

NARRATIVE

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfields Challenges and Description of Target Area

The Town of Adams, MA (pop. 8,166) lies 175 miles west of Boston in the northern Berkshires along the banks of the Hoosic River. Incorporated in 1778, Adams began as a Quaker farming community but was soon caught up in the industrialization across New England. By 1850 industrial workers outnumbered farmers. The Town emerged as a primary manufacturing center with the success of the Berkshire Mills in the late 1800s and reached its peak population of 13,525 residents in 1925. However, Adams has very much changed from its peak in population with the significant decline of the northern Berkshires industrial economy. While some industrial manufacturing employers remain Adams has become predominantly a bedroom community.

The Target Area for this project is the Route 8 corridor, a north/south commercial/industrial corridor that runs through the core of the Town. The corridor encompasses the downtown and is intermixed with dense residential neighborhoods, former mill housing, commerce and industry. Vacant often dilapidated brownfields within the Target Area pose a real safety and environmental concern. The brownfield sites within the Target Area are blighted properties that detract from the community character of the Target Area and create a sense of disregard and neglect that discourages investment in the community. **As one of the largest potential development sites in the Town, the blighted, hazardous condition of the former Curtis Fine Papers site presents a severe and urgent need for Adams.** This grant is a critical next step to address the challenges and impacts that result from known and suspected contamination and will advance the most prominent site within the corridor to cleanup and productive reuse.

b. Description of the Proposed Brownfields Site

The Curtis Fine Papers site (the Site) is located at 115 Howland Avenue in Adams, Berkshire County, Massachusetts. The Site is located within the Town's northern gateway, in a mixed residential and industrial area approximately 2 miles north of the downtown. It is bounded on the west by Route 8 and on the east by a rail line. The Site includes the former factory building, an office building and three outbuildings. The three outbuildings consist of a workshop and two water processing buildings. Two groundwater extraction well houses, a 100,000-gallon No. 6 fuel oil storage tank, and a non-contact cooling water pond are all located on the Site.

Historically, the Site was owned and operated by several paper companies, including Curtis Papers, Inc., (formerly known as Royal Blue Papers, Inc.) and prior to that by Crown Paper Company and the James River Company, Inc. In October 2003, Curtis Papers filed for bankruptcy and all mill operations ceased. Much of the manufacturing equipment was removed from the facility, and the property remained vacant until MJD Real Estate purchased the property at a bankruptcy sale in June 2009. The site has been operated by multiple industrial tenants, which used numerous types of petroleum and hazardous materials including, chlorinated solvents for various industrial processes associated with the manufacturing of plastic goods, bicycle frames, and paper. MJD Real Estate took measures to secure the Site; however, trespassers frequently entered the buildings and there is widespread evidence of vandalism.

The Site consists of five (5) main buildings, all in various stages of disrepair. Located on the west side of the facility is a standalone workshop (Building 1). The main mill complex (Buildings 2,

3, and 4) includes a boiler room, hazardous waste storage room, mill equipment room, and other rooms used for chemical and paper storage. An office building (Building 5) is connected to the main building by a narrow passageway, and a well house on the east side of the main building. A 259,000-gallon open reservoir on site was historically used for fire suppression.

In October 2019 through April 2020, the EPA, Region 1, Emergency Planning and Response Branch (EPRB), EPA's Superfund Technical Assessment and Response Team (START) and EPA's Emergency and Rapid Response Services (ERRS) demolished the on-site smokestack; conducted hazardous categorization of container and drum contents; combined and containerized container and drum contents for disposal; segregated drums and totes for transportation and disposal (T&D); excavated lead-contaminated soil for T&D; and performed site restoration.

Despite these efforts, the site poses a significant safety risk as the buildings have continued to deteriorate. The Town took ownership of the site in September 21, 2016 due to tax delinquency. The Town was awarded an EPA Brownfields Community Wide Assessment Grant in 2023. Under that grant a structural assessment of the buildings and a Hazardous Building Materials Investigation (HBMI) were conducted in 2025. The structural inspection identified building conditions that ranged from fair to significantly damaged throughout the mill complex and roof conditions in Buildings 1, 2, 3 and 4 ranged from poor condition to total collapse. The structural inspection concluded that all the buildings have been exposed to water and moisture causing various levels of damage to the structural members. Building 1 and the south portion of Building 4 may be economically viable to repair, while Buildings 2, 3, and the north portion of Building 4 are beyond repair. Severely degraded sections of the buildings prevented complete access due to safety concerns. The HBMI identified asbestos-containing materials (ACMs) in Buildings 1, 4 and 5. Suspect ACMs were observed in Buildings 2 and 3 that were inaccessible and should be assumed to be ACMs. The investigation also identified lead-based paint (LBP), building components containing polychlorinated biphenyls (PCBs), and various universal wastes inside the buildings.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

A reuse strategy has not been finalized for the Site; however, the remediation and ultimate development of the Site is in alignment with the Town's land use and revitalization plans. The proposed project is supported by the 2023-2027 Comprehensive Economic Development Strategy (CEDS) for Berkshire County. **Redevelopment of the Site is listed as a priority project for mixed use and commercial site redevelopment within the CEDS.** The CEDS highlights the need to identify and mitigate development constraints (environmental contaminants, functionally obsolete buildings, etc.) on the property in order for the private sector to transition the property to a higher and better use (and contribute to the local economy and tax base). The proposed cleanup of the site also supports EPA's "Powering the Great American Comeback Initiative", as it will promote Clean Air Land and Water for every American by removing HBM contamination.

The Town's Community Development Strategy "CD Strategy" represents a comprehensive and integrated approach or "action plan" to address critical issues including enhancing the local economic base. The CD Strategy specifically identifies the Route 8 Corridor, a major north/south highway with almost 18,000 vehicles per day, as a primary focus for economic activity and recognizes its importance as a location for manufacturing in the northern Berkshires. The project Site is prominently located along the Route 8 Corridor, on the Berkshire Regional Transit Authority bus route, served by all public utilities, and along an active rail line (CSX). The

prominent location and poor conditions at the Site present a highly visible source of blight and decline within the immediate gateway to the Adams town center.

d. Outcomes and Benefits of Reuse Strategy

The remediation and reuse of the Site is expected to stimulate economic development in the Target Area post-cleanup. As acknowledged within the CEDS, the Site is prime for redevelopment as it is located adjacent to a major transportation route (Route 8), as well as active rail. Its relatively large size allows the potential for multiple uses. **Remediation and reuse will provide important public health, employment, and fiscal benefits to the community at large, and will stimulate economic development and job creation upon completion of the cleanup activities.** Given the continuing interest in this Site, its advantageous location on Route 8, the Town's planning and revitalization goals and zoning regulations, the Town strongly believes remediation of this Site will lead to the redevelopment of this Site, resulting in job creation and additional tax revenue.

While the reuse of the Site is not likely to improve local resilience to the impacts of extreme weather events and natural disasters, **in its current condition, the Site is extremely vulnerable to the impacts of extreme weather events and poses a real hazard.** Local zoning allows rooftop and small-scale solar by-right, providing for the inclusion of renewable energy. The reuse of the Site could facilitate the development of renewable energy from solar, or geothermal energy and will incorporate energy efficiency measures, supporting the Great American Comeback Initiative.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The Town was awarded an EPA Brownfields Assessment Grant in 2023. This funding has allowed for the structural assessment and HBMI conducted at the Site. Grant funding has not yet been exhausted and the Site remains a priority for the Town if further characterization of the Site is needed for the remediation to continue. If needed, the Town would seek additional support from the Berkshire Regional Planning Commission (BRPC) through their Brownfields Program.

f. Resources Needed for Site Remediation

The Town has committed an additional \$100,000 toward the completion of the remediation and/or reuse planning at the Site if sufficient funds remain. The Town has initiated the process of requesting a \$500,000 subgrant from BRPC's Brownfields Revolving Loan Fund (RLF) to complete the remediation. RLF funds are available and the Town has BRPC's full support.

g. Resources Needed for Site Reuse

The Town has successfully leveraged a variety of other funding sources and incentives to help remediate brownfields and bring them back into productive use. The Town is eligible for funding from both federal and non-federal resources, and is committed to pursuing these resources that have successfully been utilized in the past to support the reuse of the Site. EPA Brownfields Cleanup Funding is critical as the first step toward leveraging other funding sources. Key funding resources that will be sought to support site reuse include MassDevelopment funds, MassWorks, Rural Development Fund program, and Community Development Block Grant (CDBG) funds.

h. Use of Existing Infrastructure

The Site is within a heavily developed area and is already served by existing infrastructure, including rail. The need is not to expand and extend roads and utility services, but to renew facilities where they already are, in order to continue to serve existing neighborhoods and industry. This grant will facilitate the use of existing infrastructure at the Site, rather than encouraging

development in previously undeveloped areas without existing infrastructure. Additional infrastructure is not needed to carry-out revitalization plans for the Site; however, remediation of known contamination is needed in order to take full advantage of the existing infrastructure.

(2) COMMUNITY NEED & COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

The Town of Adams is considered an EPA micro community with a population of just 8,166. According to data from the US Census American Community Survey 2019-2023, the median household income within the Target Area is \$54,000, significantly lower than the national average of \$78,538 and state median household income of \$101,341. Therefore, the Town's small size and low-income are just two factors that limit the Town's ability to draw on other initial sources of funding to carry out environmental remediation and subsequent reuse of the Site. The pervasive industrial decline and other significant economic disruptions within the Town have resulted in direct impacts to the local economy. The Town has suffered population loss, concentrated in the outmigration of younger, working age residents. Meanwhile the Town's ability to increase its investments in cleanup and reuse of brownfields is hindered by the inability to continually raise taxes on an already-burdened population. More than half of the Town's budget is dedicated to education, and operational and capital costs for the schools continue to increase even as enrollments decline. State Aid to the Hoosac Valley Regional School District has remained flat or declined over the past 6 years, meaning the member towns, including Adams, shoulder more of the financial burden every year. This grant is necessary to meet the needs of the community to advance the remediation of this critical Site and overcome the obstacles to redevelopment and reuse that the community is currently faced with.

b. Health or Welfare of Sensitive Populations

According to a recent survey conducted by the Town, people are concerned about the diminishing quality of life in their neighborhoods and perceive a loss of spirit and cohesiveness. The Site is prominently located on the Route 8 corridor, the main highway connecting Pittsfield and North Adams with over 17,500 vehicles per day. **Within the northern gateway to the town center, the highly-visible Site is vacant, boarded-up, with visible collapsed roofs and broken windows and unable to be used due to hazardous contamination and structurally unsound buildings.**

The welfare of the community living within the Target Area is impacted by the blight associated with the Site as well as safety concerns. Some of the lowest income families within the Town live in dense neighborhoods within the Target Area that were once mill housing. The existence of brownfields within the Target Area fosters a sense of disinvestment, disregard and neglect within an already struggling community. Over half of the people within the Town (58.2%) can be classified as belonging to a sensitive population: minorities (4.3%), over 65 years old (24.9%), children (14.1%) and women of childbearing age (14.9%).¹

This grant will address the blight and safety hazard posed by structurally unsafe building conditions and reduce related threats, including those posed by potential exposure to hazardous materials. The ultimate reuse of the Site will be a highly visible, tangible investment in the community which is expected to create job opportunities and increase the tax base.

¹ Data from the US Census American Community Survey 2019-2023

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Berkshire County ranks 13th out of 14 Massachusetts counties in the county-wide health rankings released by the Robert Wood Johnson Foundation. The Massachusetts Community Health Information Profile, which maintains county-level data to assess health needs, monitor health status indicators, and evaluate health programs indicates that the rate of asthma related emergency room visits, deaths from chronic disease, and breast cancer deaths in the County are all above the state rates. Notable differences exist for both women of childbearing age and minorities. According to the Massachusetts Cancer Registry, cancer incidence within the Town of Adams is higher than expected for the following cancers: breast (invasive), brain and other nervous system, Non-Hodgkin Lymphoma, esophagus, kidney and renal pelvis, leukemia, and Hodgkin Lymphoma. The cleanup activities conducted under this grant will protect against exposure and reduce the threats associated with contamination that can lead to adverse health conditions, and redevelopment will remove the threats associated with the unsafe buildings.

d. Economically Impoverished/Disproportionately Impacted Populations

This grant and the projected site reuse will address and reduce threats to populations in the Target Area that are economically impoverished and disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies.

Even though the unemployment rate within the Town (5.5%) is comparable to the National average (5.2%), **the poverty rate is 14.7%, significantly higher than the state average of 10% and the national average of 12.4%.** The median household income within the Target Area is \$54,000, significantly lower than the national average of \$78,538 and just over half of the state median household income of \$101,341.² In addition to the presence of brownfields, the Target Community is impacted by various cumulative environmental issues including those represented by the flood control chutes, the presence of ongoing industrial activity, and impacts to the community associated with both rail and highway traffic. Route 8 is the primary north-south artery through Berkshire County and runs parallel to the site with over 17,500 vehicles per day and Adams is a non-attainment area for Ozone 8-hour. **Traffic studies conducted in the region conclude that the high number and proportion of trucks in the Target Area have significant impacts, including detrimental air quality issues, noise impacts and safety impacts.**

This grant will address the blight and safety hazardous posed by structurally unsafe buildings and reduce related threats, including those posed by potential exposure to hazardous materials. The Site cleanup will protect against exposure and reduce the threats associated with contamination that can lead to adverse health conditions, and redevelopment will remove the threats associated with vacant, abandoned buildings. The projected reuse will be a highly visible, tangible investment within the Target Area that will create jobs and improve the tax base.

Community Engagement

e and f. Project Involvement and Project Roles

Adams is a small town in which organizations across a wide variety of venues tend to know each other and work together consistently, often at a very personal level. The following community-based organizations have committed to providing support to the Town and facilitate community engagement with smaller neighborhood community groups impacted by the Site.

² Data from the US Census American Community Survey 2019-2023

- **Northern Berkshire Community Coalition (NBCC):** is a non-profit organization, located in North Adams, whose mission is to improve the quality of life in northern Berkshire County by organizing, supporting, and empowering the community. NBCC will use their monthly forums as a venue to assist the Town in providing information to affected neighborhoods and facilitate community engagement and involvement. Amber Besaw abesaw@nbccoalition.org
- **1Berkshires:** the county-wide economic development organization, marketing the region to create jobs and a sound local economy, will help to identify potential reuse opportunities and communicate the project with the business community. Ben Lamb blamb@1berkshire.com
- **Youth Center, Inc.:** their mission is to provide social, educational and recreational opportunities, for the youth and families of Adams, Cheshire and Savoy. Youth Center, Inc. will help to publicize the project, host presentations, and serve as a liaison for the community.

g. Incorporating Community Input

The Town will maintain a high level of community engagement by a range of venues. Public discussions held as part of regular meetings of the Selectmen, subcommittees of the Selectmen, the downtown committee, and other meetings involving members of the public are a tried-and-true method for engaging community members. Public meetings concerning the project will be held at the Adams Town Hall or at the Adams Visitors Center (both within the Route 8 corridor). The date and time of any public meetings will be advertised in The Berkshire Eagle at least a week prior, posted on the Town Clerk's Notice Board at Town Hall, and on the Town of Adams website. Meetings of the Selectmen are televised. The Town's Community Development Department will be an on-going source of general information to the public on the site remediation. Various media will also be utilized including public notices, press releases, the Town's website, and community access television, presentations before community organizations, as well as handouts.

Town staff is already actively engaged in the Target Area – CD staff already has in place a mailing list of every property owner within the Target Area and frequently sends out mailings to this list regarding upcoming meetings on progress with the Town's community development strategy and the CDBG program. The Town will extend the community engagement process by working in partnership with other organizations, including NBCC, the Youth Center, Inc., and 1Berkshire.

The Town will provide opportunities for public input and two-way communication to ensure the proposed cleanup activities are conducted in a manner that is protective of sensitive populations and nearby residents. The Qualified Environmental Professional (QEP) will complete the site-specific Community Involvement Plan (CIP), which will set forth in greater detail how the community can be involved in the project. The Town will ensure that two-way communication is maintained throughout the duration of the project to communicate the progress to citizens and ensure that community can provide meaningful input and feedback. Methods of communicating with the public will be adjusted as needed to ensure that they are both appropriate and effective.

(3) **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

a. Proposed Cleanup Plan

Severe deterioration has compromised the structural integrity of the onsite buildings and has prevented access to potentially impacted soils beneath the building footprints that may require remediation. Asbestos, lead-based paints (LBP) and PCB-containing materials within unstable and exposed areas of the building provide a direct pathway for release(s) to the environment. Many of the buildings cannot be restored or reused for any purpose, therefore demolition and bulk removal

of the hazardous building materials (HBM) and associated structures is necessary, and the entire waste stream will be disposed of as asbestos waste. The proposed cleanup plan includes demolition of Buildings 1, 2, 3 and 4, leaving Building 5 in place. In addition to the removal of hazardous building materials, numerous drums, totes and tanks of hazardous substances located within the building's interior will be removed and disposed of properly. Hazardous building material abatement will address public safety concerns and decrease the potential release of hazardous substances from the dilapidated structures during the redevelopment process.

Description of Tasks/Activities & Outputs - No Non-EPA grant resources are needed to carry out the tasks/activities described below.

Task 1: Cooperative Agreement Oversight:
b. Project Implementation: The Town will solicit the services of an experienced Brownfields grant manager and a QEP in accordance with all applicable procurement laws. The grant manager will ensure that all federal cross-cutting measures are met, such as Davis Bacon and BABA. EPA quarterly reports (QRs), annual FFR reports, updates to the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database and requests for reimbursement will be prepared and submitted by the grant manager with assistance from the QEP. The Town will maintain project files and information repository. A member of the project team will attend the National EPA Brownfields Conference.
c. Anticipated Project Schedule: Quarterly Reports submitted within 30 days after the end of each reporting period (Jan/April/July/Oct). Annual FFR submitted by October 30 of each grant year. ACRES updated following each milestone. Final Closeout report submitted within 90 days after end of cooperative agreement period.
d. Task/Activity Lead: Town/Grant Manager
e. Outputs: Signed contracts with a grant manager and a QEP that meet the recipient's and EPA's expectations, 16 quarterly reports; ACRES to track program measures; FFR reports; Closeout Report, a member of the Team will attend the EPA National Brownfield Conference.
Task 2: Community Outreach and Engagement
b. Project Implementation: The Town will provide community outreach and engagement, and focus gathering input from the Target Area residents and community stakeholders. The selected QEP will develop a Community Involvement Plan (CIP) which will detail the steps to ensure adequate public notice and the opportunity for the community to provide input / feedback on the proposed cleanup/reuse plan and response to comments. Public notice of the updated draft ABCA will be provided and presented at a public meeting with a 30-day comment period for members of the community to review and provide their input. Written responses to public comments will be provided and incorporated into the finalized CIP and ABCA. Reports and other materials will be posted to the town's website. The Town will hold four public meetings and provide ongoing communication to EPA and MassDEP.
c. Anticipated Project Schedule: Community engagement activities would begin Spring 2027 with generation of CIP and continue through Spring/Summer 2030.
d. Task/Activity Lead(s): Grant Manager
e. Output: CIP, Final ABCA, meeting minutes, presentation materials, and fact sheets.
Task 3: Cleanup Activities, Oversight and Compliance
b. Project Implementation: QEP will prepare documentation required for cleanup implementation, including a Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Remediation / Engineering Plans & Specifications, and EPA / state required documents and

Remedial Action Plans. Town will prepare a public bid package with support from QEP for the procurement of a cleanup contractor in accordance with state regulations. QEP will provide bid support to the Town during competitive procurement process. Cleanup contractor will implement cleanup tasks with oversight from QEP. QEP will oversee building demolition and hazardous building materials abatement, and removal/disposal of drums, totes, tanks and electric transformers. During site remediation, the QEP will perform observation activities and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA and state requirements. QEP will prepare and submit state required Remedial Action Plan, weekly Status Reports, and Cleanup Completion reports to the MassDEP and EPA. QEP will issue closure report to MassDEP and EPA. QEP will also ensure Davis Bacon compliance.

c. Anticipated Project Schedule: Spring / Summer 2027: Generate cleanup plans, remediation / engineering designs and specifications, issue invitation for bids for cleanup contractor. Fall/Winter 2027: award cleanup contractor, secure permits. Spring/Summer 2028: Commence site remediation. Fall / Winter 2028: Complete site remediation related field tasks. Final documentation and Cleanup Completion report is anticipated in Spring/Summer 2029.

d. Task/Activity Lead: QEP

e. Outputs: HASP, QAPP, remedial engineering plans & specifications, bid documents, site remediation & restoration. Bulk loading of ~ 12,800 tons of HBM. Bills of Lading/Manifest, Remedial Action Plan, Status Reports, Cleanup Completion & Closure Report.

f. Cost Estimates

The Town is requesting **\$4,000,000** to complete the tasks above. Costs have been estimated based upon past experience and estimates from environmental contractors and in consultation with the EPA's Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines. *No personnel, fringe, indirect, administration, equipment, supply or other costs are requested and therefore are not included in the cost table. Only costs to be covered by EPA grant funds are included within the cost estimates and within the budget table.* Funding resources that will be leveraged to meet the remediation budget are discussed under Section 1.c.i. and 1.c.ii. *Resources Needed for Site Characterization and Remediation*

Task 1 – Cooperative Agreement Oversight: Total= \$49,600

Contractual: Grant management expenses of \$16,000 for general Cooperative Agreement Oversight and programmatic assistance, including Quarterly Reports (16), ACRES updates, and grant closeout reporting plus QEP expenses of \$30,600

Travel: \$3,000 for National Brownfield Conference (registration, airfare, lodging, per diem)

Task 2 – Community Outreach & Engagement: Total = \$34,000

Contractual: Grant management expenses of \$10,000 and QEP expenses of \$24,000 for 4 public meetings, CIP, Final ABCA, and outreach materials including survey.

Task 3 – Cleanup Activities, Oversight and Compliance: Total= \$3,916,400

Contractual: Grant management expenses of \$10,000 to ensure all federal cross-cutting measures are met, assistance to procure cleanup contractors, and conduct Davis Bacon wage monitoring. QEP expenses (\$255,000) include: \$155,000 for final ABCA, HASP, QAPP, Design Plans & Specifications, bidding assistance, EPA required remedial action plans and status documents, and Final Clean Up Completion Report; and \$100,000 for construction administration and oversight.

Construction: Total \$3,651,400 includes \$90,500 site preparation (erosion controls, clearing and grubbing, temp fencing, permits and submittals); \$25,800 utility disconnect and removal;

\$364,400 demo and load out; \$1,920,000 (12,800 tons @\$150/ton bulk loading); \$80,000 abatement; \$167,000 drums/AST removal; \$119,840 Bonding (~4%); \$584,280 Contingency (~20%); \$299,580 Inflation (~10%).

Budget Categories		Project Tasks (\$)			Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Cleanup Activities, Oversight & Compliance	
Direct Costs	Personnel				
	Fringe Benefits				
	Travel	\$3,000			\$3,000
	Supplies				
	Contractual	\$46,600	\$34,000	\$265,000	\$345,600
	Construction			\$3,651,400	\$3,651,400
	Other (include subawards)				
Total Direct Costs		\$49,600	\$34,000	\$3,916,400	\$4,000,000
Indirect Costs					
Total Budget (Total Direct Costs + Indirect Costs)		\$49,600	\$34,000	\$3,916,400	\$4,000,000

g. Plan to Measure and Evaluate Environmental Progress and Results

The Town will procure the services of a grant manager who will work with the Town to track, measure and evaluate our progress in achieving project outcomes, outputs and project results. The Town will develop a Workplan for approval by EPA Region 1 which will outline anticipated outputs and outcomes. This information will be tracked in the quarterly and final reports. ACRES will be utilized to report, document, and track information such as funding received, contamination present, acres cleaned up, acres redeveloped and funds leveraged. The Town will also work closely with our Project Officer, and selected QEP to track, measure and evaluate our progress.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

The Adams Community Development Department will be the responsible party for ensuring the completion of all administrative, technical, and financial requirements of the grant project. The Town intends to solicit the services of a grant manager for assistance in meeting the project management and reporting requirements of the grant and will include BRPC in such a solicitation. BRPC has extensive experience in managing EPA Brownfields grants and has assisted the Town with many community development projects. BRPC is currently serving as the grant manager for the Town's Community-wide Assessment Grant and is assisting the Town to ensure compliance with all federal programmatic requirements. Melissa Provencher has been with BRPC for 26 years and has managed several successful Assessment and Cleanup Grants.

b. Description of Key Staff

The Interim Community Development Department Director, Donna E. Cesan, has over 35 years of community planning, development, and grants management experience. Ms. Cesan has

managed the Town's Community Development Block Grant program (\$25 million) over the past 24 years. As a member of the American Institute of Certified Planners, she has worked at state and local government levels in development review, program development and management, environmental planning, community and economic development, and as a planning consultant.

c. Acquiring Additional Resources

The Town will follow federal procurement and EPA guidelines to procure the services of a grant manager and QEP. The Town will include BRPC in the invitee list for the solicitation. BRPC has been a valuable resource to the Town with a dedicated and experienced staff responsible for meeting the various requirements of state and federal agencies. BRPC has a strong track record with EPA Brownfields and is serving as the grant manager for the Town's current EPA Assessment Grant. Melissa Provencher, Brownfields Program Coordinator, has been with the agency for over 26 years and worked with Town to manage their 2016 Assessment Grant as well as their Cleanup Grant for Hoosac Valley Coal & Grain. Ms. Provencher has managed a Brownfields Area-Wide Planning Project and numerous Brownfields Assessment, Cleanup, and Revolving Loan programs for BRPC and several municipalities within BRPC's region. The Town will work with the selected grant manager to hire an experienced QEP. The QEP will be competitively procured and contractually responsible for ensuring compliance with applicable federal and state requirements, particularly those related to labor practices and local hiring. The Town is well versed in conducting competitive bidding and securing qualified contractors, as it has done under its current Assessment Grant and previous Cleanup Grant.

Past Performance and Accomplishments

d. Currently or Has Previously Received an EPA Brownfields Grant

(1) Accomplishments

The Town of Adams was awarded an FY16 EPA Assessment Grant (BF00A00103). This grant was successfully completed and closed out. Six sites were identified and deemed eligible for funding. The Town of Adams was awarded an FY18 Brownfields Cleanup Grant for the Hoosac Valley Coal & Grain Site (BF00A00508). This grant was successfully completed and closed out. The Town has been awarded a FY23 Assessment Grant (BF 00A01134). Three sites have been prioritized and deemed eligible for funding, including the Curtis Fine Papers Site. Additional work includes MCP compliance activities, Phase I and II ESAs, site-specific QAPPs, and Health & Safety Plans. The outputs and outcomes are accurately reflected in ACRES. Assessment activities are ongoing and ACRES will continue to be updated accordingly.

(2) Compliance with Grant Requirements

The Town has an excellent history of timely and acceptable quarterly performance, grant deliverables, and ongoing ACRES reporting. The Town has consistently reported progress towards achieving the expected results of the grants in a timely manner. No corrective measures have been needed and there were no funds remaining at the end of the Period of Performance. The Town is in compliance with the Workplan, schedule, and terms and conditions for their open Brownfields Grant. Funds remain and will be expended on eligible activities by the end of the Period of Performance. The Town has procured the services of BRPC to serve as grant manager and the services of Weston & Sampson to serve as the QEP. The Project Team works closely and collaboratively with their EPA Project Officer. Progress toward achieving the expected results of the grant are being made in a timely manner. The sites have been entered into ACRES. Quarterly and annual reports have been submitted on time and the project is on schedule and within budget.