicate the larger proportional impact of redevelopment.

1.b Revitalization of the Target Area

i. Reuse Strategy & Alignment with Revitalization Plans: This grant will support the Town’s goal to redevelop industrial, mixed use, and housing in North Billerica, consistent with *the 2018 Master Plan*, and the *2021 Housing Production Plan*. These plans called for mixed use development along Boston Road, Billerica’s main spine and intensification of commercial and industrial uses – focusing on flex and lab space for pharmaceutical and other high-tech manufacturing close to Billerica’s highway exits. The Town is also actively pursuing several trail projects, including the *proposed Middlesex Canal Trail*, identified in the *2018 Open Space and Recreation Plan*. The Town also established the *Mill Conversion and Reuse Overlay District* to incentive reuse of the Faulkner and Talbot Mills. This grant will also be a catalyst to advancing land use and revitalization plans associated with meeting the Town’s housing capacity requirements as part of the *state’s new MBTA Communities law*³. The law requires communities served by commuter rail, subway, or bus to pass zoning that allows 15 units per acre by right near the

³ Massachusetts Bay Transit Authority (MBTA) Communities Law: <https://www.mass.gov/info-details/multi-family-zoning-requirement-for-mbta-communities>

transit station. This grant could help leverage this law to build housing in walkable neighborhoods, closer to transit.

ii. Outcomes & Benefits of Reuse Strategy: The impact of brownfields in our Target Area stems from a long-term downward spiral of disinvestment. Brownfields funding will be a catalyst for redevelopment. New development will follow MA “stretch code”⁴ requirements for energy efficient building and newer stormwater regulations. Targeted outreach within the identified Target Area will demonstrate that government agencies can help and be trusted. Assessments will clear the way for cleanup so redevelopment can begin to occur, increasing employment, stimulating economic development, as well as recreational and housing opportunities and decreasing exposure risks to contaminants, thus improving the target community’s health and wellbeing.

Assessments will bring greater attention to the Target Area, improving welfare and quality of life. Even a small amount of investment can remove the stigma in this EJ Target Area and spur revitalization. Investment raises property values, removes blight and improves aesthetics, increases the local tax base, and decreases illegal dumping and crime. A benefit of redeveloping brownfields is that it allows for sustainable and climate resilient land reuse. Reuse can provide much needed open space and connectivity – contributing to improved land, air and water quality and accommodating additional stormwater capacity, provide shade, and reduce heat island effects. Converting brownfields sites into the proposed Middlesex Canal Trail provides access to recreation/exercise in disadvantaged areas and reduces exposure to contaminants. Where wetland habitats are impaired, BMPs and green infrastructure can reduce stormwater runoff by 80% and renewable energy use such as solar energy, and EV charging stations, can help slow climate change. As the Target Area is located within a 15-minute walk to the train station, infill and walkable mixed-use redevelopment will contribute to improved air quality via reduced auto dependency and traffic congestion.

1.c Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: This grant will leverage additional funding opportunities from other local, state and federal sources, as needed, to support the assessment, cleanup and/or reuse at priority sites. The Town will leverage EPA Assessment funds with the following resources:

Source	Purpose & Role / Amount / Status
<ul style="list-style-type: none"> ▪ MassDEP Natural Resource Damages Grants ▪ Mass Trails Grants ▪ LAND/PARC Grants 	State Grants for Open Space and Sustainability including Open Space and trails creation, Flooding control, Acquisition of target properties for flood storage, hazard mitigation, conservation and natural resource protection - \$400,000– <i>Potential, to be applied for at appropriate time. Annual applications</i>
EPA TBA Program and Clean Up Grants	If additional assessment is needed, Town can apply for site-specific TBA grants. \$500,000 - \$2M Cleanup grants – <i>Potential, apply for at appropriate time.</i>
Tax Increment Financing (TIF)/Economic Development Incentive Program (EDIP)	Town is an Economic Target Area (ETA) and has entered into at least seven (7) Tax Increment Financing (abatement) agreements, resulting in over \$207M in new investment & creating over 2,021 new jobs <i>Negotiated on as needed basis.</i>
MA Brownfields Redevelopment Fund	Up to \$250,000 for assessment and \$750,000 for clean-up. Property owners get zero-interest loans, the Town can access funds as grants. <i>Potential.</i>
Massachusetts Municipal Vulnerability Program (MVP)	Grants that support plans for climate change resiliency and adaptation action project implementation. Up to \$5M. <i>Potential, apply when appropriate.</i>
Municipal Tax Abatement Program	Authorizes the Town to negotiate back taxes with developers undertaking brownfields projects. <i>As needed, case by case.</i>

⁴ Massachusetts “Stretch Code”: <https://www.mass.gov/info-details/building-energy-code>

Community Compact Grant Program	Best Practices, Efficiency and Regionalism, Technical Assistance Grants to assist with specific local issues. <i>Value depends on project, rolling applications</i>
Housing Choice	Grants for infrastructure improvements for Housing Production. <i>up to \$250,000 annual applications through Massachusetts Community One Stop program.</i>

The Town will work with developers to leverage available funding such as: **MA Brownfields Tax Credit** (up to 50%); **Brownfields Redevelopment Access to Capital Program**; **MassBusiness Remediation Loans** (\$500,000-\$2,000,000); **Federal Brownfields Tax Deduction Program** (100% of costs).

ii. Use of Existing Infrastructure: The Target Area has full infrastructure, including water, sewer, electrical, natural gas, telephone, and broadband services including at Priority Sites with enough capacity to accommodate significant future growth. The Town has a recently upgraded sewer treatment plant and a long-term plan to sewer all neighborhoods and add redundancy. The Town has excellent transportation, including highway access; a commuter rail station in the Target Area that links to Boston, and bus access by the Lowell Regional Transit Authority which provides accessible public transportation through Billerica to additional job centers in Lowell and Burlington, MA.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

i. The Community’s Need for Funding: To implement plans and actively assess, remediate, and redevelop brownfields, the Town is in critical need of funding from EPA. The EJ community of the Target Area does not have the financial means to carry out assessment activities or make the proposed reuse plans for the Target Area a reality by themselves. Low-income residents in the Target Area have limited resources and with inflation (6.5% in 2022), the costs for necessities continuing to rise, such as rent (12.8%), food (11.8%) and electricity (30%) in MA. The Town struggled to meet new public health, educational, and infrastructure needs since the COVID-19 pandemic. As stimulus money expires, municipal operating budgets will be cut, barely leaving funds for critical operations and services, restricting Town support for brownfields assessment. Illegal activity, including persistent illicit dumping and crime especially in the Target Area, strain municipal resources. In addition, the Town lost thousands of local jobs since the start of the pandemic – including manufacturing jobs – and the labor force has still not returned to its pre-pandemic high. As recent hot housing markets cool, higher foreclosure rates threaten to destabilize this area in a domino effect of disinvestment. The COVID-19 pandemic also left many small and medium-sized businesses struggling or closed – especially in the Target Area. Vacant buildings and lower than expected water/sewer usage have strained town revenues while increasing costs to implement new protocols.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The concentration and inequitable distribution of brownfields in the Target Area harms the health and welfare of the target community, which is home to Billerica’s most sensitive and underserved populations. There is a concentration of residents who are minority (16% compared to the Town overall at 9%)⁵ or in poverty. The foreign-born population in North Billerica is 15.4% compared to 13%, and 27% speak a language other than English compared to 15% townwide⁶. The most prevalent languages after English are Portuguese, Spanish and Gujarati. The elderly population comprises 18.5% (16.1% townwide) of the Target Area.

Property values are depressed due to dilapidated brownfields. There are major gaps in alternative transportation modes and access to goods/services/jobs due to the saturation and proximity of brownfields

⁵ 2020 US Census Data

⁶ 2020 US Census Data

to residents. Welfare is further diminished by low income and educational attainment rates, and an illegal dumping problem the Town has struggled to address. Reduced contaminant exposure, cleaner air, less traffic, more open space, and physical activity resulting from improvements to our Target Area through the resources leveraged by this grant will improve the overall health and wellbeing of Target Area residents, reduce asthma emergency room visits, obesity, and other chronic diseases. Investments to pre-1970 housing and creation of new housing will decrease lead exposure and provide safe housing options for underserved communities. Reactivating underutilized spaces creates a cohesive street network, encourages bicycling/walking, and improves access to transit and amenities.

(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: According to the 2022 Greater Lowell Community Health Needs Assessment⁷ which measures health data across the region including Billerica and surrounding towns, the region has higher rates of death caused by lung cancer and chronic lower respiratory disease than the state or national levels. Lung cancer diagnoses have a rate of 57.7 diagnoses (per 100,000) nationwide and 60.9 statewide. The *region* is on par with the state incidences, while *Billerica* exceeds it by another 24%, or approximately 75 diagnoses per 100,000. Billerica ranks highest in the region for child cancer hospitalizations, and 2nd in the region for colon cancer, heart disease/stroke, and hospitalizations due to asthma. Sensitive populations in the *Target Area* have higher instances of asthma, cancer, COPD, and heart disease than the town as well as Middlesex County (see Table⁸ to right). Asthma, cancer, COPD, and heart disease, as well as obesity, and lack of exercise are key health impacts related to brownfields⁹. Many of these diseases can be traced back to contaminants, including VOCs, and PAHs found in the Target Area.

	Target Area	Billerica	Middlesex Cty
Asthma	10.4	10.4	9.90
Cancer	7.3	6.93	7.00
COPD	5.5	5.43	4.80
Heart Disease	4.8	4.57	4.7

In environmental health, 62% of Billerica’s homes were built prior to 1978 with increased exposure to lead. Stormwater runoff –increasing due to climate change – from homes, factories, junkyards, and other sites flow into the Concord River¹⁰. The town draws its drinking water directly from the Concord River, which runs through the Target Area and beyond and is in FEMA-designated floodplain. The regional study further found multiple violations of PFAS contamination in drinking water systems as recently as 2021, commonly associated with factories such as ours and the typical contamination they create. Air Quality Index ranges from 38 (good) to 57 (moderate), which pose hazards to asthmatic and other at-risk residents.

To better prevent, screen and treat cancer, the state of Massachusetts’s statewide Cancer Plan identifies the following goals, which Billerica can use this grant to advance: **Reduction of obesity**. The Town’s Master Plan and Open Space and Recreation Plan have identified the need for redevelopment of industrial properties into recreation opportunities. **Multilingual access to education materials**. The Town’s school-age families report speaking 51 different languages, and community outreach continues to be a need; **Reduction of environmental hazards**. The Town suspects contamination from our historic and current land uses are contributing to our greater than normal incidence of disease and adverse health conditions and we need assistance to assess and resolve this.

(3) Promoting Environmental Justice:

(a) Identification of Environmental Justice Issues. The dense and underserved neighborhoods surrounding Brownfields in the Target Area are a legacy of our industrial past, which left us with major

⁷ Greater Lowell Community Health Needs Assessment (2022) <https://www.lowellgeneral.org/news-and-media/publications/greater-lowell-community-health-needs-assessment/2022-greater-lowell-community-health-needs-assessment>

⁸ Source: CDC’s 500 Cities and Places Health Data 2023

⁹ US EPA EJ Screen tool – <https://www.epa.gov/ejscreen>

¹⁰ Concord River Watershed Report: <https://www.mass.gov/doc/suasco-2001-water-quality-assessment-report-concord-subwatershed-0>

environmental problems to address. However, these legacy neighborhoods are an asset, presenting opportunities for redevelopment and better quality of life for residents. EPA assistance can harness this potential and disrupt the vicious circle of negative impacts from brownfields and investment into the Target Area will start a virtuous circle of positive outcomes. Billerica’s northeast quadrant includes historic mills (1860s) and a former railyard (established in 1913). This area is upstream along the Concord River from the City of Lowell which is over 40% non-white and 17% of the population in poverty.¹¹ In addition to health impacts described above, this condition has resulted in lower property values and less economic opportunity for residents.

(b) Advancing Environmental Justice. There are two ways this grant will stimulate investment in the area without displacing existing businesses or residents.

Economic Benefits stem from investing in the Target Area which signals that local, state, and federal entities deem the Target Area a worthy investment. The Town has taken measures to bring more economic investment to this area, as highlighted earlier via rezoning and infrastructure investment. Target Area Priority Sites, within a 15-minute walk to the train station and bus hub and along Boston Road, are Billerica’s best option for increasing jobs, affordable housing, and access to alternative transportation. Many residents, young and old, prefer to live in walkable, transit-oriented, dynamic urban places and redeveloping these neighborhoods through adaptive reuse of existing buildings/sites takes advantage of existing infrastructure for sustainable growth, while also increasing access to services, recreational opportunities, and providing opportunities to mitigate the impacts of climate change. The Target Area will receive greater attention, and even a small investment can remove the stigma of blighted land, improve soil, groundwater and air pollution issues, eliminate food deserts, and raise property values. Neighbors will invest in their properties, improving aesthetics and decreasing illegal dumping and crime, demonstrating to all that people care about the neighborhood. Appropriate land uses will be encouraged to fill in brownfield gaps, with the goal of creating a walkable, sustainable, climate resilient and livable neighborhood, increasing public transit and access to goods/services/jobs.

Community Benefits include more open space and green infrastructure reiterating the Town’s vision for the Target Area. Reusing underutilized properties for greenspace ensures these residents receive more access open space. Long term visions include connecting the Middlesex Canal and intersecting rail lines in the Target Area into an “emerald” network, meeting open space and recreational access needs while improving non-vehicular access and public health. Secondary outcomes include low-income residents and owners becoming more educated on brownfields and strengthening their trust of government agencies.

2.b. Community Engagement

i. Project Involvement / ii. Project Roles: The Town intends to create a Community Engagement Plan as part of this grant and will include community members in the brownfields process. Representatives from local government, civic groups, community-based organizations, and Steering Committee members will be directly involved in planning and executing all community engagement. The following project partners that serve and represent the residents and businesses in the Target Area will assist with engagement and site identification, selection and assessment and cleanup/reuse planning decision making:

Organization / Point of Contact	Specific Involvement in the Program or Assistance Provided
<p>Billerica Housing Authority Robert M. Correnti, Executive Director bcorrenti@billericahousing.org 978-667-2175</p>	<p>Help identify and engage underserved populations, sharing information about brownfields and promoting feedback. Evaluate properties for future development as affordable housing. Assist in cleanup / reuse planning activities.</p>

¹¹ <https://www.census.gov/quickfacts/> (2022 estimates)

<p>Billerica Community Pantry Sandra Giroux, Board Member [REDACTED] (978) 357-7560</p>	<p>The Food Pantry serves hundreds of Billerica’s neediest families every week. They will help identify critical community needs and identify underserved and disenfranchised populations.</p>
<p>Shawsheen Technical High School Tony McIntosh, Superintendent tmcintosh@shawtech.org 978-671-3602</p>	<p>Educate the community about brownfields and inform students about potential career paths in assessment, remediation, and development. Obtain input on site selection, prioritization & cleanup / reuse planning activities. Provide public meeting space.</p>
<p>Greater Lowell Chamber of Commerce Danielle McFadden, President & CEO dmcfadden@greaterlowellchamber.org (978) 459-8154</p>	<p>Will publicize Brownfields meetings, project updates and redevelopment opportunities. Will assist in obtaining input on site prioritization & selection. Will help guide reuse planning and investment decisions and finding potential developers.</p>
<p>Northern Middlesex Council of Governments Jenny Raitt, Executive Director jraitt@nmcog.org 978-454-8021 x120</p>	<p>Provides technical assistance and support to the region, sharing best practices, identifying potential state and federal resources, special planning initiatives, and sharing data/resources to align local to regional plans. Assist in cleanup / reuse planning activities.</p>

iii. Incorporating Community Input: Town staff and the QEP will engage Target Area and community residents and solicit, consider, and respond to community input, including translation into Portuguese, Spanish, and Gujarati. Community involvement will include: **Steering Committee Meetings:** Regular meetings to select strategic sites for environmental assessments and/or cleanup planning and discuss community reuse alternatives. The committee will be composed of local government officials, non-profits, and community stakeholders. **Public meetings:** We intend to hold up to five (5) public meetings throughout the course of the grant, utilizing UCONN TAB services to help with Brownfields 101 education and to communicate project progress. Meetings will be hybrid (virtual and in person) when feasible to ensure maximum participation. The meetings will be held at different times during the day to accommodate working parents, the elderly and others. Recordings will be available online for those who were unable to attend. In-person meetings will be in handicapped accessible spaces with access to transit. **Targeted Mailings:** Program flyers and other educational/outreach materials. **Website:** Create brownfields site on Town webpage. **Social Media:** Facebook, Twitter, and Nextdoor to publicize meetings, project updates, redevelopment opportunities and successes. **Traditional Media:** when feasible, use local public access TV to share information and educate. **Surveys:** will be conducted to solicit community feedback and input on site selection, prioritization, and reuse. **Stakeholders:** There are three (3) target audiences for outreach: the general community, property/business owners, and the Target Area community. Since each group is reached in different ways, we will design a plan to maximize success in reaching all parties.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs:

i. Project Implementation / ii. Anticipated Project Schedule / iii. Task/Activity Lead / iv. Outputs:

<p>TASK #1 – COOPERATIVE AGREEMENT (C.A.) OVERSIGHT</p>
<p>EPA-funded activities: Management and execution of C.A. oversight activities: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); Procure and manage qualified environmental professional (QEP) per 40 CFR 31.36; Maintain financial records and complete drawdowns; Maintain project files and information repository; project coordination with stakeholders; Site Eligibility Determination Forms; compliance with Section 106 Historic Preservation Act, as applicable; execute access agreements with private property owners; quarterly Steering Committee meetings, ensure program remains on schedule/budget. Attend National Brownfields Conference. Non-EPA grant resources needed: Town to provide in-kind services of staff time for any oversight activities beyond those that have been budgeted.</p>

<p>Anticipated Project Schedule: Competitively procure QEP by 12/31/24. Kick off program January 2025. Quarterly Reports submitted within 30 days after end of each reporting period (Jan/April/July/Oct). Annual FFR and M/W/DBE reports submitted by October 30 of each grant year. ACRES updated when assessments are started/completed, new information becomes available and other major milestones. Quarterly Steering Committee meetings. Closeout report will be submitted within 90 days at end of C.A. period.</p>
<p>Task/Activity Lead(s): Town will lead this task in coordination with and assistance from the QEP, who will provide technical and programmatic assistance, including eligibility forms, QRs, ACRES.</p>
<p>Output(s): EPA Reporting (ACRES, 4 annual FFR & M/W/DBE reports, 16 QRs, Closeout Report), RFQ for and procure QEP, grant drawdown requests, eligibility determinations, executed access agreements, 16 Steering Committee Meetings, general C.A. oversight and 2 staff attend National Conference.</p>
<p>TASK #2 - COMMUNITY ENGAGEMENT</p>
<p>EPA-funded activities: Town will lead efforts to inform and engage the Target Areas, with a focus on input into the Assessment and Cleanup/Reuse Planning for Priority Sites. Outreach materials will be prepared for posting on Town’s website and social media platforms. Updates will be made to Town’s website to include Brownfield Assessment Program information. Town will create promotional materials to publicize meetings and ensure the Target Area residents are fully engaged, as well as broader community & stakeholders</p>
<p>Non-EPA grant resources needed: Town will provide in-kind services in the form of staff time and translation services, when feasible, for additional outreach activities beyond those that have been budgeted.</p>
<p>Anticipated Schedule: Outreach activities are expected to commence Winter/Spring 2025 and occur through 9/30/28. Survey Spring 2025. Town anticipates up to five (5) public meetings [one (1) Townwide preassessment ~ Spring 2025, 2-3 meetings with stakeholders in the Target Area post-assessment/pre reuse planning Fall 2025-Winter 2027, and one (1) Townwide at completion of grant activities Spring 2028].</p>
<p>Task/Activity Lead(s): Town will lead community engagement and translation activities, when feasible. QEP will provide support with technical expertise and other community outreach assistance, as well as assistance with identifying and prioritizing additional potential sites, if applicable.</p>
<p>Output(s): Community survey and outreach materials, flyers, website updates, public notices, public meeting presentation materials, email blasts, handouts, and coordination with project partners and stakeholders. Translation. 5 public meetings both in Target Community and general Town public. Documentation of feedback and input from the general public and reporting on the Town's response to this community input.</p>
<p>TASK #3 – PHASE I & PHASE II ASSESSMENTS</p>
<p>EPA-funded activities: Town, with assistance from QEP and input from community, will compile a Target Area and Town-wide brownfields inventory. The criteria used to prioritize and select sites is anticipated to include grant eligibility, access, community needs, redevelopment potential, and potential impact/benefits to underserved communities. Phase I Environmental Site Assessments (ESAs) will be completed in accordance with current ASTM Standard Practice for Environmental Site Assessments (E1527-21) and EPA’s “All Appropriate Inquiry” requirements. Site-specific Quality Assurance Project Plans (QAPPs) will be prepared and approved by EPA prior to Phase II activities. Phase II ESAs/ HBM surveys will be completed to confirm/dismiss presence of impacts in accordance with ASTM’s most current standard. QEP will conduct Phase II ESAs/HMB surveys, help enroll sites into the state’s voluntary cleanup program (if appropriate) and prepare report(s) for regulatory compliance. Non-EPA grant resources needed: Although not anticipated, if additional assessment funds are needed, Town will apply to MassDevelopment or TBA.</p>
<p>Anticipated Project Schedule: Inventory Winter/Spring 2025. Commence Phase I/II ESAs in Spring/Summer 2025. Activities will be conducted to maximize efficiency and available resources, when feasible. Phase I/II expected to be completed by 6/30/28.</p>
<p>Task/Activity Lead: Town will lead generation of inventory with assistance from QEP and input from community. QEP conduct Phase I/II ESAs and QAPPs. Town personnel review reports for accuracy/completeness. The Town will enroll sites into the MA Voluntary Cleanup Program, if applicable.</p>

Output(s): Updated Brownfields Inventory. Generate Five (5) Phase I ESAs and 5 QAPPs/Phase II ESAs. Enroll sites in VCP, if needed.
TASK #4 – CLEANUP/REUSE PLANNING & AREA WIDE PLANNING
EPA-funded activities: Cleanup/reuse planning will be conducted in accordance with EPA’s Greener Remediation guidance and will consider climate resiliency. Phase II data and redevelopment plans will help develop an Analysis of Brownfields Cleanup Alternatives (ABCA)/Reuse Plans for each Priority Site. Proposed alternatives will be evaluated based on cost, feasibility, and effectiveness in protecting human health and the environment. Task may also evaluate options for compliance under the MCP/state voluntary cleanup program, if applicable, identify response actions and/or land use restrictions to achieve regulatory closure. Area Wide Planning activities for multimodal trail/path connections associated with brownfields cleanup/reuse sites may also be conducted if funds allow. Non-EPA grant resources needed: Town does not anticipate needing additional resources. Town will provide in-kind services in the form of staff time for any additional activities beyond those that have been budget and apply to MassDevelopment if needed.
Anticipated Project Schedule: Autumn 2025 – Summer 2029. All tasks can be completed within 4 years.
Task/Activity Lead(s): QEP leads ABCA/Reuse Plans/Area Wide Plan. Town personnel reviews reports.
Output(s): Up to five (5) ABCAs/ Reuse Plans/Area Wide Plan deliverables.

3.b. Cost Estimates - The Town is requesting \$500,000 to complete the tasks above. Costs have been estimated based upon experience and estimates provided from QEPs: *No indirect or equipment costs requested.* **TASK 1: Personnel:** \$10,000 (Program Dir (PD) = \$3,476 (~1hr/mo x 48 months = 44 hours at ~\$79/hour) + Program Manager (PM) = \$4,4836 (~2hrs/mo x \$52 x 48mo) + Associate Planner (AP) = \$1,620 (~1hr/mo x \$36 x 48mo); **Travel:** \$5,000 = Two staff attend National Brownfields Conference (\$2000 ea for air/hotel/per diem) plus local conferences (\$500ea mileage/hotel/per diem). \$500 for General Supplies (such as books and other educational material) Contractual: \$10,500 for QEP (\$150/hr x 3.75 hrs per quarter for 16 quarters = \$9,000 to provide technical elements of quarterly reporting and ACRES and general Programmatic Oversight Assistance, including but not limited to site eligibility research and forms, etc. Assume \$1,500 for legal assistance. **TASK 2: Personnel:** Public Meetings (5): Personnel: PD=\$1,580 (\$79/hr x 4 hr public meeting preparation and attendance), PM = \$2,600 (\$52x10 hrs each), AP=\$540 (\$36 x 3 hrs each) plus creation of a Community Outreach Plan and general outreach and notifications: PD = \$951 (\$79 x 12 hrs), PM = \$1,300 (\$52 x 25hrs) and AP = \$540 (\$36 x 15). Contractual: \$29,000 [Translators = \$3,800 (\$75/hr x 2 people x 5, 2-hour meetings = \$1,500 + 30 hours at \$75/hr for written translation time = \$2,300); QEP = \$10,500 (14 hrs public meeting preparation + attendance time x 5 meetings x \$150/hour); Community Engagement Specialist=\$14,700 (98 hrs x \$150/hr)]; Supplies: \$11,000 [\$2,600 for mailings (3 letter mailings to ~850 commercial property owners x \$0.6 = \$1,546 plus 2 postcard mailings to 1200 households in Target Area x \$0.44 = \$1,050). Brochure and Map Printing=\$5,000. Meeting materials=\$2,800 and light refreshments=\$500]. **TASK 3: Personnel:** PD = \$1,738 (\$79/hr x 2hr/report for review x 11 reports), PM = \$2,028 (\$52/hr x 1.75 hrs/report) and AP = \$34 (\$36/hr x ~1hr); Contractual: QEP = Inventory (~\$9,600) + 5 Phase I ESAs (~\$7,500 ea = \$37,500) + 5 QAPPs/Phase II ESAs (~\$65,380 average for ea = \$326,900) = \$374,000. **TASK 4: Personnel:** PD = \$1,490 (\$79/hr x 19hrs), PM = \$2,080 (\$52/hr x 40 hours), AP = \$197 (\$36 x 5.5 hrs); Contractual: QEP = \$45,000 for 5 ABCA/Reuse Plans/Area Wide Plan (~\$9,000 ea).

Budget Categories	Project Tasks				TOTAL
	1.Cooperative Agreement Oversight	2.Community Engagement	3. Phase I & Phase II Assessments	4. Cleanup & Area Wide Planning	
Personnel	\$10,000	\$7,500	\$3,750	\$3,750	\$25,000
Fringe	Incl. above	Incl. above	Incl. above	Incl. above	
Travel	\$5,000	\$0	\$0	\$0	\$5,000

Supplies	\$500	\$11,000	\$0	\$0	\$11,500
Contractual	\$10,500	\$29,000	\$374,000	\$45,000	\$458,500
Total Direct Costs	\$26,000	\$47,500	\$377,800	\$48,700	\$500,000

3.c Plan to Measure and Evaluate Environmental Progress and Results: The Town will prepare quarterly reports and enter program measures into ACRES on an ongoing basis to track, measure and evaluate progress in achieving outputs, outcomes, and project results. Quarterly Reports are comprehensive and serve as the basis for measuring environmental and economic results. Each will include details from our workplan to help monitor progress on specific outputs and outcomes. We will update ACRES with site assessment information that allows us to track variables and measure program metrics beyond the completion of the grant including how much has been cleaned and redeveloped. We will also maintain internal PM tools and “Sites Matrix” that provides basic information and status updates for all the sites addressed by the program. Outputs will include new assessed properties, reuse plans, and public outreach and the outcomes will include progress towards clean up and reuse of compromised properties as well as increased awareness in the community of hazards and potential reuse of specific sites and groupings.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability: i. Organizational Capacity/ ii. Organizational Structure/ iii.

Description of Key Staff The overall project will be managed by the Town’s **Planning and Community Development Department (PCD)**, whose director reports to the Town Manager and Selectboard (executive). **PCD Director, Erika Jerram, will serve as the Brownfields Program Director (PD)**. She has over 24 years of planning experience, managing a variety of projects and administering state and federal grants—including 13 years of managing EPA Brownfields Assessment Grants. Jerram will manage the workflow and monitor budgets and schedule. Day-to-day activities will be assigned to the **Project Manager (PM), Senior Planner, Katherine Malgieri**, who has over 7 years of professional experience and **Associate Planner (AP), Jane Merrill** (1 year experience) who will be responsible for public outreach, research, and assist with reporting. Monthly project update reports and related invoices will be required from the QEP. Invoices are processed by the PD. The Town uses MUNIS, an integrated financial management software package, to track revenue and expenses for each grant separately. **Town Accountant, Paul Watson**, audits all invoices for accuracy prior to payment.

iv. **Acquiring Additional Resources:** The Town is governed by the Massachusetts Uniform Procurement Law (MGL Chapter 30B), which sets the framework for the purchase of goods and services. The Town will issue a Request for Proposals (RFP) to competitively procure a QEP / MassDEP-approved Licensed Site Professionals (LSPs), based on the application of comparative evaluation criteria. The EPA Cooperative Agreement Terms and Conditions will be included in the RFP and as part of the final contract. Legal services can be accessed through a competitively procured contract with the Town Counsel’s office. Translation services that cannot be provided through in-kind services by the Town will be secured through a competitively procured contract with the School Department.

4.b Past Performances & Accomplishments - ii. Has Not Received an EPA Brownfield Grant but has Received Other Federal or Non-Federal Assistance Agreements

According to our most recent external audit dated June 30, 2022, The Town of Billerica has managed numerous state and federal grants in the last few years. In addition to direct and pass through grants related to COVID-19 Emergency and Educational needs, the Town received over \$6 million in US EPA funding through the Massachusetts Clean Water Trust for capital improvements to our sewage treatment plant.



BILLERICA PLANNING and COMMUNITY DEVELOPMENT

365 Boston Road Billerica, MA 01821
978-671-0962

MEMORANDUM

To: Jerry Minor-Gordon, US EPA

From: Erika Oliver Jerram, Director of Planning and Community Development

Date: November 13, 2023

Re: Threshold Criteria – Town of Billerica Eligibility for EPA Brownfields Assessment Grants

III.B. THRESHOLD CRITERIA FOR ASSESSMENT GRANTS

1. Applicant Eligibility

In accordance with Section III.A of the EPA’s FY24 Guidelines for Brownfield Assessment Grants (Community-Wide Assessment Grants), the Town of Billerica is the responsible entity applying for this EPA Assessment Grant. The town qualifies for this grant as a “General Purpose Unit of Local Government” and is eligible for funding.

The Town of Billerica was incorporated as a Town in May 1655 and has a representative Town Meeting form of government, as established in the Town Charter adopted 1979, as amended. The Town is not a Section 501(c)(4) organization.

2. Community Involvement

Our Community Involvement Plan includes a series of public meetings and several other targeted methods of communication. We will host a town-wide public workshop shortly after receiving the grant to inform the community of the Brownfields Program and its opportunities and resources for property owners. Community meetings throughout the grant period will target the specific parcel groupings identified in the Brownfields Plan and provide multiple opportunities for property owners and the community to ask questions and to help prioritize redevelopment options for key sites. The outreach budget includes print advertisements, postage for targeted and broad postcard mailings, website notices, cable/radio advertising, and funds for translation services. Low- or no-cost strategies include website updates, social media, press releases, list serves, and notification through our community partners throughout the project. In addition, the town will leverage technical assistance from UCONN TAB to design community engagement activities and conduct Brownfields 101 educational workshops.

3. Expenditure of Existing Grant Funds

N/A – The Town of Billerica has not received previous/existing grant funds.

4. Contractors and Named Subrecipients

N/A – The Town of Billerica has not procured/named contractors or subrecipients.