

# Environmental Hazard Mitigation Project

Preliminary project proposal submitted to Board of Selectmen 2021 OCT 19.

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Produced by the Office of Emergency Management.

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Hamilton Reservoir Dam- September 2, 2021- Photo Credit: Holland Police Department Archives

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# **Attachments**:

• Phase 1- Joint MVP/HMP Planning Project Description

#### **Abstract:**

The Town of Holland is seeking financial and technical assistance in the areas of emergency preparedness and hazard mitigation. This includes developing and maintaining comprehensive programs and plans to identify vulnerabilities in an effort to minimize the negative impact of natural events that affect our environment and infrastructure.

Hazard mitigation is any sustained action taken to reduce or eliminate the long-term risk to human life and property from hazards<sup>1</sup>. Mitigation planning is a proactive process and will help minimize damage to buildings, infrastructure, water supplies, and natural, cultural, and historic resources. A mitigation plan is a demonstration of the commitment to reduce risks from natural hazards and will create a safer, more disaster-resilient community.

Property damage, injury, and loss of life can be reduced or prevented by a mitigation program that addresses the unique geography, demography, economy, and land use of a community. Preparing and maintaining mitigation plans is an important factor in reducing costly repairs of public resources and infrastructure and provides private property owners with additional protection.

These plans will identify the natural hazards that impact the community, identify actions to reduce losses from those hazards, and establish a coordinated process to implement the plan<sup>2</sup>. It has been demonstrated that hazard mitigation is most effective when based on an inclusive, comprehensive, long-term plan that is developed before a disaster occurs<sup>3</sup>.

Before implementing physical measures we must identify the natural hazards that may impact the community by conducting risk assessments to identify the critical facilities, roads, homes, businesses, public spaces, and other ecological areas that may be at risk of damage by natural causes. We must also identify and assess the policies, programs, and regulations we currently incorporate to ensure that we have the most efficient and effective protection methods in place to mitigate future risk. This may involve addressing any deficiencies found in current strategies and establishing goals for updating, revising, or adopting new strategies.

Please note that this document has been formatted with the expectation of modifications being made.

<sup>&</sup>lt;sup>1</sup> <u>Code of Federal Regulations 44 CFR 201.2</u>

<sup>&</sup>lt;sup>2</sup> Code of Federal Regulations 44 CFR 201.1(b)

<sup>&</sup>lt;sup>3</sup> Federal Emergency Management Agency FEMA- Local Mitigation Plan Review Guide (October 1, 2011)

# **Community Profile:**

The Town of Holland is a rural community with an estimated population of 2,603 citizens<sup>1</sup> and is located in Hampden County in the Commonwealth of Massachusetts. The Town is bounded to the north by the Town of Brimfield, to the west by the Town of Wales, to the east by the Town of Sturbridge, and to the south by the Town of Union Connecticut. The Town is situated inland with no coastline and of the approximately 13 square miles or 8,320 acres, two-thirds are forested. Most of the community's large tracts of forest lands occupy the western side of town and water bodies occupy approximately 501 acres of the total land area (2016).

Historical data shows us that Holland was originally included in the Winthrop Lead Mine Grant of 1644. In 1633, John Oldham, a fur trader, brought to Boston some samples of a black substance from a deposit in a hill in the southern part of the present Town of Sturbridge, long known to the natives as Tantiusque<sup>2</sup>. The Bostonians called it black lead, although it was actually graphite. At the urging of Dr. Robert Child, then in England, John Winthrop, Jr., Assistant, General Court, Massachusetts Bay Colony, 1631-1649, and the eldest son of John Winthrop, first governor of the Massachusetts Bay Colony, procured from Webomscom and Nodowahant of the Nipmuc people a grant of the land for ten miles around the hills containing the black lead<sup>3</sup>.

In 1714, a southern boundary for present-day Holland that was derived from a 1642 survey was set at the Massachusetts-Connecticut state line. Holland was originally included within the Brimfield annex of 1717 with an eastern boundary set at the Sturbridge line. In 1762 Holland was included within the formation of South Brimfield-Wales with its northern boundary set at the Brimfield line. Holland was then established as an independent community in 1783 with a boundary at County Road in present-day Wales. Although established as an independent community in 1783 Holland was considered a district until the General Court enabled districts formed prior to 1785 to become towns. As a result, in 1836, Holland was incorporated as a town<sup>4</sup>.

Since its inception, Holland has been part of the Quinebaug River Valley watershed which flows through the Town and then merges with the French and Middle Rivers to form the Thames River. The Thames River and its tributaries flow through Connecticut and ultimately run to the Long Island Sound of the Atlantic Ocean. In 1865, the Quinebaug River was dammed, which created the Hamilton Reservoir. The present dam was constructed in 1956 after a flood caused the previous dam to rupture and flood large areas of the Town. The Hamilton Woolen Company of Southbridge MA originally built the dam a short distance east of the center of Holland. This resulted in the taking of many acres of farmland for approximately 2.5 miles along what was the Quinebaug River in the southern section of Holland. The building of the dam was protested by farm owners but the Woolen Company was empowered by a "flowage law" which was intended to encourage the building of saw and grist mills to accommodate local farmers. Not long after the dam was built, the law was repealed, but too late for the Holland farmers<sup>5</sup>.

<sup>&</sup>lt;sup>1</sup> <u>United States Census Bureau</u>- 2020 decennial census

<sup>&</sup>lt;sup>2</sup> The Colonial Society of Massachusetts Volume 61: The Pynchon Papers, Volume II

<sup>&</sup>lt;sup>3</sup> <u>Indian Deeds of Hampden County</u>- Edited by Harry Andrew Wright, (June 1905), pg 15, August 8, 1644

<sup>&</sup>lt;sup>4</sup> Massachusetts Historical Commission MHC Reconnaissance Survey Holland - CT Valley (1983)

<sup>&</sup>lt;sup>5</sup> <u>History of East Brimfield and the Lost Village</u> by John Mahitka Jr., Kenneth Lucier,( 2019)

The Reservoir is the most defining attraction in the Town today and its appeal has produced the establishment of many seasonal dwellings in addition to year-round residences along its shores. The fully recreational waterway consisting of approximately 413 acres provides many leisure opportunities, beautiful vistas, and important wildlife habitats. The Town has rights of way on small areas of land for access to the Reservoir with one developed public boat ramp. In addition, there are numerous private ramps and rights of way that provide access to the Reservoir. The Reservoir is the largest water body in the Town and a natural choice for homeowners seeking peaceful, scenic views. For this reason, residential development is focused intensely around the Reservoir and approximately 1,451 acres of land is occupied by residential development in Holland (2016).

The Reservoir is divided by a public way, Mashapaug Road, which threads south to north through the Town and crosses over the Reservoir before arriving at a junction with Brimfield Road, Stafford Road, and Sturbridge Road, creating a 4 road intersection. A causeway that is part of Mashapaug Road forms a north and south basin of the Reservoir and water flows through both basins via a Town maintained culvert pipe system underneath. The Town regulates construction in and near the Reservoir by requiring permission from the local Conservation Commission, regulates recreational use of the water as well as the placement of docks through general bylaws, and controls water flow by the manual operation of a dam sluice gate. The Town also utilizes public funds for police enforcement of the waterway, chemical treatments, and water quality testing. The presence of the Reservoir is not only notable for its recreational opportunities and scenic vistas, but also because the majority of the Town's prime agricultural soils lie below the Reservoir. There are a few small parcels of cropland on the southwestern side of Holland, and approximately 2,125 acres of public and semi-public open space exist within the Town. This figure represents 25% of Holland's total land area (1999)<sup>6</sup>.

At approximately 65 acres, Lake Siog is the next largest body of water after the Reservoir. In pre-colonial times this area was populated by the Nipmuc people who were said to be indigenous to the area and first settled because of the abundant fish, especially Pickerel<sup>7</sup>. Today, the Lake is part of the U. S. Army Corp of Engineers (USACE) East Brimfield Impoundment and provides valuable flood control storage for the Quinebaug River. It also remains as the centerpiece of a beautiful, scenic, and ecologically valuable wetlands complex that is widely used for fishing, swimming, and boating. There is a small town-owned beach alongside Pond Bridge Rd within the impoundment and situated across from the beach is a fully operational recreational area that contains another beach, a swimming area, a picnic area, and hiking trails. This area is operated by the USACE seasonally and is known as the Lake Siog Recreation Area. Within the impoundment there is also a boat ramp providing public access to the Lake.

Adding to the variety of water resources in the Town are numerous ponds, streams, and brooks. This includes Lost Lake, a beautiful lake located in deep woods, accessible only by foot through pine woodland. Many of the streams and brooks, such as May Brook and Stevens Brook, have native trout populations and are popular areas for fishing. Located on the Quinebaug River is a designated canoe water trail with a total of four miles between Lake Siog and the East Brimfield Reservoir in Brimfield and Sturbridge. This trail offers a pleasant trip through a variety of habitats, with areas to stop to picnic or swim.

<sup>&</sup>lt;sup>6</sup> <u>Town of Holland LHMP</u> Prepared by: The Holland Natural Hazards Mitigation Planning Committee and The Pioneer Valley Planning Commission (2016)

<sup>&</sup>lt;sup>7</sup> <u>Massachusetts Paddler</u>- Holland Pond & Quinebaug River Trail

In addition to recreational waterways, there are several hiking trails, walking paths, and wildlife management areas located within the Town. Included is the approximately 36 acre Quinebaug Woods operated by The Trustees, the Lake Siog Pass Trail leading to the USACE Grand Trunk Trail in Brimfield and Sturbridge, Norcross Wildlife Sanctuary properties, and portions of the Leadmine Wildlife Management Area. The combination of a large amount of protected open space in the Town, as well as the large footprint of the Reservoir and the various trails and wildlife areas, will most likely produce future residential development in these areas.

The historical-geographical center of the Town currently encompasses the Hitchcock Field and Recreation Area, the Town Hall, the Elementary School, and the Public Library. The Holland Congregational Church which is located adjacent to the Library has been the center of community life for almost one hundred years. All of these locations are noteworthy for their civic importance and several, such as the Church, the parsonage, and the Library, have historic significance.

According to the 1999 MacConnell Land use data, the total land area of Holland was approximately 8,373 acres with roughly 13 percent of those acres as developed land. The remaining land was classified as undeveloped with forest as the largest category (76% of all land in town) with 6,348 acres. Open Water was the second-largest category with 481 acres compared to cropland and pasture, which represented individually, the third and fourth-largest amount of undeveloped land in the town with 184 and 46 acres, respectively.

Holland is 1 of only 2 municipalities within the Commonwealth of Massachusetts that Interstate Highway 84, (I-84) passes through. I-84 consists of approximately 232 miles and begins in the Commonwealth of Pennsylvania, (PA), at an interchange with Interstate 81, (I-81), in Dunmore, PA, and ends at an interchange with Interstate 90, (I-90), the Massachusetts Turnpike, which is within 6 miles of Holland. The small portion of the interstate that passes through Holland is located on the outskirts and does not contain an off-ramp but the motoring public can easily access Mashapaug Road from the south via an off-ramp that is situated in Union CT only feet from the border.

Unlike some of the surrounding communities, Holland has no major thoroughfares running through its mainland area. In order to get into Holland from the north, commuters coming from I-90, the Massachusetts Turnpike, must travel southeast on Holland/Sturbridge Road and commuters traveling along U.S. Route 20 must travel south along Brimfield/East Brimfield Road to reach Holland. From the west, Stafford Road is the primary means of access. The approach from the south and east cannot sidestep the Reservoir which means that any traffic into the center will have to travel through the more scenic portions of the Town. In addition, the densest network of roads surrounds the Reservoir and the area west of Kimball Hill Road contains the most obvious system of interlocking streets (2016).

The Town is one of a very small number of towns with no state-owned roads. This places the burden of maintaining roads squarely on the shoulders of its taxpayers. There is limited commercial activity and Mashapaug Road contains most of these parcels. There are isolated commercial enterprises scattered west of the Reservoir as well and in total, there are roughly 30 acres in commercial use. Additionally, of the 154 named roads in town, 71% of them are considered private ways. Although the Town has the authority by way of bylaws to make temporary repairs to private ways which have been open to public use for 6 years or more, and may conduct snow plowing and sanding operations on private ways where year-round residents reside, the Town's ability to properly manage and maintain a consistent road

network is significantly diminished. Just under half of all named roads are unpaved (46%), most of which are considered private ways and are in poor condition (2016).

The forested hills have once again become an abundant natural resource as they have recovered from being clear-cut in the late 1800s. These hills provide valuable timber and wildlife habitats and the long cultural history of Holland is still evident in the archeological remnants of the Nipmuc people around Lake Siog. This rich heritage continues following European settlement in the 1730's through the events that occur today (2016).

#### **Needs Assessment:**

With the focal point of our community being the Hamilton Reservoir and with our vast amount of ponds, rivers, streams, trails, and other unique ecological systems we must take a proactive approach in prioritizing the preservation of our environment. The Town has abundant natural and cultural resources and was originally settled because of its fishing grounds, fertile floodplains, and heavily forested hills.

Being a community with these unique resources we constantly face challenges in preserving the integrity of our environment. The Town's distinctive characteristics include steep sloping topography that is especially susceptible to erosion due to the relationship between the grade of the slope and the potential for increased water runoff velocity. Not only does this denigrate our nature and hiking trails it also enhances the introduction of nutrients and bacteria into our waterways.

Water quality reflects what is happening in its surrounding watershed. A watershed includes all the land, or drainage area, that drains into the body of water. Nonpoint source (NPS) pollution occurs when water flows throughout the watershed, picking up pollutants and depositing them into water resources. The combined effect of NPS pollutants such as phosphorus, sediment, and bacteria may result in degraded water quality and loss of recreational use and wildlife habitat<sup>1</sup>.

Although the Town has attempted to address these issues by installing a culvert system, these methods have proven to be ineffective during times of excessive water runoff from severe weather events. For example, in the summer of 2021, many roadways became flooded and significantly damaged during an episode of extreme rainfall within a short period of time which also exacerbated runoff into the Reservoir and other water bodies in the Town. This resulted in the rapid growth and bloom of algae and cyanobacteria in the Reservoir that lasted for several weeks and was likely caused by the water runoff picking up bacteria and pollutants in the watershed.

To develop erosion control plans and to minimize sedimentation, we must understand the impacts of the natural elements that affect our environment and provide methods to reduce the degradation of our trails, forests, and waterways.

<sup>&</sup>lt;sup>1</sup> Protecting Lakes From Nonpoint Source Pollution- Executive Office of Energy and Environmental Affairs EEA

# **Goals and Objectives:**

In order to protect and foster the natural, scenic, and aesthetic qualities of our community it is necessary that we focus on:

- defending our forests and other ecological habitats from destruction,
- flood, erosion, and pollution control,
- enhancing water runoff control systems,
- managing the growth of invasive vegetation in our waterways, and
- preparing for the harmful impacts of climate change now and in the future.

The purpose of this plan is to establish a multi-phase project consisting of an environmental hazard vulnerability assessment followed by implementing mitigation strategies and physical protective measures that will protect the health and safety of persons and property.

Our overall goal is to adopt procedures that center on the protection, restoration, and management of our ecological systems to safeguard public health, provide clean air and water, increase natural hazard resilience, and sequester toxic and carbon emissions.

#### **Project Management:**

After the concept of the project has been attained and agreed upon the planning phase of development should begin. This is where the scope of the project is defined and a project management team is established for the purpose of defining individual roles and responsibilities so all persons involved know to whom they are accountable.

It is recommended this includes a team of individuals who have the ability to identify and develop a cost analysis, funding sources, and a realistic timetable for project completion. Planning and project development may include community members and consultants who are comprised of outside service providers, such as engineering firms, architectural firms, and law firms. Additionally, consultants may include municipal personnel who provide advice, recommendations, or other input. For example, consultants may include members of municipal finance, parks, recreation, building, zoning, planning, and conservation sections, as well as public health, public safety, public works, and school department personnel. All of these individuals will become a part of the overall team that will establish and manage the project until completion.

It is recommended that members of the planning and development team maintain the capability to work in a collaborative manner with other members of the project team and maintain the capacity to prioritize and be flexible so they can adapt and refine goals as needed. Team assignments should be limited in scope and time for the purpose of maintaining a manageable operation overall.

It is of vital importance to preserve a consistent and reliable management structure to enhance communication between the diverse disciplines within the project team and to demonstrate a clear and concise reporting procedure. A well-designed management system includes the ability to identify resources and assignments and the ability to provide team members with direction in a controlled manner to ensure that best practices are followed and the quality of output is paramount for purposes of attaining maximum efficiency.

While executing the project, careful consideration should be given to the procurement and purchasing components in order to ensure that supplies and resources are readily available at the appropriate time. It is recommended that cost tracking systems are implemented, schedules are monitored, and plans are modified as needed.

Objectives, quality control, and performance should continue to be monitored throughout the project, and status reports, progress reports, and project development updates should be calculated and reviewed during all phases of the operation. It is also important to consider a close-out phase once the project is complete in order to evaluate project successes and to identify failures for the purpose of understanding so modifications can be made to improve future projects.

# **Management Team:**

Title	Name	Phone/VM/Email
Project Manager [Director]	Bryan Haughey- Chief of Police/EMD	413-245-0117 ext:330
[		bhaughey@hollandma.org
Administrative Assistant	-	-
Finance & Purchasing Manager	-	-
Grant & Funding Administrator	Bryan Haughey- Chief of Police/EMD	413-245-0117 ext:330
(Phase 1)		bhaughey@hollandma.org
Operations Manager	Brian Johnson- Highway Superintendent	413-245-3276
		highwaydept@hollandma.org
Construction Superintendent	-	_
Construction Superintendent		_
Logistic Coordinator	-	-
208,000 000 000 000		
Health & Safety Officer	-	-
·		
Site Supervisor	-	-
Project Procurement Officer	-	-
Consultant		
Consultant	-	-
Sub Contractor	-	_
Chief Financial Officer [CFO]	Linda Blodgett- Town Treasurer	413-245-7108 ext:104
(ex officio)		treasurer@hollandma.org
Chief Procurement Officer [CPO]	Stacy Stout- Town Administrator	413-245-7108 ext:108
(ex officio)		townadmin@hollandma.org

# **Organizational Chart:**



# **Project Description:**

Each phase of the project should include its own description that delineates conditions that are exclusive to that segment of the project. This is an important step because even though the scheme of the project may be consistent as it applies to overall goals and objectives, specific criteria may vary from phase to phase.

Each phase may include establishing a separate (core team) and that team may be broken down into even smaller groups of participants to include a single sector group, a mixed sector group, or a group by location<sup>1</sup>. Core teams may consist of members of the project management team or other individuals whose singular focus is that particular phase of the project. For example, a planning phase would require research and development personnel but would not necessarily require construction personnel or a health & safety officer. Although a core team may be led by an individual other than the project manager the entire team should still be responsible to the project management structure.

The planning and development phase must consider risk factors and quality control issues. Planning and development should involve aspects to engage citizens and other members of the community to participate in the planning of the project and may include activities such as public meetings and informational workshops that expand beyond simply providing notice that a project will be taking place. Phases may also be guided by standards and principles that are unique to the subject matter. For instance, a (building) phase may require licensing, permitting, and a construction impact declaration that would not be required as part of a needs assessment study.

Consideration must also be given to the policy that guides funding opportunities on a case-by-case basis as some funding agreements may require specific standards to be applied, (e.g. boundary statements, inclusion, exclusions, and precise timeline requirements). The project description should include the standards that apply and may include other details or attachments, such as, but not limited to, design proposals, blueprints, maps, GIS data, procurement instructions, written estimates, and signed contacts.

<sup>&</sup>lt;sup>1</sup> Community Resilience Building Workshop Guide (pg 7, #4, Grouping Options for Small Teams): Single sector – Group participants by like sectors (i.e., infrastructure, emergency management, social services, natural resources, finance) to capture higher levels of detail on select issues. This approach works well if the core team is at a point where very detailed information on risks and actions for a single sector is required. The tradeoff is that a more comprehensive, mixed-sector discovery of actions will need to be synthesized by a large team. Mixed sectors – Group participants from diverse sectors together to foster an exchange of different perspectives and actions. This approach helps participants see the connections comprehensively and develop common actions with co-benefits across sectors. By location – Group participants by geographic location or structural units within an organization (i.e., department, division, agency) to facilitate deeper dialogue on specific aspects of the issue. Small team report-outs are critical here to ensure the various teams can listen for commonalities which ideally result in crossjurisdictional or multi-organizational actions. This approach works well for large and/or complex focus areas with multiple jurisdictions or overlapping governmental/corporate decision making authority and processes

# **Permitting and Compliance Standards:**

Some projects may require approval or permits to be obtained from one or more levels of government, to include federal, state, and local agencies. It is recommended that the Operations Manager or Construction Superintendent obtain all permits necessary for the purpose of construction. Specific plans may be required to be submitted as part of the permitting process.

Additionally, in certain circumstances, such as construction on private land, approval will be required from the property owner. In private property situations, consideration should be given to conferring with legal counsel.

Permitting and Approval:								
Agency	Requirement	Approval Only	Туре	Status/Date				
<u>FEDERAL</u>	-	-	-					
1	-	-	-	-				
2	-	-	-	-				
<u>STATE</u>	-	-	-	-				
1	-	-	-	-				
2	-	-	-	-				
<u>LOCAL</u>	Required	-	-	-				
<ol> <li>Select Board</li> </ol>	Required Property of the Required	X	<mark>-</mark>	APPROVED 10/19/2021				
2	-	-	-	-				
<u>PRIVATE</u>	-	-	-	-				
1	-	-	-	-				
2	-	-	-	-				

# Compliance:

- The specifications outlined in the Massachusetts Department of Transportation Highway Division, (MassDOT), <u>Manual on Uniform Traffic Control Devices</u> (MUTCD), and the Standard Municipal Traffic Code (SMTC), shall be followed for any traffic signs, signals, or markings that may be a part of the project.
- 2. The provisions outlined in the MassDOT Highway Division, <u>Smart Work Zone Design Standards</u>, Version 1.1 shall be followed for any roadway construction that may be a part of the project.
- 3. The provisions outlined in the Americans with Disabilities Act [ADA] shall be followed.

#### Agreements:

1. It shall be agreed upon that the provisions promulgated by a provider funds associated with this proposal will be followed.

# **Funding and Procurement:**

Financial opportunities should be explored and approved during the planning phase of a project. Funds may originate from several different sources to include grants or donations, or by way of other forms of federal, state, and local appropriations.

It is expected that the project Finance and Purchasing Manager and Procurement Officer work closely with the municipal Chief Procurement Officer [CPO], Chief Financial Officer [CFO], and other funding administrators, such as, but not limited to, grant administrators and accountants.

Funding Sources:			
Source	Program	Percent or Amount	
1. EEA*	FY 22 MVP Planning Grant	100%	
Reference:	Smith, Andrew B (ENV)- andrew.b.smith@state.ma.us		
Source	Program	Percent or Amount	
2	-	-	
Reference: -			

<sup>\*</sup> Potential funding source

# **Procurement Requirements:**

- 1. The process for procuring bids, proposals, and contracts for services, supplies, and other professional services shall follow the <u>Uniform Procurement Act</u> as outlined in G.L. c. 30b, (unless expressly exempt from public bidding under §1¹).\*\*
- 2. Pursuant to § 4, for the procurement of a supply or service in the amount of \$10,000 or greater, but not more than \$50,000, the procurement officer shall seek written quotations from no fewer than 3 persons customarily providing the supply or service. The procurement officer shall record:
  - the names and addresses of all persons from whom quotations were sought
  - the purchase description used for the procurement
  - the names of the persons submitting quotations and
  - the date and amount of each quotation

Such information shall be retained in the file required pursuant to this section.

- 3. A governmental body may require that any procurement in an amount of not more than \$50,000 be subject to § 5. The procurement officer shall award the contract to the responsible person offering the needed quality of supply or service at the lowest quotation.
- 4. Procurement in the amount of less than \$10,000 shall be obtained through the exercise of sound business practices. \*\*\*

<sup>&</sup>lt;sup>1</sup> M.G.L. c. 30b §1

Pro	Procurement Sources:						
1.	Vendor	Description	Name	Date	Amount		
-		-	-	-	-		
	Address:		-				
	Website:	-					
2.	Vendor	Description	Name	Date	Amount		
-		-	-	-	-		
	Address:			-			
	Website:			-			
3.	Vendor	Description	Name	Date	Amount		
-		-	-	-	-		
	Address:			-			
	Website:			-			

<sup>\*\*</sup> If labor is to be completed at the local level by qualified municipal employees, procurement does not require construction subcontractors to be solicited for the project.

<sup>\*\*\*</sup> Sound business practices, defined as, ensuring the receipt of a favorable price by periodically soliciting price lists or quotes<sup>2</sup>. While the law does not require a formal competitive process, it does require local jurisdictions to ensure that they have received the needed quality of supplies and services at a reasonable price<sup>3</sup>.

<sup>&</sup>lt;sup>2</sup> M.G.L. c. 30b § 4(c)

The c. 30b Manual- Commonwealth of Massachusetts Office of the Inspector General- November 2016 (c. 1, pg 4)