



TOWN OF CLINTON

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BOARD OF SELECTMEN

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Narrative Information Sheet

1. Applicant Identification: Town of Clinton, 242 Church Street, Clinton, MA 01510
2. Funding Requested:
 - a. Assessment Grant Type: Single-Site Cleanup
 - b. Federal Funds Requested: \$500,000
3. Location: Clinton, Worcester County, Massachusetts
4. Property Information: Rockbestos-Surprenant Cable Corp. Facility, 172 Sterling Street, Clinton, MA 01510
5. Contacts:
 - a. Project Director: Philip Duffy, Director of Community & Economic Development, Town of Clinton, 242 Church Street, Clinton, MA 01510. Philip can be reached via telephone at (978) 365-4113 or email pduffy@clintonma.gov
 - b. Chief Executive/Highest Ranking Elected Official: The responsible Chief Executive is Michael Ward, Town Administrator, Town of Clinton, 242 Church Street, Clinton, MA 01510. Mr. Ward may be reached at (978) 365-4120 or email mward@clintonma.gov
6. Population: 15,2425
7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site is adjacent to a body of water (i.e., the border of the proposed site is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a	1

street, road, or other public thoroughfare separating them).	
The proposed site is in a federally designated flood plain.	
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse strategy will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	3
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Releasing Copies of Application: Not Applicable

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (55 points)

1.a. Target Area and Brownfields (15 points)

1.a.i. Overview of Brownfield Challenges and Description of Target Area (5 points)

Situated within the heart of Central Massachusetts, the 5.7-square mile Town of Clinton is the state's 19th smallest town (pop. 15,425) that flourished in the 1800s with a swell of textile factories but suffered from a decline of jobs and a swath of abandoned buildings from the 1920s to the 1960s, due to factory closures. A resurgence of industrial development in the 1970s included plastics, wire and food manufacturing in the 1.49 square mile Clinton CDP target area, attracting immigrants from Brazil, Haiti, Puerto and Central America, residing in the surrounding clustered older-stock rentals and low-income and subsidized housing in the target area. There are close to 70% of pre-1978 housing units in the community¹, with suspect lead paint. Underserved populations in the target area are housing burdened, experience broadband gaps, with access to only 50% home ownership, all of which limit opportunities for growth and progress. Aging freight trains that transported factory wares continue to spew diesel fumes along the 2-mile stretch of CSX and Springfield Terminal lines that intersect the target area and contribute to the **high rates of asthma² and disease and low life expectancy³**. The target area is located within a **state-designated EJ population area**, based on **minority populations** and **low income⁴**. As manufacturing decreased in the target area over the last 50 years, factory buildings that remain house a number of small businesses but have not replenished the lost jobs. Along the eastern edge of the target area, the Nashua River is **FEMA-designated special flood area** which flows from the Wachusett Reservoir⁵, serving as one of the **largest public drinking** water supplies for the state. The Site underlain by a high-yield non-potential drinking water resource area⁶. Flood risk in the target area is within the 80th-90th percentile⁷. According to MassDEP⁸ and EPA⁹, there are 149 state-listed release sites in the community and 14 federally-regulated facilities in the target area, which threaten our **sensitive populations**. There is a need for walkable and good-paying jobs for our low-income and immigrant populations in the target area. The target area is located within a State-designated **Economically Distressed Area (EDA)** and **Economic Target Area (ETA)**.

1.a.ii. Description of the Brownfield Site (10 points)

The 8.4-acre Rockbestos-Surprenant site (Site) is one of the largest vacant properties in Town, located at 172 Sterling Street at the intersection of Sterling and Greeley Streets. The Site is abutted to the north by Sterling Street (state route 62), beyond which is industrial and commercial use; to the northeast by the intersection, beyond which is residential development; to the east by Greeley Street, beyond which is commercial use; to the west by a landscape company; and, to the south by the CSX rail line; beyond which is residential use and a wetland area and subsidized housing managed by the Clinton Housing Authority. As state route 62 is the principal entry to Clinton from the west, the site is a conspicuous blight; Greeley Street, meanwhile, is the principal connector to 119 units of public housing on Fitch Road. The stone culverted **Rigby Brook** (easement) flows beneath the eastern portion of the Site and daylight south of the Site and discharges to the wetland located south of Rigby Street. The property was developed in the late 1800s and operated as textile manufacturing facilities until the late 1920s. The Rockbestos-Surprenant Cable Corp. manufactured wire and cable from 1943 to 2006. The estimated 450,000 square feet of industrial buildings were demolished in 2008; left behind were concrete floors and building foundations and open foundation voids/pits along with a legacy of contamination associated with historic industrial use. Although the concrete and paved areas mitigate potential exposure to underground contaminants,

¹ Percentage of housing units built prior to 1978 as defined by the American Community Survey. In 1977 the Consumer Product Safety Commission banned lead-containing paint (16 C.F.R. 1303). Housing units built prior to this date may contain dangerous levels of lead in paint. Mass. Dept. of Public Health (DPH) 2022 Annual Childhood Lead Poisoning Surveillance Report

² Average of statistically high incidences of asthma hospital admissions from 2002-2020. Mass. DPH

³ EPA EJ Screen

⁴ Updated Massachusetts 2020 Environmental Justice Populations for Census Tracts 25027716200 and 25027716102.

⁵ The 65 billion gallon reservoir was constructed in the early 1900s is managed by the Massachusetts Water Resource Authority and is the 2nd largest body of water in the state. Mass, Dept of Conservation and Recreation

⁶ Massachusetts Department of Environmental Protection (MassDEP)

⁷ EPA EJScreen

⁸ Massachusetts Department of Environmental Protection

⁹ EPA Envirofacts

there are no stormwater controls to mitigate potential flooding, due to the impervious nature of the Site, which also creates a local heat desert. Industrial activities have resulted in the releases of petroleum, heavy metals and chlorinated solvents to soil and groundwater and assigned Release Tracking Numbers (RTNs) 2-10421, 2-11386 and 2-11434 by the Massachusetts Department of Environmental Protection (MassDEP) from 1994 to 1996. Site assessment activities have been conducted from 1994 to 2022. The Town acquired the Site property as a tax taking in 2018. Limited remedial activities have been conducted and an Activity and Use Limitation (AUL¹⁰) was implemented on a portion of the Site in 2000. The Town's contractor conducted the assessment of stockpiled soil and construction & demolition (C&D) debris (associated with abandoned Site building materials) to assess potential contaminant impacts. There was evidence of "illegally disposed bags of asbestos-containing transite siding and piping". Soil samples were collected for laboratory analysis of waste characteristics analytes, including Toxicity Characteristics Leaching Procedure (TCLP) lead and arsenic. Based on lab results, the soil is not classified as hazardous waste. Asbestos-containing waste materials (ACWM) were determined to be present and MassDEP was notified of the release. The debris was consolidated into an approximate 2,056 ton¹¹ stockpile (measuring approximately 32,000 square feet) and placed on a concrete, covered with polyethylene sheeting with a fenced enclosure and signage. Despite these measures and routine visits by Town police and personnel, trespassers continue to access the Site, risking their health and safety. Unless the stockpile is removed, friable ACM is likely to disperse throughout the target area. The site is located within 550 feet of two public housing projects, whose households are 50% minority.¹² For the residential and commercial neighbors, the Site is an eyesore and wasteland and represents lost opportunities. Furthermore, the Site is depreciating property values and limiting walk-in traffic to businesses in the target area.

1.b. Revitalization of the Target Area (20 points): 1.b.i. Reuse Strategy and Alignment with Revitalization Plans (10 points): Beginning in 2018, the Town has aggressively invested in infrastructure and zoning modifications within the Target Area, to enhance community quality of life, encourage investment, and eliminate blight. Infrastructure abutting project site has already been improved on Greeley Street; Sterling Street is a designated TIP project, slated for construction in FFY26. The Town has prioritized the cleanup of the Site as a **Priority Development Area (PDA)** site as outlined in our Clinton PDA Assessment (2012) was nominated as a Priority Development Site at Town Meeting in 2008. Town planning has documented the paucity of modern manufacturing and commercial inventory in town, and the attendant effects on employment and the community. In 2006, for instance, four of Clinton's five largest manufacturers (Nypro; Rockbestos/Suprenant; Weetabix; Nylco) employed more than 1750; since then, more than 900 jobs have been relocated- not eliminated- to more modern facilities in Devens, MA; Granby, CT, St Paul, MN, and Nashua, NH. The loss of opportunity and disruption affect working class families disproportionately. It is a primary goal of the project to enable the creation of contemporary "jobs-accommodating" facilities on the site, to serve the employment needs of the region.

The Site is zoned for industrial use and falls within a Bioscience Enterprise Overlay District. The Industrial District is intended to provide areas for office parks, industrial parks, manufacturing, fabrication, research, development, and assembly which are free from the intrusion of residential, retail, or commercial uses, which might be adversely affected by the uses of the district. There are several uses allowed by right or with a special permit in an industrial district. Similarly, the Bioscience Enterprise Overlay District expands those allowable uses. In conjunction with MassDevelopment, a **Site Readiness Assessment** (2023) was conducted at the Site to evaluate Site reuse and included three concept designs for redevelopment, including at least 100,000 square feet of buildable space. The Town is eager to promote workforce development and education, due to labor shortages of highly skilled workers. Partnerships with academic and training institutions will be encouraged and continue to be cultivated so that prospective businesses have a reasonable expectation of meeting their labor need

¹⁰ The AUL restricts certain activities and usage based on the presence of subsurface contaminated soils.

¹¹ 1.75 tonnage multiplier

¹² Clinton Housing Authority Federal reporting data, correspondence dated 11/07, 11/08/2023

The Town will maintain the culvert easement to protect the downstream sensitive ecosystem and perform inspections and implement climate resiliency to address potential flooding.

The target area includes two Opportunity Zones. Residents will have access to new housing, jobs, recreation, shopping and cultural activities in the target area. Over the past several years, Clinton has maintained a focus on economic development through innovative planning efforts in partnership with the Montachusett Regional Planning Commission (MRPC) and continual review of the Town’s regulatory provisions and permit process.

1.b.ii. Outcomes and Benefits of Reuse Strategy (10 points): Cleanup of the Site is crucial for the Town’s planned reuse efforts. Removal of the ACM-impacted stockpile will mitigate threats to the surrounding community and trespassers, and prevent the threat of migration of contaminants to Rigby Brook and sensitive receptors in the target area, which could be exacerbated by flooding and threaten the wetland. We expect a reduction of adverse health impacts in the target area associated with Site contaminants, including reductions in disease/cancer rates to sensitive populations in the target area, especially underserved minority populations. Site reuse will provide much-needed jobs to the underserved and minority communities in the target area. The Town’s Community Resilience Building report (2019) and Hazard Mitigation Plan Update (2022) identify high priority vulnerabilities in the target area with regard to Site contaminants and their potential for off-site migration with climate change, which will be mitigated by cleanup and site reuse. We will advocate for renewable energy and climate resiliency as part of redevelopment. The expansion of the Town’s successful sidewalk program will allow Site workers to connect to Downtown resources, including transportation.

1c. Strategy for Leveraging Resources (20 points)

1.c.i. Resources Needed for Site Characterization (5 points): Site assessment has been conducted from Characterization of the stockpile has been conducted and no additional sampling is anticipated.

1.c.i.i. Resources Needed for Site Remediation (5 points): Every effort will be made to financially supplement the Cleanup Grant program. **The Town was awarded a \$250K MassDevelopment¹³ Brownfields Cleanup Grant which will be applied to the cleanup** and we are eligible to apply for additional MassDevelopment Brownfields Cleanup funding (up to \$500K) to supplement the EPA grant.

1.c.i.i.i. Resources needed for Site Reuse (5 points): In 2021, the Town, in conjunction with National Grid, repaired and replaced natural gas, roadway, and sidewalk infrastructure on Greeley Street, the western boundary of the property. These sidewalks are a vital pedestrian connection to downtown for residents of public housing to the south of the property. Sterling Street will be reconstructed as a TIP project, currently scheduled for FFY26. In July,2023, in partnership with MassDevelopment and BSC Group, the Town commissioned a site-design analysis to evaluate re-use scenarios. forecast site-related redevelopment costs- information that will be included in an RFP for site disposal and re-use. Developers can apply for loans & guarantees, bond financing and tax credits from MassDevelopment. The two **Opportunity Zones (OZs)** are expected to link resources to the target area. The Town has several options to leverage funding to support reuse:

Secured	Eligible	Funding Opportunity
	✓	MassWorks¹⁴ infrastructure grants: The Town was awarded a FY'19 grant (\$1.5M) for paving a streetscapes improvements is eligible to apply for additional funding for improvements in the target area
	✓	MassDOT Complete Streets Program: The Town has been awarded over \$500K since 2017 to implement sidewalk and bicycle network connections and is eligible to apply for additional funding.

¹³ MassDevelopment is the state’s development and finance agency and provides Brownfields funding.

¹⁴ The MassWorks Infrastructure Program is a competitive state grant program that provides the largest and most flexible source of capital funds to municipalities and other eligible public entities primarily for public infrastructure projects that support and accelerate housing production, spur private development, and create jobs throughout the Commonwealth.

✓	✓	<u>State Chapter 90 DOT funding:</u> We have been allotted \$328K in Chapter 90 FY'24 state local transportation funding, which can be applied to additional infrastructure improvements in the target area.
✓	✓	<u>Green Community Grant:</u> Awarded \$165K in 2021 and eligible to apply for additional funding for energy conservation measures for new development.
✓	✓	<u>MVP Community:</u> Eligible to apply for MVP Action grants to implement the climate change resilience measures outlined in our MVP Plan that can be applied to new development.

1.c.iv. Use of Existing Infrastructure (5 points): The Town will utilize the existing infrastructure at the Site, including water, electric, and gas connections. The target area is connected to public water, along with electric, natural gas, and communications (i.e., cable, high-internet, fiber optics). New development is anticipated to utilize and improve existing infrastructure, along with upgrading stormwater discharges by implementing green stormwater infrastructure (GSI)¹⁵. Planned enhancements of public transportation infrastructure include an expansion of walking and biking connections to connect to Downtown resources.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (40 Points)

2.a.i. The Community's Need for Funding (5 points): Clinton is a small, densely-populated community of limited means and limited capacity for growth. According to the Massachusetts Department of Revenue (DOR), the Town's FY25 per capita income (\$33,412) is 78% the state's average, placing it 267th among 351 municipalities. The Town's Equalized Value (\$120,528)- a measure of its revenue levying capacity- is 64% the state's average, ranking 301st in Massachusetts¹⁶. By this measure, it is in the bottom 20% of Massachusetts communities. The ability to raise revenue, and to retain and attract modern industries and thereby provide employment opportunities, is limited by the lack of developable space and the age of existing inventory. Indeed, 172 Sterling Street, at 8.4 acres, is the largest, industrially-zoned, developable site in Clinton. 172 Sterling Street is located within 1200 feet of 4 census tract block groups, with HUD LMI populations of 55.81% (7163.3), 53.61% (7162.1) 52.79% (7161.2), and 34.68% (7162.2), indicative of its location in a district of pronounced need.

There are close to 119 public housing units within 550 feet of the project area and up to 51% renter-occupied homes¹⁷ in the target area, with limited pathways to home ownership. Approximately 80-90th percentile of the households in the target area are house-burdened.¹⁸ The Town is NOT an entitlement community, which means that grant funding must come through competitive application processes. The limitations of the Town's existing commercial and industrial inventory has contributed to a 12.5% decline in private sector employment within the Town¹⁹, even as its population and workforce has grown by 14% over the same time. Revitalization of the site for a jobs-accommodating use is vital to the community's future.

2.a.i.i. Threats to Sensitive Populations (20 points): (1) Health or Welfare of Sensitive Populations (5 points): Clinton is home to several sensitive populations within a half-mile radius of the target brownfield site. The percentage of the population under age 5 is twice as much as the state percentage of 5% and is far more than the US percentage (6%); ranking in the 88th and 84th percentile in the state and the US respectively.²⁰ Moreover, the area is ranked in the 79th percentile in the US and in the 70th percentile in the state for limited English-speaking households.¹ Furthermore, 23% of the population is people of color, and the low-income population accounts for 21% of the total populace.¹ According to the United States Census Bureau's American Community Survey (ACS), the average household income in our census tract 7162 is lower (\$52,194) as compared to the county, state, and

¹⁵ GSI is proven, *sustainable* flood-prevention strategy

¹⁶ https://dls.gateway.dor.state.ma.us/reports/rdPage.aspx?rdReport=DOR_Income_EQV_Per_Capita

¹⁷ EPA EJ Screen

¹⁸ EPA EJ Screen

¹⁹ <https://lmi.dua.eol.mass.gov/lmi/employmentandwages>

²⁰ EPA EJ Screen (Block group 250277162002, and 0.5-mile radius of 172 Sterling Street, Clinton, MA)

the US average household incomes of \$106,611, \$120,670 and \$ 97,196 respectively. The economic hardship faced by the community is further reflected by the staggering percentage of households in tract 7162 (11.6%) whose income and benefits (in 2021 inflation-adjusted dollars) were less than \$10,000, exceeding the county (4.5%), state (4.8%) and national (5.5%) percentages.²¹ The area struggles with blight and excessive amounts of hazardous waste, which can be particularly harmful to these sensitive populations as they may not have the resources to relocate themselves or the financial capacity to access medical care. The flood risk in the target area is within the 80-90th percentile²². Without intervention, these structures will continue to deteriorate and spread contaminants throughout the target area. Flooding can also cause hazardous mold accumulation in the neighborhood buildings, with airborne spore dispersal. *Cleanup of the site will mitigate contaminant risks and improved infrastructure will attenuate flood hazards. The Cleanup will remove public safety and health threats while the increased tax revenue from the redevelopment will allow us to supplement Town support services.*

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points): There is evidence of heightened levels in the occurrence of chronic diseases in the Town. According to the Massachusetts Department of Public Health (DPH), cancers of the bladder, liver and interhepatic bile ducts and prostate are higher than expected²³. The cancer rate in Clinton is 470.3 per 100,000, exceeding state and national rates²⁴-Asbestos is directly linked to mesothelioma. Obesity (32.9 %), combined with unhealthy behaviors (smoking, binge drinking, physical inactivity) and poor outcomes (depression, poor physical and mental well-being, unintentional injury deaths) exceed state percentages²⁵. From 2002 to 2020, the average asthma hospital admissions are statistically significantly higher than expected²⁶ and can be exacerbated by mold accumulation from flooding and smoking. Low life expectancy is within the 80-90th percentile. Site cleanup will help mitigate these human health concerns by removing the threat of contamination and bolstering the positive outcomes of the target area revitalization.

(3) Environmental Justice (10 points):(a) Identification of Environmental Justice Issues (5 points) People of color populations in the target area and represent the majority of low-income rental and subsidized households in the target area. The additional challenges include language barriers, limited transportation, broadband access translate in to reduced employment, health access and job opportunities. Furthermore, these underserved populations are exposed to potential contaminant impacts and flooding, resulting in reduced lifespan and elevated disease. Within the 0.5-mile radius of our site, the percentages of low-income and minority populations account for 21% and 23% of the total population respectively. Additionally, the ACS statistics for tract 7162 revealed that in the year 2021, the percentage of the population who were food stamp/SNAP recipients was 14.1%.² This was greater than the proportion of food stamp/SNAP recipients in the county (13.1%), state (11.5%), and nation (11.4%). The EPA EJ Screen reports for the 0.5-mile radius of our site revealed that several environmental indicators (traffic proximity and volume, lead paint, hazardous waste proximity, and underground storage tank) were considerably high, ranking within the range of 79th and 84th percentile in the nation.

(b) Advancing Environmental Justice (5 points): The Town is committed to the economic growth and restoration of degraded Brownfields sites that pose a significant source of environmental burden and threat to the health, welfare and wellbeing of these sensitive populations, including the project site. Removal of the asbestos will mitigate the health threats to the community. Redevelopment of the Site will foster job training opportunities for well-paying jobs. The expansion of the sidewalk and bike path program in the target area will provide increased fitness opportunities and connection to Downtown and resources from our nearby larger cities. Infrastructure improvements will mitigate flooding in the target area and associated health risks and costs to residents. The brownfields program will provide the Town with the impetus to collaborate with community groups and expand

21 American Community Survey. Accessed from: <https://data.census.gov/cedsci/>. Accessed on 10/26/2023

22 EPA EJScreen

23 Observed and Expected Case Counts, with Standardized Incident Ratios at 95% level of probability, 2000-2020

24 Massachusetts Community Health Assessment-Clinton-Health Outcomes. Massachusetts Community Health Tool

25 Ibid

26 Massachusetts Environmental Public Health Tracking. Mass. DPH.

our recent outreach and engagement successes. The revitalization of the site is expected to be an impetus for reinvestment by developers in the target area.

2.b. Community Engagement (15 points): 2.b.i. Project Involvement and 2.b.ii. Project Roles (5 points): In addition to municipal staff in the target area communities, the following is our list of Project Involvement entities and Project roles:

<p>MRPC, the Montachusett Regional Planning Commission, will provide planning and redevelopment support. Glenn Eaton, Executive Director, (978) 345-7376, x 310. geaton@mrpc.org.</p>
<p>MassHire North Central Workforce Board is a 501(c)3 incorporated in 1979, which serves as local workforce board under the Federal Workforce Innovation and Opportunity Act. MassHire will advise on regional employment needs. Jeff Roberge, Executive Director, (978)534-1481. jroberge@masshirenorthcentralwb.org</p>
<p>United Way of Tri-County/ WHEAT Community Connections since 1982, the Wachusett Health and Education Action Team, is Clinton’s home-grown social service entity. It is located in the Target Area. WHEAT will assist in outreach to underserved populations. Jodi Breidel, Executive Director, (508)370-4942, jodi.breidel@uwotc.org</p>
<p>Sharing is Caring is a 501(c)3 within the Target Area addressing food security. It will assist in outreach to underserved populations. Janice Ryan, Executive Director, (978)368, 9990</p>
<p>Clinton Housing Authority manages 119 public housing units located within 550 feet of 172 Sterling Street. The CHA will assist in outreach to residents. Danielle Fahey, Executive Director, (978)_365-4150, dfahey@clintonha.com</p>
<p>Clinton Area Chamber of Commerce will assist in outreach to business community and post-project re-use planning. Lauren Nanof, Executive Director, (978)500-8420. revivepaints@gmail.com</p>
<p>MassDevelopment is the state’s finance and development agency. The agency will provide support on Brownfields Cleanup funding; Developer financing; Tax credits; Developer RFPs. Shyla Ruffer Matthews, Sr. Vice President Community Investment, Central Region. (508)363-2799, ext. 125. smatthews@massdevelopment.com.</p>

2.b.i.i.i. Incorporating Community Input (5 points): Since the closing of Rockbestos/ Suprenant in 2007, multiple community planning processes have identified site revitalization as a community priority, including town meeting’s vote to nominate it as a Priority Development Site (PDS) in 2008, citation in the 2012 Master Plan, and designation as one of three Priority Development Areas in 2013. Each of these were discussed and debated in multiple public forums. Prior to commencement of debris pile removal, a Brownfields committee will be convened, with the purpose of informing neighbors and residents of the project’s timeline and progress, and to gather input on desired site redevelopment outcomes. Meetings will be held at the Town Hall, which is centrally located and fully accessible. The committee will include representatives of WHEAT Community Services, Sharing is Caring, and the Clinton Housing Authority, to ensure outreach and communication with underserved populations. Translation services will be coordinated with Guadalupe Puim, Family Outreach Coordinator with the Clinton Public Schools. The Committee will determine effective modes for outreach and community input, which may include fliers, surveys, and workshops.

A project web page on the Town’s official site will provide updates and contact information. Project updates will periodically be posted to the Town’s social media. Additionally, a job sign will be erected at the site, directing people to the website for more information.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan (10 points): Cleanup of the Site will be conducted in accordance with the MassDEP Asbestos Regulations, 310 CMR 7.00, including 7.09 and 7.15; Asbestos Disposal Regulations, 310 CMR 19.061; Massachusetts Contingency Plan waste site cleanup regulations, 310 CMR 40.0000; Timely Action and Fee Provisions, 310 CMR 4.00; and, Administrative Penalties Regulations, 310 CMR 5.00. under the

management of the Town's selected Qualified Environmental Professional (QEP) and performed by licensed contractors. Cleanup plans will be discussed and integrated in the Community Relations Plan (CRP). The cleanup plan will incorporate EPA Principles for Greener Cleanups. All local, state and federal permits will be obtained and a Health & Safety Plan will be prepared, prior to the implementation of cleanup activities, and all Site personnel will be properly licensed and/or certified to perform and oversee cleanup activities, including OSHA HAZWOPER certifications.

1. Public Bid Specifications for Cleanup Contractor: The QEP will prepare bid specifications to assist the City in its award of a cleanup contractor ("the Contractor"). The bid package will include technical specifications and drawings that will address local and state requirements, measurement and payment, contractor scheduling requirements, health and safety requirements, Davis-Bacon wage requirements, and Town Prevailing Wage rates. The specifications will cover all of the cleanup activities including implementation of stormwater control measures, fencing, measures, asbestos-containing waste material (ACWM) removal and disposal and site restoration. The QEP will assist the Town to prepare ES a Request for Proposals (RFP) for the Town's use for bid advertisement in a local newspaper and in the Central Register. The QEP will accompany the Town on a bidder's walk and will document bidder's questions and will prepare a response to bidder's questions. The QEP will assist the Town in bid reviews, Contractor selection and contract document preparation. The QEP will review state lists of debarred and de-listed contractors as part of the bid review. Subsequent to Contractor award, the QEP will review Contractor invoices, adherence to Davis Bacon/Prevailing Wage rates and conduct employee interviews and perform budget tracking.
2. A Non-Traditional Asbestos Abatement Plan ("NT Plan") will be prepared by the QEP's state-licensed Asbestos Project Designer, which will include MassDEP BWP-AQ 36 application form and submitted to MassDEP over a 30-day review period. The Asbestos Project Designer will accompany MassDEP on its Site inspection; respond to MassDEP comments and revise the NT Plan, as needed.
3. Site Security and Stormwater Controls: The Contractor will install construction fencing with filter fabric and stormwater erosion and sedimentation controls which will be maintained during cleanup activities.
4. State regulatory notification (Prior to Start of Cleanup) The QEP's asbestos project monitor will provide the MassDEP Central Regional Office (CERO) with 24-hour notification prior to the start of work, or at the completion of work, so that the MassDEP can schedule a site inspection. We anticipate a Site visit at the completion of Work Area preparations and/or at the completion of cleanup.
5. Water Applications: The Contractor will provide clean water to the Site, which will be applied to ACWM during cleanup activities as a measure to mitigate dust impacts to workers and the surrounding neighborhood. A washing station will be established at the Site to wash down truck tires prior to off-Site transportation.
6. Asbestos Monitoring: The QEP's Massachusetts Dept. of Labor Standards (DLS) licensed Asbestos Project Monitor shall conduct full-time project oversight during the work for the duration of the project. The Project Monitor shall collect ambient air samples around the perimeter of the Work Area for on-site analysis for total fibers via phase contrast microscopy (PCM) by the NIOSH 7400 Method. If the air monitoring results reach or exceed the Massachusetts DLS "clean air criteria" of one - one hundredth fiber per cubic centimeter (0.010 f/cc) of air, then all work shall stop. The work methods shall be evaluated and altered as needed prior to continuing any further work and MassDEP shall be notified by telephone immediately. All sample analysis shall be performed by consultants who are properly trained, and shall be performed by an Asbestos Analytical Service licensed and approved pursuant to 454 CMR 28.06(1)(c).
7. Excavation and Disposal: The waste will be transported by truck (and potentially rail) to an out-of-state facility (since there are no in-state facilities that accept ACWM). The ACWM shall be loaded into 100-yard trailers (or similar), pre-lined with two layers of 10 mil polyethylene sheeting. The trailers will be covered with lids and affixed on all four sides with a 2212 Asbestos Department of Transportation (DOT) placard. Conspicuous and legible warning labels with permanent, waterproof print and adhesive shall be affixed to all waste containers (lids and sides as applicable) used to store and/or transport waste

8. Waste Management forms: ACWM will be transported to a licensed receiving facility under a waste shipment records (WSRs) and MassDEP bill of lading (BOLs) as non-hazardous waste. A Licensed Site Professional (LSP) Opinion will be prepared and submitted to MassDEP. Copies of WSRs will be emailed to MassDEP at the end of each work shift.
9. Green and Sustainable Remedial Measures: As a sustainable measure to reduce truck traffic, transportation of waste by rail will be considered.

3.b. Description of Tasks/Activities and Outputs (25 points)

Implementation of the EPA grant and completion of the project will be a collaborative effort between Town staff, project partners, Qualified Environmental Professional (QEP) and contractors. The scope of work has been organized into four tasks, for which the specific activities, deliverables, and roles are summarized below.

Task 1: Cooperative Agreement Oversight

3.b.i. <u>Project Implementation</u> : The Town will establish a Brownfields Committee comprised of local elected officials, business community, community organizations, economic development authority and stakeholders. MassDEP and EPA Brownfields staff will be invited to sit on the Committee. We will prepare a Request for Proposal (RFP) and review responses, conduct interviews and select a Cleanup contractor. We will also perform program management and communication with regulatory personnel, community officials and the public. EPA ACRES reporting will be conducted throughout the duration of the project.
3.b.ii. <u>Anticipated Project Schedule</u> : Progress reports will be submitted on or before January 30th, April 30th, July 30th, October 30th of each year. Annual DBE reports will be submitted on or before October 30th of each year. Initial information on the Site will be entered into ACRES following execution of the cooperative agreement, and updated upon completion of milestones related to remediation, City approvals, and site redevelopment. The Committee will initially meet monthly and then quarterly to execute the priorities and direction of the Brownfields Program.
3.b.iii. <u>Task/Activity Lead</u> : The Community & Economic Development (CED) Director will serve as the Lead, with support from the Brownfields Committee, QEP, Assessors Dept., and legal counsel.
3.b.iv. <u>Outputs</u> : Quarterly progress reports, annual DBE reports, final closeout report, ACRES updates (as needed); and Davis Bacon reporting. Contract with QEP and Cleanup Contractor.

Task 2: Community Engagement

i. <u>Project Implementation</u> : We will hold a series of quarterly public meetings to engage local stakeholders about the cleanup and proposed redevelopment. We will prepare public outreach materials and conduct extensive outreach and communication with residents and businesses prior to undertaking the cleanup/abatement efforts, during remediation, and following the successful completion of remediation. A Community Relations Plan (CRP) will be prepared.
ii. <u>Anticipated Project Schedule</u> : Ongoing before, after, and during the project.
iii. <u>Task/Activity Lead</u> : The CEDO Director will serve as the Lead with support from our Project partners, Health Dept. and QEP, including the use of translators.
iv. <u>Outputs</u> : Project schedules and milestones for activities from cleanup and reuse planning. Meetings, presentations, and materials, including multilingual documents, posters, flyers

Task 3: Cleanup

i. <u>Project Implementation</u> : The Town will issue RFPs for a QEP and a Cleanup Contractor. The Town's selected QEP will perform oversight of licensed contractors.
ii. <u>Anticipated Project Schedule</u> : The cleanup program will be performed over the 4-year grant duration : Years 1-2: Bid specifications; contractor award; Year: 3-4: Cleanup
iii. <u>Task/Activity Lead</u> : The same team will oversee our QEP for execution of remedial activities, report preparation, and regulatory interpretation and interfacing with regulatory authorities and will provide direction to municipal staff for implementation support.
iv. <u>Outputs</u> : Remediation bid specifications; BOLs Contractor RFP and bid results; Permits.

Task 4: Reporting and Reuse Planning

i. <u>Project Implementation</u> : State and federal reports will be prepared prior to, during and subsequent to the cleanup to meet grant requirements and state regulatory requirements.
ii. <u>Anticipated Project Schedule</u> : The QAPP and ABCA will be prepared in Year 1 and submitted to EPA for review/approval. A NT Plan will be prepared Cleanup (Year 1/Year 2); A Closeout Report will be completed in Year 4.
iii. <u>Task/Activity Lead(s)</u> : The CED Director will oversee the QEP on reporting and regulatory interpretation and will interface with Planning Board and MRPC on reuse planning.
iv. <u>Outputs</u> : QAPP; Draft and Final ABCAs, state regulatory reports

3.c. Cost Estimates (15 points) *Fringe Benefits are included in Personnel costs line item

Budget Categories	Project Tasks				
	Task 1 Coop. Agreement Oversight	Task 2 Community Engagement	Task 3 Cleanup	Task 4 Reporting and Reuse Planning	Total
Personnel	\$1,500	\$1,500	\$2,000	\$2,500	\$7,500
Fringe Benefits*					
Travel	\$2,000				\$2,000
Equipment					
Supplies					
Contractual	\$4,500	\$3,600	\$714,300	\$20,100	\$742,500
Cost Share			\$250,000		
Total Federal Funding	\$8,000	\$5,100	\$464,300	\$22,600	\$500,000

Task 1 Budget: 30 staff hrs. @ \$50/hr.= \$1,500; \$4,500 QEP support; Travel is for one EPA Brownfields conference (i.e., est. \$2K conference for airfare, hotel, per diem, and expenses).

Task 2 Budget: 30 staff hrs. @ \$50/hr.= \$1,500; \$3,600 QEP support.

Task 3 Budget: 40 staff x \$50./hr. = \$2,000; QEP/ Cleanup Contractor details below:

Bid specifications: \$22,000; Contractor Mob/Demob=\$15,000; Construction Fencing =\$5,000;
Erosion Controls & Dust suppression=\$8,000; Contractor load ACWM: 2,056 tons x \$19.50/ton =\$40,092
T&D ACWM : 2,056 tons x \$275/ton=\$5645,400 plus 5% contingency (\$28,270)=\$593,670
Asbestos pre-plan site visit and contractor submittal review: \$1,000
Asbestos project monitoring: \$862.50 (per shift) x 20 shift =\$17,250; Travel = \$582
Asbestos PM: \$132.25/hr. x 25 hrs. = \$3,306.25; QEP (PM): \$175/hr. x 48 hrs. = \$8,400

Task 4 Budget:

LSP Opinion/BOL: \$4,600; NT Plan: \$2,500; Closeout Report=\$2,000. QAPP, ABCA and CRP= \$11,000

3.d. Plan to Measure and Evaluate Environmental Progress and Results (5 points)

Our anticipated outputs from the Brownfields Program are technical and quantitative reports that will provide the Town with the next steps to move the site forward. We also will measure the success of public engagement by requesting our community partners to help us measure the qualitative and quantitative outcomes of community engagement, along with worker training initiatives. Additionally, we will measure project success beyond the completion of the Brownfields Cleanup program by increases in tax revenue, number of jobs, decrease in crime and redevelopment; prepare quarterly reports; and update ACRES to document site progress. The Site will be brought into state compliance, moving towards redevelopment, attracting developer interest, and achieving regulatory closure.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 points)

4.a. Programmatic Capability (15 pts.): Project administration will be overseen by the Director of the Community & Economic Development Office (CEDO), Philip Duffy. Mr. Duffy has served in this capacity since 2011, and has successfully overseen more than \$17 million in grant-funded capital and planning projects. Projects have included infrastructure and vertical construction, commercial and housing rehab, environmental remediation, open-space acquisition, social services, and COVID response. Relevant programmatic experience includes the successful assessment and remediation of 329 High Street, a 1920's era gas station located in the target area. The 329 High Street project was accomplished with assistance from an EPA regional assessment grant (administered by MRPC), legislative earmark, a MassDevelopment Brownfields grant, and town funds. Mr. Duffy has overseen multiple community-driven planning processes, including master plan updates, Community Development Strategies, Open Space Plans, zoning by-law modifications, community facility assessments, social service plans, public health and walkability assessments, downtown revitalization plans, climate resiliency planning, and project-specific initiatives. In addition to engagement with residents and stakeholders, the CEDO routinely engages constructively with municipal departments, the MRPC, regional social service agencies, Chambers of Commerce, elected officials, and state agencies to advance community goals.

Routine oversight over CEDO activities is performed by Town Administrator Michael Ward, who has served in this capacity since 1995. Mr. Ward is the Town's chief procurement officer, and will issue RFP for services and make recommendation for award. Contracts are signed by the Select Board. Supplementary work to enhance the developability of the site, including infrastructure improvements to Greeley and Sterling Streets, are collaboratively overseen with DPW Superintendent Chris McGown, who has served in this capacity since 2005. The Town maintains a robust system of financial checks and balances to ensure compliance with all federal administrative requirements. Warrants for payment are reviewed by the CEDO Director and project engineer/LSP and submitted by the CEDO to Town Accountant Diane Magliozzi (since 2004) before being submitted to Town Treasurer John Kittredge (since 2013) for payment.

Acquiring Additional Resources: The Town will adhere to state²⁷ and municipal public procurement requirements and obtain public bids to procure a QEP and a cleanup contractor. Our internal system includes our Accounting Department and Town Administrator, which will form an internal team to prepare Requests for Proposals (RFPs) and to perform reviews of proposals and interviews (if necessary), prior to QEP and contractor selection. The QEP will be selected initially and will prepare cleanup bid specifications to support the cleanup contractor RFP.

4.b. Past Performance and Accomplishments (15 points)

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (15 points)

(1) Purpose and Accomplishments (5 points): Since 2011, the CEDO has received and successfully administered 10 federal grants, including 3 FEMA Grants (AFG, FY13; AA, FY18; HMP FY19) and 7 non-entitlement CDBG (FY11, FY13, FY16, FY17, FY 18, FY21, FY22/23). The last 2 CDBG are open; all other grants were fully expended and successfully closed out. The FY18 CDBG program provided \$743,000 to install new water lines, curbing, sidewalks, street lighting, and paving for a 1,015LF residential street within the Downtown Target Area. Relevant non-federal assistance includes MassDevelopment Brownfields Grants received in FY19, FY22, and FY23. FY19 assistance (\$99,000, supplemented by \$36,000 town funds) provided for environmental assessment of 172 Sterling Street, to assess contaminant impacts.

(2) Compliance with Grant Requirements (10 points): The Town has complied with all grant reporting requirements, including financial and progress reports. CDBG grants are routinely monitored by a two-day office visit by MA DHCD- neither agency monitoring nor annual single audit of federal funds has ever yielded a finding.

²⁷ Enacted in 1990, Chapter 30B of the Massachusetts General Laws, the Uniform Procurement Act, establishes uniform procedures for local governments to use when contracting for supplies, services, and real property.



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

Phil Duffy, Director of Community & Economic Development
Town of Clinton
242 Church Street
Clinton, MA 01510

RE: STATE LETTER OF ACKNOWLEDGMENT
Town of Clinton – Brownfields Cleanup Grant
172 Sterling Street, Clinton [RTNs 2-11386 and 2-11434]

Dear Mr. Duffy:

I am writing to support the application submitted by the Town of Clinton under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. We understand that the Town of Clinton is proposing to undertake cleanup activities including the management and off-site disposal of contaminated soil, including soil containing asbestos containing waste materials.

Based on information provided by the Town of Clinton, the Town took ownership of the property through tax taking in 2012, and the property is enrolled in the Massachusetts voluntary cleanup program. According to information provided by the Town and their consultant, the level of assessment conducted to date is sufficient to design and initiate the proposed cleanup activities.

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 Clinton 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
Kevin Daoust, MassDEP Central Regional Office
Amy Sullivan, MassDEP Central Regional Office



99 High Street
Boston, MA 02110

September 26, 2023

Main: 617-330-2000
Fax: 617-330-2001

massdevelopment.com

Michael Ward
Town Administrator
Town of Clinton
242 Church Street
Clinton, MA 01510

VIA EMAIL

Re: Application: FY24-01264 for Brownfields Site Remediation

Dear Mr. Ward:

Thank you for submitting this application to the FY24 Round of the Community One Stop for Growth. The Executive Office of Economic Development (EOED), Executive Office of Housing and Livable Communities (EOHLC), and Massachusetts Development Finance Agency (MassDevelopment) worked together to evaluate all eligible applications and recommended the most ready and highest-impact projects for a grant. This application from Town of Clinton was reviewed by the program(s) that could best serve the project's funding needs.

Maura Healey
Governor

Kim Driscoll
Lieutenant Governor

Dan Rivera
President and CEO

On behalf of the Healey-Driscoll Administration, I am pleased to inform you that a grant in the amount of \$250,000 from the Brownfields Redevelopment Fund has been approved to support your project.

A member of MassDevelopment's Community Investment Department will be in touch to assist you with entering into a Grant Agreement regarding use of the funds and containing the details on the conditions, processes, and timeframe for drawing down funds, and other program requirements during the term of the Grant Agreement including, but not limited to, compliance with MassDevelopment's Contractor Policy and potential recoverability of the award under limited circumstances.

Prior to execution of the Grant Agreement, MassDevelopment will require proof of site ownership or legal authority for you and your Massachusetts Licensed Site Professional ("LSP") or remediation contractor to enter the site and perform the approved site assessment investigations or remediation activity. We will require that you submit a fully executed contract and scope of services with your contractor consistent with the scope submitted with the One Stop application for the work to be performed.

Until the Grant Agreement is fully executed and all disbursement conditions are met, no MassDevelopment Funds will be disbursed. MassDevelopment Funds cannot be used for any site assessment or remediation work undertaken prior to the execution of the Grant Agreement unless such work is approved in the Grant Agreement by MassDevelopment.

This Award Letter sets out the general terms of the grant. In the case of inconsistencies (if any) between this Award Letter and the Grant Agreement, the terms of the Grant Agreement shall govern.

Finally, please note that public announcement of this award is embargoed until the Administration has had the opportunity to formally announce it through a local event and/or media release. Please refrain from sharing, posting publicly, or publicizing news about this award outside of your organization until it is officially announced.

MassDevelopment's primary mission is to help build the communities of the Commonwealth by stimulating economic development. We look forward to working with you to make your project a reality for the benefit of Town of Clinton and all of the people of Massachusetts.

Sincerely,



Daniel Rivera
President & Chief Executive Officer

Please confirm your acceptance of this Award by signing below and returning it within sixty (60) days of the date of this letter to Shyla Matthews at smatthews@massdevelopment.com.

Accepted by:

Town of Clinton

By: _____

Name:

Title:

Date: _____

CC: Shyla Matthews

THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

The Town of Clinton, Massachusetts is eligible to apply for an EPA Brownfields Cleanup grant because it is a General Purpose Unit of Government.

2. Previously Awarded Cleanup Grants

Not Applicable. The Site has not received funding from a Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

Not Applicable. The Site has not received funding from a Multipurpose Grant.

4. Site Ownership

The Town of Clinton is the sole owner of the Site.

5. Basic Site Information

- a) **Name of Site:** Rockbestos-Surprenant Cable Corp. Facility
- b) **Address:** 172 Sterling Street, Clinton, Massachusetts
- c) **Owner:** The Town of Clinton is the current owner of the Site

6. Status and History of Contamination at Site

a.) Site Contamination:

The Site is contaminated asbestos-containing materials, currently stockpiled on-site.

b.) Operation history and current use of the Site:

The property was developed in the 1880s and operated as the Sterling Worsted Mills until the 1910s, when the Clinton Wirecloth Co expanded operations to the site. The Rockbestos-Surprenant Cable Corp. manufactured wire and cable from 1943 to 2006. The estimated 450,000 square feet of industrial buildings were demolished in 2008 after the Town's fire chief declared the buildings a hazard. The Site is currently unoccupied.

c.) Environmental concerns at the site

There is a potential of migration of contaminant impacts to nearby human and ecological receptors and a nearby wetland.

(d.) How the site became contaminated and the nature and extent of contamination

The source of ACM is building materials. Abandoned stockpiles of building debris were accumulated by the former property owner and associated with building demolition.

7. Brownfields Site Definition:

The Site is (a) not listed or proposed for listing on the National Priorities List; (b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to

FY'23 EPA Brownfields Cleanup Grant Application
172 Sterling Street Remediation Project, Clinton CDP Target Area, Clinton, Massachusetts

or entered into parties under CERCLA and (c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications:

Site assessment activities were conducted from 1994 to 2022 which included soil, groundwater and ACM stockpile investigations. These activities were documented in comprehensive site assessment reports submitted to the Massachusetts Department of Environmental Protection (MassDEP) by the Potentially Responsible Party (PRP), along with reports prepared on behalf of the Town in 2021 and 2023.

9. Site Characterization:

The Site is enrolled in a state voluntary response program under the MassDEP. MassDEP assigned Release Tracking Numbers (RTNs) 2-10421, 2-11386 and 2-11434 to releases at the site. There is a sufficient level of assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions:

There are no known ongoing or anticipated environmental enforcement or other actions related to the Brownfields site for which funding is sought. There are no inquiries or orders from federal, state, or local government entities that the City is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.

11. Sites Requiring a Property-Specific Determination:

The property does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility-Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

- (a) The Town acquired the property as a tax taking.
- (b) The property was acquired on July 17, 2018.
- (c) All disposal of hazardous substances at the site before the Town acquired the property.
- (d) The Town has not caused or contributed to any release of hazardous substances at the site
- (e) The Town has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure

- a. The Town will contract a Qualified Environmental Professional (QEP)/Massachusetts Licensed Site Professional (LSP) to oversee cleanup activities pursuant to 310 CMR 40.000, the Massachusetts Contingency Plan (MCP). Site workers will be OSHA HAZWOPER certified.
- b. If access is required, The Town will obtain an access agreement with the abutting property owner.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The Town made available a Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

b. Community Notification Ad:

A public notice was published in the Clinton Item on October 20, 2023, and posted in Clinton Town Hall and the Bigelow Free Public Library. (see attachment).

c. Public Meeting

A hybrid public meeting was held on Wednesday, October 25, 2023, via zoom and in the Select Chamber of Clinton Town Hall.

d. Submission of Community Notification Documents

The following items are attached:

- Draft ABCA
- Copy of newspaper ad
- Narrative Summary of Public Meeting
- The public meeting attendees list

15. Contractors and Named Subrecipients

Not Applicable. The Town will procure the QEP and contractors(s) through a public procurement process.