PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
MANLEY STREET HOUSING RESOURCE CENTER
BROCKTON, MASSACHUSETTS

Pursuant to the National Environmental Policy Act (42 United States Code [USC] §§4321-4370h) and the US Department of Health and Human Services General Administration Manual, Part 30-50-40, Father Bill’s and MainSpring has prepared an Environmental Assessment to identify potential impacts associated with the rehabilitation of the Brockton US Army Reserve Center into a Housing Resource Center with emergency shelter, supportive services, and affordable housing units for the homeless.

PURPOSE AND NEED FOR THE PROPOSED ACTION (EA §§ 1.1 through 1.3, pages 1-1 to 1-2)

Father Bill’s and MainSpring (FBMS) seeks to rehabilitate the Brockton US Army Reserve Center into an emergency shelter with supportive services and construct a new 3-story affordable housing building for the homeless. The Environmental Assessment (EA) analyzes potential environmental impacts associated with implementing the Proposed Action and Alternatives. The EA has been prepared in accordance with NEPA (42 United States Code [USC] §§4321-4370h) and the US Department of Health and Human Services General Administration Manual, Part 30-50-40.

Brockton US Army Reserve Center (USARC) is located at 124 Manley Street, Brockton in Plymouth County, Massachusetts (Figure 1-1). The USARC occupies approximately three acres (“Project site”) and is part of the larger 143-acre parcel owned by the United States of America and operated by the Department of Veterans Affairs (VA), Boston Healthcare System – Brockton Medical Campus (Figures 1-2 and 1-3).

The Project site is currently occupied by an Administration (Reserve) Building, an Organizational Maintenance Shop (OMS), a privately-owned vehicle (POV) parking area, and military equipment parking (MEP) area (see Figure 1-5). The USARC facility was constructed in 1964 but has been vacant since August 2015 when it was taken out of commission.

The General Services Administration proposes to lease and eventually transfer the Project site to FBMS through a quitclaim deed. FBMS proposes the complete renovation of the Administration (Reserve) Building to a new Housing Resource Center with a 100-bed emergency shelter and supportive services including a health clinic, and the construction of a new three-story building with 32 permanent affordable housing units (“Proposed Action”). The Proposed Action would support FBMS’s mission of providing housing and resources for the homeless in Brockton and Southeastern Massachusetts. FBMS has experienced an increase of 67 percent in nightly occupancy over the past eight years and its individual shelters currently operate at an occupancy rate of over 200 percent. By adding 100-emergency beds and 32 affordable units, the Project would help alleviate the need for shelter among the homeless population in the Brockton area.
DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

ALTERNATIVE 1 - PREFERRED ALTERNATIVE (EA § 2.2 & 2.3.1, pages 2-1 & 2-2): This Alternative consists of the renovation of the Reserve Building, and the construction a new affordable housing building east of the Reserve Building. The Preferred Alternative will redevelop the underutilized site, while respecting the site constraints as well as minimizing and mitigating any anticipated impacts.

NO-ACTION ALTERNATIVE (EA § 2.3.2, page 2-2): Under the No-Action Alternative, no renovation and construction would be undertaken. The existing buildings would continue to sit vacant. The No Action Alternative was used as the baseline from which the impacts of the Preferred Alternative were compared.

SUMMARY OF ENVIRONMENTAL IMPACTS

The Environmental Assessment (EA), referenced in this finding, analyzes the potential environmental impacts of activities associated with the renovation of the Reserve Building, and the construction a new affordable housing building. The EA also provides environmental protection measures to avoid or reduce all potential adverse environmental impacts of the Preferred Alternative and the No-Action Alternative. The analyses in the EA, of the potential environmental impacts of the Preferred Alternative on human and natural resources, concluded that by implementing environmental protection measures, FBMS would be in compliance with all regulations required by the US Department of Health and Human Services (HHS). The HHS has concluded that no significant adverse effects from the Preferred Alternative would result to the following resources:

Land Use (EA § 3.2, page 3-1):

The Project site is currently zoned under R1-B single family residential and surrounded by industrial to the south, commercial to the west, and residential to the north and east. To pursue the Preferred Alternative, the Proponent would seek zoning relief under the Dover Amendment Education Exemption (Section 27-23 of the Zoning Bylaw). The site is already developed and therefore, no impacts to the land use are anticipated.

Water Resources (EA § 3.3, pages 3-1 to 3-2):

The Project site is not located within or near surface water bodies, wetlands, floodplain, or coastal zones. Therefore, the Preferred Alternative is not anticipated to impact any water resources.

Biological Resources (EA § 3.4, page 3-2):

Based on previous consultations with the USFWS conducted in January 2018, no threatened, endangered, or candidate species were identified to be present on the Project site. Moreover, recent GIS assessments show that the Project site is not located within a Massachusetts Natural Heritage and Endangered Species Program (NHESP) priority habitat of rare species or estimated habitat of rare wildlife. Additionally, no vernal pools or potential vernal pools are located on site or neighboring parcels (see Figure 3-3). The Project site is also not located near a wild, scenic, or recreational river area. Therefore, the Preferred Alternative is not anticipated to impact any biological resources.

Geology and Soils (EA § 3.5, pages 3-6):

The Preferred Alternative is anticipated to have minor construction-related impacts to geology and soils. The site has a gentle slope west and is already disturbed, resulting in minimal grading and topographical
changes for the construction of the new affordable housing building. To mitigate impacts, erosion controls including straw wattles and silt fences would be placed along the perimeter of the Project site along with the installation of inlet protection (i.e., silt sacks) and at construction entrances to reduce the tracking of sediment into the public right-of-way and adjacent properties.

**Public Resources (EA § 3.6, pages 3-6 to 3-8):**

The Preferred Alternative is not anticipated to have a significant impact on public resources. Demand for public utilities including water, wastewater, stormwater, solid waste, electricity, natural gas, fire protection services, and telecommunication services will increase with the Proposed Action. Several strategies including water conservation measures and stormwater management design features will be used to reduce potential impacts resulting from the Preferred Alternative. Necessary steps will be taken to protect existing utilities from damage during construction.

With regards to transportation impacts, the Proposed Action is expected to create a small number of daily trips as those staying at the shelter generally do not own personal vehicles. The small number of trips generated by the facility is not expected to have any significant impact on traffic operations. To cater to the small parking demand, approximately 30-surface parking spaces would be provided for staff, visitors, and residents. A bicycle shelter is also proposed south of the Administration Building to provide bicycle parking for staff, guests, and residents.

**Public Safety (EA § 3.7, pages 3-8):**

Given the Project’s location within the city of Brockton, the Project site will be well served by Brockton’s public safety services, including police, fire, and emergency medical services. The Proposed Action is not anticipated to significantly change the population of the area; therefore, the Preferred Alternative is not expected to have any significant impact on police, fire, and emergency medical services.

**Hazardous Waste (EA § 3.8, pages 3-10 to 3-11):**

The Project site is not situated on a superfund site and the Preferred Alternative is not anticipated to have adverse impacts on hazardous materials. On the contrary, the Preferred Alternative would be beneficial in removing potential hazardous material (including volatile organic compounds, asbestos containing materials, lead based paints, radon, polychlorinated biphenyl, minimum explosive concentration, and radioactive materials) on the Project site. All hazardous materials listed above would be remediated in accordance with all federal, state, and local regulations.

**Air Quality (EA § 3.9, pages 3-11):**

The Preferred Alternative would result in short-term localized air quality impacts primarily due to construction and demolition activities. All equipment and vehicles used during construction would be maintained in good operating condition to minimize exhaust emissions. In addition, appropriate dust abatement techniques will be employed to control dust onsite. Long-term impacts on air quality from the emissions of the Proposed Action’s small heating/water boilers, and any potential emergency generator are anticipated to be inconsequential. FBMS expects that the Project’s stationary sources (boilers, engines, etc.) will be subject to the Massachusetts Department of Environmental Protection’s (MassDEP’s) Environmental Results Program and will complete the required applications and submittals for the equipment, as necessary.
Given the very minor increases in trip generation expected from the Project, it is anticipated that there will be no violations of the National Ambient Air Quality Standards for carbon monoxide at any intersections associated with Project-related traffic.

**Noise (EA § 3.10, pages 3-11 to 3-12):**

Construction and demolition activities associated with the Preferred Alternative are anticipated to result in short-term intermittent increase in noise levels in the area. Noise attenuation measures would be integrated into the design and construction of the structures to minimize adverse effects. No significant long-term noise impacts would be experienced as a result of the Preferred Alternative. After construction, noise from the Preferred Alternative is expected to be similar to the surrounding community noise level.

**Historic Resources (EA § 3.11, pages 3-12):** The Proposed Action is not anticipated to have no impacts on any buildings registered under the National Register of Historic Places. A Project Notification Form was submitted to the Massachusetts State Historic Preservation Officer in January 2021, who determined that the Proposed Action would be unlikely to affect significant historical or archaeological resources.

**PUBLIC REVIEW**

The Environmental Assessment and a draft of this notice were both posted on the Father Bill’s & MainSpring website and available for public review from 7/22/21 through 8/21/21.

**PROPOSED FINDING OF NO SIGNIFICANT IMPACT**

Based on my review of the facts and analysis summarized above and contained within the findings of the EA, I find the proposed decision to lease and eventually transfer the Project site so that FBMS may implement the Proposed Action will not have a significant impact on the natural or human environment; therefore, an environmental impact statement is not required. This analysis fulfills NEPA 42 USC §§4321-4370h and the US Department of Health and Human Services General Administration Manual, Part 30-50-40, Part 30-40-40 Floodplain Management and, Part 30-40-70 Protection of Wetlands.

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SIGNATORY                             DATE