



U.S. Department of Housing and Urban Development  
451 Seventh Street, SW  
Washington, DC 20410  
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## **Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58**

### **Project Information**

**Project Name:** Christopher Heights of Concord

**Responsible Entity:** City of Newton, MA

**Grant Recipient** (if different than Responsible Entity): Town of Concord

**State/Local Identifier:** M17-DC250213 / M18-DC25013 / M19-DC25013 / M20-DC25013

**Preparer:** Jody Kablack, RHSO Specialist

**Certifying Officer Name and Title:** Barney Heath, Planning Director, City of Newton, MA

**Grant Recipient** (if different than Responsible Entity): Town of Concord

**Consultant** (if applicable): N/A

**Direct Comments to:** Eamon Bencivengo, Housing Development Planner, City of Newton  
100 Commonwealth Avenue, Newton, MA 02459

**Project Location:** 6X Winthrop Street, Concord, MA 01742

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

The Project is an 83 unit assisted living facility to be constructed on a vacant 6 acre parcel of land located at 6X Winthrop Street in West Concord, MA. The facility will consist of one three-story building, including driveways, parking, wastewater disposal, stormwater management improvements, utilities and landscaping. There will be seventy-one (71) studio/alcove apartments, and twelve (12) one-bedroom units. All units will be age restricted to persons age 62 and older. The development will have 40 units priced at market (150% AMI), 17 units will be income restricted to extremely low-income residents earning less than

30% of the area median income (“AMI”), and 26 units will be income restricted to residents earning less than 60% of AMI. Public open space and recreational opportunities will be constructed on the Property, including walking trails.

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

The proposed development will consist of 83 units of assisted living. The 2020 market study for the project projects that interest in this project will be high given the limited number of affordable assisted living units in the region, the affordable price point as compared to nearby competitive facilities, the growing number of the 65+ age population in the region and the developer’s strong track record of leasing up this type of facility.

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

The project site was formerly land belonging to the MA Department of Corrections. The Commonwealth conveyed the site to the Concord Housing Development Corporation (CDHC) for the express purposes of creating affordable housing and open space. The Project sponsor, the Grantham Group, will lease a portion of the undeveloped site from CHDC. The Project site is currently undeveloped land situated adjacent to a discontinued railroad that has recently been transformed into the Bruce Freeman Rail Trail. The southeast portion of the project site adjoins the Nashoba Brook at its confluence with the Assabet River, a Wild and Scenic River. Access to the site will be made via a continuation of a Winthrop Street, an existing public roadway adjoining the project site. There are retail, commercial and residential developments in the nearby West Concord Village area, and the West Concord MBTA commuter rail station. This facility will increase housing options in Concord, including the provision of affordable units in this unique type of housing.

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
HM18-13B	HOME	\$ 33,316.00
HM19-13B	HOME	\$407,570.10
HM20-13B	HOME	\$44,612.30
HM21-13B	HOME	\$25,900.00

**Estimated Total HUD Funded Amount:**  
 WestMetro Consortium HOME: \$511,398.40  
 DHCD HOME: \$825,000.00

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$17,430,379.60

**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.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Property is not located within 2,500 feet from the end of a civil airport, nor within 15,000 feet (2.8 miles) of a military airfield runway, and is not located within an Airport Runway Clear Zone (RCZ) or Runway Protection Zone (RPZ). Sources: Location Plan; L.G. Hanscom Field 2017 Environmental Status and Planning Report
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Concord is not a coastal community as defined by the Massachusetts Coastal Zone Management Program. Source: MassGIS
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	All proposed structures are located outside of the 500 year floodplain. No development is proposed within a Special Flood Hazard Area. Source: FIRM map 25017C0359F, effective 7/7/14.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Concord is not identified in the air quality State Implementation Plan and is not located in any nonattainment area designated by the EPA. Source: <a href="https://www.epa.gov/green-book">https://www.epa.gov/green-book</a>

<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes No  <input type="checkbox"/> X</p>	<p>Concord is not a coastal community as defined by the Massachusetts Coastal Zone Management Program.  Source: MassGIS</p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes No  <input type="checkbox"/> X</p>	<p>Property was once a part of MCI Concord prison. MCI Concord property has a RAO since 1998. There are no Activity and Use Limitation on the property. Phase I Environmental Site Assessment performed in 2009 due to prior storage of aggregate material and sewage disposal on the property. Chromium in soil samples detected above reportable concentrations for residential use in 2009. Limited Subsurface Evaluation performed in 2013 by ENSTRAT. No reportable concentrations of toxins in soil or groundwater were detected. Updated Phase I Environmental Site Assessment performed in April 2021 with same conclusions.  Sources: Phase I Environmental Site Assessment by Williamson Environmental LLC 2009; Limited Subsurface Evaluation by ENSTRAT 2013; Phase I Environmental Site Assessment by ENSTRAT 2021.</p>
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No  <input type="checkbox"/> X</p>	<p>There are no known Estimated Habitat or Priority Habitat as mapped by the Natural Heritage and Endangered Species Program of the Mass. Division of Fisheries and Wildlife on the Property, nor any Areas of Critical Environmental Concern.  Source: MassGIS</p>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No  <input type="checkbox"/> X</p>	<p>There is an Acceptable Distance between the project site and know above-ground storage facilities as provided by the Concord and Acton Fire Departments.  Sources: Concord Fire Dept; Acton Fire Dept.; Explosive and Flammable Hazards Worksheets; HUD Acceptable Separation Distance Electronic Assessment Tool.</p>

<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No  <input type="checkbox"/> X</p>	<p>The Property contains a small area of Prime Farmland, however no development is proposed to occur in this area. No prime agricultural soils will be disturbed or removed.  Source: MassGIS</p>
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<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>All proposed structures are located outside of the 500 year floodplain. No development is proposed within a Special Flood Hazard Area. Approximately 6,420 cubic feet of storage capacity within the 100-year floodplain will be disturbed by the Project. Approximately 11,900 cubic feet of storage is proposed to replace the proposed disturbance. Sources: FIRM map 25017C0359F, effective 7/7/14; Stormwater Management Report</p>
<p><b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>A Project Notification Form was sent to the Massachusetts Historic Commission in 2018 for this project and MHC has determined that the proposal is “unlikely to affect significant historical or archeological resources”. The 2013 West Concord Historic Resources Survey Plan prepared by ttl-architects identified potential impacts from development of the Project Site along Winthrop Street. Winthrop Street currently provides access to 5 residential structures (3 of which are on listed on the MACRIS database) and 2 commercial/ industrial buildings. The development plan proposes extension of Winthrop Street for approximately 600 feet into the Project Site, consisting of a 24 foot wide paved roadway to match existing pavement, and a 5 foot wide concrete sidewalk along 1 side of the road. This extension will not have any detrimental impact on Winthrop Street. Traffic volumes from the development are projected to be modest. Federally-recognized Massachusetts Indian tribes have been consulted and no response has been received within the required 30 day notice period. Sources: MHC Project Notification Form; West Concord Historic Resources Survey Plan, ttl-architects, 2013; Site Plans prepared by Fuss and O’Neill, 11/16/2016; Traffic Impact Memorandum by Bayside Engineering, 11/2013.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>Combined DNL calculation is 56, below the 65 decibel threshold. Source: HUD DNL Calculator <a href="https://www.hudexchange.info/programs/environmental-review/dnl-calculator/">https://www.hudexchange.info/programs/environmental-review/dnl-calculator/</a></p>
<p><b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>The Property is not located within a Sole Source Aquifer, or a potential active aquifer, or a Zone II drinking water resource area, or within 50 feet of a private drinking well. Source: ENSTRAT Limited Subsurface Evaluation report dated 11/2013.</p>

<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>    X</p>	<p>The Property contains wetland resources and riverfront area within jurisdiction of the Massachusetts Wetlands Protection Act and the Town of Concord Wetlands Bylaw. An Order of Conditions has been issued by the Concord Conservation Commission dated 5/5/17 (with an extension to 11/6/2023). Source: Order of Conditions</p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p>X</p> <p>The Property is adjacent to the Assabet River, a designated Wild and Scenic River. The National Park Service has determined that the proposed Project would not have direct and adverse effects on the free-flowing condition, water quality, and outstandingly remarkable values for which the Assabet River was designated as a component of the National Wild and Scenic Rivers System.</p>
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p>X</p> <p>The Town of Concord is in a high income/low minority concentration area. The project expands the ability of low-income residents to reside in the Town of Concord. The only potentially adverse impact is to wetlands which will be fully mitigated. Source: Supply and Demand Study</p>

**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 Limited Subsurface Evaluation performed in 2013 by ENSTRAT or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>The Project is the product of many years of planning and state and town approvals, including donation of the land by the State, town supported zoning changes and funding, and local permitting. The project complies with the master plan for West Concord Village, which includes affordable assisted living housing options, the preservation of Open Space and the creation of public parkland. The Project will contribute to cohesiveness of the West Concord Village community by creating new affordable housing opportunities for low-income elderly persons. The Project will have a minimum of 17 units or 20% of the total project units restricted to extremely low-income individuals earning less than 30% of the area median income. An additional 26 units will be restricted to individuals earning less than 60% of the area median income. These affordability restrictions will remain in perpetuity. The development has received a Comprehensive Permit under the Massachusetts 40B process. The permit has provided relief on a number of zoning regulations, including allowing assisted living in the current zone, lot frontage and height restrictions</p> <p>Sources: West Concord Village Master Plan, April 2010, prepared by Stantec Planning and Landscape Architects, PC; Comprehensive Permit dated May 12, 2017.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>The site is generally level, sloping slightly to the east towards the Assabet River. The site stormwater drainage system was designed to capture and infiltrate stormwater on the premises, utilizing LID stormwater management practices as much as possible. Runoff from the parking lots and a majority of the pavement areas will be</p>

		managed using sheet flow directed to stone filterstrips, infiltration basins and a rain garden. The roof runoff from the proposed building will be collected and directed to one of the infiltration basins. The infiltration basins and rain garden have been sized to attenuate runoff through the 100-year storm event, with overflows to grade, following the existing drainage patterns. Peak flows leaving the site will be maintained or reduced in all storm events through the 100-year design storm. Groundwater recharge will be promoted through the proposed infiltration basins and rain garden. An Operation and Maintenance Plan has been developed for long term operation of the stormwater management system. Source: Stormwater Management Report
Hazards and Nuisances including Site Safety and Noise	2	It is anticipated that no blasting will be required during construction, based on subsurface soil evaluations. Construction will entail typical dust and noise abatement during construction. No nearby hazards have been identified. Sources: Limited Subsurface Evaluation, ENSTRAT; Stormwater Management Report
Energy Consumption	2	The Project will be built to the Stretch Energy Code and that in conjunction with targeting LEED certification will dictate the use of sustainable materials and practices during construction. The design will include energy efficient building envelope and systems and will also incorporate rainwater harvesting and co-generative power generation. The Project will feature many additional green building components including reduced water consumption fixtures, Energy Star appliances, and the use of low-VOC materials. Source: Supply and Demand Study

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	Concord is characterized by low unemployment, similar to Middlesex County and lower than Massachusetts. Over a 13-month period from December 2018 to January 2020, both Concord and Middlesex County averaged just 2.2% unemployment, below the Massachusetts average of 2.9%. Major employers in the town are centered on the health care/residential care fields, including Emerson Hospital, which employs between 1,000 and 4,999 people, and Deaconess Abundant Life Community, and The New England Deaconess Association. Concord is a high-income community with an estimated 2017 median household income of \$121,418, which is significantly higher than the median household income in Massachusetts (\$71,460). Between 2017 and 2022, the median household income in the West Concord Area is expected to increase by \$10,860, or 8.6%. The project is expected to generate 80 temporary construction jobs, and 30 permanent jobs. Sources: Supply and Demand Study; Developer



Demographic Character Changes, Displacement	2	No displacement will occur as the site is currently vacant. By contrast, the development is intended to meet the demand for affordable senior housing, as the Concord population over the age of 65 is expected to grow significantly between 2010 and 2035, with those ages 65-74 and 75-84 more than doubling in size during this time. These demographics suggest that the West Concord Area has a population in need of assisted living and the means to pay for it. Source: Supply and Demand Study
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	The development will have minimal impact on educational facilities in the area as the population will be reserved for senior residents 62+.
Commercial Facilities	2	Commercial and retail facilities are located in the West Concord Village area less than ¼ mile from the development. The development will add to the consumer base within the area, bolstering these businesses.
Health Care and Social Services	1	There are numerous healthcare service providers near the development. The site is located 1.2 miles southeast of the 150-bed Emerson Hospital. Additionally, The Harvard Vanguard Concord, Massachusetts General Hospital Radiology and Oncology, and the Concord Professional Center are all within a five-minute drive of the Subject Property. The Concord Professional Center has additional medical offices, including Concord-Lexington Oral Surgery, Walden Health & Rehabilitation Center, and Family Dermatology. There are many additional doctors' offices located near the hospital specializing in many different areas. These providers have sufficient capacity to serve residents of the proposed project. Social services will be provided to residents on site. Source: Supply and Demand Study
Solid Waste Disposal / Recycling	2	The development will contract with solid waste and recycling pickup providers. The development will not adversely impact the Town's solid waste disposal.
Waste Water / Sanitary Sewers	2	A new septic system will be installed on site and the developer has drafted a stormwater management plan to properly collect and treat stormwater on site. Source: Stormwater Management Report
Water Supply	2	The development will tie into the existing municipal water system.
Public Safety - Police, Fire and Emergency Medical	2	The development is .6 miles from the Concord Fire Station #2 and it is anticipated that the development will have no impact on the availability of any public safety services. Given the target population of the development, it may increase the number of

		service calls for the Emergency Medical Services team but should not require an increase in the capacity of these services.
Parks, Open Space and Recreation	1	The project protects open spaces and identified sensitive natural and historic resources. The project development area will occupy approximately 3 acres and the balance will be maintained as public Open Space to include walking trails and a canoe landing on the Assabet River. Source: West Concord Open Space Planning Study, 2016
Transportation and Accessibility	2	The Project's proximity to community amenities of West Concord Village (1,000 feet away from the project site via the Bruce Freeman Rail Trail) will enable residents to access these community resources (including shops, restaurants, MBTA commuter rail, Senior Center and a branch of the Town Library).

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	3	The development has been designed to have minimal impact on water resources, and has been designed in accordance with the Massachusetts Wetland Protection Act, Massachusetts Stormwater Handbook, and the Town of Concord Regulations. There is no proposed work within the riverfront area associated with Assabet River and Nashoba Brook. Mitigating measures are included in the Order of Conditions and the Comprehensive Permit. Sources: Stormwater Management Report; Order of Conditions; Comprehensive Permit
Vegetation, Wildlife	1	The development will have beneficial impacts on vegetation and wildlife. As a condition of approval, invasive species as well as old debris on the site, will be removed. A 6.7 acre undeveloped portion of the site will be permanently protected under a Conservation Restriction. Source: CR and Open Space Map
Other Factors: None		

**Additional Studies Performed:** none

**Field Inspection** (Date and completed by):

Jody Kablack, October 16, 2020

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

1. Site Plans and Location Plan
2. Coastal Barrier map
3. FIRM Flood Map 25017C0359F
4. ASTM Phase 1 Environmental Site Assessment, Williamson Environmental LLC, 2/26/2009
5. Limited Subsurface Evaluation, ENSTRAT, 11/11/2013
6. Phase I Environmental Site Assessment, ENSTRAT, 4/2021

7. MassGIS Natural Heritage Map
8. Flammable Hazards Worksheets
9. HUD Acceptable Separation Distance Assessment Tool
10. MassGIS Prime Farmland Map
11. Mass Historic Commission Project Notification Form response, 1/29/2018
12. West Concord Historic Resources Survey Plan, ttl-architects, 2013
13. Documentation on notice to recognized Indian Tribes
14. Airport Noise Contour Map, L.G. Hanscom Field 2017 Environmental Status and Planning Report
15. HUD Day/Night Noise Level Calculator
16. Concord Conservation Commission Order of Conditions, 5/5/2017
17. Letter from Emma Lord, Wild and Scenic Rivers Program, National Park Service, 10/23/2020
18. Assisted Living Supply and Demand Study For: Christopher Heights of Concord, Concord, MA, LDS Consulting Group, January 9, 2020
19. West Concord Village Master Plan, April 2010, Stantec Planning and Landscape Architects PC
20. Concord ZBA Comprehensive Permit, May 12, 2017
21. Notice of Intent and Stormwater Management Report, Fuss and O'Neill, November 28, 2016
22. Junction Village Open Space Planning Study, JM Goldson community preservation + planning, 7/12/2016
23. Conservation Restriction and Open Space Plan, Fuss and O'Neill
24. Traffic Impacts Memorandum, Bayside Engineering, 11/2013
25. Emma Lord, Wild and Scenic Rivers Program, National Park Service, Interior Region 1 - North Atlantic-Appalachian
26. Michael Cucchiara, Developer
27. Concord, MA Fire Dept
28. Acton, MA Fire Dept

**List of Permits Obtained:**

Comprehensive Permit dated May 12, 2017

Concord Conservation Commission Order of Conditions dated 5/5/2017 (extended to 11/6/2023)

**Public Outreach [24 CFR 50.23 & 58.43]:**

Public notice in published in the Concord Journal.

FONSI & NOI-RROF emailed to interested parties:

Marcia Rasmussen – [mrasmussen@concordma.gov](mailto:mrasmussen@concordma.gov)

Delia Kaye – [dkaye@concordma.gov](mailto:dkaye@concordma.gov)

Stephen Crane – [scrane@concordma.gov](mailto:scrane@concordma.gov)

Lee Smith – [leesmith125@gmail.com](mailto:leesmith125@gmail.com)

Walter O'Hanian – [wohanian@grantam-group.com](mailto:wohanian@grantam-group.com)

Deb Szaro, EPA Region 1 Administrator: [szaro.deb@epa.gov](mailto:szaro.deb@epa.gov)

Martha Curran, HUD Regional Environmental Officer: [martha.a.curran@hud.gov](mailto:martha.a.curran@hud.gov)

Martin Suuberg, MA DEP: [martin.suuberg@state.ma.us](mailto:martin.suuberg@state.ma.us)

Danielle Bailey, Newton Grants Manager: [dbailey@newtonma.gov](mailto:dbailey@newtonma.gov)

Eamon Bencivengo, Newton Housing Development Planner: [ebencivengo@newtonman.gov](mailto:ebencivengo@newtonman.gov)

Malcolm Lucas, Newton Housing Planner: [mlucas@newtonman.gov](mailto:mlucas@newtonman.gov)

Amanda Berman, Newton Director of Housing & Community Development:

[aberman@newtonma.gov](mailto:aberman@newtonma.gov)

Jennifer Steel, Newton Chief Environmental Planner: [jsteel@newtonma.gov](mailto:jsteel@newtonma.gov)

Claire Rundelli, Newton Assistant Environmental Planner: [crundelli@newtonma.gov](mailto:crundelli@newtonma.gov)

Barbara Kurze, Newton Senior Preservation Planner: [bkurze@newtonma.gov](mailto:bkurze@newtonma.gov)

Katy Hax Holmes, Newton Chief Preservation Planner: [kholmes@newtonma.gov](mailto:kholmes@newtonma.gov)

Jennifer Caira, Newton Planning Department Deputy Director: [jcaira@newtonma.gov](mailto:jcaira@newtonma.gov)

Barney Heath: Newton Planning Department Director: [bheath@newtonma.gov](mailto:bheath@newtonma.gov)

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

All impacts noted above have been mitigated. There will be no adverse cumulative impact from this development. The project will have a positive impact on the creation of affordable senior housing in the region.

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

Alternatives include the No Action Alternative below.

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

Under the No Action Alternative, the subject property would remain vacant and disturbed. Under this scenario, demand for affordable assisted living housing options would continue to be unmet in the Town of Concord. Public parkland would not be created. Invasive plant species would not be removed.

**Summary of Findings and Conclusions:**

Development of the proposed project would not conflict with any federal environmental laws and standards outlined under HUD environmental regulation 24 CFR 58.40. The proposed action would have no significant adverse impact on the quality of the human environment under the National Environmental Policy Act (NEPA). The proposed action would not expose residents to substantial hazards, including unacceptable noise levels, air pollution, ground water and soil contaminants, and aircraft hazards.

**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
Wetlands Protection	Conditions contained in the Order of Conditions dated 5/5/17 (extended to 11/6/2023)

**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: Jody Kablack Date: 4/29/2021

Name/Title/Organization: Jody Kablack, RHSO Specialist, Regional Housing Services Office

Certifying Officer Signature: Barney Heath Date: 5/17/21

Name/Title: Barney Heath, Director of Planning and Development

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).