DRAFT ENVIRONMENTAL ASSESSMENT

NEW ELIAS BROOKINGS SCHOOL
433 WALNUT STREET, SPRINGFIELD, MASSACHUSETTS

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Table of Contents

Appendices

List of Acronyms

BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CGP	Construction General Permit
CO	Carbon monoxide
CWA	Clean Water Act
dB	Decibels
DPW	Department of Public Works
DRA	Drummey Rosane Anderson, Inc.
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
ESOI	Emergency Statement of Interest
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
MA	Massachusetts
MA CZM	Massachusetts Office of Coastal Zone Management
MA DEP	Massachusetts Department of Environmental Protection
MA NHESP	Massachusetts Natural Heritage and Endangered Species Program
MassGIS	Massachusetts Office of Geographic Information
MHC	Massachusetts Historical Commission
MSBA	Massachusetts School Building Authority
NAAQS	National Ambient Air Quality Standards
NCA	Noise Control Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO_2	Nitrogen dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRHP	National Register of Historic Places
O_3	Ozone
Pb	Lead
$PM_{2.5}$	Particulate Matter with a diameter less than 10 microns
PM_{10}	Particulate Matter with a diameter less than 2.5 microns
P.E.	Professional Engineer
PNF	Project Notification Form
ppm	Parts per million
RCRA	Resource Conservation and Recovery Act

List of Acronyms (continued)

SCS	Soil Conservation Service
SF	Square Feet
SHPO	State Historical Preservation Office
SO_2	Sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
SWSC	Springfield Water and Sewer Commission
THPO	Tribal Historic Preservation Officer
TIS	Traffic Impact Study
U.S.	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
UST	Underground Storage Tank
WMECO	Western Massachusetts Electric Company

1 Introduction

1.1 Background

The City of Springfield, Massachusetts is located in Western Massachusetts, in Hampden County, 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. The Elias Brookings Elementary School (referred to herein as the Brookings School) on Hancock Street sustained significant damage from the tornado, rendering it uninhabitable for its intended purpose. After the tornado, the City of Springfield took immediate actions to assess the extent of the damage, secure the school, and make contingency plans for the remainder of that school year.

A determination was made that the repairs and rehabilitation needed to make the school habitable could not be reasonably addressed before the start of school in August 2011. A Damage Assessment Report prepared by the City of Springfield was submitted to the Massachusetts School Building Authority (MSBA) as part of the Emergency Statement of Interest (ESOI) process to help the City obtain state funding for rebuilding.

The City undertook limited action at the Brookings School to prevent further damage from the elements, including making window and door openings weather tight and repairing the roof (an action partly funded by the Federal Emergency Management Agency [FEMA]).

The City reviewed temporary options to house its students, including relocating the students to other schools within the Springfield Public Schools and constructing temporary classrooms (partially FEMA funded) at the City-owned Ruth Elizabeth Park, located adjacent to the Brookings School. The City decided to construct temporary modular classrooms at Ruth Elizabeth Park, which is located immediately to the south and east of the Brookings School. The park is roughly bounded by Hancock Street to the west; Hickory Street, a residence, and commercial property to the south; and Walnut Street and residences to the east.

Over the summer of 2011, the City constructed two temporary modular classroom buildings, one single-story building and one two-story building side by side on an existing soccer field at the park. Temporary sidewalks and driveways were constructed to provide temporary access for vehicles from Walnut Street and pedestrians from both Walnut and Hancock Streets. Temporary parking included use of the existing Brookings School parking lot and new parking areas near the modular classrooms. New utility connections were also made to service the temporary classrooms.

1.2 Project Authority

The City of Springfield has submitted an application for Federal Emergency Management Agency (FEMA) funding under FEMA's Public Assistance Program under the Presidentially Declared Disaster FEMA-1994-DR-MA. In accordance with the Robert T. Stafford Disaster

Relief and Emergency Assistance Act, PL 93-288, as amended, and implementing regulations at 44 Code of Federal Regulations (CFR) Part 206, FEMA is required to review the environmental effects of the proposed action prior to making a funding decision. This Environmental Assessment (EA) has been prepared in accordance with FEMA's National Environmental Policy Act (NEPA) regulations found in 44 CFR Part 10.

This EA has been prepared to meet FEMA's responsibilities under the National Environmental Policy Act of 1969 (NEPA) to fully understand and consider the environmental consequences of actions proposed for federal funding. In accordance with the NEPA, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500-1508) and FEMA regulations for NEPA compliance (44 CFR Part 10).

2 Project Purpose and Need

The purpose of the Brookings School project is to restore the City's capability to provide elementary classroom education to the Old Hill and Six Corners communities in the City of Springfield by providing a permanent facility that is safe, accessible, and meets all applicable codes and standards.

The need for the project is a result of tornado damage to the Elias Brookings School. The school sustained damage significant enough to render it unuseable for classroom education and Brookings School students are currently being served by the use of temporary classrooms on an adjacent site.

3 Alternatives

NEPA requires the evaluation of reasonable project alternatives, including impacts to the human and natural environment as part of the planning process. Prior to selecting the Proposed Action/Proposed Alternative, multiple alternatives were considered, as discussed in this Section.

A Locus Map is included as Figure 1 to show the location of the Brookings School, the temporary classrooms at Ruth Elizabeth Park, and the Proposed Alternative site. Figure 2 provides an aerial photo which shows the tornado-damaged school, the temporary classrooms on Ruth Elizabeth Park, and the proposed new Brookings School site. Note that since the date of the aerial photo, structures on the land bounded by Melrose, Marshall, and Walnut Streets have been demolished, such that the land cover is now bare earth and no structures remain. Also, paved parking adjacent to the temporary classrooms was constructed after the date of this aerial photo. Existing conditions at the Brookings School, temporary classrooms, and Proposed Alternative site are shown in photographs attached to this report, numbered Photographs 1 through 10.

3.1 No Action Alternative

The No Action Alternative would leave the temporary modular classroom facilities which were constructed in direct response to the tornado damage to the Brookings School. The Brookings School building would remain in its current state and not be used for educational purposes.

3.2 Proposed Alternative

The Proposed Alternative is to construct a new Elias Brookings School. This alternative would be in the same vicinity as the existing school and would serve the same population. The Proposed Alternative site is located across Walnut Street from the existing temporary classroom facilities and is roughly bounded by five city streets - Hickory Street to the south, Walnut Street and Walnut Street Extension to the west, Marshall Street to the north and Melrose Street to the east. A portion of Melrose Street which currently traverses the proposed site would be discontinued and incorporated into the school property. The site is currently comprised of multiple parcels which would be combined to create the proposed school property, which would be approximately four (4) acres.

The existing land which comprises the Proposed Alternative site currently does not have structures and is covered primarily either by grass or exposed soil. There is a paved parking lot and drainage retention area on one area of the site which has been used in the past for parking for the temporary classrooms' staff before other onsite parking arrangements were made.

The new Brookings School would include a new school building, development of a new onsite parking lot with accessible spaces and an entrance/egress along Walnut Street, a playground, a school garden area, lawn and landscaped areas, new utility connections and electrical/mechanicals, and associated appurtenances on the four-acre site. Figure 3 is a design development plan showing the proposed layout of the new Brookings School and site. Figure 4 shows the architect's rendering of how the Proposed Alternative will appear.

3.3 Rehabilitation of Existing School Alternative

This Alternative would repair the school to a safe and accessible facility meeting the current MSBA school and site construction standards and requirements, safety and fire codes, seismic standards, and building codes. Rehabilitation of the Brookings School, which was constructed in 1925, includes addressing damage caused to the building by the tornado and also addressing deficiencies which exist in the facility related to building and life safety codes, MSBA requirements, handicap accessibility, and seismic requirements.

A 2012 report by Drummey Rosane Anderson, Inc. (DRA) indicated that existing conditions post-tornado include roof damage requiring replacement, and exterior and interior damage to structural components, interior walls and facades. DRA indicated that the building and toilet facilities are not wheelchair accessible; significant seismic upgrades would be required if interior spaces require reconfiguration; that the majority of the mechanical system is original to the building and according to reports caused air quality and temperature control problems, as well as acoustic disruption of learning; the existing electrical system is inadequate for the need of the modern educational facility; the building does not have a sprinkler fire protection system; and that there is not adequate parking on the school site and the existing site doesn't offer opportunity for parking expansion.

Other deficiencies cited include overcrowding due to inadequate educational space sizes, high energy consumption due to outdated equipment and a poor building envelope, traffic issues, groundwater infiltration in the boiler room, environmental concerns, and a site that is too limited in size to accommodate the necessary building expansion.

DRA concluded that the existing building configuration cannot provide the required educational space needs without expansion because the existing facility falls short of the school's educational needs by over 15,000 SF, that expansion is infeasible on the current site, and that the renovation costs would be close to 70% of the costs associated with new construction of an adequate facility.

3.4 Alternatives Considered but Eliminated from Further Discussion

3.4.1 Closing of the Brookings School and Relocation of Students

Under this alternative, the Brookings School would be closed permanently and its students relocated from the temporary classrooms at Ruth Elizabeth Park to other schools within the Springfield Public Schools system. This option was determined not to be feasible due to a lack of current capacity at other schools within the schools system to accept these students.

Recommendations were also provided by the Superintendent of Schools, Dr. Alan J. Ingram, in a letter to MSBA dated February 23, 2012, indicating that research has supported the concept that elementary schools serving populations with high poverty rates such as Brookings School should maintain smaller enrollment sizes for proper functioning, which would make the combination of Brookings School with another school less than desirable.

Based on the lack of capacity at other Springfield Public Schools to accept the Brookings School students and on concerns from the School District regarding functionality, this alternative was deemed infeasible and has not been included for further consideration in this EA.

4 Affected Environment and Potential Impacts

4.1 Physical Resources

4.1.1 Noise

Noise, which is typically measured in decibels (dB) and is defined as an unpleasant or undesirable sound, is regulated at the federal level by the Noise Control Act (NCA) of 1972. The United States (U.S.) Environmental Protection Agency (EPA) distributes information to the public regarding noise pollution and its adverse health effects and evaluates the effectiveness of existing regulations in protecting public health and welfare. In general, noise issues are currently handled at the state and local level. EPA has published guidelines regarding acceptable ambient noise levels, which most states have adopted. Levels of 55dB for outdoor activities and 45dB for indoor activities have been identified by EPA as levels which would provide activity interference and annoyance.

4.1.1.1 No Action Alternative

Noise associated with the operation of the temporary Brookings classrooms is primarily associated with bus and private vehicle trips and the drop-off and pick-up periods at the beginning and end of the school day. Other noise associated with the school includes noise from children utilizing outdoor areas of the school and noise associated with operational systems of

the school (HVAC, etc). Periods of expected noise are during daytime hours when the school is in operation. Nighttime and weekend noise is limited to infrequent events which occur outside school hours.

The No Action alternative would not result in a change in noise levels or variations where the noise levels occur, as no changes to the existing condition would occur.

4.1.1.2 Proposed Alternative

Temporary short-term impacts related to noise would occur during the construction of the new Brookings School due to construction activities onsite. To reduce noise levels during this time period, construction activities will be limited to normal daytime work hours and idling of construction vehicles will be limited.

Since no change in enrollment is projected, it is expected that the long-term noise levels in the general area would be similar to those currently experienced on the temporary school site which is adjacent to the Proposed Alternative site. The noise levels would be shifted across Walnut Street to the new school location and increase noise on the Proposed Alternative property. Traffic trips to the new school site would be the same as those to the existing school and utilize an entrance/egress across Walnut Street from the existing condition, keeping the noise pattern similar to the existing condition.

4.1.1.3 Rehabilitation of Existing School Alternative

Temporary short-term impacts related to noise would occur during the renovation of the building. Since no change in enrollment is expected, the noise levels would resume to the pre-disaster levels once the renovations were completed.

4.1.2 Air Quality

Under the Federal Clean Air Act (CAA), as amended, the EPA has been required to establish both primary and secondary standards for air quality. The primary standards are meant to protect the public health, including the health of sensitive populations such as asthmatics, children and the elderly, while the secondary standards are designed to protect public welfare, including protection against decreased visibility, and damage to crops, vegetation, and buildings. Primary National Ambient Air Quality Standards (NAAQS) have been established for the following six "criteria" pollutants:

- Nitrogen dioxide (NO_2),
- Sulfur dioxide (SO_2),
- Lead (Pb),
- Carbon Monoxide (CO),
- Particulate matter with a diameter of 10 microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), and
- Ozone (O_3).

According to the Massachusetts Department of Environmental Protection's (MA DEP) 2011 Air Quality Report dated August 2012, MA DEP operates a network of 28 ambient air quality

monitoring stations at locations across the state and also oversaw four private monitoring stations in Boston. According to this report:

> *"Massachusetts was designated as nonattainment with the 1997 8-hour ozone standard of 0.08 parts per million (ppm). However, all monitors now show that Massachusetts meets the 1997 ozone standard statewide. EPA updated the 8-hour ozone standard to 0.075 ppm in 2008, and designated Massachusetts as attainment statewide except for Dukes County in 2011. Massachusetts is designated as attainment or unclassifiable for the other criteria pollutants, including carbon monoxide, lead, nitrogen dioxide, particulate matter (including PM_{10} and $PM_{2.5}$), and sulfur dioxide."*

Executive Order (EO) 13514 was signed into effect in 2009 by President Obama. This EO sets sustainability goals for federal agencies to improve in their environmental, energy, and economic performance. The EO also required federal agencies to set a 2012 greenhouse gas emissions reduction target within 90 days of the Order, to increase energy efficiency, reduce fleet petroleum consumption, conserve water, reduce waste, support sustainable communities, and leverage federal purchasing power to promote environmentally-responsible products and technologies.

Greenhouse gases are gases that trap heat in the atmosphere. The most common greenhouse gases are Carbon dioxide, Methane, Nitrous oxide, and fluorinated gases. These gases have been evaluated for their potential to contribute to global warming. The primary sources for these gases are electric production, transportation, industry, commercial and residential development, and agriculture.

4.1.2.1 No Action Alternative

Under the No Action alternative, no changes or impacts to air quality would be expected, as no changes to the site would occur.

4.1.2.2 Proposed Alternative

Under the Proposed Alternative, short-term impacts to air quality would occur during construction activities. To reduce impacts, contractors onsite would be required to wet down areas as needed to mitigate fugitive dust from the site. Emissions from vehicles and equipment could also temporarily increase levels of primary pollutants and greenhouse gases in the area. To mitigate for these temporary impacts, idling and run times will be limited and equipment will be properly maintained.

For long-term impacts, it is expected that although there would be a localized increase in impacts on the Proposed Alternative site due to vehicle trips, the vehicle trip count would be the same in the general vicinity, since no enrollment increases are projected due to the Proposed Alternative and the new school would be immediately across the street from the existing temporary classrooms and utilize the same traffic routes. It is expected that emissions related to building systems in the new school would be a localized increase over the existing vacant area; however, they would be similar to those of the current school across the street and may actually decrease over the existing temporary classrooms or former school due to the use of newer more efficient

systems. Since the existing temporary classrooms would be replaced by the new school, the emissions sources would not be increased, just relocated across Walnut Street.

4.1.2.3 Rehabilitation of Existing School Alternative

Under this alternative, short-term impacts to air quality would occur during renovation similar to the Proposed Action. After the renovation was completed the impact to air quality would be similar to the pre-disaster impact.

4.2 Infrastructure –

4.2.1 Public Services and Utilities

The temporary classrooms and the damaged school building, as well as the Proposed Alternative are within a highly urbanized area with easy access to all necessary utilities. Utility services are currently provided by the following:

- Domestic and fire protection water supply, sanitary sewer - Springfield Water and Sewer Commission (SWSC),
- Electrical service - Western Massachusetts Electric Company (WMECO),
- Telecommunications – Verizon, and
- Natural Gas – Columbia Gas of Massachusetts.

For any selected alternative, utility providers would remain the same.

The Springfield Police Department, Massachusetts State Police, and Springfield Fire Departments are currently the responding agencies for emergencies and would remain so for any selected alternative.

4.2.1.1 No Action Alternative

A sewer service is in place from the existing temporary classroom buildings southerly to Hickory Street and a water main services the classrooms with potable water and fire flows from Walnut Street. Electrical service is provided via overhead lines from Walnut Street and telecommunications service is provided via an existing connection along Hancock Street.

The No Action alternative would leave existing services in place at the existing Brookings School and temporary classrooms, in their current state, and as such, would not have any impacts.

4.2.1.2 Proposed Alternative

Under the Proposed Alternative, construction of the new Brookings School would require the use of the above-listed utility providers. All existing utility providers have confirmed that their existing systems can provide service to this Alternative.

Domestic and fire protection water supply will be supplied from existing SWSC distribution mains in Walnut Street and will be looped to the nearby main in Melrose Street for redundancy.

Sanitary sewerage from the building will be collected on site, including external grease separation, and will discharge to the existing municipal sewer collector in the eastern part of the property.

Electrical services are available from each of the four streets on which the site has frontage. Pending final determination by WMECO, the building service is anticipated to come from an electrical manhole in Melrose Street, directly adjacent to the building's main electrical room.

Natural gas is available in the adjacent streets and will be extended to the building, most likely from Hickory Street.

Communications will most likely be provided from existing infrastructure in Walnut Street, pending final determination by the local providers.

Short-term construction impacts would occur related to this option for the connection of the utilities to service the new building to the main lines in the public right-of-way. Mitigation to limit impacts will include the use of plates to cover excavations or same-day backfilling to limit the potential for soil erosion or safety hazards and use of public safety personnel as needed to mitigate for potential temporary traffic and safety impacts. Utility usage rates are expected to be similar for the new Brookings School as compared to the existing condition and are not expected to be an impact associated with any alternative.

4.2.1.3 Rehabilitation of Existing School Alternative

Under this alternative all of the above listed utilities are already established. Upgrading to current codes and standards may cause temporary construction activities at the site.

4.2.2 Transportation/Traffic

4.2.2.1 No Action Alternative

The temporary classrooms have frontage with an entrance/egress driveway along the west side of Walnut Street.

There would be no traffic impacts associated with the No Action Alternative, as no changes would occur to the existing condition.

4.2.2.2 Proposed Alternative

Under the Proposed Alternative, the entrance/egress to the new Brookings School would also be on Walnut Street, almost directly across the street from the existing temporary entrance. The site currently has frontage along five streets: Walnut Street, Walnut Street Extension, Hickory Street, Melrose Street, and Marshall Street.

A Traffic Impact Study (TIS) was completed for the Proposed Alternative (Benesch, 2012). The study concluded that the Proposed Alternative will not result in adverse traffic effects on the adjacent roadway network, provided that recommended improvements are made, including:

- Making Marshall St. a two-way street for the 350 ft section between Walnut St. and Melrose St. and prohibiting parking along this segment of the street,
- Discontinuing a portion of Melrose Street between Melrose and Walnut Streets,
- Enlarging the northwest corner of the Marshall St. and Melrose St. intersection to facilitate turns for larger vehicles,
- Relocating the pedestrian crosswalk to the new school drive,
- Positioning a crossing guard at the relocated crosswalk (one is used already at the current crosswalk) during arrival and departure times, and
- Relocating the existing School Speed Zone flashers to the new crosswalk location.

The TIS indicated that there are two fire stations in proximity to the school and that a review was undertaken which shows that "there will not be any perceivable increase in response times" associated with the project. The TIS also indicated that there will be no change in level of service at the intersections studied and that the new school drive will operate at a satisfactory level of service.

Based on the TIS, no impacts associated with the Proposed Alternative are anticipated provided the improvements are made as listed above as mitigation.

4.2.2.3 Rehabilitation of Existing School Alternative

Under this alternative the Transportation/Traffic conditions would be similar to the pre-disaster condition.

4.2.3 Aesthetic and Visual Resources

4.2.3.1 No Action Alternative

The tornado-damaged Brookings School building is boarded up and the temporary modular classrooms were designed with function in mind and do not have an aesthetic façade. Existing parking and access routes were similarly installed with their temporary nature in mind and no landscaping or aesthetic improvements have been completed.

The No Action Alternative will not result in any impacts to visual resources, as no construction or changes will occur.

4.2.3.2 Proposed Action

The Proposed Alternative would redevelop the site. The new school would be a visual obstruction to the houses along Melrose Street, directly east of the proposed school site. The Proposed Alternative, while a visual impact, will also provide for a permanent school structure which will be more visually appealing than the existing temporary units.

4.2.3.3 Rehabilitation of Existing School Alternative

Short-term impacts related to renovation activities would have a limited, temporary visual impact. The final appearance of the school would be similar to the pre-disaster landscape, and there would be little change to visual resources since no new construction will occur.

4.2.4 Historic and Cultural Resources

4.2.4.1 Historic Context

The history of the existing Brookings School started in 1924, when the city of Springfield decided to build a new public school along Hancock Street in the Six Corners neighborhood. The site was conveniently located next to a recently completed city park, Ruth Elizabeth Playground, which would serve as the proposed school's yard.

At least four houses and their accompanying outbuildings were removed before school construction. The city auctioned off the structures in 1924 to a local wrecking company and interested citizens. The three story, brick school building opened in 1926, after having cost $450,000 (36 cents/cubic foot) to build. It was designed by local architect Morris W. Maloney. The school was planned for a capacity of 1150 students, and was expected to replace the needs of an existing school on nearby Central Street, where Elias Brookings (1836-1906), a prominent Springfield educator and Civil War veteran, himself once taught.

When Brookings School opened in 1926 its first principal was Arthur D. Talmadge. The school contained 27 classrooms, a gymnasium, a domestic sciences room, a household arts room, and a medical department. The interior featured terrazzo floors and ornamentation. Over subsequent decades, a new library, kitchen, and cafeteria were constructed and new lighting, plumbing, and windows were installed. The school underwent many changes and renovations, particularly in 1975, when new non-transparent windows were installed. On June 1, 2011, the school was severely damaged by a tornado, though no students were harmed.

4.2.4.2 No Action Alternative

The No Action Alternative will not result in any impacts to historic or cultural resources, as no new construction or changes will occur.

4.2.4.3 Proposed Action

As per Section 106 of the National Historic Preservation Act (NHPA) of 1966, federal agencies must consider the potential effects of their Proposed Action on historical properties. The NHPA defines a historic property as "any prehistoric or historic district, site, building, structure, or objects included in, or eligible for inclusion on the National Register". Criteria for listing a property on the National Register of Historic Places (NRHP) are found at 36 C.F.R. Part 60.

FEMA must consult with the applicable parties to determine if the Proposed Action will have an effect on historic properties and, if the project will have an effect, how to avoid, minimize, or mitigate the effect. In Massachusetts, the Massachusetts Historical Commission (MHC) is the office of the State Historic Preservation Officer (SHPO) as well as the office of the State Archaeologist. MHC was consulted by FEMA on April 25, 2013 regarding the eligibility of the Brookings School for listing on the National Register of Historic Places. The SHPO concurred with FEMA's determination. (see Appendix C).

The City of Springfield notified the MHC of this project with a Project Notification Form (PNF) dated November 8, 2012. In their subsequent correspondence, dated December 7, 2012, the MHC indicated that after review of their records, there are no structures that are listed in the

State Register of Historic Places nor included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth located on the Proposed Alternative site (see Appendix C). Water Shops Armory (SPR-CP), which is listed in the State and National Registers of Historic Places, is located across Hickory Street from the site. However, the MHC indicated in their response that "after review of the information submitted, [the Commission has] determined that the proposed new construction will have 'no adverse effect' (950 CMR 71.07(2) (b) (2)) on the adjacent Water Shops Armory".

A letter from FEMA was mailed to Ms Brona Simon, the Massachusetts SHPO, on April 25, 2013 regarding the Determinations of Eligibility for the Alfred G Zanetti School and Elias Brookings School in the City of Springfield, MA. In the letter FEMA made the determination that the Brookings School is ineligible for inclusion in the National Register.

A notification and request for comment letter was also sent to the Stockbridge-Munsee Community Band of Mohicans Tribal Historic Preservation Officer (THPO) on May 6, 2013, pursuant to Appendix B of the June 27, 2011, FEMA-State Programmatic Agreement for Massachusetts (see Appendix C). A response dated May 29, 2013 was received from Sherry White, the THPO, that the project is within Mohican territory, but that they are not aware of any cultural site within the project area.

4.2.4.4 Rehabilitation of Existing School

Rehabilitation of the existing school will result in little to no impact to historic or cultural resources, since the structure and landscape would be repaired to pre-disaster condition.

4.3 Natural Resources

4.3.1 Geology and Soils

4.3.1.1 No Action Alternative

Based on a review of the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) Soil Survey of Hampden County, Massachusetts, Central Part, onsite soils for the No Action Alternative are listed as Urban Land. Areas designated with this classification have been obscured by urban works and structures and have significantly disturbed natural soil formations in the area. For such areas, onsite soils investigations are needed to accurately determine onsite soils and geologic formations. There are no prime or unique farmlands in the area, which is highly urbanized.

Geology and soils would not be impacted by the No Action Alternative as no construction activities would occur.

4.3.1.2 Proposed Alternative

Based on a review of the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) Soil Survey of Hampden County, Massachusetts, Central Part, onsite soils for the Proposed Alternative are listed as Urban Land. Areas designated with this classification have been obscured by urban works and structures and have significantly disturbed natural soil formations in the area. For such areas, onsite soils investigations are needed to accurately

determine onsite soils and geologic formations. There are no prime or unique farmlands in the area, which is highly urbanized. The Proposed Alternative site has a history of urbanized uses and has significantly disturbed soils.

The geologic quadrangle map prepared by the United States Geologic Survey (USGS) for the area indicates that delta-outwash deposits were deposited in the area after the glacial front in the area had receded (USGS, 1967) and that bedrock in the area is noted as being Portland Arkose of the late Triassic age.

Based on an onsite review of existing conditions, the site proposed for the New Elias Brookings School appears to consist of both naturally-occurring and disturbed soils and contains one or more filled cellar holes. An onsite geotechnical investigation by GZA in July 2012 (GZA, 2012a) included a total of nine (9) test borings which were advanced to depths as great as twenty-five feet (25') below existing grade. All but one of the ten soil borings encountered two to five feet of urban fill material composed primarily of sand. Below the urban fill was found several feet of medium-dense natural glacial outwash deposits. In the deeper borings, dense to very dense glacial till was encountered at approximately 16-19 feet below existing grade. No bedrock was encountered in any of the soil borings. Groundwater, where found, was 6 – 10 feet below grade.

Also in July 2012, a total of nine (9) test pits were excavated to depths of 8 – 11 feet below existing grade at select locations throughout the Proposed Alternative site to further investigate the presence of urban fill and to ascertain the potential presence of buried foundations at the site. Urban fill, one to five feet in thickness, was encountered just below the ground surface at each test pit. The urban fill consisted primarily of sand, with some brick and concrete rubble, glass, and ash noted. No definitive evidence of buried foundations was observed. Below the urban fill, glacial outwash deposits were observed, consistent with the findings of the soil borings. The glacial till was encountered in only one test pit, at a depth of about eight feet below grade. No bedrock was encountered. Groundwater, where observed, was found 7 – 11 feet below grade.

According to the geotechnical report prepared for the project (GZA, 2012a), the urban fill at the Proposed Alternative site is considered undocumented fill and in its current condition will not be suitable for the support of shallow foundations. Existing fill materials will need to be excavated and imported fill material or the excavated material (if suitable) will be replaced in accordance with the recommendations of the geotechnical investigation and the building code, including proper compaction techniques and documentation. It is anticipated that the undocumented fill will also be suitable for the non-structural fill requirements in the vicinity of the proposed play areas.

Schematic-level evaluations of earthwork quantities indicate that a moderate amount of off-site ("borrow") earth materials will be required to attain the grades indicated on the current site drawings for the Proposed Alternative. Additionally, topsoil borrow will be required, as there is little existing topsoil on the site.

All construction activities which require earth disturbance will follow the Construction Stormwater Pollution Prevention Plan (SWPPP) which has been prepared for the project for

compliance with the U.S. EPA National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges from Construction Activities, or Construction General Permit (CGP). Best management practices to minimize soil erosion will be implemented during construction, including the use of silt fencing, straw bales, catch basin protection, wattles, and stabilized construction entrances. Once construction is complete, the site will be stabilized with pavement, turf, and landscaped vegetation to limit the potential for future soil erosion.

4.3.1.3 Rehabilitation of Existing School Alternative

Based on a review of the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) Soil Survey of Hampden County, Massachusetts, Central Part, onsite soils for the No Action Alternative are listed as Urban Land. Areas designated with this classification have been obscured by urban works and structures and have significantly disturbed natural soil formations in the area. For such areas, onsite soils investigations are needed to accurately determine onsite soils and geologic formations. There are no prime or unique farmlands in the area, which is highly urbanized.

Geology and soils would not be impacted by this alternative as no new construction activities would occur.

4.3.2 Water Resources

The Clean Water Act (CWA), as amended established the framework for regulating discharges of pollutants to Waters of the U.S.

No surface waters or wetlands were observed to be present on the Brookings School site or the Proposed Alternative site. However, stormwater runoff from both sites would be directed to the local collection system on the property and then to either infiltration or to the municipal sewer system.

Groundwater in the general area is expected to be impacted in its current state due to the urbanization of the contributing area and is not used as a drinking water source.

4.3.2.1 No Action Alternative

The existing temporary classrooms area drains to a few catch basins on the Ruth Elizabeth Park site.

The No Action Alternative will not result in a change in onsite conditions and will thus not have an impact on water resources.

4.3.2.2 Proposed Alternative

The Proposed Alternative site is currently drained via overland flow to municipal street drainage, with the exception of a parking area on the site which currently drains to a constructed retention area onsite.

Storm drainage from the Proposed Alternative's associated parking facilities and bus loop will be collected and treated on site through stormwater management Best Management Practices (BMPs) and will be discharged to adjacent municipal sewers. Runoff from the rooftop of the

new school building will be separately collected on site and directed to a proposed underground detention facility which will also provide groundwater recharge of the uncontaminated stormwater to the underlying high-permeability glacial outwash deposits.

Although stormwater runoff from the site will be increased due to increased imperviousness, stormwater runoff quantity and quality will be mitigated through the use of stormwater BMPs and infiltration, in accordance with applicable regulations. Construction phase impacts associated with stormwater runoff will be mitigated by the installation and maintenance of temporary sediment and erosion control measures during construction. The project will be subject to the EPA's CGP. A Construction SWPPP has been prepared for the project. The Contractor will be required to file a Notice of Intent (NOI) for coverage under this General Permit and to implement this plan in order to mitigate any potential construction phase impacts related to stormwater runoff.

4.3.2.3 Rehabilitation of Existing School Alternative

The Brookings School building which was damaged in the tornado drains via overland flow and limited drainage structures to the street drainage system along Hancock Street. This alternative will not result in a change in onsite conditions and will thus not have an impact on water resources.

4.3.3 Coastal Zone, Floodplains, and Wild and Scenic Rivers

4.3.3.1 No Action, Proposed and Rehabilitation of Existing School Alternatives

All of the alternatives reviewed are located within Springfield, Massachusetts, in an urbanized inland area. None of the alternatives are within or in the vicinity of the Massachusetts Coastal Zone Boundary, as defined by the Massachusetts Office of Coastal Zone Management (MA CZM), based on a review of mapping available on their website (MA CZM, 2013). As such, no impacts to coastal zone resources will be associated with any of the alternatives and no further assessment of impacts or mitigation is needed related to the coastal zone.

None of the alternatives reviewed are within the 100-year or 500-year floodplain, based on a review of FEMA floodplain mapping available from the Massachusetts Office of Geographic Information (MassGIS) (MassGIS, 2013). The nearest floodplain to any alternative is associated with Watershops Pond and is located more than 250 feet to the south. As such, no impacts to floodplains will be associated with any of the alternatives and no further assessment of impacts or mitigation is necessary relative to floodplains.

The nearest river to any of the alternatives is the Mill River, located approximately 300 feet south of any of the alternatives. This river is not designated as a Wild and Scenic River as designated by Congress or the Department of the Interior, according to the National Wild and Scenic Rivers System website (National Wild and Scenic Rivers System, 2013). As such, no impacts to Wild and Scenic Rivers will be associated with any of the alternatives and no further assessment of impacts or mitigation is necessary relative to Wild and Scenic Rivers.

4.3.4 Biological Resources

All of the alternatives reviewed are located in a highly urbanized area of the City of Springfield, with limited biological resources due to the extent of urbanization.

4.3.4.1 No Action Alternative

The existing Brookings School site with temporary classrooms consists of structures, parking areas, pedestrian walkways, and turf areas, with some landscaped features. This alternative will not result in a change in onsite conditions and will not have additional impact biological resources.

4.3.4.2 Proposed Alternative

The Proposed Alternative site consists of a parking area, retention area, and grassed areas or exposed soil. Since this site is in a highly urbanized area of the City of Springfield there will be limited impact to biological resources.

4.3.4.3 Rehabilitation of Existing School Alternative

The existing Brookings School site consists of structures, parking areas, pedestrian walkways, and turf areas, with some landscaped features. This alternative will not result in a change in onsite conditions and will not have additional impact biological resources.

4.3.5 Wildlife

Avifauna expected to be found at these sites include urban tolerant birds such as house sparrow, song sparrow, American goldfinch, American crow, American robin, house finch, rock pigeon, European starling, lack-capped chickadee, mourning dove, and northern mockingbird. Mammals expected to be present include raccoon, Virginia opossum, Norway rat, house mouse, and striped skunk.

It is expected that these species would continue to utilize the sites associated with either alternative. Development of the Proposed Alternative would result in the removal of the existing temporary classrooms and reverting that area back to turf parkland, which would offset any loss of area associated with the new school.

4.3.5.1 No Action Alternative

The No Action Alternative supports wildlife common to urbanized areas. As such, no impacts to wildlife are expected to be associated and no further assessment of impacts or mitigation is necessary relative to wildlife.

4.3.5.2 Proposed Alternative

The Proposed Alternative after construction is completed, will site support wildlife common to urbanized areas. As such, no impacts to wildlife are expected to be associated and no further assessment of impacts or mitigation is necessary relative to wildlife.

4.3.5.3 Rehabilitation of Existing School Alternative

The Rehabilitation of Existing School Alternative will support wildlife common to urbanized areas once renovations are completed. As such, no impacts to wildlife are expected to be associated and no further assessment of impacts or mitigation is necessary relative to wildlife.

4.3.6 Vegetation

Vegetation at the Proposed Alternative site is limited primarily to sparse grass, while the existing temporary classrooms site has grass and a few trees.

4.3.6.1 No Action Alternative

The No Action Alternative would not result in any vegetation change or impact.

4.3.6.2 Proposed Alternative

The Proposed Alternative will have turf and landscaped areas and a garden area. This alternative would also result in the removal of the temporary classrooms at the existing Brookings School and that area being reverted to lawn. It is expected that this would offset any vegetative losses at the new school site.

4.3.6.3 Rehabilitation of Existing School Alternative

The Rehabilitation of Existing School Alternative would not result in any vegetation change or impact.

4.3.7 Threatened and Endangered Species

4.3.7.1 No Action, Proposed and Rehabilitation of Existing School Alternatives

The existing Brookings School site, which is the location for the No Action Alternative and the Rehabilitation of Existing School Alternative, and Proposed Alternative site were evaluated for the potential presence of federally-listed threatened and endangered species, in accordance with Section 7 of the Endangered Species Act of 1973, to ensure that a federally funded action is not likely to jeopardize the continued existence of listed species or affect their habitat.

The New England Field Office of the US Fish and Wildlife Service (USFWS) process for review for projects with federal involvement was followed to review potential impacts. The USFWS has a website set up to expedite the review process for such projects. Following the process identified on that site leads to the conclusion that no known Federally-listed species are known to occur within Springfield (see Appendix C). The Massachusetts Natural Heritage and Endangered Species Program (MA NHESP) GIS layers for Estimated and Priority Habitats and Certified Vernal Pools was also consulted, in accordance with the federal review process. No designated habitat areas or vernal pools were identified on the sites or in the vicinity.

As such, no impacts to threatened and endangered species are expected to be associated with either the Proposed Alternative or the No Action Alternative and no further assessment of impacts or mitigation is necessary relative to threatened and endangered species.

4.3.8 Wetlands

The Unites States Army Corps of Engineers (USACE) regulates the discharge of dredged or fill materials to waters of the U.S., including wetlands in accordance with Section 404 of the CWA. In addition, federal agencies are required to avoid adverse impacts to wetlands to the extent possible, which may occur from federally funded actions. Regulated wetlands are also protected by MA DEP under the Wetlands Protection Act.

4.3.8.1 No Action Alternative

No wetlands have been identified on or adjacent to the existing site. The nearest wetland resources to the site would be associated with Watershops Pond and the Mill River, located approximately 250 feet to the south of the Brookings School.

No impacts to wetlands are expected to be associated with the No Action Alternative and no further assessment of impacts or mitigation is necessary relative to wetlands.

4.3.8.2 Proposed Alternative

No wetlands have been identified on or adjacent to the Proposed Alternative site. The nearest wetland resources to the site would be associated with Watershops Pond and the Mill River, located approximately 250 feet to the south of the Proposed Alternative site.

No impacts to wetlands are expected to be associated with the Proposed Alternative and no further assessment of impacts or mitigation is necessary relative to wetlands.

4.3.8.3 Rehabilitation of Existing School Alternative

Since no wetlands have been identified on the existing site, no impacts to wetlands are expected to be associated with either the Rehabilitation of Existing School Alternative.

4.4 Socioeconomic Resources

4.4.1 Zoning and Land Use

4.4.1.1 No Action Alternative

This alternative would have no impacts to land use or zoning, as no changes would take place.

4.4.1.2 Proposed Alternative

The individual land parcels which make up the Proposed Alternative site are zoned either Business A or Residence B, according to the City's Zoning Map. In the City of Springfield, schools are exempted from zoning, in terms of acceptable land uses. The project will still be required to meet the applicable building setbacks for the underlying zoning.

Under the Proposed Alternative, there are no anticipated zoning or land use impacts associated with the project. The project will meet required setbacks and any other applicable local zoning requirements to which schools might be subject.

4.4.1.3 Rehabilitation of Existing School Alternative

This alternative would have no impacts to land use or zoning, as no changes would take place.

4.4.2 Human Health and Safety (Hazardous Materials)

4.4.2.1 No Action Alternative

Under the No Action Alternative, there would be no impacts from hazardous materials because no construction would occur.

4.4.2.2 Proposed Action

A Phase I Environmental Site Assessment (ESA) and Phase II ESA were prepared for the land parcels which form the site for the proposed New Elias Brookings School. The Phase I ESA databases searched included the National Priorities List (NPL), the Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), and the Resource Conservation and Recovery Information System (RCRIS) within the guidelines described in ASTM Standard Practice E 1527-2005. .

The Phase I ESA was completed in May, 2012, for the sixteen (16) contiguous properties that would later comprise the proposed site for the New Elias Brookings School and indicated that the Proposed Alternative site was not listed on any of the referenced Federal databases. However, limited properties within close proximity were listed. Based on the results of the Phase I ESA, a Phase II ESA was conducted to further investigate four of the land parcels within the site to assess whether environmental impacts have occurred based on identified areas of potential impact.

The Phase II ESA included: soil borings; soil and groundwater sampling; and laboratory testing of the acquired samples.

The Phase II assessment and report concluded by stating there were no further recommendations for environmental investigations at the site for the proposed New Elias Brookings School.

These documents are available for viewing at the City of Springfield Office of Procurement located at Springfield City Hall, 36 Court Street Room 307, Springfield, MA 01103, Monday through Friday 8:15AM-4:30 PM.

Under the Proposed Alternative, no hazardous materials or waste related impacts would be anticipated. Temporary construction activities should not expose hazardous materials or produce hazardous wastes. Any hazardous materials discovered, generated or used during construction would be handled and disposed of in accordance with applicable local, state, and federal regulations.

4.4.2.3 Rehabilitation of Existing School Alternative

Under this alternative, any hazardous materials discovered, generated or used during construction would be handled and disposed of in accordance with applicable local, state, and federal regulations.

4.4.3 Economic Justice

EO 12898 requires that federal agencies focus on achieving environmental justice by identifying and addressing disproportionately high and adverse effects on human health and the environment

as a result of federal programs, policies, and activities on minority and low-income populations in the nation.

The 2010 Census indicates the racial makeup of population of Springfield, Massachusetts consisted of 51.8% White, 22.3% African American, 0.6% American Indian and Alaska Native, 2.4% Asian, 0.1% Native Hawaiian and Other Pacific Islander, and 4.7% from two or more races. Hispanic or Latino origin of any race was reported at 38.8% of the population. The median household income was reported at $35,603, with 27% of the population reported to be living below the poverty level.

4.4.3.1 No Action Alternative

Under the No Action Alternative, the students would remain in temporary classrooms on the Ruth Elizabeth Park site, which reduces park space available for the community.

4.4.3.2 Proposed Alternative

The Proposed Alternative provides a new school for the Elias Brookings School students. The new school will provide for a permanent classroom environment for the students. The Proposed Alternative will keep the school in the same general location within their community.

4.4.3.3 Rehabilitation of Existing School Alternative

Under the Rehabilitation of Existing School Alternative, the students would return to the existing school. This would restore the community to the pre-disaster condition.

4.5 Cumulative Impacts

As per CEQ regulations, cumulative impacts represent the impact on either the natural or human environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.

4.5.1.1 No Action Alternative

Under the No Action Alternative, no new construction would take place and there would be no cumulative impacts anticipated.

4.5.1.2 Proposed Alternative

The Proposed Alternative would occur on a project site which is currently undeveloped, except for a parking lot and retention basin. Construction of the new Elias Brookings School would replace both the temporary classrooms currently located at Ruth Elizabeth Park and also the former Brookings School which was damaged by the tornado.

Once the new school is completed, the temporary modular classrooms which are being leased would be deconstructed and taken offsite by the company which owns them. Parking and access ways would be removed, as would temporary utilities, and the site would be restored to its original use as a soccer field and grassed areas for passive recreation. The restored area would be returned to use as part of Ruth Elizabeth Park and maintained by the City.

The former Elias Brookings building damaged by the tornado would not be returned to use as a public City school. The City has reviewed several options for reuse of the building, including renovation of the building for market-rate housing.

No other cumulative impacts are anticipated at this time, as the project will not result in a change in enrollment and will keep the school within the same vicinity on a parcel in close proximity to the original school and the temporary classrooms.

4.5.1.3 Rehabilitation of Existing School Alternative

Under this alternative, no new construction would take place. As in the Proposed Alternative, the temporary classrooms would be removed and Ruth Elizabeth Park restored and returned to park land. The vacant site which would have been used by the City for construction of the new school would remain vacant for the near term.

5 Summary of Alternatives

5.1 No Action Alternative

The No Action Alternative would result in continued reliance on the temporary modular classroom facilities which were constructed in direct response to the tornado damage to address interim and immediate needs for school children that attend the Brookings School. The Brookings School building would remain in its current state and not be used for educational purposes under this alternative.

5.2 The Proposed Alternative

The Proposed Alternative will provide a permanent classroom environment for the students of the Brookings School that will include a safe and accessible facility meeting the current MSBA school and site construction standards and requirements, safety and fire codes, seismic standards, and building codes.

5.3 Rehabilitation of Existing School Alternative

Since the existing building cannot meet the educational space requirements and would require significant improvements to meet basic codes and standards, and because there is no room for the required expansion on the existing site, this alternative was deemed infeasible

5.4 Summary of Impacts

Summary of Affected Environments and Impacts summarizes the potential impacts of the Proposed Action and, where potential impacts exist, what mitigation measures will be taken to minimize the impacts, as discussed in this EA. Because the No Action and the Rehabilitation of Existing School Alternatives have negligible associated impacts, they are not included in this summary table.

Table 1 summarizes the effects described and analyzed in this chapter. Levels of potential effect are defined as follows:

* Negligible: The resource area would not be affected, or changes would be non-detectable or if detected, effects would be slight and local. Impacts would be well below regulatory limits.
* Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory limits. Mitigation measures may be necessary to reduce potential effects.
* 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.
* 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.

5.4.1 Table 1 – Summary of Affected Environments and Impacts on Proposed Action

Summary of Affected Environments and Impacts on Proposed Action							
Affected Environment/ Resource Area	**Impact**				**Agency Coordination/ Permits**	**Mitigation/ BMPs**	**Comments**
	Negligible	**Minor**	**Moderate**	**Major**			
Noise		X				Limit construction to normal daytime work hours and limit construction vehicle idling.	There may be a short-term increase in noise due to construction activities; otherwise noise levels will remain about the same for the general area.
Air Quality		X				Limit work hours and idling times, maintain equipment condition. Wet down areas as needed during construction to prevent fugitive dust.	Minor and temporary impacts to air quality and increased emissions related to construction activities.
Public Services and Utilities		X			Water and Sewer Service Permits and Approvals from Springfield Water and Sewer Commission	Limit impacts by use of plates to cover excavations or same-day backfilling to limit potential for soil erosion or safety hazards; use public safety personnel to mitigate for potential temporary traffic and safety impacts associated with construction.	Minor and temporary impacts for the connection of the utilities to service the new building to the main lines in the public right-of-way.
Transportation / Traffic	X				Street Occupancy Permit, Street Opening Permit, Trenching Permit, Driveway/Curb Cut Permit, and other Misc. Permits from Springfield DPW, application for	Proposed improvements as identified by TIS for project, including signage, repositioning crosswalks, roadway improvements, and partial road discontinuance.	No change in level of service, acceptable level of service for new driveway, no perceivable increase in emergency vehicle response times associated with Proposed Alternative. Minor transportation related improvements will provide safe conditions for new school and provide land area for school.

Summary of Affected Environments and Impacts on Proposed Action							
Affected Environment/ Resource Area	**Impact**				**Agency Coordination/ Permits**	**Mitigation/ BMPs**	**Comments**
	Negligible	**Minor**	**Moderate**	**Major**			
					discontinuance of portion of Melrose Street		
Aesthetic and Visual Resources		X				School building oriented on parcel away from residences, screening, vehicle entrance on far side from residences, aesthetic treatments on building.	New school will be a visual obstruction to a few private residences. Improvement over existing damaged school and temporary classrooms; new building will be in keeping with other structures in vicinity and provide improvement over vacant area.
Historic and Cultural Resources	X				Coordination with SHPO, THPO		Coordination with SHPO and THPO indicated no historic properties will be impacted by project.
Geology and Soils	X				EPA NPDES CGP	Implement sediment and erosion controls during construction. Apply for NPDES CGP coverage and implement and maintain SWPPP during construction. Provide landscaping and final stabilization post construction.	No impacts to unique geology or soils, site is in a historically disturbed and urbanized area.
Water Resources		X			EPA NPDES CGP	Post-construction stormwater BMPs including detention/ infiltration Implementation of sediment and erosion controls and	Potential stormwater impacts related to changes in impervious and site development. Temporary impacts related to construction phase stormwater runoff

Summary of Affected Environments and Impacts on Proposed Action							
Affected Environment/ Resource Area	**Impact**				**Agency Coordination/ Permits**	**Mitigation/ BMPs**	**Comments**
	Negligible	**Minor**	**Moderate**	**Major**			
						adherence to SWPPP.	
Floodplains, Coastal Zones, Wild and Scenic Rivers	X						No coastal zones, floodplains, or Wild and Scenic Rivers are located near the Proposed Action.
Wildlife	X						No critical habitats are located near the Proposed Action. No impacts to wildlife are expected.
Vegetation	X						No significant impacts are expected relative to vegetation.
Threatened and Endangered Species	X						No threatened or endangered species or critical habitats are located near the Proposed Action.
Wetlands	X						The Proposed Action would not impact waters of the U.S. or wetlands.
Zoning and Land Use	X						No anticipated zoning or land use impacts are associated with the Proposed Action.
Human Health and Safety (Hazardous Materials)	X					Any hazardous materials discovered would be handled and disposed of in accordance with all applicable regulations.	Minimal potential for hazardous waste/materials impacts during construction.

Summary of Affected Environments and Impacts on Proposed Action							
Affected Environment/ Resource Area	**Impact**				**Agency Coordination/ Permits**	**Mitigation/ BMPs**	**Comments**
	Negligible	**Minor**	**Moderate**	**Major**			
Economic Justice	X					No mitigation needed, net benefit anticipated.	Proposed Action would be likely to result in improvements by providing increase quality and space for education, code compliance, and provide new permanent classrooms.
Cumulative Impacts		X				Temporary classrooms will be deconstructed and returned to the company from which they are being leased. The segment of Ruth Elizabeth Park which is currently being used for the school will be returned to lawn/field areas. Reuse options for former school building are being assessed by the City.	When the new school is constructed, there will not be a need for the existing temporary classrooms or existing tornado-damaged school.

6 Public Participation

As the lead Federal agency for the NEPA compliance process for the proposed New Elias Brookings School in Springfield, Massachusetts, FEMA's goal is to expedite the preparation and review of NEPA documentation and to be responsive to the community and the purpose and need of the Proposed Action, while meeting the intent of NEPA and complying with all relevant provisions thereof.

As part of the concept and design development process, multiple meetings were held, including agency and board/commission meetings, programmatic meetings with stakeholders, and public community workshops dedicated to discussing the Elias Brookings School.

Interagency reviews will consist of agency consultation correspondence sent by FEMA and the responses received from the agencies, which will be appended to the Final EA as Appendix C.

The City of Springfield 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.

7 Mitigation and Permits

Construction of the Proposed Alternative will be completed in general accordance with the mitigation measures cited in Table 1 of this EA.

In accordance with applicable local, state, and federal regulations, the City of Springfield (or its designee) would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. The following permits and approvals may be required prior to construction:

- Site Plan Review – City of Springfield DPW
- Application for discontinuance of portion of Melrose Street – Springfield DPW, Board of Public Works, City Council
- Various Building Permits – City of Springfield Building Department
- Street Occupancy Permit, Street Opening Permit, Trenching Permit, Driveway/Curb Cut Permit, and other Misc. Permits – Springfield DPW
- Water and Sewer Service and Related Approvals - Springfield Water and Sewer Commission
- Project Notification Form – Massachusetts Historical Commission (Response Letter dated December 7, 2012, indicated no adverse impact)
- U.S. EPA NPDES Construction General Permit (SWPPP prepared for project, NOI to be filed prior to construction by applicable Operators)

8 List of Preparers

The following people were responsible for the preparation of and quality control/quality assurance associated with the draft and final EA :

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9 References

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