



U.S. Department of Housing and Urban Development

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

Project Information

Project Name: Fitchburg Theater – Envelope Repairs

Responsible Entity: City of Fitchburg, MA

Grant Recipient (if different than Responsible Entity): Fitchburg State University (FSU)

State/Local Identifier: Massachusetts/City of Fitchburg

Preparer: Daniel P. White, Atlas Technical Consultants, 617-872-6570,
Daniel.white@oneatlas.com

Certifying Officer Name and Title: Mayor Samantha M. Squailia

Consultant (if applicable): Daniel P. White, Atlas Technical Consultants

Direct Comments to: City of Fitchburg, Community Development, Kimberly LeBlanc,
Commdev@fitchburgma.gov, (978) 829-1890

Project Location: 689-717 Main Street, Fitchburg, MA 01420

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

FSU has been awarded a federal Community Project Funding (CPF) Grant #B-23-CP-MA-0679 in the amount of \$2,000,000 for a development Project at the property. The CPF program is managed by the U.S. Department of Housing and Urban Development (HUD).

The development Project partially funded by the CPF grant includes repairs to the exterior envelope of the original Fitchburg Theater building on the 689-717 Main Street parcel which is currently in poor condition. Repairs will match existing brick construction and are intended to maintain the historical integrity of the building. These repairs will primarily include:

- Repairs and reconstruction of the roof (both main building and “fly tower” roof).
- Removal and replacement of gutter/downspout systems.

- Masonry repairs and repointing to north, east, and west sides of building (south side is currently in good condition and will not need repairs) to match existing conditions.
- Removal of current steel emergency exit stairs and platforms on east and west sides of building. Where needed, new wooden emergency exit stairs will be constructed.
- Replacement of existing exit doors on east and west sides of building with new doors to match existing historical door styles.
- Replacement of other doors, windows, and vents on the east, west, and north sides of the building with new weather-tight, historically appropriate replacements.

The interior of the Fitchburg Theater building will be renovated in the future using other funding mechanisms.

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

Fitchburg State University (FSU), in coordination with the City of Fitchburg, New Vue Communities, the Fitchburg Art Museum, and other community stakeholders, are engaged in an ongoing effort to revitalize downtown Fitchburg, specifically focused on the restoration and renovation of the historic Theater Block. The theater, constructed in 1929, has been closed for more than 30 years, contributing to the blight of the downtown area. FSU acquired the site in 2016 with the bold vision to renovate and reactivate the Theater Block, providing a mix of academic, community, and cultural spaces. This redevelopment plays a key role in the larger plan to revitalize the long-dormant city center, creating a cultural district to attract local and regional tourists.

The proposed project will complete major restoration work to the building envelope, stabilizing the existing theater building. This stabilization work will prepare the structure for the construction of the “theaterLAB” within the historic Theater Block building. The proposed theaterLAB space is intended to create an inclusive and collaborative learning/performance facility that will engage community members who might not otherwise engage in University-sponsored events, allowing FSU to integrate the diverse neighborhoods around Main Street and promote equity of access to arts and humanities programming.

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

The proposed project site has been vacant for more than 30 years and has resulted in deteriorated conditions, both to the interior and envelope of the building. These deteriorating conditions include major roof failure that has resulted in water infiltration, deteriorating brick and mortar at the theater and flytower that pose significant safety concerns, and exterior openings that are not weather-tight or secure and do not comply with existing Code.

The proposed project is located in a densely developed urban area that was originally developed as a second central district for the Fitchburg community in the late 1700s. The area is characterized by a mix of uses including, residential, commercial, institutional, and historical

buildings. Much of this area comprises the Upper Common Historic District, which was deemed eligible for the National Register by the Massachusetts Historic Commission on May 10, 2017 and was adopted by the National Park Service on February 20, 2019.

Within this district, the preservation of the theater building is of utmost importance and will secure a contributing resource to the Upper Common Historic District. This proposed renovation project will preserve the structural integrity and maintain the exterior appearance of the historic Fitchburg Theater building, improving and preserving a key historical and cultural resource for the community.

Funding Information

Grant Number	HUD Program	Funding Amount
#B-23-CP-MA-0679	Community Project Funding (CPF)	\$2,000,000

Estimated Total HUD Funded Amount: \$2,000,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: **\$7,464,295**

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>See HEROS Worksheet</i>
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>See HEROS Worksheet</i>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>See HEROS Worksheet</i>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list 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
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	According to the City of Fitchburg Zoning Map, the project property is zoned as Central Business District, with Student Housing overlay zoning. The proposed action is in conformance with the zoning plan. Rehabilitation of the existing historical theater will eventually lead to reintegrating it into the economic and cultural fabric of the city.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The proposed action is envelope rehabilitation of the existing historical theater building. There has been no noticeable settlement or structural problems with the existing building. The area around the building is flat and paved, in an urban district of Fitchburg, with good stormwater drainage characteristics including municipal storm drain systems. The exterior envelope rehabilitation will not involve soil disturbance.
Hazards and Nuisances including Site Safety and Noise	2	The proposed action is envelope rehabilitation of the existing historical theater building, including roof replacement, brick repointing, new windows and doors, removal of old emergency exist staircases, etc. The rehabilitation efforts will improve the long-term structural integrity of the building and improve current and future safety of the building. Standard safety measures to protect workers and the surrounding population will be implemented during construction. Construction activities will temporarily increase noise levels to a minor degree (no construction activities generating excessive noise are planned) but these increases will be short-term and not have a significant impact.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Energy Consumption	1	The proposed action will have limited impact on energy consumption. Rehabilitation of the building envelope will improve air tightness of the building, which will improve heating/cooling efficiency when the interior is renovated under a future project. The future interior renovation design will include LED lighting, WaterSense-labeled plumbing fixtures products, energy efficient heating/cooling systems, etc.
SOCIOECONOMIC		
Employment and Income Patterns	1	The proposed project includes repairs to the exterior envelope of the existing historical theater building (roofing, brick repointing, windows, doors, etc.), which is currently in poor condition. The proposed rehabilitation work would result in beneficial impacts through the purchase of materials and supplies for renovation, and employment of workers to complete construction. The revitalization will benefit the community and performing arts in Fitchburg by providing performing arts space for both academic and small venue performances. It will enhance the economic and cultural vitality of this urban area in Fitchburg, a city which in its recent history has struggled economically. In summary, there will be a positive socioeconomic benefit to this area of the city once the full planned renovation of the theater building is completed in the next several years.
Demographic Character Changes, Displacement	1	The proposed historical theater envelope rehabilitation provides beneficial improvement with no demographic changes or displacement. There will be no change in use, although future renovation of the theater interior will result in re-opening the theater for performing arts activities, a change from its current vacant status.
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	Land use in the area surrounding the project property is predominantly commercial and institutional. No projected increase in student population is expected since the theater building envelope rehabilitation is focused on non-residential use. The rehabilitation project will improve educational and cultural facilities in the city by providing Fitchburg State University and the community with a newly re-opened performing arts theater. The project is being undertaken at the proposed location because it is a beneficial renovation of an existing historical building that is an integral part of Fitchburg's historic downtown urban area.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Commercial Facilities	2	Many commercial facilities (i.e. grocery stores, retail shopping, and restaurants) are located within half a mile of the project property to the east, south, and west. Existing retail and commercial services would not be impacted or displaced by the proposed rehabilitation of this historical performing arts building, and in fact the re-opening of the theater after renovation in future phases of the project will increase the economic well-being of nearby businesses as performances in the renovated theater bring people to the area.
Health Care and Social Services	2	Various doctor, medical, and social services are available within five miles of the proposed project, which is located in an urban area of Fitchburg, a city of approximately 42,000 residents. The proposed historical theater building rehabilitation will not impose any impacts to health care and social services to the area.
Solid Waste Disposal / Recycling	2	Household curb-side trash and recycling pickup is provided by the City of Fitchburg. The project theater building could be served by one of several commercial waste hauling companies operating in the area, including Republic Services. Asbestos and lead paint waste material generated during abatement prior to the project activities will be disposed of appropriately at off-site licensed landfills. Other non-hazardous demolition materials generated during project rehabilitation work will be disposed off-site at appropriate facilities.
Waste Water / Sanitary Sewers	2	The proposed project building is serviced by the City of Fitchburg municipal sanitary and storm sewer utilities. The rehabilitation of the historical theater building and re-use as an active theater building after renovation of the interior in future project phases will not have an adverse impact on these sewage systems or the environment.
Water Supply	2	The proposed project building is serviced by the Fitchburg Water Department. The proposed rehabilitation of the historical theater building and re-use as an active theater building after renovation of the interior in future project phases would result in no impact.
Public Safety - Police, Fire and Emergency Medical	2	The proposed project building is located 0.4 miles from the Fitchburg Police Department; 0.7 miles from the Fitchburg Fire Department; and approximately 1.1 miles from HealthAlliance-Clinton Hospital. The proposed project will not impact public safety community services in the area.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Parks, Open Space and Recreation	2	Several public parks, playgrounds, and conservation areas are located within 1-2 miles of the proposed project. No parks, open spaces, or recreational facilities would be impacted by the proposed exterior envelope rehabilitation of the historical theater building.
Transportation and Accessibility	2	Massachusetts Bay Transportation Authority (MBTA) has a commuter rail station approximately 0.5 miles east of the project property that serves the towns to the east including Boston. Fitchburg State University runs bus shuttles within the city during college semesters that is free to the public and stops in front of the project property. Montachusett Regional Transit Authority (MART) has three bus routes that run on Main Street and has stops within 3 blocks of the project property. Although the proposed project includes only exterior envelope rehabilitation of the historical theater building, future renovations of the interior to make the theater space(s) usable again will include updating accessibility for the building to meet current codes and requirements.
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project property is situated approximately 500 feet north of the Nashua River. No other unique natural features or water resources (sensitive watershed areas) are located on or near the project property; therefore, there would be no significant impacts resulting from the proposed construction. The project property is not subject to rapid water withdrawal problems that change the depth or character of the water table or aquifer. The project will not use groundwater for its water supply or use a septic system.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Vegetation, Wildlife	2	The project property is currently developed with a historical theater building in poor condition and unoccupied, surrounded primarily by asphalt pavement. The project scope includes only exterior historical building envelope rehabilitation/repairs. Therefore, the project will not create problems by introducing nuisance or non-indigenous species of vegetation that may be ecologically disruptive, be invasive, threaten survival of indigenous plant habitats, or disrupt agricultural or silvicultural activities, damage or destroy existing remnant or endemic plant communities, especially those containing nationally, regionally or locally rare species, damage or destroy plant species that are legally protected by state or local ordinances, damage or destroy trees, create special hazards for animal life, impact migratory birds, impact any species that are monitored or listed by local, state, tribal or the federal government, damage or destroy existing wildlife habitats, alter the groundwater, damage game fish habitat or spawning grounds, create conditions favorable to the proliferation of pest species, or create conditions that could harm or harass wildlife species that are nationally, regionally or locally rare or protected by state or local ordinance.
Other Factors	2	No other factors were considered.

Additional Studies Performed:

None

Field Inspection (Date and completed by):

Phase I Environmental Site Assessment site reconnaissance - Heidi Resca, Atlas Technical Consultants, March 12, 2024

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

- ASTM International. E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. West Conshohocken, PA; ASTM International, 2021. DOI: 10.1520/E1527-21.
- ASTM International. E2600-22 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. West Conshohocken, PA; ASTM International, 2022. DOI: 10.1520/E2600-22.
- ATC Group Services, Phase I Environmental Site Assessment, Fitchburg Theater Block, 689-717 Main Street, Fitchburg, Massachusetts 01420, dated October 12, 2016

- ATC Group Services, Limited Phase II Environmental Site Assessment, Fitchburg Theater Block, 689-717 Main Street, Fitchburg, Massachusetts 01420, dated October 28, 2016
- Atlas Technical Consultants, *Remedy Operation Status Report, 15 Central Street, Fitchburg, Massachusetts, MassDEP RTN: 2-18346*, dated July 14, 2023.
- Charles Klingler, LSP for RTN 2-18346, Atlas Technical Consultants.
- EDR, Certified Sanborn® Map Report, 3 Lots Main Street, Fitchburg, MA, 01420, dated April 12, 2023.
- EDR, EDR Historical Topo Map Report with QuadMatch, 3 Lots Main Street, Fitchburg, MA, 01420, dated April 12, 2023.
- EDR, The EDR Aerial Photo Decade Package, 3 Lots Main Street, Fitchburg, MA, 01420, dated April 12, 2023.
- EDR, The EDR-City Directory Image Report, 3 Lots Main Street, Fitchburg, MA, 01420, dated April 12, 2023.
- EDR, The EDR Radius MapTM Report with GeoCheck®, Fitchburg Theater, 689-717 Main Street, Fitchburg, MA, 01420, dated March 26, 2024
- FEMA, FEMA Flood Map Service Center Website <https://msc.fema.gov/portal/home>.
- FEMA FIRM, for Fitchburg, MA, Community-Panel Number 2503040008C, dated September 18, 1991.
- FEMA FIRM (Preliminary Revised), for Fitchburg, MA, Community-Panel Number 25027C0258F, dated May 5, 2023.
- Fitchburg, City of, <http://www.ci.fitchburg.ma.us/>
- Fitchburg Water Department, Drinking Water Quality Report, dated 2022.
- Google Earth, <https://www.google.com/earth/>.
- Mary Beth McKenzie, Associate Vice President, Finance & Administration, Fitchburg State University
- Massachusetts Cultural Resource Information System, <https://mhc-macris.net/details?mhcid=FIT.200>
- MassDEP, <https://eeaonline.eea.state.ma.us/portal/dep/wastesite/>
- National Wild and Scenic Rivers System, Map of Wild and Scenic Rivers. <https://www.rivers.gov/map.php>.
- National Wild and Scenic Rivers System, Inventory List of Study Rivers, <https://www.rivers.gov/study-rivers>.
- Phase I ESA User Questionnaire, prepared by Fitchburg State University representative, dated April 8, 2024
- Security First Title Resource, Environmental Lien and AUL Search, 689-717 Main Street, Fitchburg, MA, dated April 1, 2024.
- USGS Topographic Map, Fitchburg, Massachusetts Quadrangle Map, 7.5 Minute Series, dated 2021.

- U.S. Environmental Protection Agency, Map showing Nonattainment Areas for Clean Air Act National Ambient Air Quality Standards.
- U.S. Environmental Protection Agency, Sole Source Aquifer Map
<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>
- U.S. Fish and Wildlife Service, CBRS Map of Massachusetts.
- U.S. Fish and Wildlife Service, National Wetland Inventory Mapper, <http://www.fws.gov/nwi/>.
- U.S. National Park Service, National Rivers Inventory Map, <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>.

List of Permits Obtained:

Inspectional Services/Building permits pending.

Public Outreach [24 CFR 50.23 & 58.43]:

Public notice has been conducted for the *8-Step Decision Making Process, Protection of Floodplains* that was prepared as part of the Environmental Assessment. Public notice included publication of initial notice and final findings notices in the Sentinel & Enterprise newspaper as required by Executive Order 11988 and in accordance with 24 CFR Part 55.

Public notice has also been conducted for the Finding of No Significant Impact for this Environmental Assessment. **DETAILS FOR CITY TO FILL IN**

Cumulative Impact Analysis [24 CFR 58.32]:

The project consists of exterior envelope rehabilitation of a single existing historical theater building. The project is expected to be completed within a two-year period. The environmental review has covered all relevant laws and authorities related to this single component, short-term project. No project aggregation is necessary to evaluate cumulative impacts of a multi-component or extended time-frame project.

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

No other alternatives were considered, as the intent of the current project is to preserve a historical theater building that anchors an area that has been deemed eligible for inclusion in a National Register Historic District. The proposed alternative will consist of a historically-accurate exterior envelope rehabilitation that will prevent further decay and allow future re-use of the existing building. Other alternatives, such as a demolition and re-build of the theater building, would be financially infeasible and would not achieve the beneficial re-use of a historical building.

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

The proposed renovation of the historical theater property, an important historical building that has been deemed eligible for inclusion in a National Register Historic District, would not occur under the no-action alternative. The no-action alternative is not considered practical as the

benefits of the proposed action would not be achieved, and instead the building would continue to decay and/or require demolition.

Summary of Findings and Conclusions:

In conclusion, the HUD-grant funded project, exterior envelope rehabilitation of an existing historical theater building in an urban area, is limited in scope and will no potential adverse impacts on the environment except for the following, for which mitigation measures are required:

Contamination and Toxic Substances

- The northwestern adjoining property at 15 Central Street is identified by the Massachusetts Department of Environmental Protection (MassDEP) as an oil and /or hazardous material (OHM) release site with two release tracking numbers (RTNs) 2-18346 and 2-18601 due to a release of No. 2 fuel oil from a former leaking underground storage tank (UST). Since RTN 2-18346 is active (linked with RTN 2-18601) and a portion of the petroleum plume encroaches onto the north end of the project property, this is identified as a *recognized environmental condition*.
- Additionally, based on laboratory analysis of indoor air and sub-slab vapors, and the presence of petroleum contamination beneath the north end of the project theater building, a vapor encroachment condition (VEC) has been identified.

Floodplain Management & Flood Insurance

Atlas reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the City of Fitchburg, Massachusetts, Community-Panel Number 2503040008C, dated September 18, 1991. Different portions of the project property are located within either Zone A17 (northern/central portion) or Zone B (southern portion) flood zones. Zone A17 is defined as "areas of 100-year flood." Zone B is defined as "areas between limits of the 100 year flood and 500 year flood or certain areas subject to 100 year flooding with average depths less than one foot, or where the contributing drainage area is less than one square mile, or areas protected by levees from the base flood."

A preliminary revised FEMA FIRM, dated May 5, 2023 is available that shows the entire project property outside of any floodplains. However, HUD guidance indicates that the most stringent of current or preliminary floodplains must be used. Since the current map shows floodplains existing on the project property, that map is the most conservative and must be used.

The City of Fitchburg participates in the National Flood Insurance Program (NFIP).

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below 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.

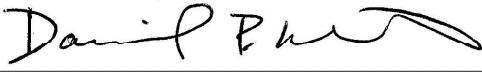
Law, Authority, or Factor	Mitigation Measure
Contamination and Toxic Substances	<p>Work with a Licensed Site Professional (Massachusetts LSP) to remediate and/or determine how a risk-based approach can be used to achieve closure for the No. 2 fuel oil contamination that is present on the northern end of the project property with associated RTN 2-18346. This work should be conducted on an on-going basis in accordance with the requirements and time-frames of the Massachusetts Contingency Plan (MCP).</p> <p>For improvements / renovations made to the theater portion of the building, including the proposed black box theater project, consult with a Licensed Site Professional to evaluate whether vapor intrusion mitigation measures are needed during construction and/or prior to occupancy. Sub-slab vapor, indoor air, or other testing may be needed. If necessary, these could take the form of floor/slab impermeable membranes or moisture barriers, sub-slab depressurization systems, building ventilation, or other measures.</p>
Flood Insurance	<p>The City of Fitchburg participates in the National Flood Insurance Program (NFIP). As a portion of the property structure is located within the current Special Flood Hazard Area (100-year flood zone), flood insurance will be carried on the structure until such time as Flood Insurance Rate Maps are changed to indicate that the project property is no longer located in a Special Flood Hazard Area.</p>
Floodplain Management	<p>To limit future flood damage, measures will include further sealing the lower façade of the building to floodwater intrusion along the northern and eastern sides of the building by sealing certain existing openings into the northern basement area. This will include windows and vents with opening bottom elevation of 456.25 or lower, within two feet above the current base flood elevation of 454.25 feet. These openings will be sealed with concrete masonry unit (CMU) block, brick, or equivalent, mortared into place.</p>

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 05/11/24

Name/Title/Organization: Daniel P. White

Senior Project Manager Atlas Technical Consultants

Certifying Officer Signature:  Date: 30/10/24

Name/Title: Samantha M. Squailia Mayor

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).