

APPENDIX C
STATE HISTORIC PRESERVATION OFFICER
LETTER OF CONCURRENCE



FEMA

October 28, 2013

Brona Simon
State Historic Preservation Officer
Massachusetts Historical Commission
220 William T. Morrissey Blvd
Boston, MA 02125

Re: **Section 106 Consultation:** *Finding of “No Historic Properties Affected”*
Undertaking: *Demolition of the Science Wing, Gymnasium, and Auditorium of Cathedral High School/St. Michael’s Middle School and Demolition of St. Michael’s Pre-K School/Retired Priest Home, Springfield, MA*
Grant Applicant Name: *Diocese of Springfield*
FEMA Grant Program: *Public Assistance Grant Program*

Dear Ms. Simon,

As a result of damages caused by severe storms and tornadoes on June 1, 2011, the President declared a major disaster declaration, referenced as DR-1994-MA which makes Federal Emergency Management Agency (FEMA) funding authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, available to eligible applicants. The Massachusetts Emergency Management Agency (MEMA/Grantee) has forwarded an application to FEMA from the Diocese of Springfield (Applicant) for an Improved Project under the Public Assistance Grant Program for demolition of buildings at two (2) locations in Springfield, Massachusetts. In accordance with Section 106 of the National Historic Preservation Act (NHPA), FEMA has determined that the above referenced proposed projects constitute federally-assisted undertakings.

Project Locations and Descriptions

Cathedral High School/St. Michael’s Middle School is located at 260 Surrey Rd (N42.10016, W-72.54131 or UTM Zone 18: 0703310 E, 4663822 N) across the street from Mary A. Dryden Veteran Memorial School and St. Michael’s Pre-K/Retired Priest Home (both on Wendover Rd). The current proposed plan is for the demolition of the following sections of the building: the science wing that is located in the St. Michael’s Middle School, the gymnasium located in the Cathedral High School, and the Auditorium located in the Cathedral High School. In addition to demolition of these three (3) sections of the school, the applicant will also complete the

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following: remove the entire exterior curtain wall, and reconfigure the school by removing and replacing interior concrete masonry walls, heat ventilators and cabinetry, and effectively demolishing the interior of the building to its structural shell. *See Attachments 1 & 2 for maps and plans.*

St. Michael's Pre-K School/Retired Priest Home is located on 90 Wendover Rd, across the street from Cathedral High School and immediately north of Mary A. Dryden Veteran Memorial School (N42.10075, W-72.54412 or UTM Zone 18: 0703075 E, 4663881 N). The current proposed plan is complete demolition of the building.

Area of Potential Effect

As defined in the Advisory Council on Historic Preservation's (ACHP) regulations, the Area of Potential Effect (APE) for a project is defined as, the "geographic area or area within which an undertaking may directly or indirectly cause changes in the character of or use of historical properties, if any such properties exist" (36 CFR 800.16[d]). The APE is based upon the "potential" for effect, which may differ for aboveground resources (historic structures and landscapes) and subsurface resources (archaeological sites). Factors with potential to cause effects include but are not limited to; noise, vibration, visual (setting), traffic, atmosphere, construction, indirect and cumulative.

For these undertakings the APEs will be the parcels of land at 260 Surrey Rd (~18 acres) and 90 Wendover Rd (~3.5 acres). At the Surrey Rd location the area of direct ground disturbance associated with the selective demolition of the science wing, gymnasium, and auditorium will roughly be a 50 ft. perimeter around the current existing building footprint. Considering the full scale building demolition at the Wendover Rd. location it is most likely that the entire parcel will be impacted by the staging of equipment and materials related to the demolition activities. *See Attachment 3 for maps.*

Historical Context and Significance

The Cathedral High School/St. Michael's Middle School is a 1959-1960 2-3 story brick school building, with aluminum-frame windows. The structure was heavily impacted by a tornado on June 1, 2011, and exhibits a great deal of damage. It was built in an asymmetrical, modern style. The exterior lacks ornamentation. It has mostly replacement doors and mostly original windows. The original school was built for 3,000+ students, but as additional schools were built and Springfield's population fluxed, the enrollment decreased. The original school did not support both middle and high schools, but as the enrollment decreased, St. Michael's Middle School was added to bolster adequate use of the large facility. Even with combining the schools, current enrollment is 300-500 students. *See Attachment 4 for photographs.*

The St. Michael's Pre-K School/Retired Priest Home is a 1960 1-2-story brick school building. The structure was heavily impacted by a tornado on June 1, 2011, and exhibits a great deal of damage. It was built in a modern style and demonstrates very little exterior ornamentation. It has replacement doors and windows. It was built around the same time as Cathedral High

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School/St Michael's Middle School and use first as a Pre-K School and then as a Retired Priest Home. *See Attachment 4 for photographs.*

Steps Taken to Identify Historic Properties & Determination of Eligibility

Neither of these buildings is included on any local, state, or federal historic registers, nor are they listed in any historic district. A FEMA-Secretary of the Interior Qualified Architectural Historian has reviewed both buildings for historical and architectural significance. FEMA recommends that both buildings be considered **ineligible** for listing on the National Register of Historic Places under Criteria A, B, C, and D. Neither is associated with an event, historical pattern, or person; neither possesses architectural distinction; neither is an example of a rare building type; and both parcels contain only a relatively low likelihood of possessing intact archaeological resources due to extensive soil disturbance associated with past construction activities.

Finding of Effect and Request for Concurrence

FEMA does not consider either the Cathedral High/St. Michael's Middle School or St. Michael's Pre-K School/Retired Priest Home eligible for the National Register, therefore FEMA finds that the proposed undertakings of demolition result in **"No Historic Properties Affected"**. However, FEMA will include the following inadvertent discoveries language as a condition of the grant to address potential subsurface materials:

- In the event of the discovery of archaeological deposits (e.g. Indian pottery, stone tools, old house foundations, old bottles) the Diocese of Springfield (Applicant) shall immediately stop all work in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. The Applicant shall secure all archaeological discoveries and restrict access to discovery sites. The Applicant shall immediately report the discovery to the Massachusetts Emergency Management Agency (MEMA/Grantee) and the FEMA Deputy Regional Environmental Officer (Lydia Kachadoorian, 857-205-2860); FEMA will determine the next steps.
- In the event of the discovery of human remains, the Diocese of Springfield (Applicant) shall immediately stop all work in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. The Applicant shall secure all human remains discoveries and restrict access to discovery sites. The Applicant shall follow the provisions of applicable state laws, including Massachusetts General Laws Chapter 38, section 6 (Discovery of skeletal remains likely to be Native American); Chapter 9, sections 26A (State archaeologist; duties; reservation of lands from sale; cooperation of governmental agencies) & 27C (Projects; notice; adverse effect; review); and Chapter 7, section 38A (Skeletal remains; preservation; excavation; analysis), or any amendments or supplanting laws and regulations. Violation of state law will jeopardize FEMA funding for this project. The Applicant will inform the Office of the Chief Medical Examiner (617 - 267-6767), the State Archaeologist (Brona Simon, 617-727-8470), Massachusetts Emergency Management Agency (MEMA/Grantee) and the FEMA Regional

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Environmental Officer (Jack Sullivan, 617-447-0479) or the FEMA Deputy Regional Environmental Officer (Lydia Kachadoorian, 857-205-2860). FEMA will consult with the SHPO and Tribes, if remains are of tribal origin. Work in sensitive areas may not resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act.

Per 36 CFR 800.4(c)(2) and under the terms of the FEMA-SHPO-MEMA Programmatic Agreement for Massachusetts (2011), FEMA cordially requests SHPO concurrence with its determinations and findings within ten (10) calendar days from receipt of this transmittal.

Should you have any questions, please do not hesitate to contact our project reviewer Marcus Tate at (617) 784-4712 or Marcus.Tate@fema.dhs.gov. I can be reached by phone at 857-205-2860 or email Lydia.Kachadoorian@fema.dhs.gov. Thank you for your prompt review.

Sincerely,



Lydia Kachadoorian, RPA
Deputy Regional Environmental Officer
FEMA Region 1, New England

Attachments:

- 1) School Layout Map
- 2) Diocese of Springfield Tentative Plan
- 3) Project APE Maps
- 4) Photograph Sheets

CONCURRENCE:

11/5/13


BRONA SIMON
STATE HISTORIC
PRESERVATION OFFICER
MASSACHUSETTS
HISTORICAL COMMISSION

RC.55009