

**Environmental Assessment  
Determinations and Compliance Findings  
for HUD-assisted Projects  
24 CFR Part 58**

**Project Information**

**Project Name:** FBMS-124-Manley-Street

**HEROS Number:** 900000010316858

**Responsible Entity (RE):** BROCKTON, 45 School St Brockton MA, 02301

**RE Preparer:** Zaias Andrade

**State / Local Identifier:** MA

**Certifying Officer:** Robert F. Sullivan

**Grant Recipient (if different than Responsible Entity):** Father Bill's & MainSpring

**Point of Contact:** April Connolly & Emily Rothschild

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 124 MANLEY STREET, BROCKTON, MA 02301

**Additional Location Information:**

N/A

**Direct Comments to:** Brockton Redevelopment Authority  
50 School Street, 2nd Floor

Brockton, MA 02301

zandrade@brocktonredevelopmentauthority.com

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The Manley Street project is very similar to the DHCD-funded Quincy HRC-BSH, creating a new Housing Resource Center to replace an existing emergency shelter facility, with an on-site health clinic and an expanded homeless service center along with 32 new studio apartments. Much like the Quincy HRC-BSH project, these two projects will be structured as two separate condominiums within a single building to accommodate separate ownership and financing. Only the Manley Street Supportive Housing is being submitted for funding in this application. For the Manley Street Supportive Housing phase of the project, we plan to build a new three-story wood frame slab on grade structure adjacent the 09/27/2022 Page 1 of 8 Rental OneStop Organization: Father Bill's & Investment OS-R-Father Bil-08771 Location, Development Plan, and Proposed Project Funding Proposed Housing Resource Center. Each building will have separate utilities, distinct and separate building areas, separate entries, and separate case management offices. The project will incorporate the Green Building and energy efficiency elements that are required by the Brockton Stretch Code and will exceed the Stretch Code in some respects. We are acutely aware that the current COVID 19 pandemic increases the urgency of relocating homeless individuals (many of whom have compromised health and are at high risk of infection) out of crowded shelters, off the streets and into permanent housing. As a developed largely flat site, 124 Manley Street offers many inherent cost efficiencies for housing development and plenty of space for parking and green areas. The site is ideally suited for the proposed project with easy access to bus lines and surrounding commercial properties that should be minimally impacted by the project. The residential development will be a new construction of 32 studio apartments units in which 11 will be assisted by the City of Brockton Home Investment Partnership Program.

**Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:**

Homelessness has been and continues to be a problem in the city of Brockton, and Massachusetts as a whole. The number of individuals experiencing homelessness has more than doubled since 1990. FBMS proposes to improve the Project site through the complete renovation of the building into a new Housing Resource Center with a 100-bed emergency shelter and supportive services including a health clinic, and the construction of a new 3-story building with 32 permanent affordable housing units. This proposal is to assist FBMS in meeting some of the growing demand for emergency shelters and affordable housing in the city of Brockton. FBMS has experienced an increase of 67 percent in nightly occupancy over the past eight years and its individual shelters currently operate at an occupancy rate of over 200 percent. The proposed 100-emergency beds and 32 affordable units are vital in supporting FBMS efforts to alleviate the need for shelter amongst the homeless population in the Brockton area.

**Existing Conditions and Trends [24 CFR 58.40(a)]:**

The Project site consists of three acres of improved land, with a 12,000-square foot (sf) Administration (Reserve) Building, a 2,800 sf Organizational Maintenance Shop (OMS), a privately-owned vehicle (POV) parking area, and military equipment parking (MEP) area. The buildings have been vacant since August 2015 when the USARC was taken out of commission. The site is generally flat, with a slight slope to the west toward Manley Street. Areas adjacent to the USARC are mostly developed, with the Brockton Veterans Affairs Medical Center located across the site and commercial businesses including several car sales dealerships and retail stores located along Manley Street. Transportation services in proximity to the site include a Massachusetts Bay Transportation Authority (MBTA) bus stop, serving bus route 3, located less than half a mile away, along Belmont Street, and the Massachusetts Route 24 freeway. In the absence of the project, the project site would remain a vacant and blighted parcel and would maintain/create environmental health hazards that can potentially pose a health risk for the public residing and working nearby.

**Maps, photographs, and other documentation of project location and description:**

**Determination:**

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

**Approval Documents:**

[ERR Signature Page \(signed\).pdf](#)

**7015.15 certified by Certifying Officer**

**on:**

**7015.16 certified by Authorizing Officer**

**on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name
M-18-MC-25-0201	Community Planning and Development (CPD)	HOME Program
M-19-MC-25-0201	Community Planning and Development (CPD)	HOME Program

M-20-MC-25-0201	Community Planning and Development (CPD)	HOME Program
M-21-MC-25-0201	Community Planning and Development (CPD)	HOME Program

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$750,000.00

**This project anticipates the use of funds or assistance from another federal agency in addition to HUD in the form of:**

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$8,837,251.00

**Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities**

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.</p>

<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was acceptable: 57.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

**Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]**

**Impact Codes:** An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Project site is currently zoned under R1-B single family residential and surrounded by industrial structures to the south, commercial buildings to the west, and residential buildings to the	No mitigation required.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
		<p>north and east. The No-Action Alternative would result in no land use impacts as no changes would occur. To pursue the Preferred Alternative, the Proponent will seek zoning relief under the Dover Amendment Education Exemption (Section 27-23 of the Zoning Bylaw), which requires that the Project site meet the following: A minimum of 50 sf of useable open space for recreation for each individual living in the facility. A minimum of one parking space for every two individuals living in the facility; and the standards of building height, lot area, lot frontage, yards, and lot coverage for a single-family home in an R-2 zone shall apply. The Proposed Action complies with these requirements.</p>	
<p>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</p>	<p>3</p>	<p>A previous study of the Project site's topography by the Environmental Data Resources, Inc. (EDR) showed that the site's elevation is approximately 110 to 120 ft above mean sea level. According to the EDR GeoCheck Report, bedrock at the Project site is classified as the Pennsylvanian Series of the Pennsylvanian System of the Paleozoic Era and the soil as Windsor loamy sand. The U.S. Department of Agriculture (USDA) Web Soil Survey website classifies the soil on site as 623B, Woodbridge- Scituate - Urban land sandy loam (Figure 3-4). The EDR GeoCheck Report also estimates groundwater to be</p>	<p>To mitigate impacts, erosion controls including straw wattles and silt fences would be placed along the perimeter of the Project site along with the installation of inlet protection (i.e., silt sacks) and construction entrances to reduce the tracking of sediment into the public right-of-way and adjacent properties.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>greater than six feet below ground surface (bgs). The No-Action Alternative does not propose any construction or rehabilitation of the site; therefore, no impacts on the Project site's geology and soils would occur. The Preferred Alternative is anticipated to have minor construction-related impacts on geology and soils. The site has a gentle slope west and is already disturbed, resulting in minimal grading and topographical changes for the construction of the new affordable housing building. A previous study of the Project site's topography by the Environmental Data Resources, Inc. (EDR) showed that the site's elevation is approximately 110 to 120 ft above mean sea level. According to the EDR GeoCheck Report, bedrock at the Project site is classified as the Pennsylvanian Series of the Pennsylvanian System of the Paleozoic Era and the soil as Windsor loamy sand. The U.S. Department of Agriculture (USDA) Web Soil Survey website classifies the soil on site as 623B, Woodbridge- Scituate - Urban land sandy loam (Figure 3-4). The EDR GeoCheck Report also estimates groundwater to be greater than six feet below ground surface (bgs). The No-Action Alternative does not propose any construction or rehabilitation of the site; therefore, no impacts on the</p>	



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Project site's geology and soils would occur. The Preferred Alternative is anticipated to have minor construction-related impacts on geology and soils. The site has a gentle slope west and is already disturbed, resulting in minimal grading and topographical changes for the construction of the new affordable housing building. The Preferred Alternative is anticipated to have minimal impacts on the site's stormwater system. With the proposed addition of approximately 0.11-acres of impervious surface from the construction of the affordable housing building, stormwater management design elements will be incorporated into the design of the Preferred Alternative. The Preferred Alternative will also take away some of the surface parking spaces, resulting in approximately 1.19 acres of total open space onsite. Stormwater Pollution Prevention Plan (SWPPP) will be prepared in accordance with the United States Environmental Protection Agency's (USEPA) National Pollution Discharge Elimination System (NPDES) Program for construction sites disturbing greater than one-acre of land and the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Handbook standards. The stormwater management system and associated Stormwater Report would</p>	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
		<p>undergo review by the City of Brockton Department of Public Works and Planning Board as required for local permitting approval. No State review is required for the stormwater management system.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>3</p>	<p>The Project site is not situated on a superfund site and both the No-Action and Preferred Alternatives are not anticipated to have adverse impacts on hazardous materials. On the contrary, the Preferred Alternative would be beneficial in removing any potential hazardous material located within the Project site. The Preferred Alternative uses would generate noise in comparison to the No-Action Alternative. Short-term intermittent increases in noise levels would occur during demolition and construction activities, affecting surrounding properties.</p>	<p>The following hazardous materials, if applicable, would be remediated in accordance with all federal, state, and local regulations: volatile organic compounds, asbestos containing material, lead-based paint, radon, polychlorinated biphenyl, minimum explosive concentration, and radioactive materials. Efforts would be made to reduce construction noise including limiting construction to regular working hours (between 7 am and 5 pm) on regular workdays (Monday through Friday). Moreover, appropriate mufflers on all equipment and ongoing maintenance of intake and exhaust mufflers and turning off idling equipment would be strategies applied to minimize noise impacts. Long-term noise impacts from the Proposed Action are anticipated to be minimal. After construction, noise from the Preferred Alternative</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
			would be like the surrounding community noise level.
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	1	The project will create several temporary construction employment opportunities. The general contractor and subcontractors with contracts of \$100,000 or more will be subject to Section 3 hiring requirements. the Project. The Project Sponsor will seek to maximize the economic impact of the project by using qualified minority, female and Section 3 qualified businesses and individuals. The Project Sponsor will take affirmative steps to ensure that minority firms, women's business enterprises, and Section 3 qualified firms are employed when possible. Upon completion, the facility is expected to employ approximately 20 employees, with some working off-peak hours.	No mitigation required.
Demographic Character Changes / Displacement	2	The Project is the redevelopment and expansion of a currently vacant building and will result in no displacement. The Project will create new housing units for extremely low-income individuals. These newly constructed units will offer affordable housing to 30% AMI individuals/households with project based rental assistance.	No mitigation required.
Environmental Justice EA Factor	2	The project is not expected to have an impact on Environmental Justice Factors.	No mitigation required.
<b>COMMUNITY FACILITIES AND SERVICES</b>			

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Educational and Cultural Facilities (Access and Capacity)	2	The project site is located about one mile from Brockton High School and Brockton Public Library West Branch. The proposed project will create a three-story building with 32 studio apartments for extremely low-income individuals/households. The Brockton Public Schools is a nationally recognized leader in urban education with close to 17,000 students in grades PreK-12 and an array of programs for adults. Brockton High School serves 4,046 students in grades 9-12. Based on the relatively small size of the project - 32 OBR units for single adults relative to the City of Brockton's current school enrollment of over 17,000 students, the Project is not anticipated to strain the local school system.	No mitigation required.
Commercial Facilities (Access and Proximity)	1	The Project site is currently zoned under R1-B single family residential and surrounded by industrial structures to the south, commercial buildings to the west, and residential buildings to the north and east. Areas near the site are mostly developed, with the Brockton Veterans Affairs Medical Center located across the site and commercial businesses including several car sales dealerships and retail stores located along Manley Street. The Project will create support for the growth of local businesses by bringing 32 new households and customers to the area.	No mitigation required.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Health Care / Social Services (Access and Capacity)	2	The project site is directly across from Brockton Veterans Affairs Medical Center and 3.7 miles from Good Samaritan Medical Center. Other health care facilities are Brockton Neighborhood Health Center (about 3 miles from site) and Brockton Hospital (about 5 miles from site). The developer will have supportive services including a health clinic onsite to support the project's extremely low-income households. It is not anticipated that this project will cause a significant impact to health care resources in the region.	No mitigation required.
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	In comparison to the No-Action Alternative, the Preferred Alternative would generate more waste from construction and demolition activities and operational uses. The Preferred Alternative would create typical municipal waste generated from a shelter, offices, and apartment units, and medical waste generated from a health clinic. Waste generated during all stages, from demolition and construction to operation, would be disposed of as appropriate. The Project will also reprocess and recycle construction debris and daily use waste to the extent feasible. Hazardous medical waste generated from the onsite health clinic would be handled and disposed of in accordance with the Massachusetts Department of Public Health and MassDEP regulations.	No mitigation required.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Currently, the Project site is serviced by municipal sanitary sewer, which sends sewage to the Brockton Advanced Water Reclamation Facility at 303 Oak Hill Way. The Preferred Alternative's uses would generate an estimated 14,525 gpd more wastewater than prior uses. It is also anticipated that a 1,000-gallon grease trap would be required for treatment of grease waste generated from the kitchen prior to discharge to the municipal sanitary sewer system. New sanitary sewer connections will be established for the new site additions. No capacity problems with the wastewater system are expected because of the increased sewer production.	No mitigation required.
Water Supply (Feasibility and Capacity)	2	The Project site is currently serviced with municipal water by the City's Department of Public Works Water Division, which obtains water from Silver Lake and the Brockton Reservoir. The Preferred Alternative's anticipated water demand is estimated to increase by approximately 15,978 gallons per day (gpd) compared to the prior use. New water connections for the proposed additions would be established before occupation. No capacity problems with the water system are expected because of the minimal increase in domestic water demand.	No mitigation required.
Public Safety - Police, Fire and Emergency Medical	2	Given the Project's location within the city of Brockton, the Project will be served by Brockton's public safety services,	No mitigation required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>including police, fire, and emergency medical services. The No-Action Alternative would result in no population change and thus, would not impact the need for public safety services. The Preferred Alternative is anticipated to have minimal impacts on public safety services. The Brockton police station is located at 7 Commercial Street. The nearest fire station to the Project site is approximately 1.1 miles away at 540 West Street. Responses times to 911 calls are expected to be minimal from this location. The Proposed Action is not anticipated to significantly change the population of the area; therefore, the Preferred Alternative is not expected to have a significant impact on police, fire and emergency medical services.</p>	
<p>Parks, Open Space and Recreation (Access and Capacity)</p>	<p>2</p>	<p>While there is green space planned for the developed lot and there is quite a bit of green space on the adjacent VA Medical Center property, the closest public park is Stone Farm which is located 2 miles from the site. However, with new bus service planned at the site tenants will have access to most of the area's parks.</p>	<p>No mitigation required.</p>
<p>Transportation and Accessibility (Access and Capacity)</p>	<p>2</p>	<p>The Preferred Alternative would result in the addition of 32 permanent affordable housing units, 100 emergency shelter beds, and administrative offices. The Preferred Alternative is expected to create a small number of daily trips as those</p>	<p>No mitigation required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>staying at the shelter generally do not own personal vehicles. The facility is expected to employ approximately 20 employees, with some working off-peak hours. The facility will be accessed via the existing driveway from Manley Street with no change to the curb cut. Manley Street is a two-lane minor arterial roadway. In 2020, average daily traffic on Manley Street was 8,744 but over the past several years, traffic volumes have been flat or declining. The Route 24/Route 123 interchange is approximately 0.4-miles from the Project site. Route 24 is the regional freeway from which most trips to and from the Project site are expected to use. The small number of trips generated by the facility is not expected to have any significant impact on traffic operations. To cater to the small parking demand, approximately 30-surface parking spaces would be provided for staff, visitors, and residents. The proposed bicycle shelter south of the Administration Building would also provide bicycle parking for staff, guests, and residents.</p>	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	The No-Action Alternative proposes no structural and operational changes to the site; therefore, no impacts on the water resources listed below would occur. After careful analysis of the location of various water resources, the Preferred	No mitigation required.



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Alternative is also not anticipated to impact any water resources. The project site is in an area of minimal flood hazard and is not located within 200ft of any wetland resource areas. The Project site is not located within or near surface water bodies and any EPA designated aquifers or wellhead protection zones; therefore, no water resources are anticipated to be affected by this project.</p>	
<p>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</p>	<p>2</p>	<p>Based on previous consultations with the USFWS conducted in January 2018, no threatened, endangered, or candidate species were identified to be present on the Project site. Moreover, recent GIS assessments show that the Project site is not located within a Massachusetts Natural Heritage and Endangered Species Program (NHESP) priority habitat of rare species or estimated habitat of rare wildlife. Additionally, no vernal pools or potential vernal pools are located on site or neighboring parcels. The Project site is also not located near a wild, scenic, or recreational river area. As such, no impacts to vegetation and wildlife are anticipated. All new landscaping will be non-invasive and indigenous.</p>	<p>No mitigation required.</p>
<p>Other Factors 1</p>			
<p>Other Factors 2</p>			
<b>CLIMATE AND ENERGY</b>			
<p>Climate Change</p>	<p>2</p>	<p>The project is not expected to have an impact on climate</p>	<p>No mitigation required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		change, nor will it be impacted by anticipated rising sea levels.	
Energy Efficiency	1	Currently, the site is serviced by municipal electrical power. To meet additional energy demands of the new site additions such as the affordable housing units, the Preferred Alternative would establish new connections to electrical services. Impacts on electrical utilities are anticipated to be minimal. The site is currently serviced by municipal natural gas. The Preferred Alternative would require additional gas service connections to the proposed affordable housing building. Overall, impacts on natural gas utilities are anticipated to be minimal. The Preferred Alternative would add fire protection services and telecommunications services to meet new demand.	No mitigation required.

**Supporting documentation**

**Additional Studies Performed:**

Environmental Assessment by Epsilon Associates, May 6th, 2021 ASTM Phase I  
 Environmental Site Assessment by Green Environmental, February 2022 ASTM Phase II  
 Limited Subsurface Assessment by Green Environmental, December 2021 ASTM Phase I  
 Environmental Site Assessment by Green Environmental, November 2022  
 Geotechnical Engineering Report by Green Environmental, December 2021  
 Stormwater Management report by Green Environmental, February 1, 2022 Radon Gas Testing by Green Environmental, February 2023  
 Asbestos Survey by Green Environmental, November 2022 Radiological Site Assessment Report by Plexus Scientific Corp., September 2016

**Field Inspection [Optional]:** Date and completed by:

**List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:**

City of Brockton Planning Department City of Brockton Zoning Board of Appeals  
Department of Housing and Community Development Brockton Redevelopment  
Authority City of Brockton Conservation Commission Green Environmental Joyce  
Consulting Group Eplison Associates, Inc. Massachusetts Historical Commission  
Massachusetts Bureau of Geographic Information Fish and Wildlife Service United  
States Federal Emergency Management Agency United States Environmental  
Protection Agency Massachusetts Department of Environmental Protection MA  
Traffic Volume and Classification

**List of Permits Obtained:**

Planning Board approval Building permit for unit 1, Manley Street Housing Resource  
Center Building permit for unit 2, Manley Street Supportive Housing Off site sewer  
extension approval Off site sidewalk extension approval

**Public Outreach [24 CFR 58.43]:**

A Notice of Intent (NOI), Request for Release of Funds, and Finding of No Significant  
Impact (FONSI) will be published in a newspaper of general circulation and subject to  
the regulatory minimum time period for public comment.

**Cumulative Impact Analysis [24 CFR 58.32]:**

There is no significant cumulative impact on the environment prior to or as a result of  
this project or due to reasonably foreseeable future activities related to this site.

**Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]**

This EA considers only the Preferred and the No-Action Alternatives. Other  
alternatives that make minor changes to the scope of the facility and that would still  
be able to be accommodated on the relatively small site could theoretically be  
developed. Since this is the only site being made available, no alternative locations  
were considered. Similarly, other uses were not considered as they would not meet  
the purpose and need described. The Preferred Alternative consists of the renovation  
of the Administration Building and the construction a new affordable housing building  
east of the Administration Building. This alternative would redevelop the  
underutilized site, while respecting the site constraints as well as minimizing and  
mitigating any anticipated impacts.

**No Action Alternative [24 CFR 58.40(e)]**

No renovation and construction would be undertaken under the No-Action Alternative. The existing buildings would continue to sit vacant. The No Action Alternative is used as the baseline from which the impacts of the Preferred Alternative are compared.

**Summary of Findings and Conclusions:**

The project meets compliance with the covered statutes and authorities and will have a positive impact on the built and natural environment. The Phase I and II environmental assessment was performed by Green Environmental (GE). Based upon the historic site information, reviewed as part of Phase I activities, GE was able to assess subsurface conditions in the approximate locations of the historic underground storage tanks. Field observations and the laboratory analytical results did not identify evidence of releases associated with the former USTs, and no further soil or groundwater assessment is recommended at this time. During Phase I and Phase II field activities GE observed the presence of an existing tank or oil/water separator structure remaining on the property. The structure is situated off the southwest corner of the maintenance building in the area of condominium unit 3, an area reserved for future development. A manway type cover and a fill port/cap were noted, within a poured concrete pad. The presence of standing water was observed in the fill port. No obvious evidence of oil was noted. Further evaluation of this structure would be required to determine its use. If it is no longer to be used, it should be evaluated, cleaned, or removed in accordance with applicable local, state and/or federal regulations.

**Mitigation Measures and Conditions [CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	No mitigation required.	N/A	No mitigation plan required.	

<p>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</p>	<p>To mitigate impacts, erosion controls including straw wattles and silt fences would be placed along the perimeter of the Project site along with the installation of inlet protection (i.e., silt sacks) and construction entrances to reduce the tracking of sediment into the public right-of-way and adjacent properties.</p>	<p>N/A</p>	<p>Installation of straw wattles and silt fences along perimeters of project site and inlet protection at entrance of project site.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>The following hazardous materials, if applicable, would be remediated in accordance with all federal, state, and local regulations: volatile organic compounds, asbestos containing material, lead-based paint, radon, polychlorinated biphenyl, minimum explosive concentration, and radioactive materials. Efforts would be made to reduce construction noise including limiting construction to regular working hours (between 7 am and 5 pm) on regular workdays (Monday through Friday). Moreover, appropriate mufflers on all equipment and ongoing maintenance of intake and exhaust mufflers and turning off idling equipment would be strategies applied to minimize noise impacts. Long-term noise impacts from the Proposed Action are anticipated to be minimal. After construction, noise from the Preferred Alternative would be like the surrounding community noise level.</p>	<p>N/A</p>	<p>Remediation of any hazards materials if found and limiting construction hours no earlier than 7AM and no later than 5PM.</p>	

Employment and Income Patterns	No mitigation required.	N/A	No mitigation plan required.	
Demographic Character Changes / Displacement	No mitigation required.	N/A	No mitigation plan required.	
Environmental Justice EA Factor	No mitigation required.	N/A	No mitigation plan required.	
Educational and Cultural Facilities (Access and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Commercial Facilities (Access and Proximity)	No mitigation required.	N/A	No mitigation plan required.	
Health Care / Social Services (Access and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Water Supply (Feasibility and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Public Safety - Police, Fire and Emergency Medical	No mitigation required.	N/A	No mitigation plan required.	
Parks, Open Space and	No mitigation required.	N/A	No mitigation	

Recreation (Access and Capacity)			plan required.	
Transportation and Accessibility (Access and Capacity)	No mitigation required.	N/A	No mitigation plan required.	
Unique Natural Features /Water Resources	No mitigation required.	N/A	No mitigation plan required.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	No mitigation required.	N/A	No mitigation plan required.	
Climate Change	No mitigation required.	N/A	No mitigation plan required.	
Energy Efficiency	No mitigation required.	N/A	No mitigation plan required.	

**Project Mitigation Plan**

The mitigation required is very minimal and the project sponsor will be responsible to follow through with it. The BRA will request copies of any hazard remediation and require proof or remediation. On site construction monitoring will be done by BRA and staff will document whether silt fences and inlet protection were installed along with the hours of construction.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

General policy	Legislation	Regulation
It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

### Screen Summary

#### Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[airport distance.png](#)

Are formal compliance steps or mitigation required?

Yes

No



**Coastal Barrier Resources**

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

**1. Is the project located in a CBRS Unit?**

No

Document and upload map and documentation below.

Yes

**Compliance Determination**

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

**Supporting documentation**

[CBRS.jpg](#)

**Are formal compliance steps or mitigation required?**

Yes

No

**Flood Insurance**

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

**1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?**

No. This project does not require flood insurance or is excepted from flood insurance.

Yes

**2. Upload a FEMA/FIRM map showing the site here:**

[FIRMETTE\\_0d3dbd64-2b76-4a21-b881-c47305967473.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

**Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

No

Based on the response, the review is in compliance with this section.

Yes

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

Yes

✓ No

### **Screen Summary**

#### **Compliance Determination**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

#### **Supporting documentation**

#### **Are formal compliance steps or mitigation required?**

Yes

✓ No

**Air Quality**

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

**1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

No

**Air Quality Attainment Status of Project’s County or Air Quality Management District**

**2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

No, project’s county or air quality management district is in attainment status for all criteria pollutants.

Yes, project’s management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

**4. Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

No

**Coastal Zone Management Act**

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

**1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?**

Yes

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

**Screen Summary**

**Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

**Supporting documentation**

[czm-regions.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

**Contamination and Toxic Substances**

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

**1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.**

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
  - Remediation or clean-up plan
  - ASTM Vapor Encroachment Screening
  - None of the Above

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

- No

**Explain:**

No on-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property.

Based on the response, the review is in compliance with this section.

Yes

**Screen Summary**  
**Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Endangered Species**

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402

**1. Does the project involve any activities that have the potential to affect species or habitats?**

- ✓ No, the project will have No Effect due to the nature of the activities involved in the project.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.  
Based on the response, the review is in compliance with this section.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Yes, the activities involved in the project have the potential to affect species and/or habitats.

**Screen Summary**

**Compliance Determination**

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Explosive and Flammable Hazards**

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

**1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

No

Yes

**2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

No

Yes

**3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:**

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

**If all containers within the search area fit the above criteria, answer “No.” For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “Yes.”**

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes

**Screen Summary**

**Compliance Determination**

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Farmlands Protection**

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

Project consists of new construction but will not convert an agricultural land to non-agricultural land. The site of the project is located in a existing non-agricultural land and there are no agricultural land near the project site.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

**Screen Summary**

**Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

No

### Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

**1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]**

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

None of the above

**2. Upload a FEMA/FIRM map showing the site here:**

[FIRMETTE\\_0d3dbd64-2b76-4a21-b881-c47305967473.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

**Does your project occur in a floodplain?**

No

Based on the response, the review is in compliance with this section.

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Historic Preservation**

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 “Protection of Historic Properties” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**Threshold**

**Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

✓ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Threshold (b). Document and upload the memo or explanation/justification of the other determination below:**

See attached.

Based on the response, the review is in compliance with this section.

**Screen Summary**

**Compliance Determination**

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

**Supporting documentation**

[FBMS Manley - Historic sign off 1-5-22.pdf](#)

**Are formal compliance steps or mitigation required?**



Yes

✓ No

**Noise Abatement and Control**

General requirements	Legislation	Regulation
HUD’s noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: “Compatible Land Uses at Federal Airfields”	Title 24 CFR 51 Subpart B

**1. What activities does your project involve? Check all that apply:**

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster  
None of the above

**4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).**

**Indicate the findings of the Preliminary Screening below:**

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 57

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 57

Document and upload noise analysis, including noise level and data used to complete the analysis below.

### **Screen Summary**

#### **Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 57.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation.

#### **Supporting documentation**

[Manley St DNL Final.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Sole Source Aquifers**

General requirements	Legislation	Regulation
<p><b>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</b></p>	<p>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</p>	<p>40 CFR Part 149</p>

**1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?**

Yes

No

**2. Is the project located on a sole source aquifer (SSA)?**

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

**Screen Summary**

**Compliance Determination**

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

**Supporting documentation**

[SSA-PlymouthCarver.gif](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Wetlands Protection**

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order**

No

Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

No, a wetland will not be impacted in terms of E.O. 11990’s definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990’s definition of new construction.

**Screen Summary  
Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[Map of flooplains and wetlands.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Wild and Scenic Rivers Act**

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

**1. Is your project within proximity of a NWSRS river?**

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

**Screen Summary**

**Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

**Supporting documentation**

[Wild Scenic Rivers MA.jpg](#)

**Are formal compliance steps or mitigation required?**

Yes

No

**Environmental Justice**

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?**

Yes

No

Based on the response, the review is in compliance with this section.

**Screen Summary**

**Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

No