

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

Project Information

Project Name: Old-Town-Hall-Veterans-Apartments

HEROS Number: 900000010362265

Responsible Entity (RE): WESTFIELD, 59 Court St Westfield MA, 01085

RE Preparer: Peter J. Miller

State / Local Identifier:

Certifying Officer: Michael A. McCabe

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 20 Broad St, Westfield, MA 01085

Additional Location Information:

N/A

Direct Comments to: Peter Miller
Office of Community Development

59 Court Street
Westfield, MA 01085
E-Mail: p.miller@cityofwestfield.org

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

Domus, Inc is requesting \$410,000 in HOME ARP funds and \$700,000 in HOME funds for acquisition of the Old Town Hall property located at 20 Broad Street in Westfield, MA for the Old Town Hall Veterans Apartments Project. The Old Town Hall Apartments project will be an approximately \$8.2 million supportive housing project targeted towards homeless veterans and veterans at risk of homelessness. Domus has partnered with the City of Westfield Veterans Services Office, the Regional Veterans Administration, and will partner with the local VA- Supportive Services for Veterans Families (SSVF) for provision of supportive services to the projects residents. The project will be affordable to persons at 30% of the Area Median Income. This project includes 18 units of studio apartments and office spaces in the basement that will offer supportive services geared towards veterans.

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

The Old Town Hall Apartments project will be an approximately \$8.2 million supportive housing project targeted towards homeless veterans and veterans at risk of homelessness. The project will construct 18 new studio apartment units and will provide supportive services to its residents, responding to a need identified in the Springfield & Pioneer Valley Housing Report, commissioned by Wayfinders, a regional non-profit housing organization, and conducted by the UMass Donahue Institute of Economic and Public Policy Research. The building has been largely vacant and actively marketed for sale for the past five years. Currently, the building houses a small retail charity thrift store operated by the First Congregational Church. The upper floors are currently vacant. Alternatives considered for the building include renovation for office space.

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

The project area, located at 20 Broad Street in Westfield, MA, was built in 1837, originally functioning as the Town Hall. Most recently, under the ownership of the adjacent First Congregational Church,, the building has housed office space for a human service agency. The building has been largely vacant for the past five years. The building contains 12,898 square feet of indoor space. It is located on the City of Westfield's historic Park Square Green in the downtown area. The building is located on a public transit route and within walking distance of two full-service grocery stores, employment opportunities, and the local public library. The property is listed on the National Register of Historic Places.

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:

[20241028 EA Signature Page.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	Funding Amount
2023-1	Community Planning and Development (CPD)	HOME Program	\$700,000.00
2023-2	Community Planning and Development (CPD)	HOME American Rescue Plan (HOME-ARP)	\$410,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$1,110,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$8,201,478.00

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

Compliance Factors: 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)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within

		an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act 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.
Flood Insurance 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.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
Farmlands Protection Farmland Protection Policy Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert

1981, particularly sections 1504(b) and 1541; 7 CFR Part 658		agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.
Noise Abatement and Control 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	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers 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	Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection 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.
Wild and Scenic Rivers Act 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.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice 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.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The Holyoke-Chicopee-Westfield Consortium HOME ARP allocation plan identifies a need for affordable housing for low income veterans experiencing homelessness or at risk of experiencing homelessness. This project contains 18 units of affordable housing and offices for supportive social services in the basement. Additionally, multifamily housing is an allowed use in the City's CORE District, a densely-developed district. Maintaining the structure's historic appearance and scale would be required.	None
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	This project is largely the reuse of an existing building in a densely-developed neighborhood. No additional impervious surface is proposed.	None
Hazards and Nuisances including Site Safety and Site-Generated Noise	1	The property has been largely vacant since 2017. Reuse as housing is anticipated to improve site safety and have minimal to no impact on noise in the neighborhood.	None
SOCIOECONOMIC			
Employment and Income Patterns	2	No impact anticipated.	None
Demographic Character Changes / Displacement	1	This project will have 18 units of housing available for low-income citizens at risk of homelessness..	None
Environmental Justice EA Factor	2	No impact anticipated. Project residents will have access to public transportation, outdoor recreation spaces, grocery stores, other retail stores, and social services.	None
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	This project will contain 18 units of housing for homeless veterans. It is unlikely that this project will have an impact on	None

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		accessing Westfield's educational and cultural facilities.	
Commercial Facilities (Access and Proximity)	2	This project is located within walking distance of a grocery store and other shopping amenities in the downtown area. This location is ideal for affordable housing for homeless veterans, as it is anticipated that residents will not have a car to travel to places for necessities such as food and toiletries.	None
Health Care / Social Services (Access and Capacity)	2	The City of Westfield has a number of medical and dental offices. This project will have supportive social services located in the basement of the building for residents to access. This project is not anticipated to overrun the existing medical, dental, and social services in Westfield.	None
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	No impact anticipated. The property will be responsible for contracting for its own solid waste and recycling disposal.	None
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	This project will be accommodated by the existing capacity of Westfield's sanitary sewers and waste water systems, to which this building is already attached. While the project would introduce additional sewage flow, the system is able to accept the added capacity..	None
Water Supply (Feasibility and Capacity)	2	This project will be accommodated by the existing capacity of Westfield's public water system, to which this building is already attached. While the project would introduce additional usage, the system is able to accept the added capacity..	None
Public Safety - Police, Fire and Emergency Medical	2	No measurable impact on public safety agencies is anticipated.	None
Parks, Open Space and Recreation (Access and Capacity)	2	The City of Westfield has a number of parks and open recreation spaces for the public. This location is within walking distance of a multi-use pedestrian bike path. This project is not anticipated to have any impact on	None

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		access or capacity for the City's parks and recreation spaces.	
Transportation and Accessibility (Access and Capacity)	1	The City of Westfield has an accessible bus network with multiple routes that travel throughout the City and to Springfield, MA. This project is located less than a quarter mile away from the bus stop at Stop and Shop that can easily bring residents to places in Westfield that are not accessible by walking.	None
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	No impact anticipated.	None
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	This project is largely a reuse of an existing building. No impact anticipated.	None
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	No impact anticipated. No additional impervious surface or in the physical environment is proposed.	None
Energy Efficiency	1	The building is receiving a full renovation, which will include replacement of heating and electrical systems, which will be replaced by equipment required to pass the new 2021 International Energy Conservation Code (IECC) and the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 90.1-2019 as minimum energy efficiency standards for new construction for certain HUD and USDA covered programs	None

Supporting documentation

Additional Studies Performed:

Phase 1 Environmental Site Assessment done by ENSTRAT Strategic Environmental Services.

[2023 Old Town Hall Phase I report\(1\).zip](#)

Field Inspection [Optional]: Date and completed
by:

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

ENSTRAT Strategic Environmental Services City of Westfield Zoning Board City of
Westfield Community Preservation Committee

List of Permits Obtained:

This project has received planning board approval. Throughout the construction process, the project will need to comply with building department rules and regulations.

Public Outreach [24 CFR 58.43]:

This project was heard and approved by the Westfield Community Preservation Committee on January 18, 2024. The project was heard and approved by the Westfield City Council on February 15, 2024.

Cumulative Impact Analysis [24 CFR 58.32]:

The Old Town Hall building located at 20 Broad St in Westfield, MA, has been mostly vacant since 2017. It's last purpose was being used as office spaces for Behavioral Health Network. Currently, a church operates a thrift store on the first level for a few hours a few days a week. Repurposing the Old Town Hall into affordable housing for homeless veterans will have minimal impact on the environment. The project site is not in a floodplain or near any endangered species/conversation protected area. There will be minimal ground disturbance since no new structures are being built as part of this project. Rehabilitating an existing building will have less of an impact on the environment than tearing it down and building a new one. Additionally, rehabilitating it is a better alternative than keeping it vacant, where it may become an eye sore and a public safety issue.

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

N/A

No Action Alternative [24 CFR 58.40(e)]

No action. The site would continue to be mostly vacant other than a thrift store on the first floor.

Summary of Findings and Conclusions:

The Old Town Hall adaptive re-use project has been analyzed by the City for its impact on the physical environment in the Broad Street and larger downtown neighborhood. Judged by the required criteria, the reviewer has determined that the project will have No Significant Impact on the environment, based on all materials reviewed. To summarize, this project consists of an adaptive reuse of a local property listed on the National Register of Historic Places. The proposed use is determined to be of similar impact as its previous use as a professional office building. The project presents the opportunity to preserve an historic property that otherwise might be endangered as it has laid largely vacant for the past seven years. Investment in new mechanical systems is anticipated to lower the building's carbon footprint and energy consumption based upon a plan to replace aged heating and electrical systems. No additional impervious surface is proposed as the building will maintain the same envelope. While the property will increase consumption and waste water, existing municipal systems are sized appropriately to accept the additional waste. No changes to the project were proposed.

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	None	N/A	None required	
Soil Suitability / Slope/ Erosion / Drainage and	None	N/A	None required	

Storm Water Runoff				
Hazards and Nuisances including Site Safety and Site-Generated Noise	None	N/A	None required	
Employment and Income Patterns	None	N/A	None required	
Demographic Character Changes / Displacement	None	N/A	None required	
Environmental Justice EA Factor	None	N/A	None required	
Educational and Cultural Facilities (Access and Capacity)	None	N/A	None required	
Commercial Facilities (Access and Proximity)	None	N/A	None required	
Health Care / Social Services (Access and Capacity)	None	N/A	None required	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	None	N/A	None required	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	None	N/A	None required	
Water Supply (Feasibility and Capacity)	None	N/A	None required	

Public Safety - Police, Fire and Emergency Medical	None	N/A	None required	
Parks, Open Space and Recreation (Access and Capacity)	None	N/A	None required	
Transportation and Accessibility (Access and Capacity)	None	N/A	None required	
Unique Natural Features /Water Resources	None	N/A	None required	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	None	N/A	None required	
Climate Change	None	N/A	None required	
Energy Efficiency	None	N/A	None required	

Project Mitigation Plan

It has been determined no mitigation is required. While the proposed project will introduce 18 units of new affordable housing in the downtown neighborhood, its impact is negligible as it includes only the reuse of an existing building and all public utilities and services can handle the increased capacity.

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

Yes

2. Is your project located within a Runway Protection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ) ?

Yes, project is in an APZ

Yes, project is an RPZ/CZ

No, project is not within an APZ or RPZ/CZ

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within either zone below.

Screen Summary

Compliance Determination

The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Old Town Hall Airport Hazards.pdf](#)

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

[Old Town Hall Flood Zone.pdf](#)

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:

[Old Town Hall Flood Zone Map.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):

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

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)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

Screen Summary

Compliance Determination

Supporting documentation

[2023 Old Town Hall Phase I report.pdf](#)

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

[Old Town Hall Endangered Species.pdf](#)

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.)	7 CFR Part 658

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:

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

Screen Summary

Compliance Determination

Supporting documentation

[Old Town Hall Flood Zone Map\(1\).pdf](#)

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” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

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).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) In progress

✓ Advisory Council on Historic Preservation In progress

✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Delaware Tribe of Indians Response Period Elapsed

- ✓ Mohegan Tribe of Indians Connecticut Response Period Elapsed
- ✓ Narragansett Indian Tribe Response Period Elapsed
- ✓ Stockbridge Munsee Community Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

The selected tribes were identified by using HUD's Tribal Directory Assessment Tool. The tribes were sent a letter via email that summarized the project and asked for a response within 30 days.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

- Yes
- No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**
20 Broad Street. Westfield MA 01085

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
20 Broad Street, Westfield MA 01085	Listed	Yes	✓ Not Sensitive

Additional Notes:

2. Was a survey of historic buildings and/or archeological sites done as part of the project?

Yes

Document and upload surveys and report(s) below.
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

Step 3 – Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

No Historic Properties Affected

No Adverse Effect

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

Document reason for finding:

The Massachusetts Historical Commission recommended that there is a finding of "no adverse effect".

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

No

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

[MHC No Adverse Effect Letter to EOHLC \(1\).pdf](#)

[Stockbridge Response.png](#)

[Tribe notification email list.png](#)

[Old Town Hall Tribe Outreach Letter.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

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

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[Old Town Hall Map.pdf](#)

Are formal compliance steps or mitigation required?

Old-Town-Hall-Veterans-
Apartments

Westfield, MA

900000010362265

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
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.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

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

Yes

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

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Aquifer Zone.pdf](#)

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

[Old Town Hall 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

[Old Town Hall Rivers.pdf](#)

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