

Environmental Assessment

# **Cathedral High School**

260 Surrey Road, Springfield, MA

DR 1994 MA

September 24, 2014



**FEMA**

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**ENVIRONMENTAL ASSESSMENT  
CATHEDRAL HIGH SCHOOL**

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## Acronyms and Abbreviations

ACM	Asbestos Containing Material
ADA	Americans with Disabilities Act
APCD	Air Pollution Control Division
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
C.F.R.	Code of Federal Regulations
CMS	Centers for Medicare and Medicaid Reimbursement
CWA	Federal Water Pollution Control Act (Clean Water Act)
DEP	Massachusetts Department of Environmental Protection
DMH	Massachusetts Department of Mental Health
DPS	Massachusetts Department of Public Safety
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
GIS	Geographic Information System
JCAHO	Joint Committee on Accreditation of Health Care Organizations
LEED	Leadership in Energy and Environmental Design
MHC	Massachusetts Historic Commission
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NEPA	National Environmental Policy Act
NESHAPS	National Emission Standards for Hazardous Air Pollution
NFIP	National Flood Insurance Program
NHESP	Massachusetts Natural Heritage & Endangered Species Program
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NRCS	Natural Resources Conservation Service
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
SCC	Springfield Conservation Commission
SHPO	State Historic Preservation Officer
USACE	U.S. Army Corps of Engineers
USEPA	U. S. Environmental Protection Agency
USGBC	U.S. Green Building Council
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service

# 1 INTRODUCTION

The Roman Catholic Bishop of Springfield, a Corporation Sole (the Diocese) has applied through the Massachusetts Emergency Management Agency (MEMA) to the Federal Emergency Management Agency (FEMA) for funding assistance.

In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, this Environmental Assessment (EA) is being prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ); 40 CFR Parts 1500-1508. The purpose of an environmental assessment (EA) is to determine whether the potential impacts of a federally proposed action could have significant environmental impacts. If the EA concludes that the impacts of the proposal could be significant, then the agency is required by the National Environmental Policy Act (NEPA) to prepare an Environmental Impact Statement (EIS). If, however, the agency concludes on the basis of the EA that the impacts would not be significant, then the agency may issue a Finding of No Significant Impact (FONSI) and proceed with the action.

## 1.1 DISASTER BACKGROUND AND OVERVIEW

The City of Springfield, in Hampden County, is located in western Massachusetts near the Massachusetts/Connecticut border. Springfield is the third largest city in Massachusetts with an estimated population of 153,000 per the 2010 Census.

On June 1, 2011, tornadoes struck portions of Western Massachusetts, including the City of Springfield, causing extensive and widespread property damage.

Cathedral High School, operated by the Diocese, is a private non-profit high school serving students from Grade 9 through 12. The school building sustained a direct hit by the June 1, 2011 tornado and was declared a total loss. The building has remained vacant and uninhabitable since the tornado.

The Cathedral High School building is located on the northeast corner of the intersection of Surrey and Wendover Roads in the East Forest Park neighborhood of Springfield, Massachusetts. The building was constructed in 1959 and is approximately 300,000 square feet in size. Since 2009, a portion of the Cathedral High School building has been shared with St. Michael's Academy Middle School serving children from Grades 6 to 8. The combined enrollment of Cathedral High School and St. Michael's Academy was approximately 700 students at the time of the tornado (nearing the end of the 2010-2011 school year). Since the beginning of the 2011-2012 school year, Cathedral High School has been operating at the former Memorial Elementary School on Main Street in Wilbraham, MA. St. Michael's Academy Middle School currently operates within St. Michael's Academy Elementary School on Eddywood Street in Springfield.

The Diocese proposes to demolish the current Cathedral High School building in accordance with Federal, state and local requirements, and to construct a new school building in its place. Currently, the proposed school building is expected to be approximately 300,000 square feet in size, and in the same approximate location as the current school building. The footprint of the new structure has not been determined. Present codes may require the new structure to extend outside the current building footprint.

## 1.2 PURPOSE AND NEED

The purpose of the Proposed Alternative is to provide educational services and a sustainable classroom environment to students and families of Cathedral High School, St. Michael's Academy Middle School, the East Forest Park community, and greater Springfield.

The Need was to find a permanent location to perform those functions once provided by the Cathedral High School and St. Michael's Academy building.

## **2 ALTERNATIVES CONSIDERED**

### **2.1 ALTERNATIVE 1 - THE NO ACTION ALTERNATIVE**

Under the No Action Alternative, the current Cathedral High School building would remain in its current state, and a new school building would not be built. The applicant (Diocese) would then decide whether to keep the schools at their present temporary locations or to move them to more permanent locations. If this alternative is selected, there would be no change to the Cathedral High School (Surrey Road) property.

### **2.2 ALTERNATIVE 2 – DEMOLITION OF EXISTING STRUCTURE AND CONSTRUCTION OF A NEW SCHOOL AT THE CATHEDRAL HIGH SCHOOL PROPERTY (PROPOSED ALTERNATIVE)**

The proposed alternative includes the demolition of the existing structure and the construction of a new school at the Cathedral High School (Surrey Road) property. Currently, the proposed school building is expected to be approximately 300,000 square feet in size, and in the same approximate location as the current school building. The footprint of the new structure has not been determined. Present codes may require the new structure to extend outside the current building footprint.

### **2.3 OTHER ALTERNATIVES CONSIDERED AND ELIMINATED**

REPAIRING THE CURRENT CATHEDRAL HIGH SCHOOL BUILDING - This Alternative was considered and eliminated since repair costs and code upgrades would exceed costs of building replacement.

PERMANENTLY RELOCATING THE SCHOOL TO ANOTHER AREA – This Alternative was considered and eliminated due to the fact that the school is recognized as an asset to the East Forest Park neighborhood, and due to the additional costs associated with purchasing new land. Additionally, the Surrey Road location of Cathedral High School is considered most desirable based on the location of the majority of the student body.

### 3 AFFECTED ENVIRONMENTS AND POTENTIAL IMPACTS CONSIDERED

**Alternative 1 - The No Action Alternative:** The current Cathedral High School building will remain in its current state. Cathedral High School and St. Michael’s Academy will continue to operate at their present temporary locations, or other arrangements would be made.

**Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):** Demolition of the existing structure and the construction of a new school at the Cathedral High School (Surrey Road) property.

**Table 3.1** summarizes the effects described and analyzed in this chapter. Levels of potential effect are defined as follows:

- \* 1 - Negligible: The resource area would not be affected. Changes would be non-detectable or if detected, effects would be slight and local. Impacts would be well below regulatory limits.
- \* 2 - Minor: Changes to the resource would be measurable, but the changes would be small and localized. Impacts would be within or below regulatory limits. Mitigation measures may be necessary to reduce potential effects.
- \* 3 - Moderate: Changes to the resource would be measurable and have localized and potentially regional scale impacts. Impacts would be within or below regulatory limits, but historical conditions would be altered on a short-term basis. Mitigation measures may be necessary to reduce potential effects.
- \* 4 - Major: Changes would be readily measurable and would have substantial consequences on a local and potentially regional level. Impacts would exceed regulatory limits. Mitigation measures to offset the effects would be required to reduce impacts, although long-term changes to the resource would be possible.

#### PROJECT ALTERNATIVES: SUMMARY OF POTENTIAL EFFECT, COORDINATION AND MITIGATION APPLIED

Affected Environment/ Resource Area	Alternatives	IMPACT	Agency Coordination/ Permits	Mitigation/BMPs
<b>Comments</b>				
<b>Air Quality</b>				
	<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified	
	<b>Proposed Alternative</b>	<b>2</b>	Pre-demolition asbestos abatement activities will be carried out under the EPA’s NESHAP regulations. Water, hygroscopic materials, or non-toxic chemical stabilizers will be used as treatment to reduce fugitive dust emissions during demolition as required under Clean Air Act. Following construction of the new school, air emissions from buses/student transportation would return to pre-tornado (June 2011) levels. Temporary increase in dust and emissions from equipment during construction	
<b>Climate Change</b>				
	<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified	
	<b>Proposed Alternative</b>	<b>1</b>	Although emissions in the area will increase temporarily during construction, and return to pre-tornado levels after construction, the amount of increase would affect climate change minimally	
<b>Water Quality</b>				
	<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified	
	<b>Proposed Alternative</b>	<b>2</b>	Use of silt fencing and hay bales during demolition and construction phases. No impacts Identified	

**Floodplains**

<b>No-Action Alternative</b>	<b>1</b>	Site is not located within a floodplain
<b>Proposed Alternative</b>	<b>1</b>	Site is not located within a floodplain

**Wetlands**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified
<b>Proposed Alternative</b>	<b>2</b>	Use of silt fencing and hay bales during demolition and construction phases No Impacts Identified

**Threatened and Endangered Species**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified
<b>Proposed Alternative</b>	<b>1</b>	No Impacts Identified

**Historic and Cultural Resources**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified
<b>Proposed Alternative</b>	<b>1</b>	No Impacts Identified

**Hazardous and Solid Waste**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified
<b>Proposed Alternative</b>	<b>2</b>	Prior to demolition, hazardous materials and special wastes will be segregated and disposed of in accordance with all applicable local, state, and federal laws, regulations, and requirements

**EO 12898 Environmental Justice**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified
<b>Proposed Alternative</b>	<b>1</b>	No Impacts Identified

**Traffic Impacts**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified.
<b>Proposed Alternative</b>	<b>1</b>	No Impacts Identified

**Cumulative impacts**

<b>No-Action Alternative</b>	<b>1</b>	No Impacts Identified.
<b>Proposed Alternative</b>	<b>1</b>	No Impacts Identified

***Location***

According to City of Springfield Assessor’s records, the Cathedral High School Site is comprised of three parcels (Parcel IDs 11330-0051, 12125-0050, 11330-0063) totaling approximately 33.5 acres of land owned by the Diocese. The Site is located at the northeast corner of the intersection of Surrey and Wendover Roads.

***Topography***

Portions of the Site proximate to Surrey Road are relatively level with an approximate elevation of 200 feet above mean sea level (MSL). Topography rises sharply to the northwest following Wendover Road to approximately 240 feet MSL at the Site’s highest point. Topography continues to rise offsite to the northwest. Topography of the Site is depicted on Figure A-1 in Appendix A.

The Island Pond retention basin is located on the northeastern portion of the Site. The Island Pond retention basin is a local topographic low point (approximately 170 feet MSL). This retention basin

collects stormwater from onsite parking lot catchbasins, along with stormwater from the surrounding neighborhood.

**IN THE FOLLOWING SECTION:**

*Alternative 1 – The No Action Alternative* (the leaving the school building as it presently exists) is not evaluated in the following section since there is no added adverse effect to the affected environments described below. Consequences of leaving the building in its current state are addressed in Table 3-1 in this EA.

Though not addressed in the following sections, leaving the building in its current state would be a blight on the East Forest Park neighborhood attracting vermin, homeless, illegal activity, etc. and would burden the Diocese to continue to secure it.

*Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative)* will have a direct effect on the existing building and the following environments and is discussed further.

**3.1 GEOLOGY**

Bedrock Mapping indicates rock under the Site likely consists of Portland Formation (Jpc), which is described as reddish-brown to pale red arkose and siltstone, and gray sandstone, gray siltstone, and black shale; interpreted as lake beds. There are no unique or protected geologic resources or geologic hazards in the project vicinity.

*Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):*

*3.1.1 Potential Impacts*

No impact to the Site geology because the demolition and construction of a new school will not involve grading beyond profile of already disturbed ground.

*3.1.2 Need for Mitigation*

None identified.

**3.2 SOILS**

Published reports indicate unconsolidated materials at the Site (above bedrock) likely consists of Hartford sandy loam (HI).

*Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):*

*3.2.1 Potential Impacts*

No impact to the Site soils because the demolition and construction of a new school will not involve filling beyond profile of already disturbed ground..

*3.2.2 Need for Mitigation*

None identified.

### 3.3 AIR QUALITY

#### ***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

##### *3.3.1 Potential Impacts*

Prior to the demolition of the current school building, asbestos-containing and hazardous materials will be identified and removed from the building by a licensed asbestos abatement contractor. Pre-demolition asbestos work will be carried out under the Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation.

During demolition of the current structure and construction of the new school, there is the potential for a temporary increase of respirable particulate matter (PM10).

Following construction of the new school, air emissions from buses bringing students to the facility and parents picking up students would return to pre-tornado (pre June 1, 2011) levels.

##### *3.3.2 Need for Mitigation*

All asbestos abatement and disposal procedures shall be performed in compliance with the Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations, the Massachusetts Department of Environmental Protection (MADEP) asbestos regulations, and City of Springfield environmental and building codes.

During demolition/construction, water, hygroscopic materials, or non-toxic chemical stabilizers will be used as treatment to reduce fugitive dust emissions. A suppressant shall not be used if prohibited by the the Environmental Protection Agency, or any other applicable law, rule or regulation. All suppressants shall meet all specifications, criteria, or tests required by any federal, state, or local water agency. The use of dust suppressants shall be of sufficient concentration and application frequency to maintain a stabilized surface.

### 3.4 CLIMATE CHANGE

The Council on Environmental Quality (CEQ) has issued a draft NEPA guidance document encouraging federal agencies to include the consideration of the effects on greenhouse gas emissions and climate change in their evaluations of proposals subject to NEPA documentation (CEQ, 2010).

#### ***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

##### *3.4.1 Potential Impacts*

Air emissions from buses bringing students to the facility and parents picking up students would return to pre-tornado (pre June 1, 2011) levels. No known impact to Climate Change due to short term impacts from dust and equipment emissions.

##### *3.4.2 Need for Mitigation*

None identified.

### 3.5 WATER QUALITY

Island Pond is a surface water body located on the northeastern portion of the Site. The pond is a retention basin that receives stormwater from precipitation events, after which water evaporates or infiltrates into the groundwater table. The basin does not discharge to surface water bodies. During emergency flood events, water is pumped from the basin into the Springfield sanitary sewer system. The retention basin collects stormwater runoff from onsite parking lot catchbasins, along with stormwater runoff from the surrounding neighborhood streets. No other sanitary wastes or process waters are discharged to the basin. Therefore, a National Pollutant Discharge Elimination System (NPDES) permit (as authorized by the Clean Water Act) is not required for stormwater discharge into Island Pond.

#### ***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

##### *3.5.1 Potential Impacts*

During demolition of the current structure and construction of the new school, existing site catchbasins could temporarily be impacted by silt and debris. Following construction of the new school, stormwater would continue to be directed to the Island Pond retention basin.

##### *3.5.2 Need for Mitigation*

Hay bales and silt fencing will be used around demolition and construction areas to mitigate impacts to retention pond and any catchbasins that may be effected by demolition/construction activities. During demolition and construction, catchbasins will be protected with filters, silt fencing, hay bales, or other methods.

### 3.6 FLOODPLAINS

A floodplain is an area of land adjacent to a stream or river that stretches from the banks of its channel to the base of the enclosing valley walls and experiences flooding during periods of high discharge. Executive Order 11988 directs federal agencies to assume leadership in avoiding direct or indirect support of development in the 100 year floodplain.

#### ***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

##### *3.6.1 Potential Impacts*

Per Flood Insurance Rate Map (FIRM) number 25013C 0406E, effective July 16, 2013, the Site is located outside the floodplain and the activity does not affect floodplain values. See Appendix A-2.

##### *3.6.2 Need for Mitigation*

None identified.

### 3.7 WETLANDS

A wetland is a land area that is saturated with water, either permanently or seasonally, such that it takes on the characteristics of a distinct ecosystem. Executive Order 11990 requires federal agencies to avoid adverse impacts to wetlands to the extent possible. Section 404 of the Clean Water act (CWA) establishes a wetland permit program administered by the U.S. Army Corps of Engineers (USACE).

A National Wetlands Inventory Map of the Site, created through the U.S. Fish and Wildlife Service website is included as Appendix A-3. The retention basin shown as Island Pond is depicted in the northeastern portion of the Site. It is designated as a Palustrine, Unconsolidated Bottom, Permanently Flooded Wetland. Also a wetlands delineation of the property was conducted by Fuss and O'Neill, Inc. and is included as Appendix A-4.

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.7.1 Potential Impacts***

The Proposed Alternative is located outside the 100 foot buffer zone from mapped wetlands. See Appendix A-4.

***3.7.2 Need for Mitigation***

Hay bales and silt fencing will be used around demolition and construction areas to mitigate impacts to adjacent wetlands.

**3.8 HAZARDOUS AND SOLID WASTE**

Hazardous waste is unwanted materials that pose substantial or potential threats to public health or the environment. In the United States, the treatment, storage and disposal of hazardous waste is regulated under the Resource Conservation and Recovery Act (RCRA). RCRA was amended in 1984 by the Hazardous and Solid Waste Amendments (HWSA).

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.8.1 Potential Impacts***

Prior to building demolition, the Diocese shall follow all applicable local, state, and federal laws, regulations, and requirements for the abatement and disposal of lead, asbestos, and other routinely encountered hazardous substances. If there is an unusual material encountered or there is an extraordinary amount of lead, asbestos, or other routinely encountered material, the Diocese will contact the Massachusetts Emergency Management Agency (MEMA) and FEMA. The Diocese will also contact the relevant agency with authority for regulation of the material.

Hazardous substances may include, but are not limited to propane cylinders, paints and solvents, coolants containing chlorofluorocarbons (CFCs), used oil, other petroleum products, used oil filters, fuel filters, cleaning chemicals, laboratory reagents, pesticides, batteries, and unlabeled tanks and containers. Equipment that may include these materials are ice machines, refrigerators, generators, computers, televisions, mercury switches, fluorescent lights, fluorescent light ballasts, sandblast units, paint sprayers, etc.

***3.8.2 Need for Mitigation***

Prior to demolition, hazardous materials and special wastes will be segregated and disposed of in accordance with all applicable local, state, and federal laws, regulations, and requirements. Following

demolition of the school building, construction and demolition debris will be segregated and disposed of in accordance with all applicable local, state, and federal laws, regulations, and requirements.

### 3.9 THREATENED AND ENDANGERED SPECIES

In accordance with the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential presence of federally listed threatened and endangered species through a review of published information.

The Natural Heritage & Endangered Species Program (NHESP), is part of the Massachusetts Division of Fisheries and Wildlife. NHESP is responsible for the conservation and protection of hundreds of species that are not hunted, fished, trapped, or commercially harvested in the state. The Program's highest priority is protecting the vertebrate and invertebrate animals and native plants that are officially listed as Endangered, Threatened or of Special Concern in Massachusetts.

The Site was plotted on the US FWS critical habitat mapper and did not fall within a designated habitat of endangered or threatened species. See Appendix A-5.

NHESP maintains the BioMap2. The BioMap2 is a statewide plan for conserving the most important habitats and ecosystems in Massachusetts. It incorporates the latest concepts of ecological resilience in the context of a changing climate. This comprehensive, multi-scale conservation plan will protect not only current biodiversity, but also ensure healthy ecosystems for the future. The BioMap2 program maintains maps of Critical Natural Landscapes. The Site was plotted on the BioMap2 and does not fall within a designated area. See Appendix A-6.

### ***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

#### 3.9.1 *Potential Impacts*

No impact to listed threatened or endangered species or their habitat for the Proposed Alternative.

#### 3.9.2 *Need for Mitigation*

None identified.

### 3.10 HISTORIC AND CULTURAL PROPERTIES

The National Historic Preservation Act (NHPA) of 1966 defines a historic property as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register". Criteria for listing a property on the National Register of Historic Places can be found in 36 C.F.R. Part 60. Cultural properties include a broader category of physical assets, such as archaeological, architectural, and historical properties, that do not meet National Register criteria, but which may have cultural value.

On October 28, 2013, pursuant to Section 106 of the NHPA, FEMA sent a consultation letter to the State Historic Preservation Officer (SHPO) at the Massachusetts Historical Commission (MHC) with a finding of "No Historic Properties Affected" for the Cathedral High School/St. Michaels's Middle School. FEMA found these properties ineligible for inclusion in National Register of Historic Places. In the letter FEMA defined the Area of Potential Effect (APE) for surface impact as a 50 ft. perimeter

around the current building footprint. SHPO concurrence was received on November 5, 2013. A copy of this letter is provided in Appendix C.

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.10.1 Potential Impacts***

No impact to historic properties for the Proposed Alternative. See Appendix C.

***3.10.2 Need for Mitigation***

None identified.

**3.11 EXECUTIVE ORDER (EO) 12898 ENVIRONMENTAL JUSTICE**

EO 12898 requires that federal agencies identify and address disproportionately high and adverse human health or environmental effects on minority or low income populations posed by their activities, policies, or programs.

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.11.1 Potential Impacts***

The Proposed Alternative will restore the function of Cathedral High School and St. Michael’s Academy Middle School to the East Forest Park community. Cathedral offers need-based financial and tuition assistance for qualifying minority and low-income students. Thus, the Proposed Alternative will benefit the entire local community including minority or low income populations by providing better educational opportunities.

***3.11.2 Need for Mitigation***

None identified.

**3.12 TRAFFIC IMPACTS**

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.12.1 Potential Impacts***

Traffic during demolition of the existing Cathedral building and construction of the new school building will be less than when the school was operating. Following construction, traffic impacts would return to pre-tornado (June 1, 2011) levels.

***3.12.2 Need for Mitigation***

None Identified.

**3.13 CUMULATIVE EFFECTS**

Cumulative effects are those that result from the incremental effect of the Proposed Alternative when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other action (40 C.F.R. 1508.7).

***Alternative 2 – Demolition of the existing structure and construction of a new school at the Cathedral High School property (Proposed Alternative):***

***3.13.1 Potential Impacts***

Construction of a new Cathedral High School building would return property use back to that of a school. As such, there would be no cumulative effects. Also, there are no known construction projects occurring near the Site of the Proposed Alternative that would result in a cumulative effect.

***3.13.2 Need for Mitigation***

None identified.

## **4 PUBLIC INVOLVEMENT**

### **4.1 PUBLIC MEETINGS**

Project update public meetings have been held with local City Councilors, Elected Officials, and the East Forest Park Civic Association. See attached documentation in Appendix D. The Diocese has posted project updates on its website, including video archives available on the Catholic Communications Real to Reel page.

The Diocese will notify the public of the availability of the Draft EA and a Draft Finding of No Significant Impact (FONSI) through publication of a notice in the local newspaper, as required. A public comment period will commence on the initial date of the public notice.

After the public review and comment period is completed and substantive comments have been addressed, the Regional Environmental Officer will sign the FONSI of the selected alternative and proceed with the action. The EA and FONSI will then be archived on FEMA's website.

### **4.2 FEMA PUBLICATION OF DRAFT ENVIRONMENTAL ASSESSMENT NOTICE AND REQUEST FOR COMMENT**

Please see Appendix D for copies of public outreach emails and a copy of the draft Public Notice.

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## 6 REFERENCES

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## **7 APPENDICES**

### Appendix A Maps and Figures

- Figure A-1 Site Location Map
- Figure A-2 Floodplain Insurance Rate Map
- Figure A-3 U.S. Fish and Wildlife Service National Wetlands Inventory
- Figure A-4 Fuss and O'Neill Wetlands Delineation and Architectural Drawings
- Figure A-5 USFWS Critical Habitat Mapper
- Figure A-6 BioMap2

### Appendix B Photographs Site Photographs

### Appendix C State Historic Preservation Officer letter of concurrence

### Appendix D Public involvement information