

# **APPENDIX D**

## **SHPO Concurrence**

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June 4, 2014

## The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth

Lydia Kachadoorian  
Deputy Regional Environmental Officer  
Federal Emergency Management Agency Region I  
99 High Street  
Boston, MA 02110

Attn: Marcus Tate

RE: Refurbishment and New Construction, Clifford A. Phaneuf Environmental Center (ECOS), Forest Park, Springfield, MA. MHC #RC.54747.

Dear Ms. Kachadoorian :

Thank you for submitting additional information regarding the proposed project referenced above, in response to the Massachusetts Historical Commission's (MHC) letter dated January 31, 2014. The additional information was received at this office on May 30, 2014. MHC staff have reviewed the information you submitted and have the following comments.

It is the opinion of MHC staff the Porter Lake Skate House no longer retains sufficient integrity to be eligible for inclusion in the National Register of Historic Places. Review of the current photographs you submitted and the line drawing of the structure as it was originally built in 1936 reveals that the configurations of windows and doors had been major contributing elements of the historical architectural design of the structure. Current photographs indicate that major changes to the door openings and windows have occurred through time, resulting in a loss of integrity of the original historic rhythm of fenestration and openings. In addition, the prominent historic balcony on the main facade was removed at some time in the past.

In the MHC's opinion, the proposed new construction and additions to the Skate House for the ECOS Center will have "no adverse effect" on the surrounding Forest Park, which may be eligible for listing in the National Register of Historic Places.

The MHC recommends that FEMA make a finding of "no adverse effect" (36 CFR 800.5(b)) for the proposed construction of the Clifford A. Phaneuf Environmental Center.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800). If you have any questions or require additional information, please feel free to contact Elizabeth Sherva or me at this office.

Sincerely,

A handwritten signature in blue ink that reads "Brona Simon".

Brona Simon  
State Historic Preservation Officer  
State Archaeologist  
Massachusetts Historical Commission  
xc: Springfield Historical Commission



FEMA

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June 11, 2014

CONCURRENCE: *Brona Simon*  
6/13/14  
BRONA SIMON  
STATE HISTORIC  
PRESERVATION OFFICER  
MASSACHUSETTS  
HISTORICAL COMMISSION

MASS. HIST. COMM  
# 54747

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

**Section 106 Consultation:** *No Adverse Effects, with Conditions*

**Undertaking:** *New Construction/Renovation of the Clifford A. Phaneuf Environmental Center, City of Springfield, MA*

**Subgrantee:** *City of Springfield*

**FEMA Grant Program:** *Public Assistance Grant Program (PA)*

Dear Ms. Simon:

This letter is an update the ongoing consultation on the FEMA Public Assistance Grant Program (PA) application for the Clifford A. Phaneuf Environmental Center aka Porter Lake Skate House (ECOS Center) project in Springfield, MA. In a letter FEMA sent to your office on January 31, 2014, FEMA made the determination that the undertaking resulted in an "Adverse Effect" based on the determination that the ECOS Center meets Criteria A and C of the Criteria of Eligibility for listing in the National Register of Historic Places. In a letter from MHC dated January 31, 2014, MHC concurred with FEMA's determination of eligibility but required additional information in order to understand the project and how the criteria of adverse effect applied to the project. After obtaining and reviewing the requested information, in a June 4, 2014 letter, MHC stated the opinion that the ECOS Center no longer retained sufficient historic integrity to be eligible for inclusion on the National Register of Historic Places. Therefore, MHC offers the opinion that this undertaking will result in "No Adverse Effects". (See Attachment 1)

Forest Park remains eligible for inclusion in the National Register of Historic Places and FEMA agrees with MHC's determination of "*No Adverse Effects*". To address the potential archaeological resources, FEMA recommends the applicant hire an archaeological monitor for during construction.

To address any archaeological sensitivity at this location, despite the potential for fill and disturbed soils, FEMA suggests that the applicant hire a qualified archaeological monitor during

Ms. Simon  
June 11, 2014

construction. This will require the applicant to hire an archaeological contractor to obtain a State Archaeologist's permit application (950 CMR 70) and perform the subsequent monitoring.

Based on these reasons, FEMA finds that the proposed undertaking would result in ***"No Adverse Effects, with Conditions"*** to the Clifford A. Phaneuf Environmental Center. Per 36 CFR 800.4(c)(2) and under the terms of the FEMA-SHPO-MEMA Programmatic Agreement for Massachusetts (2011) and **FEMA requests SHPO concurrence with this determination of effect 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](mailto:Marcus.Tate@fema.dhs.gov). I can be reached by phone at 857-205-2860 or email [Lydia.Kachadoorian@fema.dhs.gov](mailto:Lydia.Kachadoorian@fema.dhs.gov). Thank you for your prompt review.

Sincerely,

Marcus Tate  
Historic Preservation Specialist  
For: Lydia Kachadoorian, RPA  
Deputy Regional Environmental Officer  
FEMA Region 1, New England

ATTACHMENT:

Attachment 1: Previous consultations