

ENVIRONMENTAL ASSESSMENT
DECEMBER 2020

GRAFTON JOB CORPS CENTER
NEW PARKING LOT CONSTRUCTION
NORTH GRAFTON, MASSACHUSETTS

Prepared for:

DEPARTMENT OF LABOR

Office of Job Corps

Division of Facilities and Asset Management

200 Constitution Ave, N.W.

Washington, DC 20210

Prepared by:



*In Support of the Job Corps Program
for the Department of Labor*

2101 Wilson Boulevard
Arlington, VA 22201-3062

This page intentionally left blank

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	1-1
1.1	CONCLUSIONS	1-3
2.0	INTRODUCTION	2-1
3.0	PURPOSE AND NEED FOR ACTION.....	3-1
3.1	BACKGROUND.....	3-1
3.2	PROJECT PURPOSE	3-6
3.3	PROJECT NEED	3-6
4.0	ALTERNATIVES	4-1
4.1	PROJECT LOCATION.....	4-1
4.2	NO ACTION ALTERNATIVE	4-1
4.3	PROPOSED ACTION	4-1
5.0	THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES.....	5-1
5.1	IMPACT ANALYSIS METHODS.....	5-1
5.2	IMPACT TOPICS ANALYZED	5-2
5.3	HISTORIC, ARCHITECTURAL, ARCHAEOLOGICAL, & CULTURAL RESOURCES	5-10
5.4	SOCIOECONOMIC ENVIRONMENT	5-15
5.5	CUMULATIVE IMPACTS	5-21
5.6	MITIGATION MEASURES OR BEST MANAGEMENT PRACTICES.....	5-22
6.0	FINDINGS AND CONCLUSIONS	6-1
7.0	AGENCY CONSULTATION.....	7-1
8.0	PREPARERS OF THIS ENVIRONMENTAL ASSESSMENT.....	8-1
9.0	REFERENCES	9-1
	APPENDIX A AGENCY COMMENT SOLICITATION LETTERS.....	A-1

LIST OF TABLES

Table 1. Summary of Impact Analysis for the Proposed Action and No Action
Alternatives1-1

Table 2. Summary of Impact Analysis for the Proposed Action and No Action
Alternatives5-2

Table 3. Migratory Birds near the Grafton Job Corps Center.....5-7

LIST OF FIGURES

Figure 1. Regional Overview3-2

Figure 2. Project Area Vicinity3-3

Figure 3. Existing Site Plan3-5

Figure 4. Proposed Action Alternative4-2

Figure 5. Area of Potential Effects (APE)5-12

LIST OF ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-Containing Materials
ACS	American Community Survey
APE	Area of Potential Effects
BCC	Birds of Conservation Concern
BLS	Bureau of Labor Statistics
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon monoxide
CPP	Career Preparation Period
DOL	Department of Labor
EA	Environmental Assessment
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impacts
GHG	Greenhouse Gas
HHS	U.S. Department of Health & Human Services
HVAC	Heating, Ventilation, and Air Conditioning
IPAC	Information, Planning, and Conservation
IPCC	Intergovernmental Panel on Climate Change
MACRIS	Massachusetts Cultural Resource Information System
MOA	Memorandum of Agreement
MRI	Municipal Resources, Inc.
NAAQS	National Ambient Air Quality Standards
NCADAC	National Climate Assessment and Development Advisory Committee
NEPA	National Environmental Policy Act
NETR	Nationwide Environmental Title Research
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places

O ₃	Ozone
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
UMMC	UMass Memorial Medical Center
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

1.0 EXECUTIVE SUMMARY

The Department of Labor (DOL) has undertaken a program to upgrade and renovate Job Corps Centers in the United States. The Job Corps helps young people improve the quality of their lives through vocational and academic training.

The purpose of the proposed action is to improve security, to provide parking for staff, non-residents, visitors (for tours), and student intake activities, and to allow for safer maneuvering of large vehicle traffic for food deliveries, construction access, and vocational training material deliveries.

As required under the National Environmental Policy Act (NEPA), an environmental assessment (EA) must be prepared, detailing an evaluation of the impacts of the proposed action on the natural and built environment.

Under the no action alternative, the new parking lot would not be constructed. The no action alternative consists of continuing to use the temporary parking lot located northeast of the Gate House.

The proposed action is to construct a new 40,700 square foot asphalt parking lot (approximately 60 parking spots) with access to the main entrance to the Grafton Job Corps Center and to Green Street (public road). The new entrance road will be designed to allow for larger (up to 18 wheelers) trucks to access the site through the new parking area. Two new electronic lift arm gates, new light poles, and an eight (8) foot high vinyl coated chain link fence will be installed. The project also includes repair of the existing decorative concrete guardrails along the existing 302-foot long concrete entry road bed located east of the proposed parking lot, to help protect vehicular traffic on the bridge. Two brick pilasters will be repaired where the sidewalk interrupts the guardrails near Building 6 on the south side of the existing entrance roadway. Table 1 summarizes the evaluation of direct and indirect impacts to resources as a result of the proposed action. The evaluation performed for this EA shows that no significant impacts would be expected. In addition, no significant cumulative impacts would be expected from the proposed action.

Table 1. Summary of Impact Analysis for the Proposed Action and No Action Alternatives

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Air Quality	No significant impact	No significant impact
Biological and Physical Resources		
Ecologically Critical Areas or Other Unique Natural Resources	Resource not present	Resource not present
Floodplains and Floodways	Resource not present	Resource not present

Table 1. Summary of Impact Analysis for the Proposed Action and No Action Alternatives (continued)

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Prime and Unique Agricultural Land	Resource not present	Resource not present
Soils and Geology	Little or no measurable impact	Little or no measurable impact
Surface Water (Streams, Ponds, etc.) and Hydrology	No impact	No impact
Threatened and Endangered Species and Critical Habitats	No impact	No impact
Vegetation	No impact	No impact
Wetlands	Resource not present	Resource not present
Wildlife	Little or no measurable impact	Little or no measurable impact
Cultural Resources		
Archeological Resources	Resource not present	Resource not present
Historic Buildings	No impact	No significant impact
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
Energy Requirements and Conservation Potential	No impact	No impact
Climate Change	No significant impact	No significant impact
Hazardous and Toxic Substances	No impact	No impact
Land Use	No impact	No impact
Noise	No significant impact	No significant impact
Socioeconomics		
Community Services	Little or no measurable impact	No impact
Economic Development	No impact	No impact
Environmental Justice	No impact	No impact
Indian Trust Resources	Resource not present	Resource not present
Population Demographics	No impact	No impact
Protection of Children	No impact	No impact
Transportation	No significant impact	Beneficial effects with no significant impact
Utilities	No impact	Little or no measurable impact

1.1 CONCLUSIONS

Based on the analysis discussed in Section 5 of this EA, the proposed action would have no significant adverse impact on the existing natural or built environment. This EA supports a Finding of No Significant Impact for the proposed action. Accordingly, preparation of an Environmental Impact Statement is not required.

This page intentionally left blank

2.0 INTRODUCTION

Job Corps is a national residential training and employment program administered by the Department of Labor (DOL). The Job Corps was created during the administration of President Lyndon B. Johnson in 1964 as part of Johnson's War on Poverty and Great Society initiatives that sought to expand economic and social opportunities for Americans, especially minorities and the poor. The Job Corps was modeled on the Depression-era Civilian Conservation Corps of the 1930s, which provided room, board and employment to thousands of unemployed people. The Job Corps was originally established by the Economic Opportunity Act of 1964; authorization for the program continued under the Comprehensive Employment Training Act, then Title IV-B of the Job Training Partnership Act; and is currently provided for under Title I-C of the Workforce Investment Act, 1998.

The Job Corps' mission is to attract eligible young adults, teach them the skills they need to become employable and independent, and develop careers or prepare them for further education. The Job Corps addresses multiple barriers to employment faced by disadvantaged youth throughout the United States.

In conjunction with this national strategy, the DOL proposes to construct a new 44,700 square foot asphalt parking lot (approximately 60 parking spots) with access to the main entrance to the Grafton Job Corps Center and to Green Street (public road) on 5.47 acres in the northwest corner of the Center. The new entrance road will be designed to allow for larger (up to 18 wheelers) trucks to access the site through the new parking area. Two new electronic lift arm gates, new light poles, and an eight (8) foot high vinyl coated chain link fence will be installed. The project also includes repair of the existing decorative concrete guardrails along the existing 302-foot long concrete entry road bed located east of the proposed parking lot, to help protect vehicular traffic on the bridge. Two brick pilasters will be repaired where the sidewalk interrupts the guardrails near Building 6 on the south side of the existing entrance roadway.

This environmental assessment (EA) was conducted in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 et seq.) and the Council of Environmental Quality Regulations (40 Code of Federal Regulations [CFR] 1500 to 1508).

The purpose and need for the proposed action is defined in Section 3. A description of the project and overview of the alternatives is provided in Section 4. Section 5 describes the affected environment and consequences of the alternatives. Findings and conclusions are reported in Section 6.

This page intentionally left blank

3.0 PURPOSE AND NEED FOR ACTION

The Grafton Job Corps Center is located at 100 Pine Street, North Grafton, Massachusetts 01536 approximately 6 miles east of Worcester, Massachusetts and 33 miles west of Boston (Figures 1 and 2). The Grafton Job Corps Center is leased by DOL from the Commonwealth of Massachusetts and is located on 52 acres. The surrounding topography is varied with the major entry and three buildings located at the top of the hill at the extreme northwest corner of the Center with the rest of the buildings located downslope. Buildings 17, 18, 25, and 26 were constructed and are owned by DOL. The Center operator is Adams and Associates. The project site is located at approximately 42°25'06'' north latitude and -71°68'23'' west longitude. Average elevation of the site is approximately 415 feet above mean sea level.

3.1 BACKGROUND

The majority of buildings on the Grafton Job Corps Center campus were part of the original Grafton State Hospital. The earlier buildings are constructed with stone foundation walls, brick veneer, and hip roofs with slate shingles. Two of the older buildings have CMU walls, and two are wood structures (DOL 2019a). The Grafton Job Corps Center has 221,843 gross square feet in 16 buildings and 2,583 gross square feet in 20 structures (DOL 2019a).

3.1.1 Grafton State Hospital

The Grafton State Hospital was established in 1901 as the Worcester Farm Colony for chronic patients (Jenkins et al. 1993). Construction of buildings at the Grafton location began in 1905. It was administratively separated from Worcester State Hospital in 1912 (Asylum Projects 2020). The Grafton State Hospital was based on the satellite colony system with four fully developed and geographically isolated colonies dispersed over the 1200 acres; the four colonies were designated as Pines, Oaks, Elms, and Willows (Asylum Projects 2020). Each colony was characterized by freestanding wards of varying size, staff housing, and support buildings. Many were designed for quiet patients in a rustic Craftsman-style mode, featuring natural fieldstone basement stories with shingled or clapboarded upper stories and overhanging bracketed roofs. Larger scale masonry structures were erected for 'excited' patients (Jenkins et al. 1993). The colonies and their component buildings were linked through tree-lined internal roadways and landscaping included flower gardens and meandering paths to promote outside activities (Jenkins et al. 1993). Support facilities, such as workshops, barns, and power plants were located around the periphery of each colony (Jenkins et al. 1993). The Grafton State Hospital was closed in 1973 (Asylum Projects 2020).

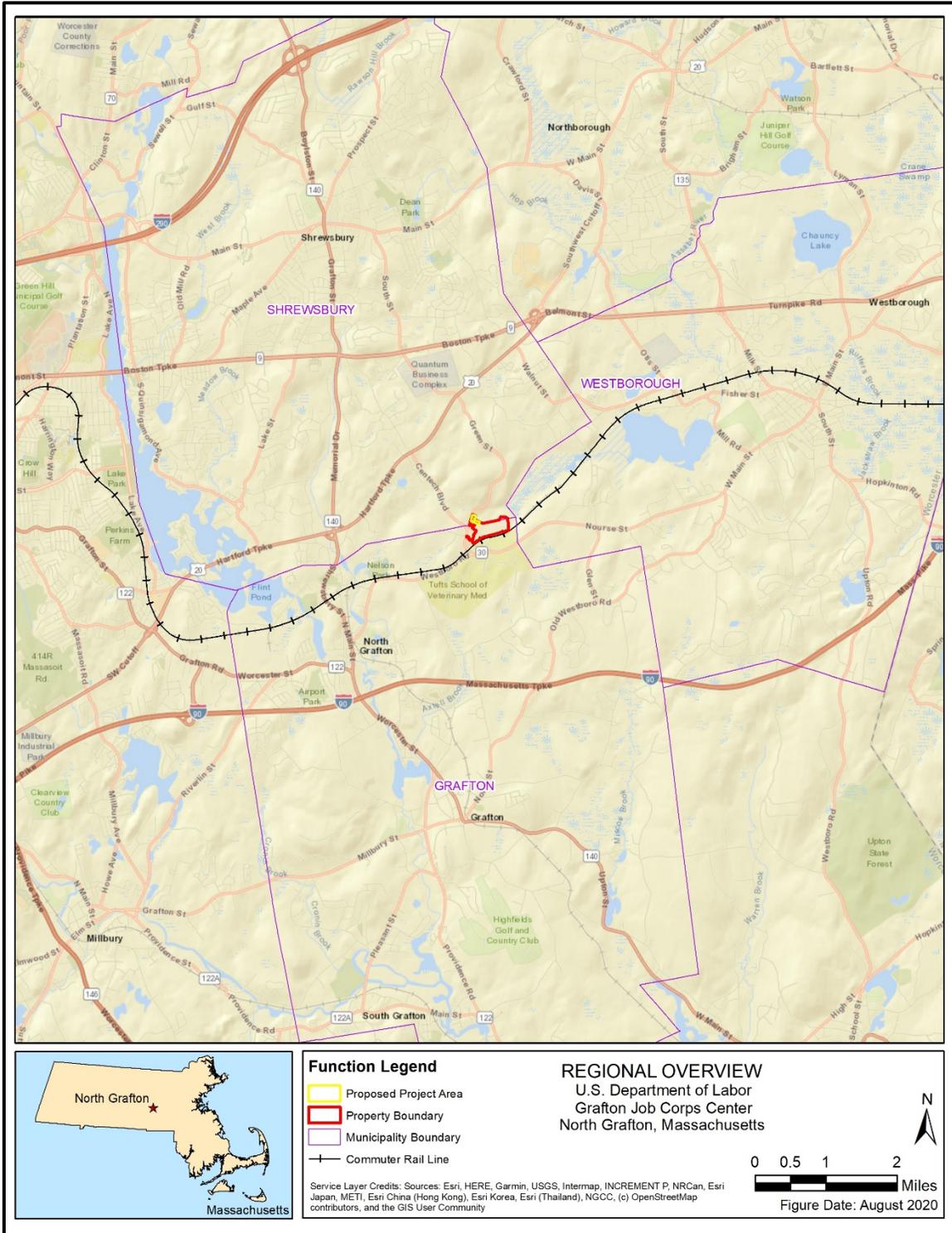


Figure 1. Regional Overview

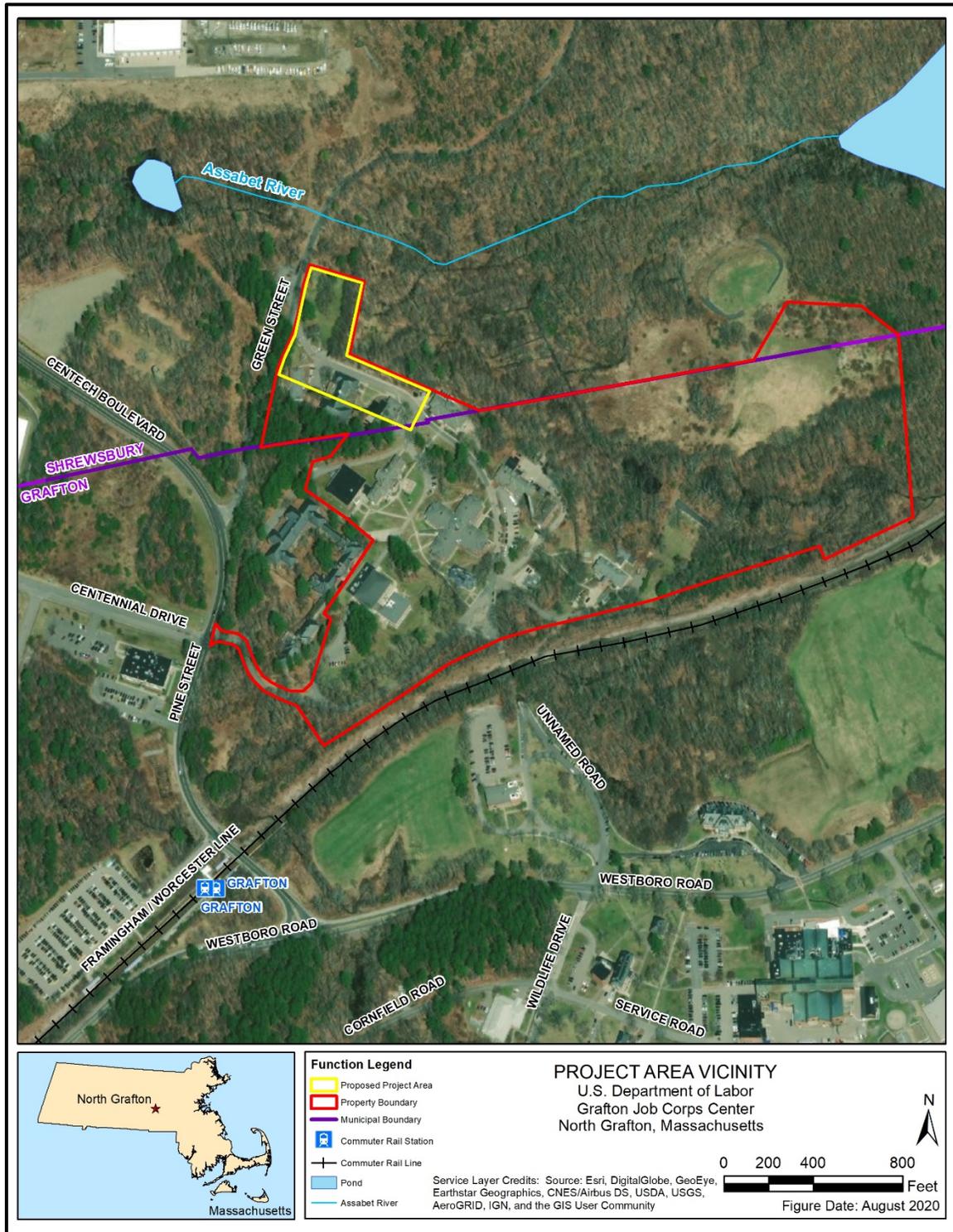


Figure 2. Project Area Vicinity

3.1.2 Grafton Job Corps Center

The Pines and Willows colony portions of the Grafton State Hospital were leased to the Department of Labor for use as a job corps center by the Commonwealth of Massachusetts. The Grafton Job Corps Center was activated in 1990 (DOL 2019a).

This Job Corps Center consists of 16 buildings and 20 structures (Figure 3). The buildings include a health and business building, a recreation building, a culinary arts building, an education building, three buildings with vocational training classrooms / storage, a career preparation period building, two storage buildings, a gate house / security building, a dormitory / administration / medical / dental building, a gymnasium, a cafeteria building, and one vacant building. The structures include a deck, a flammable storage shed, four ancillary storage sheds, a sewer building, a gazebo, two emergency generator facilities, and a bus stop shelter. The site also includes associated paved parking areas and drives. The buildings utilized by the Grafton Job Corps Center are leased from the Commonwealth of Massachusetts, with the exception of Buildings 17, 18, 25, and 26 (DOL 2019b).

The Grafton Job Corps Center provides career technical training in several vocational trades including:

- Carpentry
- Culinary Arts
- Electrical
- Facilities Maintenance and Construction
- Health Occupations
- Human Services Worker
- Medical Assistant
- Plumbing
- Security Services

Each training program prepares students to earn an industry-recognized certification through a state agency or national accrediting body. The Job Corps Center also provides academic training, including basic reading and math. It also offers a General Education Development/High School Diploma Program.

All students must complete the college application and recommendation process for their career training program as well as other center requirements. All college students must maintain satisfactory attendance and progress requirements.

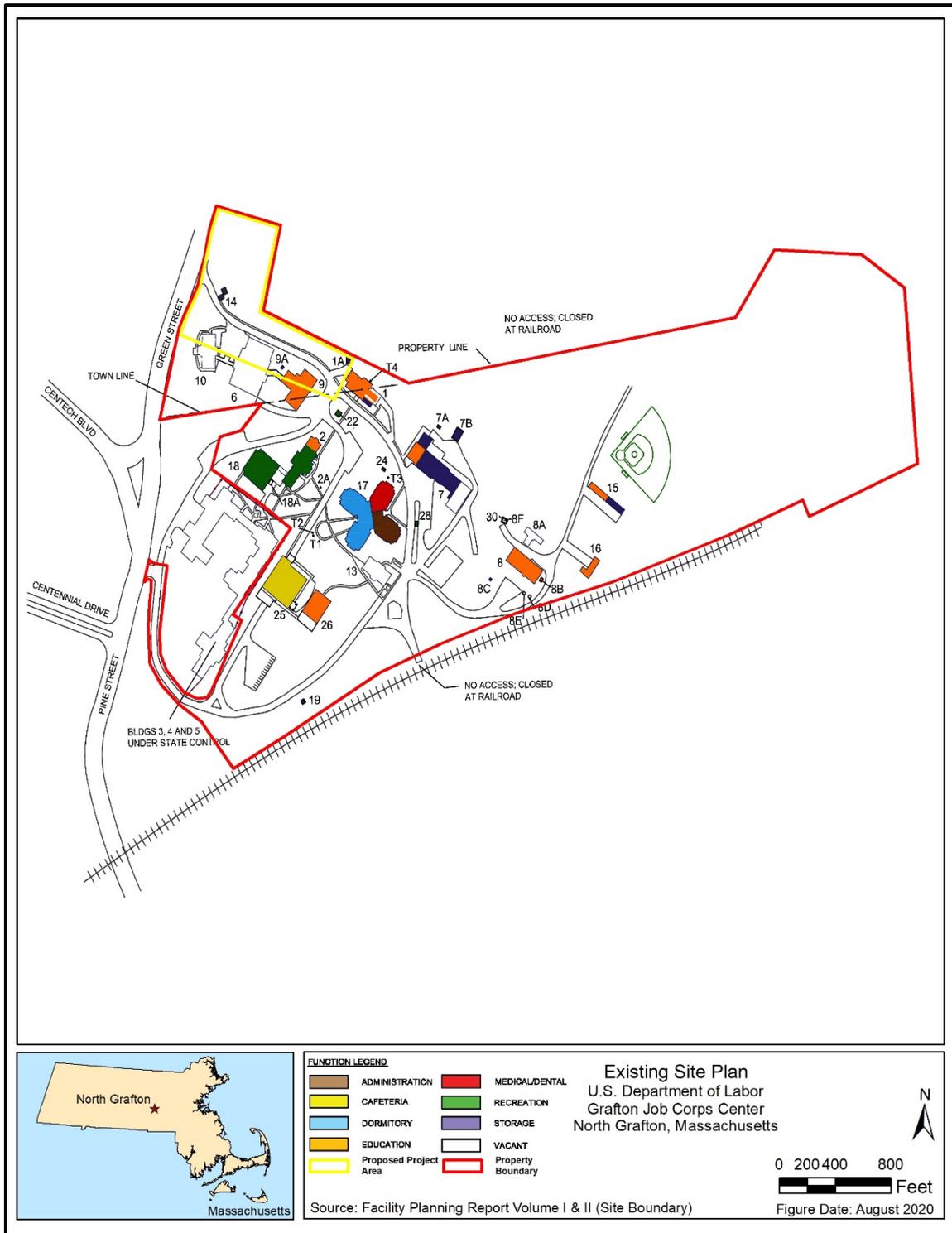


Figure 3. Existing Site Plan

3.2 PROJECT PURPOSE

The purpose of the proposed action is to improve security, to provide parking for staff, non-resident students, visitors (for tours), and student intake activities, and to allow for safer maneuvering of large vehicle traffic for food deliveries, construction access, and vocational training material deliveries.

3.3 PROJECT NEED

The proposed project is needed because the Facility Planning Report (DOL 2019a) identified the restrictive layout of the existing entrance to the Grafton Job Corps Center that does not allow for the safe maneuvering of large vehicles, and the need for additional parking spaces on campus.

4.0 ALTERNATIVES

The National Environmental Policy Act (NEPA) requires federal agencies to explore a range of reasonable alternatives and analyze effects that the alternatives could have on the natural and built environment. This section describes the proposed action and the “no action” alternative.

4.1 PROJECT LOCATION

The Grafton Job Corps Center is located in Worcester County, Massachusetts along Pine Street, approximately 4 miles north of the city center of Grafton (Figures 1 and 2). The project site is located at 42°15'0.723" north latitude and 71°40'57.075" west longitude. Elevation of the site is 430 feet above mean sea level.

4.2 NO ACTION ALTERNATIVE

The no action alternative consists of continuing use of the temporary parking lot located northeast of the Gate House at the Grafton Job Corps Center.

The Council on Environmental Quality regulations and 32 CFR Part 651 stipulate that the no action alternative be analyzed to assess any environmental consequences that might occur if the proposed action is not implemented and to provide a baseline against which the effects of the proposed action are compared. Therefore, the no action alternative was carried forward for detailed analysis in this EA. Baseline conditions under the no action alternative are described in Section 5 of this EA.

4.3 PROPOSED ACTION

The proposed action is to construct a new 40,700 square foot asphalt parking lot for approximately 60 parking spots, with access from the Grafton Job Corps Center and Green Street (public road) on 5.47 acres in the northwest corner of the Center (Figure 4). The parking lot will be located in the flat open field north of the Gate House (Building 14), which is approximately 163 feet by 245 feet wide. There is a slight downslope from the road for approximately 44 feet. The new entrance road will be designed to allow for larger (up to 18 wheelers) trucks to access the site through the new parking area. Two new electronic lift arm gates, one at the existing entrance and one at the roadway where the large trucks enter the Center, will be installed as part of the project. New light poles will be located along the lot entry/exit roadway and within the parking lot. Eight (8) foot high vinyl coated chain link fence will be installed along the site perimeter where the new parking lot will be constructed. The project also includes repair of the existing decorative concrete guardrails along the existing 302-foot long concrete entry road bed located east of the proposed parking lot, to help protect vehicular traffic on the bridge. The decorative concrete hand railings are located on the retaining wall side of the road and will be repaired to match the existing railing in size, style, and materials. Two brick pilasters will

be repaired where the sidewalk interrupts the guardrails near Building 6 on the south side of the existing entrance roadway.

Construction would involve excavation, grading, and movement of heavy equipment on the Grafton Job Corps Center property. Construction activities would take place during the daylight hours and the expected duration for construction is currently unknown.

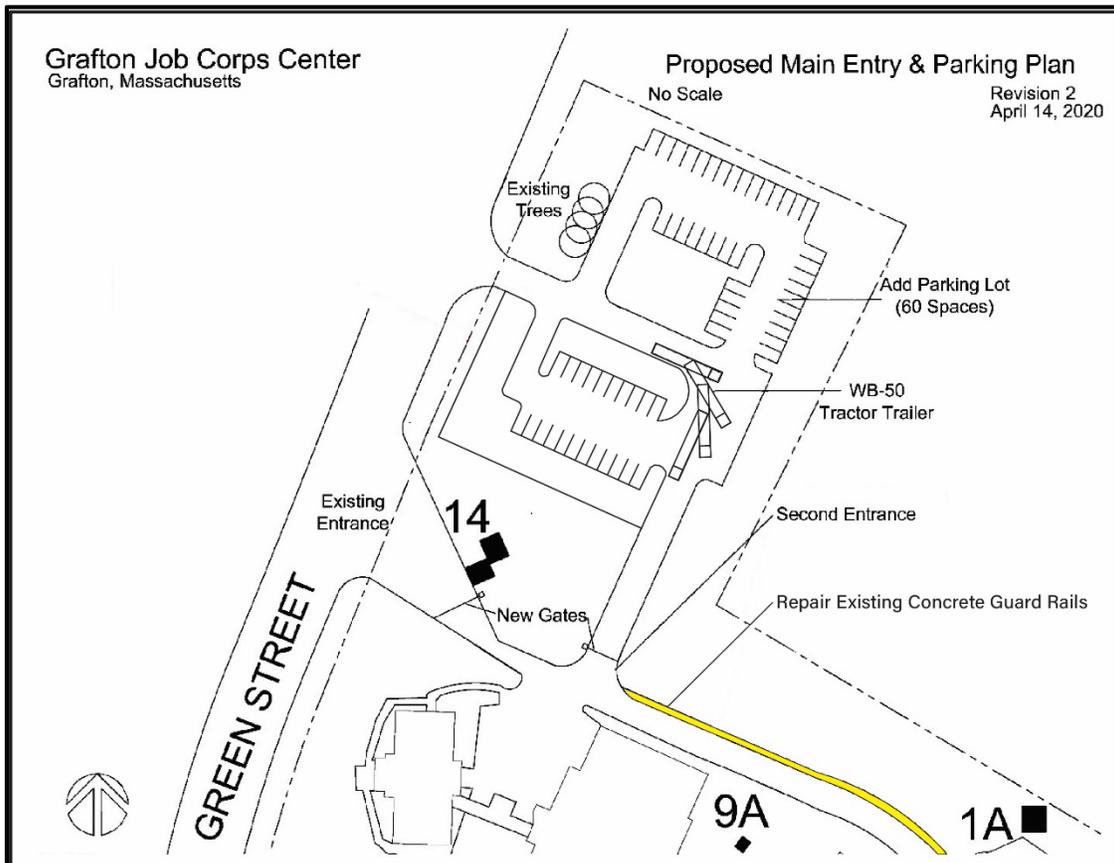


Figure 4. Proposed Action Alternative

5.0 THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section provides a description of the existing environmental conditions of the geographic area that could potentially be affected by the proposed action or the no action alternative. Following each impact topic, a description of the potential environmental impacts that could result from implementation of the proposed action compared to the no action alternative is presented. The impact topics addressed are described below.

As part of this assessment, scoping letters describing the proposed action were submitted to various federal and state agencies to solicit comments regarding any possible impacts of the proposed action. Copies of the agency correspondence letters are presented in Appendix A.

Cumulative impacts of the proposed action, combined with impacts from past, current, and reasonably foreseeable future actions, are evaluated at the end of this section.

5.1 IMPACT ANALYSIS METHODS

An environmental impact is defined as a change in a resource from the existing environmental baseline conditions caused by or resulting from one of the project alternatives. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the property and its surrounding environment. The term “significant”, as defined in Section 1508.27 of the Regulations for Implementing NEPA (40 CFR 1500), requires consideration of both the context and intensity of the impact evaluated.

Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality.

Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Because of the nature of the proposed project, all impacts may be presumed to be localized unless stated otherwise.

In accordance with the CEQ implementing guidance, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in Section 1508.27 of the Regulations for Implementing NEPA.

The range of intensity of potential impacts discussed in this EA are characterized as follows:

- Significant impact - the impact is severe, major, and highly disruptive to current or desired conditions.
- No significant impact - the impact is slight, but detectable (minor) or the impact is readily apparent and appreciable (moderate).
- Little to no measurable impact - the impact is not measurable at the lowest level of detection (negligible).
- No impact - a resource is present, but is not affected.
- Resource not present.

5.2 IMPACT TOPICS ANALYZED

Two impact topics were assessed for potential impacts resulting from the proposed action. These topics include: cultural resources and socioeconomics. Impact topics considered but not further assessed are described in section 5.2.1. Table 2 lists each of the impact topics and subtopics and the environmental impact. As noted in the following analysis, none of the potential impacts identified in this EA are significant.

**Table 2. Summary of Impact Analysis for
the Proposed Action and No Action Alternatives**

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Air Quality	No significant impact	No significant impact
Biological and Physical Resources		
Ecologically Critical Areas or Other Unique Natural Resources	Resource not present	Resource not present
Prime and Unique Agricultural Land	Resource not present	Resource not present
Soils and Geology	Little or no measurable impact	Little or no measurable impact
Surface Water (Streams, Ponds, etc.) and Hydrology	No impact	No impact
Threatened and Endangered Species and Critical Habitats	No impact	No impact
Vegetation	No impact	No impact
Wetlands	Resource not present	Resource not present
Wildlife	Little or no measurable impact	Little or no measurable impact
Cultural Resources		
Archeological Resources	Resource not present	Resource not present

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Historic Buildings	No impact	No significant impact
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
Energy Requirements and Conservation Potential	No impact	No impact
Climate Change	No significant impact	No significant impact
Hazardous and Toxic Substances	No impact	No impact
Land Use	No impact	No impact
Noise	No significant impact	No significant impact
Socioeconomics		
Community Services	Little or no measurable impact	No impact
Economic Development	No impact	No impact
Environmental Justice	No impact	No impact
Indian Trust Resources	Resource not present	Resource not present
Population Demographics	No impact	No impact
Protection of Children	No impact	No impact
Transportation	No significant impact	Beneficial effects with no significant impact
Utilities	No impact	Little or no measurable impact

5.2.1 Impact Topics Dismissed

Resources that are either not present or for which the proposed action would have little to no measurable effect were dismissed from further consideration in this EA. The following provides rationale for the dismissal of these topics.

Air Quality: The Federal Clean Air Act (42 USC 7401-7671q) required the U.S. Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels for six criteria pollutants. Current standards for these pollutants are available on the USEPA website (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Areas where pollutants were once designated as nonattainment but are now meeting and maintaining the standard are redesignated as a “maintenance area.”

During construction under the proposed action, there would be a negligible increase in air emissions. Emissions would be created from land clearing, paving concrete and asphalt surfaces, and landscaping. There would also be additional mobile emissions from commuting construction workers and construction equipment. Any impacts from these changes would be short-term and limited to the construction period. All applicable construction and operation permits would be obtained as required by the Commonwealth of Massachusetts.

During the reuse, there would be no change in stationary source emissions as there is no change to HVAC systems or buildings. There are no anticipated changes to mobile source emissions. Since the existing entrance to the Grafton Job Corps Center is restrictive and the parking lot is too small, the proposed project would allow better traffic flow and may potentially result in less emissions from idling as vehicles will have easier access to enter and park. Any impacts would be negligible.

The project area is located within Worcester County, Massachusetts which is designated as “in attainment” for most USEPA NAAQS criteria pollutants (USEPA 2020). The City of Worcester was designated in 2001 as a limited maintenance area for carbon monoxide. The second 10-year maintenance plan was approved in February 2018 (MassDEP 2018). Because the maintenance area is only the City of Worcester and the proposed project area is located outside of the city limits, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Because the county is in attainment for all other NAAQS and the project would occur on a relatively small footprint within the much larger area of Worcester County, there would be no impact to the county’s status in regard to the NAAQS. Further, the project will comply with all county ordinances and state guidance and regulations concerning emissions and air quality; therefore, this topic was dismissed from further consideration.

Ecologically Critical Areas: The Council on Environmental Quality regulations (40 CFR 1508.27(b)(3)) require consideration of the severity of impact (intensity) on unique characteristics of the geographic area such as proximity to ecologically critical areas. No ecologically critical areas were identified within or adjacent to the Grafton Job Corps Center and the project area, therefore no impacts to ecologically critical areas would occur; this impact topic was not further assessed.

Floodplains and Floodways: The project area is located in an area of minimal flood hazard (Federal Emergency Management Agency [FEMA] Flood Insurance Rate Map, Flood Plain Panels 25027C0643F and 25027C0831F). Therefore, the project area does not contain a floodplain or coastal barrier or zone and the resource category is not present (FEMA 2014). No impacts would result because this resource is not present.

Prime and Unique Agricultural Lands: Prime farmland has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops. Unique land is land other than prime farmland used for production of specific high-value food and fiber crops. Both categories require that the land be available for farming uses. According to the Natural Resources Conservation Service (NRCS) (NRCS 2020) web soil online mapping tool, two soil types (i.e., Woodbridge fine sandy loam, 3

percent to 8 percent slopes and Paxton fine sandy loam, 15 percent to 25 percent slopes) were identified within the proposed project area at the Grafton Job Corps Center; only the Woodbridge soil type was identified as Prime Farmland (Oliver 2020). However, land within the project area was previously developed during the Grafton State Hospital period and was not available for farming. Therefore, the proposed project site does not meet the above definitions and this topic was not further assessed.

Soils and Geology: The proposed action would have little or no measurable impact on the soil or geology at the project area because the soil present at the property were compacted and disturbed from previous site development. Construction activities may involve excavation, grading, and movement of heavy equipment at the site. These activities would disturb the surface soil, increasing the potential for soil erosion by wind or runoff. However, impacts would be negligible because appropriate sediment control measures would be applied in accordance with local regulations to reduce and control erosion. Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or are adjacent to the project area. This impact topic was not further assessed.

Surface Water and Hydrology: The proposed action would have no effect on surface water because there are no streams, ponds, or other surface water features within the project area. The nearest surface water feature is a perennial stream located approximately 230 feet north of the project area. This stream flows east from a pond located west of Green Street. The stream is encapsulated under Green Street and throughout the length of the proposed project area before flowing into the Assabet River or George H. Nichols Reservoir located east of the project area. The proposed action would not change the current or historical drainage patterns for the project area. During construction activities, best management practices would be followed to ensure there is no erosion that enters surface waters. Therefore, this project would have no impact on surface waters. The proposed action also would have little to no measurable impact on hydrology because construction activities would not affect surface hydrology or occur deep enough to affect groundwater; therefore, no further analysis is required.

Wetlands: Wetlands are areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and in normal conditions do support, a prevalence of vegetation adapted for life in saturated soil conditions. The USFWS National Wetlands Inventory (NWI) is a publicly available resource that provides detailed information on the abundance, characteristics, and distribution of United States wetlands. USFWS NWI maps were reviewed for the potential occurrence of wetlands at and in the vicinity of the project area.

Per USFWS NWI mapping, four wetlands are present within the Center property; however, no wetlands are present within the project area (USFWS 2020). Therefore, no impacts to wetland resources would be expected to occur as a result of the proposed action, and this topic is not further assessed.

Threatened and Endangered Species and Critical Habitats: The U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation (IPAC) System was reviewed to determine if any federally-listed endangered or threatened species may occur

in the project area. According to IPAC, one federally-listed threatened species, the northern long-eared bat (*Myotis septentrionalis*), may occur in the project area (USFWS 2020b). Under the proposed action, anticipated impacts include the physical disturbance of potential summer roosting habitats (i.e., living/dead trees) for the northern long-eared bat. There are no known hibernaculum or maternity roots trees within a 20-mile radius of the Center (Commonwealth of Massachusetts 2019). To mitigate potential impacts during construction, best management practices would likely be implemented. Such best management practices may include observing timing restrictions for the removal of trees in the project area.

DOL consulted with USFWS regarding the northern long-eared bat through the IPAC system online checklist. Verification from USFWS was received on November 4, 2020 (Appendix A) that construction of the new parking is consistent with activities analyzed in the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* (USFWS 2016a). Although the proposed action may affect the northern long-eared bat, any take that may occur as a result of the construction of the new parking lot is not prohibited under the Endangered Species Act (ESA) Section 4(d) rule adopted for this species. USFWS acknowledged that the Programmatic Biological Opinion satisfies and concludes DOL's responsibilities for the proposed action under ESA 7(a)(2) with respect to the northern long-eared bat. Therefore, there would be little to no measurable impact on the northern long-eared bat as a result of the proposed action.

The species of birds identified in Table 3 are protected under the Migratory Bird Act (16 USC 703-712) and, according to IPaC, have the potential to occur in the project area (USFWS 2020b). Bald and golden eagles are also protected under the Bald and Golden Eagle Protection Act (16 USC 668-668c). Six (6) of the migratory birds that have the potential to occur in the project area are listed as Birds of Conservation Concern (BCC). Birds designated as BCC represent those species in need of the highest conservation priority (USFWS 2015). The eBird database from Cornell Labs was used to verify presence of these species of birds listed in Table 3 from 2016-2020. Under the proposed action, anticipated impacts include temporary disturbance of habitats (i.e., living/dead trees) and temporary introduction of stressors to ecosystem areas (i.e., noise, lighting, etc.). Best practices from the USFWS Nationwide Standard Conservation Measures should be used to mitigate potential impacts during construction. Such practices include: educating all employees, contractors, and site visitors of the relevant rules and regulations that protect wildlife; scheduling all vegetation removal outside of peak bird breeding season to the maximum extent practicable; and conducting surveys prior to scheduled construction activity to determine if nests are present in the project area (USFWS 2016b).

The proposed project area is not within any designated critical habitat. Although daytime construction noise may temporarily displace individual species, this would not result in population level effects, as sufficient habitat is available within the vicinity of the site. Impacts resulting from construction would be temporary; conditions would return to normal once construction activities were completed. Therefore, there would be little to no

measurable impact on federally-listed threatened or endangered species or migratory birds as a result of the proposed action and no further analysis of this topic is required.

Table 3. Migratory Birds near the Grafton Job Corps Center

Common Name	Scientific Name	Bird of Conservation Concern	Sightings near Grafton Job Corps Center Between 2016-2020*
Bald Eagle	<i>Haliaeetus leucocephalus</i>	N	Y
Black-billed Cuckoo	<i>Coccyzus erythrophthalmus</i>	Y	Y
Bobolink	<i>Dolichonyx oryzivorus</i>	Y	Y
Prairie Warbler	<i>Dendroica discolor</i>	Y	Y
Rusty Blackbird	<i>Euphagus carolinus</i>	Y	Y
Wood Thrush	<i>Hylocichla mustelina</i>	Y	Y
Source: USFWS 2020b * The Cornell Lab 2020			

Vegetation: Hardwood trees (e.g., hickory, white oak, and maple) and some pines are located throughout the Grafton Job Corps Center. Areas without trees and adjacent to the existing buildings are manicured lawns or landscaped plantings. Little or no measurable impacts to vegetation would occur or impact the environment from a population or community perspective.

Wildlife: The proposed action would have no measurable impact on wildlife present at the project area. The project area includes some tree cover but generally, does not provide suitable habitat for wildlife. Existing wildlife consists of few species found in typical urban environments such as songbirds, small mammals, white-tailed deer (*Odocoileus virginianus*), eastern cottontail (*Sylvilagus floridanus*) and invertebrates. Although construction activities could temporarily disturb wildlife in the wooded land adjoined to the proposed project area, daytime construction activities would have little to no measurable environmental effects on wildlife; therefore, no further analysis of this topic is required.

Land Use: There would be no significant changes to land use at the Grafton Job Corps Center or the adjacent properties. The upper portion of the Grafton Job Corps Center, north of Buildings 6, 9, 10, 14 and T4, occur within the Town of Shrewsbury. This portion of the Center is zoned Rural B (RUR B) (Town of Shrewsbury 2018), a district for low density uses including one-family homes that will not change (Town of Shrewsbury 2019). The lower portion of the Grafton Job Corps Center is located within the Town of Grafton. This area of the Center is zoned Residential (R40) (AppGeo 2017), a district for detached one-family dwelling or minor residential development and agricultural and livestock activities that will not change (Town of Grafton 2016). The Commonwealth of Massachusetts owns the property and leases it to the DOL. Land use

for this area would not be changed due to the proposed action. Therefore, land use was not further assessed.

Energy Requirements and Conservation Potential: Executive Order (EO) 13834 requires federal agencies to efficiently operate federal facilities. The EO addresses requirements for federal facilities in energy, environmental water, fleet, buildings, and acquisition management. Both the no action and proposed action alternatives would adhere to guidance provided in EO 13834 per DOL policy. Therefore, this topic was not carried forward for analysis.

Climate Change: Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). A report by the National Climate Assessment and Development Advisory Committee (NCADAC) U.S. Climate Change Science Program and Intergovernmental Panel on Climate Change (IPCC) provides evidence that climate change is occurring as a result of human activity and associated rising greenhouse gas (GHG) emissions, and that it could accelerate in coming decades (NCADAC 2013). While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected in the future as a result of climate change include hotter, drier summers; warmer winters; warmer water; higher ocean levels; more severe wildfires; degraded air quality; more frequent heavy downpours; and increased drought.

By statutes, EOs, and agency policies, the federal government is committed to addressing climate change through energy conservation, reducing energy use, eliminating or reducing GHG emissions, and promoting the deployment of renewable energy technologies that are cleaner and more efficient. Where a proposal for a federal agency action implicates these goals, information on GHG emissions (qualitative or quantitative) that is useful and relevant to the decision should be used when deciding among alternatives.

The no action alternatives would involve no release of GHG and would have no impact. The proposed action alternative would include the use of heavy equipment, typical of demolition/construction projects. All activities would comply with local zoning, county and state regulations; therefore, the propose action alternative would not result in any significant impacts to regional climate change.

Hazardous and Toxic Substances: Construction activities would result in the generation of a small amount of non-hazardous construction waste. All debris generated during construction activities would be transported off-site and disposed in compliance with applicable solid waste handling laws and regulations. Hazardous waste would not be generated by construction of the facility, nor would construction affect any hazardous waste sites. Therefore, hazardous and toxic substances were not further assessed.

Noise: Noise is usually defined as unwanted sound, a definition that includes both the psychological and physical nature of the sound. Under certain conditions, noise may cause hearing loss, interfere with human activities at home and work, and may affect

human health and well-being in various ways. There are no sensitive noise receptors in the vicinity of the Grafton Job Corps Center such as schools or residential areas. The Job Corps Center is surrounded by commercial properties and forested land. Equipment used in site preparation and construction would generate noise above ambient levels. Estimated noise levels for heavy construction equipment range from 75 to 105 dB at 50 feet from the source and the sound intensity decreases 6 dB with each doubling of the distance from the source (USEPA 1971). During construction activities, there would be intermittent, temporary noise caused by construction equipment. These short-term impacts would be no greater than the noise levels produced by nearby automobile traffic. Therefore, the proposed construction would not have significant impacts.

Indian Trust Resources: Indian trust assets are owned by Native Americans but held in trust by the United States. Requirements are included in the Secretary of the Interior's Secretarial Order No. 3206, "American Indian Tribal Rites, Federal – Tribal Trust Responsibilities, and the Endangered Species Act," and Secretarial Order No. 3175, "Departmental Responsibilities for Indian Trust Resources." Indian trust assets do not occur within the project area.

Transportation: The Grafton Job Corps Center is located at the intersection Pine and Green Street in North Grafton, Massachusetts. Both roads are two lane streets where Pine Street connects to Massachusetts Highway-30/Westboro Road. A Massachusetts Bay Transit Authority Commuter Rail stop is located on Pine Street near Westboro Road.

During construction activities there would be negligible impacts to transportation due to the proposed action. A short-term increase in vehicular traffic on the local streets would occur during the construction phase of the proposed action due to truck and heavy equipment traffic and from commuting construction workers. Construction would be limited and no new access roads would be required.

The current entrance is restrictive and potentially unsafe for larger vehicles and parking is limited. After construction of the new parking lot area and expansion of the new entrance road, there would be minor beneficial impacts to transportation. More vehicles would be able to park and access the Grafton Job Corps Center. Furthermore, the widening of the new roadway would provide easier, safer access for larger vehicles, which typically have a larger turn radius. Because the impacts would have little to no measurable effect on transportation resources, no further analysis of this topic is required.

Utilities: Current utilities located at the Grafton Job Corps Center include electrical service, natural gas, telephone/communications, and municipal water and sewer.

Electric. Direct Energy, one of America's largest retail provider of electricity, natural gas, and business energy-related services, distributes electricity to over four million customers in Canada and the United States (Direct Energy 2020). Electrical service is provided to a pole south of Building 7 and fed underground to a switchgear located in the basement of the building. Distribution is underground to transformers located at all the buildings (DOL 2019a).

Natural Gas. Natural gas is provided by Eversource. Each service entrance has a single master meter (DOL 2019a).

Communication. Verizon is one of the world’s leading providers of technology, communications, information and entertainment products and services, serving over 150 countries including the United States (Verizon 2020). Verizon provides telephone service with five T1 lines that terminate in Telephone Room 112 located in Building 17 medical/dental area (DOL 2019b).

Water and Sewer. The Grafton Water District supplies water to customers within its boundaries located in Grafton, Massachusetts. The Grafton Water District primarily serves the central and north sections of town. The South Grafton Water District supplies the southern portion of town. The sole purpose of the Grafton Water District is to supply water for domestic and firefighting purposes. Currently the Grafton Water District has 4,129 water services that supply water to approximately 10,000 people (Town of Grafton 2020). Water is supplied from the Town of Grafton by one dead end 10” line. Water distribution on the site is with a looped system (DOL 2019b). Town of Grafton Sewer Department (Sanitary and Storm Sewer)—The Town of Grafton Sewer Department serves both the areas of North and South Grafton, which has a population of approximately 17,700 people. The department operates a 2.4 million gallon per day activated sludge wastewater treatment facility (Town of Grafton 2020). Sewage flows through a sewer line by gravity to a lift station near Building 8 (DOL 2019b).

There would be no impact to utilities from the no action alternative as there would be no change in baseline conditions at the Grafton Job Corps Center. Because the utility services available in the area have the capacity to expand to provide service for any new development in the project area under the proposed action alternative, any change in demand and usage would result in little to no measurable impact and this topic was not carried forward for analysis.

5.2.2 Impact Topics Retained for Analysis

The following impact topics were retained for analysis. These topics warranted more analysis because of the increased potential of impact by the proposed action. Impact topics assessed include: cultural resources and socioeconomics.

5.3 HISTORIC, ARCHITECTURAL, ARCHAEOLOGICAL, & CULTURAL RESOURCES

This section describes the existing historic, architectural, archaeological, and cultural resources, as well as potential impacts that could result from no action or implementation of the proposed action alternative. Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for traditional, religious, scientific, or any other reason. Cultural resources are discussed in terms of archaeological resources, including both prehistoric and historical occupations, architectural resources (historic buildings), and properties of religious or cultural significance to Native American Tribes,

including Traditional Cultural Properties. Historic properties, as defined by the National Historic Preservation Act (NHPA), represent the subset of cultural resources listed on, or eligible for, inclusion in the National Register of Historic Places (NRHP).

The DOL-sponsored proposed action involves federal assistance and federal permitting, licensing, or approval (36 CFR 800.16(y)). As a result, the proposed action is under the purview of Section 106 of the NHPA (54 U.S.C. 306108). Section 106 of the NHPA governs federal actions that could affect NRHP-eligible resources (*i.e.*, historic properties). Section 106 requires federal agencies to take into account the effects of their undertakings on NRHP-eligible resources and to afford the Advisory Council on Historic Preservation (ACHP) and other interested parties a reasonable opportunity to comment.

Identification of NRHP-eligible resources, including archaeological sites, architectural resources, and Native American resources, was conducted according to requirements of 36 CFR 800 for Section 106 of the NHPA. The Section 106 process was initiated with the Massachusetts Historical Commission, which contains the State Historic Preservation Office (SHPO) by mail, on October 22, 2020 (Appendix A). The Area of Potential Effects (APE) was established in coordination with that office.

5.3.1 Affected Environment

To identify cultural resources that could be potentially affected by the proposed action, the area within which archaeological, architectural, and Native American resources would have the potential to be affected must be determined. As defined by 36 CFR 800.16(d) of Section 106 of the NHPA, the APE represents the "...geographic area or areas within which an undertaking could cause changes in the character or use of historic properties, if any such exists." In delineating the APE, factors taken into account include the elements of the proposed action, the existence of buildings, vegetation, and terrain with respect to potential visual or audible impacts, and construction activities necessary for the proposed action.

The APE for cultural resources for the proposed action at the Grafton Job Corps Center consists the footprint of the proposed parking lot and 302 foot long retaining wall and includes three buildings in the viewshed located south of the Gate House and existing entrance roadway; the APE totals 5.47 acres (Figure 5).

Archival research included a review of listings on the NRHP, assessment of historic cartographic records and a general literature search. A site files search was conducted on August 11, 2020 using the online Massachusetts Cultural Resource Information System (MACRIS). The Grafton Job Corps Center campus was originally part of the Grafton State Hospital (Pines and Willows colonies) constructed between 1904 and 1939 (Jenkins 1984). The Elms colony buildings are now part of the Tufts University New England Veterinary Medical Center and the Oaks colony buildings are part of the State Canine Training Program (Jenkins 1984). The Grafton State Hospital was determined eligible for the NRHP as part of the Multiple Property listing for the Commonwealth of Massachusetts State Hospital and State School System in 1993 (Jenkins et al. 1993).

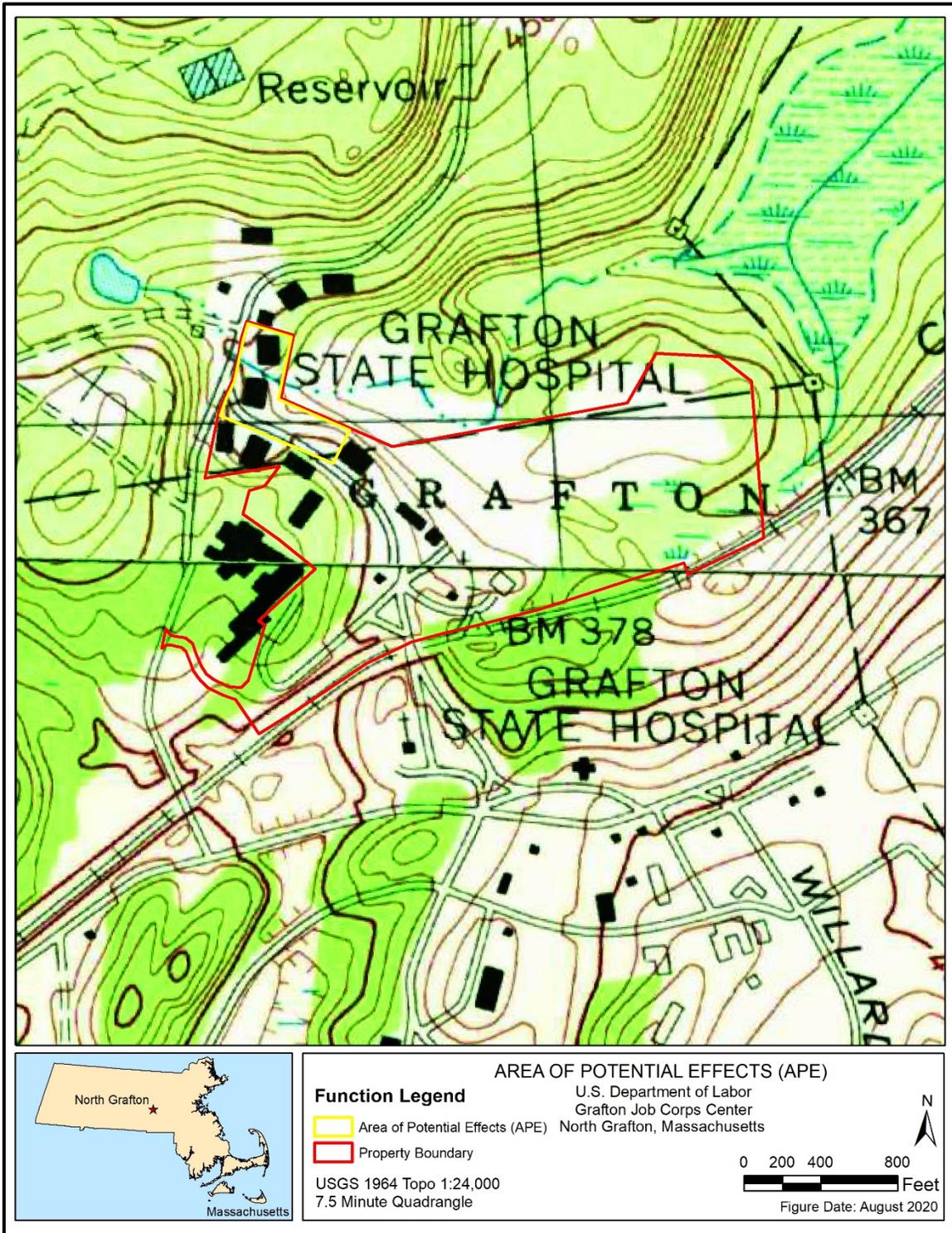


Figure 5. Area of Potential Effects (APE)

5.3.1.1 Archaeological Resources

No archaeological survey has been conducted within the APE. The APE was extensively disturbed from prior development of this portion of the Grafton State Hospital as part of the Willows colony in 1910. Historic aerial photography shows two buildings and several large trees located within the footprint of the proposed new parking lot (NETR 1938, 1943, 1954, 1966, 1967, 1971). Based on the building footprint and roof configuration, these buildings appear to be similar to existing Building 10 located south of the main entrance. Previous ground disturbance includes initial site preparation (leveling the hill slope in 1915 [Jenkins 1984]), construction of two buildings and adjoining walkways, installation of utility corridors, demolition of the buildings post-1986, and 2020 removal of the two large trees during surface preparation for the temporary gravel parking lot. No intact archaeological resources are likely to occur within the APE based on the previous ground disturbance.

5.3.1.2 Architectural Resources

Three buildings (Buildings 6, 9, and 10), which are contributing elements to the Grafton State Hospital, are located across from the main entrance and existing entrance roadway to the Grafton Job Corps Center. Building 6 was constructed as part of the Willows colony; Buildings 9 and 10 were constructed at later dates (Jenkins 1984); Buildings 6 and 10 are no longer in use by the Grafton Job Corps Center (DOL 2019a). The decorative concrete guard rails along the 302-foot long existing entrance roadway are situated atop a dry laid stone retaining wall. Two brick pilasters (2 ft x 2 ft square x 3 ft high) anchor the guardrails around the sidewalk opening near Building 6 along the south edge of the existing entrance roadway. It is likely that the retaining wall, decorative concrete guard rails, and brick pilasters were installed during the Grafton State Hospital period although these features are not specifically identified as contributing elements (Jenkins 1984; Jenkins et al. 1993).

5.3.1.3 Properties of Religious or Cultural Significance to Native American Tribes

No properties of religious or cultural significance to Native American tribes are known to occur within the proposed project area; however, the Nipmuc Nation has historical and cultural ties to the general project area.

The Nipmuc occupied the interior portion of what is now Massachusetts, and parts of Rhode Island and Connecticut. Settlement was based on scattered villages connected by kinship ties, trade alliances, and common enemies. Pre-contact subsistence was based on a seasonal round of hunting, gathering, planting, and harvesting (Nipmuc Nation n.d.). The Nipmuc Nation tribal office is located on the 3 acre Hassanamisco Reservation in South Grafton, Massachusetts. The Nipmuc Nation are not currently state or federally recognized but they are continuing to pursue federal recognition.

5.3.2 Environmental Consequences

In this EA, impacts to cultural resources are described in terms of type, context, duration, and intensity, which is consistent with CEQ regulations that implement NEPA. These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the NHPA. In accordance with the ACHP regulations implementing Section 106 (36 CFR Part 800, Protection of Historic Properties), impacts to cultural resources were identified and evaluated by: (1) determining the APE; (2) identifying cultural resources present in the APE that are either listed in or eligible to be listed in the NRHP; (3) applying the criteria of adverse effect to affected cultural resources either listed in or eligible to be listed in the NRHP; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the ACHP's regulations, a determination of either adverse effect or no adverse effect must be made for affected NRHP-listed or eligible cultural resources. An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the NRHP (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects caused by the build alternative that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). Adverse effects on historic properties would include, but not be limited to:

1. Physical destruction, damage, or alteration of all or part of the property;
2. Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
3. Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
4. Neglect of a property resulting in its deterioration or destruction; and
5. Transfer, lease, or sale of the property (36 CFR 800.9[b]).

A determination of no adverse effect means that historic properties are present, but the effect would not diminish in any way the characteristics of the cultural resource that qualify it for inclusion in the NRHP.

For the purposes of this EA, a significant impact under NEPA is defined as an "unresolvable" adverse effect under Section 106 of the NHPA. "Unresolvable" adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

5.3.2.1 No Action Alternative

Under the no action alternative, no changes to existing conditions from construction of the new parking lot would occur. The temporary parking area would continue to be used. Because the proposed project would not take place, there would be no impacts to historical, architectural, archeological, or cultural resources.

5.3.2.2 Proposed Action Alternative

Under the proposed action alternative, no impacts to archaeological resources are expected because there is limited potential for intact archaeological resources to occur within the previously disturbed portion of the APE which consists of the new parking lot footprint.

The new parking lot is located within the viewshed for Buildings 6, 9, and 10 which are contributing elements of the NRHP-listed Grafton State Hospital Historic District. The proposed action alternative will introduce new vertical elements (electronic lift arm gates, light poles, and a chain link fence) into the viewshed. Views from Buildings 6 and 9 toward the new parking lot are obscured by trees along the north side of the existing entrance road and no visual intrusions will occur. Views from Building 10 toward the proposed parking lot are partially obscured by the gate house and trees; the two new electronic lift arm gates are minimally intrusive due to their shorter height. When viewed from Building 10, the light poles and chain link fence associated with the new parking lot will not extend above the surrounding tree line around the APE. However, the historic viewshed of Building 10, one of the Willows colony buildings, has been previously compromised by the demolition of associated Willows colony buildings formerly located within the proposed parking lot footprint. The installation of new vertical elements will not impact the already altered historic viewshed from Building 10.

Although the decorative concrete guard rails and brick pilasters are not specifically identified as contributing elements to the NRHP-listed Grafton State Hospital, their historic association is recognized and repair of each feature will match the existing size, style, color, and configuration.

The proposed action alternative will have no significant impact to historical, architectural, archeological, or cultural resources.

5.4 SOCIOECONOMIC ENVIRONMENT

This section describes the existing socioeconomic conditions, as well as potential impacts that could result from taking no action or implementation of the proposed action.

5.4.1 Affected Environment

In this section, current socioeconomic conditions with potential to be affected by the proposed project are presented.

5.4.1.1 Economic Development

Local Economic Activity

The Grafton Job Corp Center has approximately 106 full and part-time employees and approximately 237 students between 16 and 24 years of age, 103 resident men and 103 resident women in addition to 31 non-residents. Expenditures by both employees and students were spent in the local economy (DOL 2019a).

Worcester County's labor force in May of 2019 was 361,479 persons with an unemployment rate of 3.2 percent. The labor force has decreased to 337,758 persons and unemployment has increased to 14.8 percent in the following year (May 2020) due to closures from the Covid-19 pandemic (Bureau of Labor Statistics [BLS] 2020a). Major employment sectors in Worcester County include education and health services (24.6 percent); trade, transportation, and utilities (18.4 percent); government (16.7 percent); and manufacturing (10.4 percent). Employment in the leisure and hospitality as well as mining, logging, and construction sectors suffered heavy losses, decreasing by 56.5 percent and 21.4 percent, respectively from the previous year (BLS 2020b).

There remains a lot of unknowns regarding how the economic situation will fare within the coming months and years due to the Covid-19 virus. Containing the virus is essential to reopening businesses, bringing back jobs, and returning the economy back to normal levels.

Regional Economic Activity

Economic activity within the Boston Federal Reserve District (First District) picked up somewhat in the second half of May and June but still remained largely below year-earlier levels. Both retailers and tourism sectors reported increased sales and bookings in June compared with values from April and May. Manufacturing reported mixed results, but most reported rising revenues. There were several reports of full to partial employment losses in the form of furloughs, salary cuts, and lay-offs. Hiring activity has more or less been stagnant with the exception of web-based businesses such as online retail and information technology services. The overall outlook from respondents remain uncertain, a continuing trend from May (Federal Reserve District 2020).

5.4.1.2 Population Demographics

According to the census records, the Town of Grafton occupies an area of approximately 23.3 square miles. The population of the city in 2018 was estimated as 18,624 (population density 799.3 persons/mi²) with 82.6 percent identified as white, 4.6 percent identified as black or African American, 0 percent identified as American Indian or Alaska Native, 7.8 percent identified as Asian, and the remainder identified as other (U.S. Census Bureau, 2018). According to the 2018 ACS 5-Year survey, median household income was \$102,737. The percentage of residents reported as living below poverty was reported at 4.5 percent for the Town of Grafton (U.S. Census Bureau 2018).

Worcester County occupies an area of approximately 1,511 square miles. The population of the county as reported in the 2018 U.S. Census Bureau American Community Survey (ACS) was 822,280 (population density 544.2 persons/mi²) with 84.0 percent identified as white, 5.0 percent identified as black or African American, 0.2 percent identified as American Indian or Alaska Native, 4.8 percent identified as Asian, and the remainder identified as other (U.S. Census Bureau, 2018). The median household income according to the 2018 ACS 5-Year survey was \$71,895 and 10.4 percent of residents were reported as living below the poverty line (U.S. Census Bureau 2018).

5.4.1.3 Community Services

Community services examined include education, health services, law enforcement, fire protection, and recreation.

Education

The Grafton Job Corps Center is located within the City of North Grafton in Worcester County, Massachusetts. The Job Corps Center falls under the Grafton Public School District. The Grafton Public School District has one high school, one middle school, and four elementary schools (Grafton Public Schools 2013). The nearest school to the Job Corps Center is North Grafton Elementary School, located approximately 2 miles away.

In the Town of Grafton, approximately 22.5 percent of the population 25 years or older have a high school diploma, and approximately 27.5 percent have a bachelor's degree. For the State of Massachusetts, approximately 24.2 percent of the population 25 years of older have a high school diploma and approximately 23.8 percent have a bachelor's degree. It is worth noting that the percentage of residents with a high school diploma or higher in the Town of Grafton is 95.1 percent which is greater than that of the State of Massachusetts at 90.4 percent (U.S. Census Bureau 2018).

Health Services

Healthcare for North Grafton residents is primarily provided by a combination of hospitals, clinics, and other organizations located in the City of Worcester. Worcester is located approximately 8 miles northwest of North Grafton. UMass Memorial Medical Center (UMMC) is the primary hospital that serves the Grafton Job Corps Center and is located approximately 7.5 miles northwest of the site. The facility has 749 licensed beds, 1,392 physicians, 2,402 registered nurses, and 7,059 employees (UMMC 2019).

Law Enforcement

The Grafton Police Department, which has a total of 19 police personnel, 4 civilian dispatchers, and an administrative assistant, provides law enforcement services within the Town of Grafton (Grafton Police Department 2020). The nearest police station to the Grafton Job Corps Center is located at 28 Providence Rd, Grafton, MA 01519, approximately 4.5 miles from the site.

Fire Protection

The Grafton Volunteer Fire Department provides fire protection services for the Town of Grafton, Massachusetts. Operating as an on-call department, personnel responds to emergency call wherever they may be when an incident is dispatched instead of normally staffing the station on regular shifts, or on a consistent basis. The department operates three stations in three districts located in Grafton (District 1), North Grafton (District 2), South Grafton (District 3), which have approximately 62 active personnel. Leadership comprises of one (1) fire chief, one (1) deputy fire chief, two (2) assistant fire chiefs, three (3) captains, and six (6) lieutenants. As of September 30, 2018, the department has

responded to 421 incidents, which is fewer calls than the previous three years (MRI 2018).

The Grafton Job Corps Center is served by Station 2 located 2.6 miles away from the Center at 2 Mill St, North Grafton, MA 01536. Emergency response time from Station 2 to the Center is approximately 8 minutes. Fire suppression is provided by ABC Type Fire Extinguishers throughout the Center. The fire alarm system is reported to be obsolete and not operational in Buildings 7, 8, and 17 (DOL 2019b).

Recreation

The Town of Grafton has an array of recreational facilities and opportunities for public use. The Grafton Recreation Commission “strives to serve the needs of every individual in Grafton by offering diverse and quality programs and services and continually monitoring the changing needs and desires” of the Town of Grafton (Town of Grafton 2020). There are numerous parks within a 10-mile radius of the Grafton Job Corps Center, including Quinsigamond State Park and Whitehall State Park.

Indoor recreation at the Grafton Job Corps Center is provided by Pines B Recreation (Building 2) which includes a weight room and a pool hall and the Gymnasium (Building 18) (DOL 2019a). Outdoor recreation facilities include a soft/baseball field located at the eastern portion of the Center (DOL 2019b).

5.4.1.4 Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations

On February 11, 1994, President Clinton issued EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low-income, i.e., at or below the poverty threshold, is defined as the aggregate annual mean income for a family of four was \$26,200 in 2020 (U.S. Department of Health & Human Services [HHS] 2020).

According to the U.S. Census Bureau, the Town of Grafton, Worcester County has a lower percentage of families below the poverty level at 2.7 percent compared to the state value of 7.5 percent (U.S. Census Bureau 2018).

5.4.1.5 Protection of Children

On April 21, 1997, President Clinton issued EO 13045, Protection of Children from Environmental Health Risks and Safety Risks. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks.

DOL intends to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting DOL policies, programs, projects, and activities. In this regard, the DOL ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed DOL action.

The closest school to the Grafton Job Corps Center is approximately 2 miles southwest of the site. The closest childcare facility is located approximately 2 miles southeast of the site.

5.4.2 Environmental Consequences

In this section the potential impacts to socioeconomic resources that could result from taking no action and implementation of the proposed action are described.

5.4.2.1 No Action Alternative

The following section details potential impacts to each aspect of socioeconomics that could result from taking no action.

Community Services

The ability of vehicles to find parking near the main entrance could be hindered due to lack of available space. Lesser vehicle capacity may prevent the Grafton Job Corps Center to perform certain functions and events. The no action alternative would have little or no measurable impacts on the local community.

Economic Development

Under the no action alternative, there would be no change from existing conditions and the number of graduates would remain at existing levels. There would be no effects to the economic development of the area.

Environmental Justice

The no action alternative would have no significant impacts on low-income or minority families with respect to health, community disruption, transportation, planned development, or employment because there would be no change from existing conditions.

Population Demographics

The no action alternative would have no significant impacts on population demographics because there would be no change from existing conditions.

Protection of Children

The no action alternative would have no significant impact on the safety of children because there would be no change from existing conditions.

5.4.2.2 Proposed Action Alternative

The following section details potential impacts to each aspect of socioeconomics that could result from implementation of the proposed action.

Community Services

There are no anticipated impacts to police, fire, or law enforcement public services (i.e., police and fire protection, hospital services) or recreational opportunities as a result of the proposed construction at the Grafton Job Corps Center. Additional parking lot space would facilitate emergency vehicle movement within the Center. There would be no increase in staff as a result of the proposed action and therefore there would not be any additional demand on the services.

Economic Development

The proposed action would result in beneficial impacts due to increased revenue to the area during construction phase due to use of construction labor and patronage of local supply stores, hotels, and restaurants. Long-term effects on the local economy would therefore not be significant.

Environmental Justice

The proposed action would not negatively affect low-income or minority families with respect to health, community disruption, transportation, planned development, or employment. No families, whether in these socioeconomic groups or not, would be relocated as a result of the proposed action. There would be no changes in local populations or other social factors as a result of the proposed action. The Job Corps Center would provide services to low income families, through their educational and training program. Therefore, the proposed action would meet the requirements of EO 12898.

Population Demographics

The proposed action would not result in any detectable changes to the demographics of the local or regional areas.

Protection of Children

There are no anticipated impacts to the safety of children during the construction phase of the project. Appropriate federal and state safety measures and health regulations would be followed to protect the health and safety of all residents as well as workers. Safety measures, barriers, and “no trespassing” signs would be placed around the perimeter of construction sites to deter children from playing in these areas, and construction vehicles

and equipment would be secured when not in use. There would be no impacts to the safety of children from the reuse. Therefore, the proposed action would meet the requirements of EO 13045.

5.5 CUMULATIVE IMPACTS

A cumulative impact analysis evaluates the incremental effects of implementing any of the alternatives when added to past, present, and reasonably foreseeable future DOL actions at the Grafton Job Corps Center and the actions of other parties in the surrounding area, where applicable. Outside of the proposed action, the following future actions are expected to occur at the Job Corps Center:

- Installation of protective covering over exterior elevated walkway and balconies on Building 17;
- Installation of entry canopy for Building 1;
- Repair or replacement of chiller piping, air handler systems, and boiler circulation pumps in Building 1;
- Repair and replacement of air handlers and unit ventilators in Building 2;
- Repair chiller, supply pumps, boiler expansion tank, and piping control mechanisms in Building 9;
- Modification to the chiller and air handling system in Building 17;
- Major repairs to paving and sidewalks;
- Renovation or demolition of Building 8A and 13 given that the buildings are deteriorated to the point of being unusable.

A new commercial complex is in the process of being constructed just north of the Grafton Job Corp Center on Fortune Boulevard. Roads are constructed, and the site is prepared, but building construction has yet to begin. Detailed information about the completion of construction is not available.

5.5.1 No Action Alternative

Under the no action alternative, the proposed project would not occur. Therefore, there would be no cumulative impacts to the surrounding area contributed by the no action alternative because there would be no change from existing conditions.

5.5.2 Proposed Action Alternative

A cumulative impact is defined as the impact on the environment that results from the incremental impact of the proposed action when added to past, present, and reasonably foreseeable future actions. The area surrounding the property has a few residences with ample forested habitats. Expansion from Worcester into the areas surrounding the Grafton Job Corps Center is likely as zoning allows.

A five-year timeframe was used for the purposes of the cumulative impact assessment. Land use in the area surrounding the Grafton Job Corps Center is described in previous sections and is not expected to change in the near future. The DOL has not completed refurbishment, renovation, or new construction in the past five years within the subject property. Building 6 and 10 are proposed to be removed from the revised lease agreement between DOL and the Commonwealth. The facility survey, conducted in 2018, identified significant issues to be addressed in the pedestrian bridge walking surface as well as beams and columns of Building 17 (DOL 2019a). The demolition and/or renovation of these buildings and structures could result in cumulative impacts to air quality, socioeconomics, and transportation. These impacts would be similar to those discussed above for the proposed action and would not be considered significant. The Commonwealth's reuse of the buildings and the new commercial complex being constructed north of the Job Corps Center, are expected to be similar to local conditions. Therefore, when past, present and future actions are taken into consideration with the proposed action, the impacts are not considered significant.

5.6 MITIGATION MEASURES OR BEST MANAGEMENT PRACTICES

The no action alternative would not require implementation of any mitigation measures. Implementation of the proposed action, however, would incorporate measures to mitigate environmental impacts during construction, operation, and maintenance activities, as follows:

- Prior to commencement of any construction activities, a silt fence or other suitable control device would be placed between the construction area and any potentially affected waterway or drainage area. The barrier would be maintained in a functioning capacity until the area is permanently stabilized upon project completion. Other erosion control measures to minimize indirect impacts to aquatic resources may include staked straw bales, brush barriers, sediment basins, and diversion ditches.
- Runoff from construction areas would be collected and stored in an approved and permitted storm water collection system prior to discharge.
- Once initiated, project construction would be carried out in an expeditious manner in order to minimize the period of disturbance to the environment.
- If needed, water sprayers would be used during dry weather in conjunction with grading and excavating to minimize fugitive dust.
- During construction, all necessary measures would be taken to prevent oil, tar, trash, debris, and other pollutants from entering adjacent waterways. Construction areas would be cleaned on a daily basis and onsite trash containers would remain closed, except when adding or removing trash.
- Upon completion of the construction activities, all adjacent disturbed areas would be permanently stabilized with a grass or vegetative covering.

- Prior to the commencement of any project activities that require tree removal, consultation with the USFWS and other state agencies, as required, would be initiated under Section 7 of the Endangered Species Act to identify and protect summer habitat of threatened or endangered bat species. Tree removal may be subject to seasonal timing restrictions, as determined in consultation with those agencies.
- Best practices from the USFWS Nationwide Standard Conservation Measures shall be implemented to mitigate potential impacts during construction and include: educating all employees, contractors, and site visitors of the relevant rules and regulations that protect wildlife; scheduling all vegetation removal outside of peak bird breeding season to the maximum extent practicable; and conducting surveys prior to scheduled construction activity to determine if nests are present in the project area.

In combination, these practices are designed to prevent or reduce environmental impacts on the proposed construction site and surrounding area.

This page intentionally left blank

6.0 FINDINGS AND CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the CFR regulations implementing NEPA (40 CFR 1500), and the Department of Labor NEPA Compliance Procedures (29 CFR §11). As analyzed and discussed in this EA direct, indirect, and cumulative impacts of the proposed action and the no action alternative have been considered and no significant impacts were identified. Therefore, issuance of a Finding of No Significant Impact is warranted and preparation of an Environmental Impact Statement is not required.

This page intentionally left blank

7.0 AGENCY CONSULTATION

In letters dated Month Day, 2020, comments regarding the proposed action were solicited from various government agencies. The letters are presented in Appendix A. The following agencies were consulted:

- USFWS, New England Field Office
- Massachusetts Historical Commission

This page intentionally left blank

8.0 PREPARERS OF THIS ENVIRONMENTAL ASSESSMENT

The Engineering Support Contractor (ESC) prepared this EA under Contract DOL 121A21848 for the DOL Job Corps program. The ESC's Parsons environmental specialists who prepared this document are listed as follows:

- Susan Bupp, Senior Cultural Resources Specialist, Parsons – M.A., 1981, Anthropology, University of Wyoming, Laramie. Years of Experience: 44. Role on the project: Author and Reviewer.
- Amanda Molsberry, Socio-economist, Parsons – M.S., 2005, Environmental Science and Policy, University of Wisconsin-Green Bay, Green Bay, WI. Years of Experience: 15. Role on the project: Author.
- Lindsey Postaski, NEPA/Natural Resources Specialist, Parsons – M.S., 2011, Biology, The College of William and Mary, Williamsburg, VA. Years of Experience: 9. Role on the project: Author.
- Hung Truong, Associate Planner, Parsons – B.S., 2017, Urban and Environmental Planning, University of Virginia, Charlottesville, VA. Years of Experience: 3. Role on the project: Author.

This page intentionally left blank

9.0 REFERENCES

- AppGeo 2017. Town of Grafton, Massachusetts – Zoning Map. Available on:
<https://www.grafton-ma.gov/sites/g/files/vyhlf4461/f/uploads/zoningmapmay2017.pdf>. Accessed on August 6, 2020.
- Asylum Projects. 2020. Grafton State Hospital. Available on line at:
https://www.asylumprojects.org/index.php/Grafton_State_Hospital. Accessed August 10, 2020.
- Commonwealth of Massachusetts 2019. Northern long-eared bat Locations. June 4, 2019. Available at: <https://www.mass.gov/service-details/the-northern-long-eared-ba>. Accessed on August 24, 2020.
- Department of Labor (DOL) 2019a. Grafton Job Corps Center - Facility Planning Report Volume I, Planning Strategy. Final January 2019.
- Department of Labor (DOL) 2019b. Grafton Job Corps Center - Facility Planning Report Volume II, Supporting Data. Final January 2019.
- Direct Energy. 2020. About. Available on line at: <https://www.directenergy.com/about>. Accessed August 26, 2020.
- Federal Reserve District 2020. The Beige Book - Summary of Commentary on Current Economic Conditions. Federal Reserve District. July 15, 2020. Available at: https://www.federalreserve.gov/monetarypolicy/files/BeigeBook_20200715.pdf. Accessed on August 10, 2020.
- Federal Emergency Management Agency (FEMA) 2014. Flood Insurance Rate Map, Worcester County. Map number 25027C0643F and 25027C0831F. Produced by Federal Emergency Management Agency. Map Effective Date July 16, 2014.
- Grafton PD 2020. Grafton Police Department. Available at <https://www.graftonpolice.com/home-1.html>. Accessed August 11, 2020.
- Grafton Public Schools 2013. Grafton Public Schools. Available at <http://grafton.schoolfusion.us/?sessionid=16b10f129ae51b9b5e2c1db23dd7d5d3&t>. Accessed on May 16, 2013.
- Jenkins, Candace. 1984. Massachusetts Historical Commission Form A- Area for the Grafton State Hospital. Available on line at: <http://mhc-macris.net/Details.aspx?MhcId=GRF.BR> Accessed August 11, 2020.
- Jenkins, Candace, Betsy Friedberg, and Douglas J. Kelleher. 1993. Commonwealth of Massachusetts State Hospital and State School System, National Register of Historic Places Multiple Property Documentation Form. Available on line at: <https://npgallery.nps.gov/GetAsset/443875ee-8824-4720-9dd3-fa43affbacff>. Accessed June 1, 2020.

- Massachusetts Department of Environmental Protection (MassDEP). 2018. Revision to the Massachusetts State Implementation Plan for Carbon Monoxide – Second 10-year Limited Maintenance Plan for the Boston Metropolitan Area, Lowell , Springfield, Waltham, and Worcester. Available at: <https://www.mass.gov/doc/second-10-year-limited-maintenance-plan-for-carbon-monoxide-for-the-boston-metropolitan-area/download>. Accessed August 28, 2020.
- Municipal Resources, Inc. (MRI) 2018. Fire Department Organizational and Staffing Analysis. Published December, 2018. Available at https://www.grafton-ma.gov/sites/g/files/vyhlf4461/f/uploads/final_report_grafton_ma_fire_department_study_-_final_to_client_1-6-19_1.pdf. Accessed August 11, 2020.
- National Climate Assessment and Development Advisory Committee (NCADAC) 2013. *Third National Climate Assessment*. Available online at: <http://www.globalchange.gov/ncadac>.
- National Grid 2013. National Grid: Our History. Available at: <http://www.nationalgrid.com/corporate/About+Us/Our+History/>. Accessed on May 16, 2013.
- Nationwide Environmental Title Research (NETR). 1938. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- NETR. 1943. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- NETR. 1954. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- NETR. 1966. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- NETR. 1967. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- NETR. 1971. Aerial Photograph showing the Grafton Job Corps Center area, North Grafton, Massachusetts. Available on-line at: <https://www.historicaerials.com/viewer>. Accessed August 3, 2020.
- Natural Resources Conservation Service (NRCS). 2020. Soil Types in the Proposed Project Area, Grafton Job Corps Center, North Grafton, Massachusetts. Available on line at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed August 31, 2020.

- Nipmuc Nation. n.d. Our History – Nipmuc Nation. Available on-line at:
<https://www.nipmucnation.org/our-history>. Accessed August 18, 2020.
- Oliver 2020. OLIVER: MassGIS’s Online Mapping Tool. Available at:
http://maps.massgis.state.ma.us/map_ol/oliver.php. Accessed on August 5, 2020.
- The Cornell Lab 2020. eBird. Available at:
<https://ebird.org/massaudubon/map/woothr?neg=true&env.minX=-71.7436414456123&env.minY=42.22971220308707&env.maxX=-71.6337781643623&env.maxY=42.27018303033532&zh=true&gp=false&ev=Z&mr=1-12&bmo=1&emo=12&yr=all&byr=1900&eyr=2020>. Accessed on August 7, 2020.
- Town of Grafton 2016. Grafton Zoning By-Law. Available at: https://www.grafton-ma.gov/sites/g/files/vyhlf4461f/uploads/2016_05_09_zbl_-_tm_approved_-_ag_approved_8-18-16.pdf. Accessed on August 6, 2020.
- Town of Grafton 2020. Town of Grafton, Department of Public Works. Available at: <https://www.grafton-ma.gov/department-public-works-engineering>. Accessed on August 10, 2020.
- Town of Shrewsbury 2018. Zoning Map – Town of Shrewsbury. Available at: <https://shrewsburyma.gov/DocumentCenter/View/4408/Zoning-Map-May-23-2018>. Accessed on August 6, 2020.
- Town of Shrewsbury 2019. Zoning Bylaw – Town of Shrewsbury, Massachusetts. Adopted June 19, 1967. Available at: <https://shrewsburyma.gov/DocumentCenter/View/4864/Zoning-Bylaws-Oct-21-2019>. Accessed on August 6, 2020.
- UMass Memorial Medical Center (UMMC) 2019. UMass Memorial Medical Center 2019 Statistics. Updated as of December 20, 2019. Available at: <https://www.umassmemorialhealthcare.org/umass-memorial-medical-center/statistics>. Accessed August 11, 2020.
- U.S. Bureau of Labor Statistics (BLS) 2020a. Databases, Tables & Calculators by Subject - Local Area Unemployment Statistics. Worcester, Massachusetts, 2019-2020. Available at: <https://data.bls.gov/pdq/SurveyOutputServlet>. Accessed August 10, 2020.
- U.S. Bureau of Labor Statistics (BLS) 2020b. Worcester Area Economic Summary. Updated July 15, 2020. Available at: https://www.bls.gov/regions/new-england/summary/blsummary_worcester.pdf. Accessed August 10, 2020.
- U.S. Census Bureau, 2018 Worcester (City) and Worcester County, Massachusetts, 2013-2018 American Community Survey 5-Year Estimates. Available through the U.S. Census database at <https://data.census.gov/cedsci/table?g=1600000US2582000&tid=ACSDP1Y2010.DP05&hidePreview=false>. Accessed August 11, 2020.

- U.S. Department of Health & Human Services (HHS). 2020. HHS Poverty Guidelines for 2020. Available online at: <https://aspe.hhs.gov/poverty-guidelines>. Accessed August 11, 2020.
- U.S. Environmental Protection Agency (USEPA). 1971. Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances. United States Environmental Protection Agency, Washington, D.C. NTID-300.1.
- USEPA. 1995. Compilation of Air Pollutant Factors, Volume 1: Stationary Point and Area Sources (AP-42), 5th edition. United States Environmental Protection Agency, Ann Arbor.
- USEPA. 2016. National Ambient Air Quality Standards (NAAQS) (40 CFR part 50) Table – Criteria Air Pollutants. Last updated on December 20, 2016. Available at: <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed August 26, 2020.
- USEPA. 2019a. Air Quality Index Report. 2019 Air Emissions by Pollutant for Worcester County, MA. Available at: <https://www.epa.gov/outdoor-air-quality-data/air-quality-index-report>. Accessed August 26, 2020.
- USEPA. 2019b. Ozone Trends – Ozone Air Quality, 2000-2019. Available at: <https://www.epa.gov/air-trends/ozone-trends>. Accessed August 26, 2020.
- USEPA. 2020. Carbon Monoxide (1971) Designated Area State/Area/County Report. EPA Green Book. Data is updated as of July 31, 2020. Available at: <https://www3.epa.gov/airquality/greenbook/cbcs.html#MA>. Accessed August 26, 2020.
- U.S. Fish and Wildlife Service (USFWS) 2015. Birds of Conservation Concern. Available on: <https://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>. Accessed on August 6, 2020.
- USFWS. 2016a. Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions. U.S. Fish and Wildlife Service Regions 2, 3, 4, 5, and 6 Prepared by: U.S. Fish and Wildlife Service Midwest Regional Office Bloomington, Minnesota January 5, 2016.
- USFWS 2016b. Nationwide Standard Conservation Measures. Updated May 24, 2016. Available at: <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures/nationwide-standard-conservation-measures.php>. Accessed August 7, 2020.
- USFWS 2020a. U.S. Fish and Wildlife Service, National Wetlands Inventory. Available at: <https://ecos.fws.gov/ipac/location/Ry7Zs4LVsVgSRONIYRFGTLHEAA/resources#wetlands>. Accessed on August 6, 2020.
- USFWS 2020b. U.S. Fish and Wildlife Service, Information for Planning and Consultation. Available at:

<https://ecos.fws.gov/ipac/location/Ry7Zs4LvsVgSRoniYrfgTLHEAA/resources#endangered-species>. Accessed on August 6, 2020.

Verizon 2020. Our Company – Verizon fact sheet. Updated as of July, 24, 2020.

Available at: <https://www.verizon.com/about/our-company/verizon-fact-sheet>.

Accessed August 10, 2020.

**APPENDIX A
AGENCY COMMENT SOLICITATION LETTERS**

This page intentionally left blank

950 CMR: OFFICE OF THE SECRETARY OF THE COMMONWEALTH

APPENDIX A
MASSACHUSETTS HISTORICAL COMMISSION
220 MORRISSEY BOULEVARD
BOSTON, MASS. 02125
617-727-8470, FAX: 617-727-5128

PROJECT NOTIFICATION FORM

Project Name: Grafton Job Corps Center New Parking Lot Construction

Location / Address: 100 Pine Street

City / Town: North Grafton, Massachusetts 01536

Project Proponent

Name: Department of Labor, Job Corps Program

Address: 2101 Wilson Blvd, Suite 400

City/Town/Zip/Telephone: Arlington, Virginia 22201

Agency license or funding for the project (list all licenses, permits, approvals, grants or other entitlements being sought from state and federal agencies).

Agency Name

Type of License or funding (specify)

Department of Labor

Project Description (narrative):

See attached letter

Does the project include demolition? If so, specify nature of demolition and describe the building(s) which are proposed for demolition.

No

Does the project include rehabilitation of any existing buildings? If so, specify nature of rehabilitation and describe the building(s) which are proposed for rehabilitation.

No

Does the project include new construction? If so, describe (attach plans and elevations if necessary).

Parking Lot

950 CMR: OFFICE OF THE SECRETARY OF THE COMMONWEALTH

APPENDIX A (continued)

To the best of your knowledge, are any historic or archaeological properties known to exist within the project's area of potential impact? If so, specify.

See attached letter for discussion of the Grafton State Hospital Historic District contributing elements within the viewshed.

What is the total acreage of the project area?

Woodland _____ acres	Productive Resources:
Wetland _____ acres	Agriculture _____ acres
Floodplain _____ acres	Forestry _____ acres
Open space <u>3.02</u> acres	Mining/Extraction _____ acres
Developed <u>2.45</u> acres	Total Project Acreage <u>5.47</u> acres

What is the acreage of the proposed new construction? 5.47 acres

What is the present land use of the project area?

Grafton Job Corps Center: open space and roadway elements

Please attach a copy of the section of the USGS quadrangle map which clearly marks the project location.

See attached letter with the USGS quad map.

This Project Notification Form has been submitted to the MHC in compliance with 950 CMR 71.00.

Signature of Person submitting this form: _____ Date: _____

Name: Johannes Hoffman, AIA, Historic Preservation Officer, Office of Job Corps

Address: 2101 Wilson Blvd, Suite 400

City/Town/Zip: Arlington, Virginia 22201

Telephone: 202-288-1928 (mobile) Email: Hoffman.Johannes@dol.gov

REGULATORY AUTHORITY

950 CMR 71.00: M.G.L. c. 9, §§ 26-27C as amended by St. 1988, c. 254.



SENT VIA E-MAIL

October 08, 2020

Ms. Brona Simon, SHPO
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125
Brona.Simon@state.ma.us

Subject: Section 106 Consultation and Environmental Assessment for the Construction of the
New Parking Lot, Grafton Job Corps Center, North Grafton, Massachusetts

Dear Ms. Simon:

The U.S. Department of Labor (DOL) has consulted with a third party to prepare an environmental assessment (EA) to address environmental and socioeconomic impacts for the proposed construction of a new parking lot at the Grafton Job Corps Center at 100 Pine Street in North Grafton, Worcester County, Massachusetts (Figures 1 and 2). The Grafton Job Corps Center is leased by DOL from the Commonwealth of Massachusetts and is located on 52 acres. Many of the buildings at the Center were originally constructed (1904-1939) for the Grafton State Hospital. The Grafton Job Corps Center was activated in 1990 and is managed by the U.S. DOL as part of the Job Corps program. The Center consists of 16 buildings and 20 structures (Figure 3).

The purpose of the proposed action is to improve security, to provide parking for staff, non-resident students, visitors (for tours), and student intake activities, and to allow for safer maneuvering of large vehicle traffic for food deliveries, construction access, and vocational training material deliveries. The proposed project consists of constructing a new 44,700 square foot asphalt parking lot (approximately 60 parking spots) with access to the main entrance to the Grafton Job Corps Center and to Green Street (public road) (Figure 4). The new entrance road will be designed to allow for larger (up to 18 wheelers) trucks to access the site through the new parking lot. Two new electronic lift arm gates, new light poles, and an eight (8) foot high vinyl coated chain link fence will be installed. The project also includes repair of the existing decorative concrete guardrails along the existing 302-foot long concrete entry road bed located east of the proposed parking lot, to help protect vehicular traffic on the bridge. Two brick pilasters will be repaired where the sidewalk interrupts the guardrails near Building 6 on the south side of the existing entrance roadway.

The Area of Potential Effects (APE) for cultural resources for the proposed undertaking at the Grafton Job Corps Center consists of the footprint of the proposed parking lot and 302 foot long retaining wall and includes three buildings in the viewshed located south of the Gate House and existing entrance roadway; the APE totals 5.47 acres (Figures 5 and 6).

No archaeological survey has been conducted within the APE. However, the APE was extensively disturbed from prior development of this portion of the Grafton State Hospital as part of the Willows colony in 1910. Historic aerial photography from 1938-1971 shows two buildings and several large trees located within the footprint of the proposed new parking lot. Based on the building footprint and roof configuration, these buildings appear to be similar to existing Building 10 located south of the main entrance. Previous ground disturbance includes initial site preparation (leveling the hill slope in 1915), construction of two buildings and adjoining walkways, installation of utility corridors, demolition of the buildings post-1986, and 2020 removal of the two large trees during surface preparation for the temporary gravel parking lot. No intact archaeological resources are likely to occur within the APE based on the previous ground disturbance.

The Grafton Job Corps Center campus was originally part of the Grafton State Hospital (Pines and Willows colonies) constructed between 1904 and 1939. The Grafton State Hospital was determined eligible for the NRHP as part of the Multiple Property listing for the Commonwealth of Massachusetts State Hospital and State School System in 1993. Three buildings (Buildings 6, 9, and 10), which are contributing elements to the NHRP-listed Grafton State Hospital, are located across from the main entrance and existing entrance roadway to the Grafton Job Corps Center. The decorative concrete guard rails along the existing 302-foot long entrance roadway are situated atop a dry laid stone retaining wall. Two brick pilasters (2 ft x 2 ft square x 3 ft high) anchor the guardrails around the sidewalk opening near Building 6 along the south edge of the existing entrance roadway. It is likely that the retaining wall, decorative concrete guard rails, and brick pilasters were installed during the Grafton State Hospital period although these features are not specifically identified as contributing elements.

Under the proposed action alternative, no impacts to archaeological resources are expected because there is limited potential for intact archaeological resources to occur within the previously disturbed portion of the APE which consists of the new parking lot footprint.

The new parking lot is located within the viewshed for Buildings 6, 9, and 10 which are contributing elements of the NRHP-listed Grafton State Hospital Historic District. The proposed action alternative will introduce new vertical elements (electronic lift arm gates, light poles, and a chain link fence) into the viewshed. Views from Buildings 6 and 9 toward the new parking lot are obscured by trees along the north side of the entrance road and no visual intrusions will occur. Views from Building 10 toward the proposed parking lot are partially obscured by the gate house and trees; the two new electronic lift arm gates are minimally intrusive due to their shorter height. When viewed from Building 10, the light poles and chain link fence associated with the new parking lot will not extend above the surrounding tree line around the APE. However, the historic viewshed of Building 10, one of the Willows colony buildings, has been previously compromised by the demolition of associated Willows colony buildings formerly located within the proposed parking lot footprint. The installation of new vertical elements will not adversely impact the already altered historic viewshed from Building 10.

Although the decorative concrete guard rails and brick pilasters are not specifically identified as contributing elements to the NRHP-listed Grafton State Hospital, their historic association is recognized and repair of each feature will match the existing size, style, color, and configuration.

On behalf of the DOL, I have determined that this undertaking will have No Adverse Effect on historic properties. In accordance with Section 106 of the National Historic Preservation Act (54

U.S.C. 306108) and 36 CFR Part 800, the DOL requests the State Historic Preservation Officer's (SHPO) concurrence with this determination.

A regional overview, project vicinity map, existing site plan, proposed action alternative, and APE maps are included with this letter to aid you in your review.

Thank you for your assistance in this matter. Please provide comments and/or concurrence to DOL within 30 days of receipt of this letter. If no response is received within 30 calendar days, it will be assumed that your office concurs with DOL's aforementioned conclusion.

Sincerely,

10/8/2020

X Johannes Hoffman

Johannes Hoffman

Historic Preservation Officer

Signed by: JOHANNES HOFFMAN

Johannes Hoffman, AIA
Historic Preservation Officer
Office of Job Corps

Attachments:

Figure 1: Regional Project Area

Figure 2: Project Area Vicinity

Figure 3: Existing Site Plan

Figure 4: Proposed Action Alternative

Figure 5: Area of Potential Effects (Topographic Map)

Figure 6: Area of Potential Effects (Aerial Photograph)

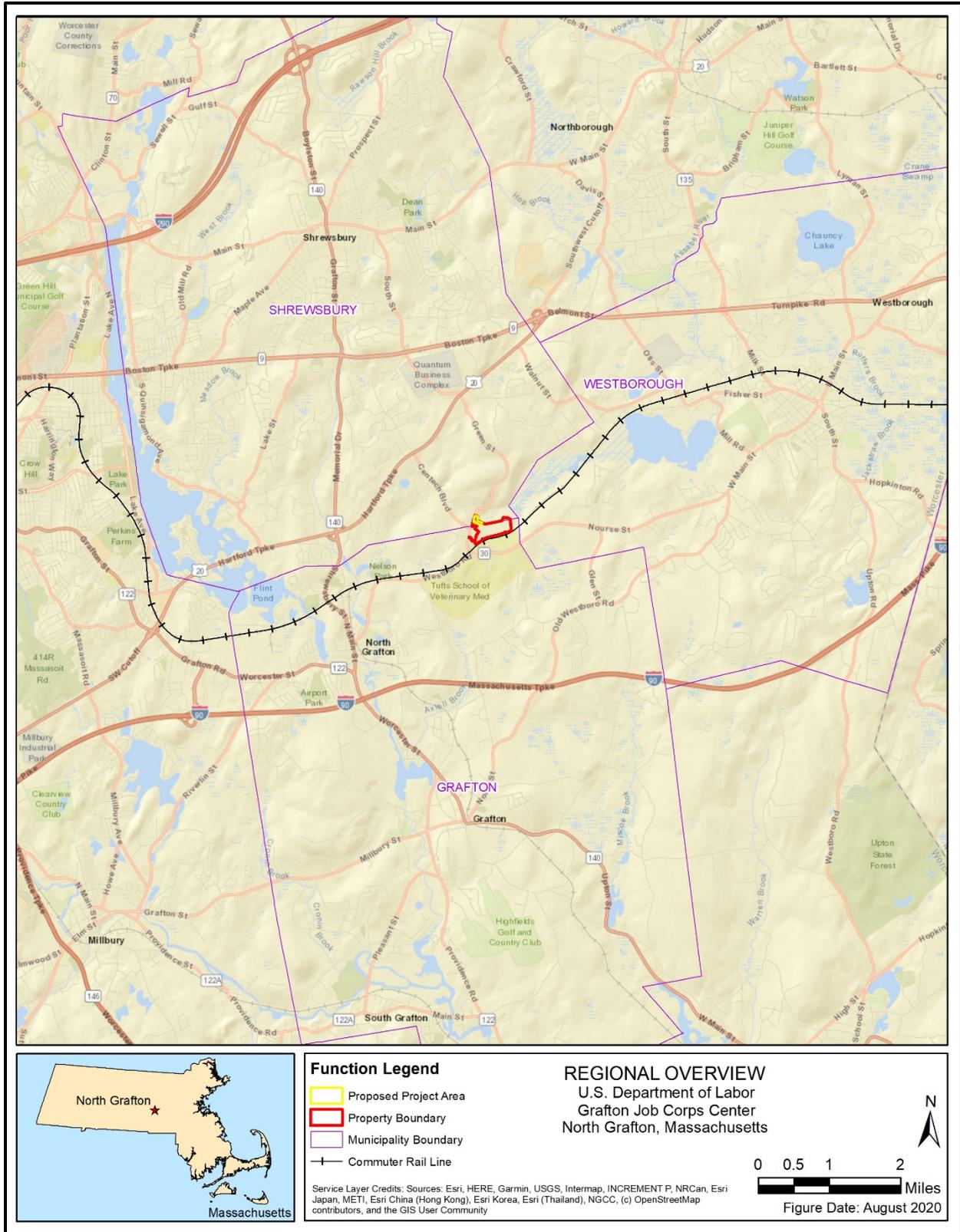


Figure 1. Regional Overview, Grafton Job Corps Center, North Grafton, MA

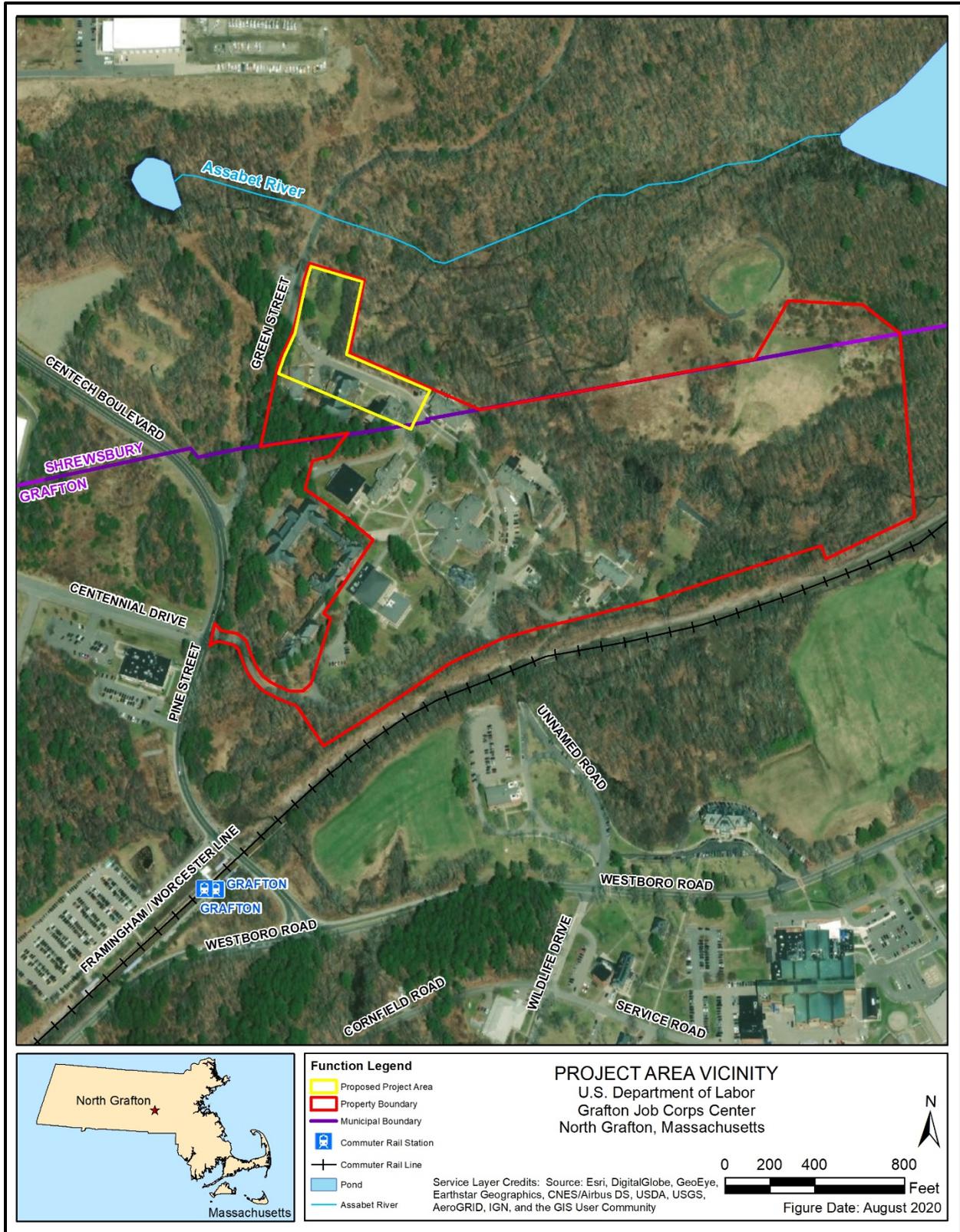


Figure 2. Project Area Vicinity, Grafton Job Corps Center, North Grafton, MA

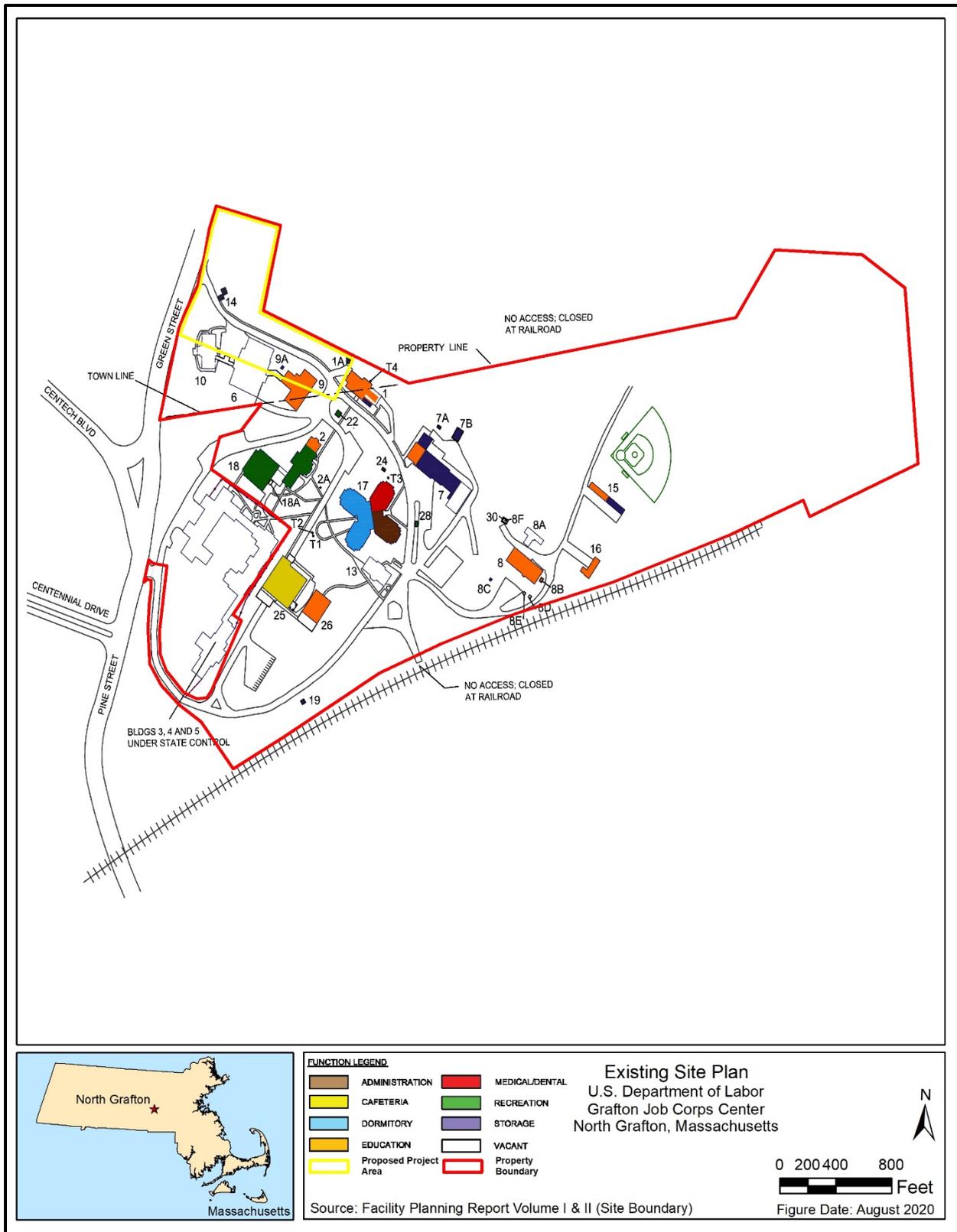


Figure 3. Existing Site Plan, Grafton Job Corps Center

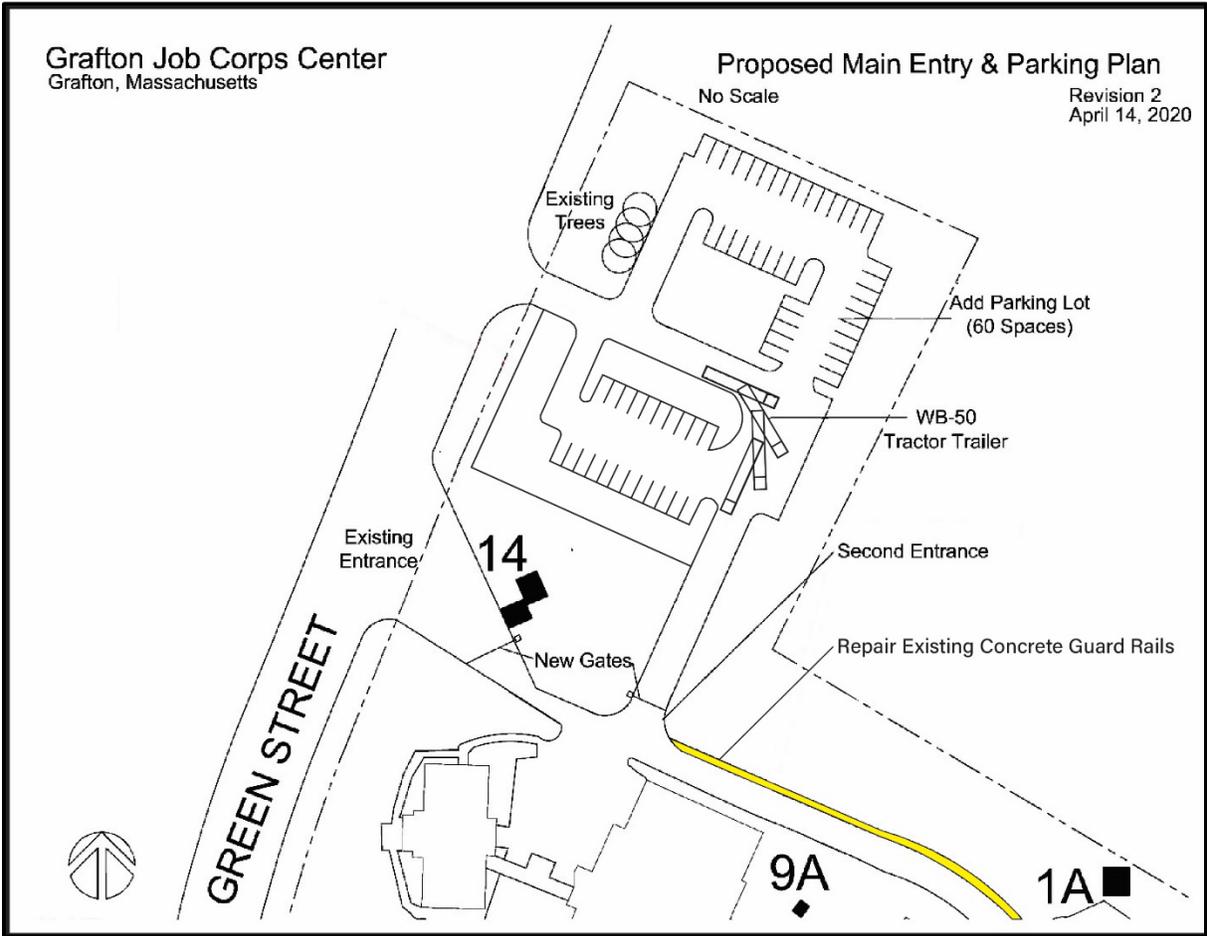


Figure 4. Proposed Action Alternative, Grafton Job Corps Center

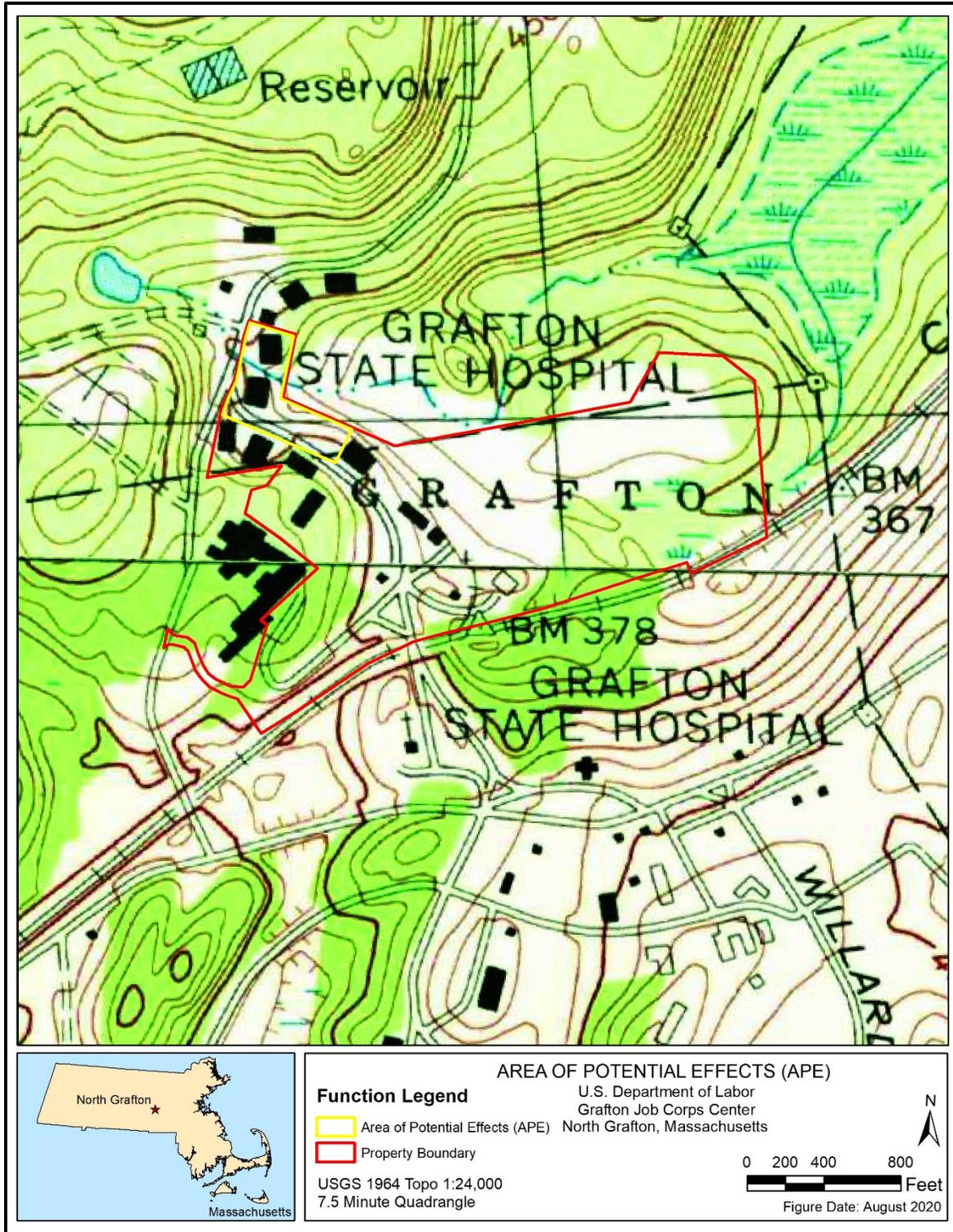


Figure 5: Area of Potential Effects (APE), Grafton Job Corps Center (USGS Topographic Map)

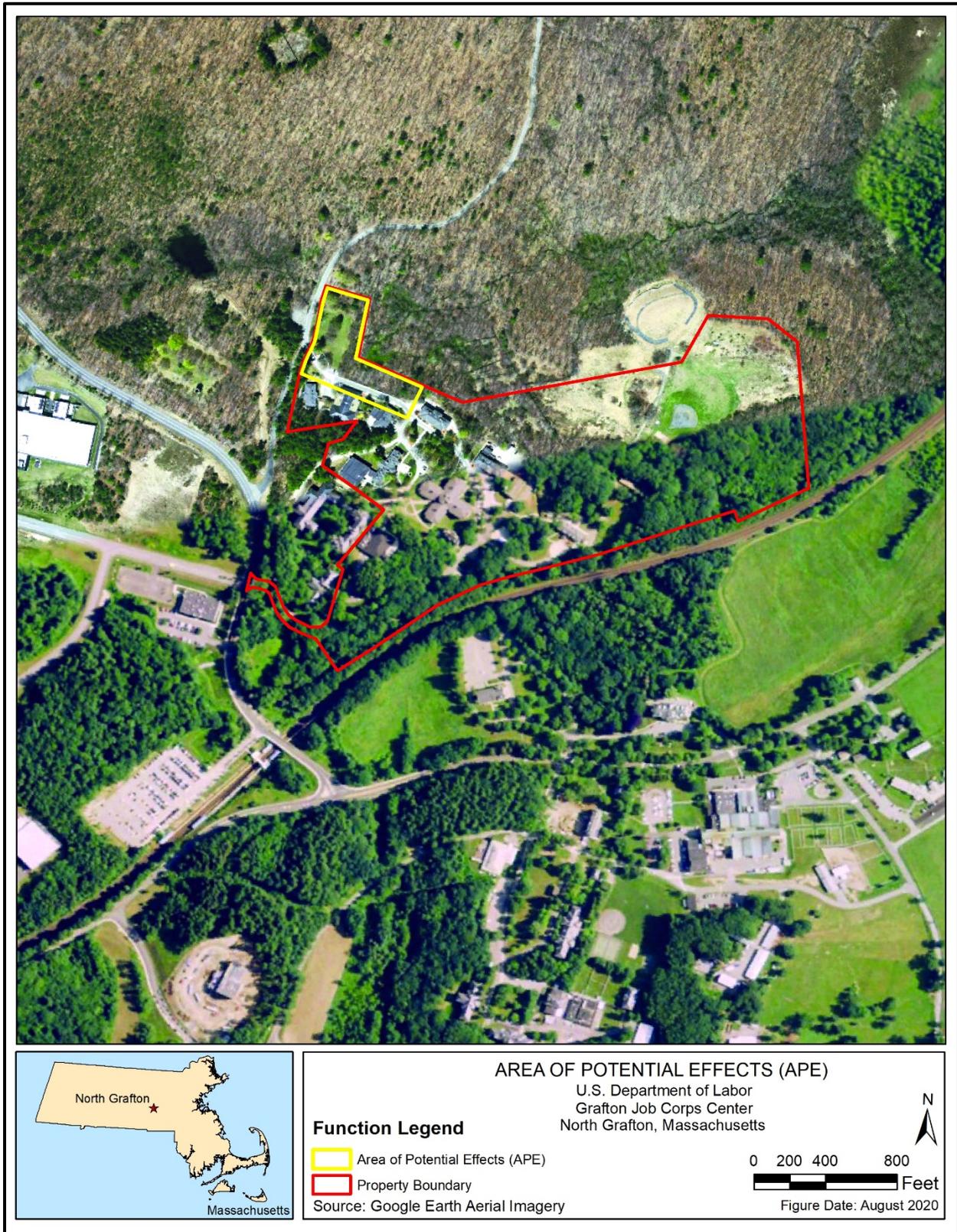


Figure 6. Area of Potential Effects (APE), Grafton Job Corps Center (Aerial Photograph)



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
<http://www.fws.gov/newengland>

In Reply Refer To:

November 04, 2020

Consultation Code: 05E1NE00-2021-TA-0363

Event Code: 05E1NE00-2021-E-01091

Project Name: Construction of the New Parking Lot at the Grafton Job Corps Center in North Grafton, Massachusetts

Subject: Verification letter for the 'Construction of the New Parking Lot at the Grafton Job Corps Center in North Grafton, Massachusetts' project under the January 5, 2016, Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions.

Dear Hung Truong:

The U.S. Fish and Wildlife Service (Service) received on November 04, 2020 your effects determination for the 'Construction of the New Parking Lot at the Grafton Job Corps Center in North Grafton, Massachusetts' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. This IPaC key assists users in determining whether a Federal action is consistent with the activities analyzed in the Service's January 5, 2016, Programmatic Biological Opinion (PBO). The PBO addresses activities excepted from "take"^[1] prohibitions applicable to the northern long-eared bat under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, the Action is consistent with activities analyzed in the PBO. The Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the PBO satisfies and concludes your responsibilities for this Action under ESA Section 7(a)(2) with respect to the northern long-eared bat.

Please report to our office any changes to the information about the Action that you submitted in IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation. If the Action is not

completed within one year of the date of this letter, you must update and resubmit the information required in the IPaC key.

If the Action may affect other federally listed species besides the northern long-eared bat, a proposed species, and/or designated critical habitat, additional consultation between you and this Service office is required. If the Action may disturb bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act is recommended.

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Construction of the New Parking Lot at the Grafton Job Corps Center in North Grafton, Massachusetts

2. Description

The following description was provided for the project 'Construction of the New Parking Lot at the Grafton Job Corps Center in North Grafton, Massachusetts':

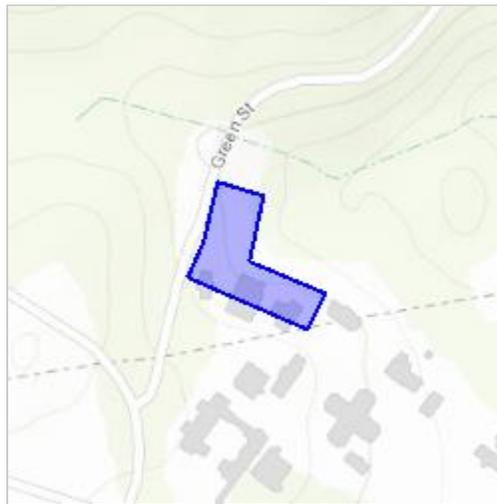
The U.S. Department of Labor (DOL) is proposing construction of the new parking lot at the Grafton Job Corps Center at 100 Pine Street in North Grafton, Worcester County, Massachusetts. The Grafton Job Corps Center is leased by DOL from the Commonwealth of Massachusetts and is located on 52 acres. Many of the buildings at the Center were originally constructed (1904-1939) for the Grafton State Hospital. The Center consists of 16 buildings and 20 structures. Adjacent land consists of industrial development, and undeveloped forested land and wetlands.

The proposed project consists of constructing a new 44,700 square foot asphalt parking lot (approximately 60 parking spots) with access to the main entrance to the Grafton Job Corps Center and to Green Street (public road). The purpose of the proposed action is to improve security, to provide parking for staff, non-resident students, visitors (for tours), and student intake activities, and to allow for safer maneuvering of large vehicle traffic for food deliveries, construction access, and vocational training material deliveries. The new entrance road will be designed to allow for larger (up to 18 wheelers) trucks to access the site through the new parking lot. Two new electronic lift arm gates, new light poles, and an eight (8) foot high vinyl coated chain link fence will be installed. The project also includes repair of the existing decorative concrete guardrails along the existing 302-foot long concrete entry road bed located east of the proposed parking lot, to help protect vehicular traffic on the bridge. Two brick pilasters will be repaired where the sidewalk interrupts the guardrails near Building 6 on the south side of the existing entrance roadway.

The U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Conservation (IPaC) System was reviewed to determine if any federally-listed endangered or threatened species may occur in the project area. According to IPaC, one federally-listed threatened species, the northern long-eared bat (*Myotis septentrionalis*), may occur in the project area. Per Massachusetts's Natural Heritage and Endangered Species Program mapping for the northern long-eared bat, there are no known hibernaculum or maternity roots trees within a 20-mile

radius of the Center. To mitigate potential impacts to the northern long-eared bat during construction, best management practices, such as observing timing restrictions for the removal of trees in the project area (should the removal of any trees be required), would likely be implemented.

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/42.2520193663196N71.68321979248068W>



Determination Key Result

This Federal Action may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the Service's PBO dated January 5, 2016. Any taking that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o). Therefore, the PBO satisfies your responsibilities for this Action under ESA Section 7(a)(2) relative to the northern long-eared bat.

Determination Key Description: Northern Long-eared Bat 4(d) Rule

This key was last updated in IPaC on May 15, 2017. Keys are subject to periodic revision.

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for Federal actions is to assist determinations as to whether proposed actions are consistent with those analyzed in the Service's PBO dated January 5, 2016.

Federal actions that may cause prohibited take of northern long-eared bats, affect ESA-listed species other than the northern long-eared bat, or affect any designated critical habitat, require ESA Section 7(a)(2) consultation in addition to the use of this key. Federal actions that may affect species proposed for listing or critical habitat proposed for designation may require a conference under ESA Section 7(a)(4).

Determination Key Result

This project may affect the threatened Northern long-eared bat; therefore, consultation with the Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.) is required. However, based on the information you provided, this project may rely on the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* to fulfill its Section 7(a)(2) consultation obligation.

Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?
Yes
2. Have you determined that the proposed action will have "no effect" on the northern long-eared bat? (If you are unsure select "No")
No
3. Will your activity purposefully **Take** northern long-eared bats?
No
4. [Semantic] Is the project action area located wholly outside the White-nose Syndrome Zone?
Automatically answered
No
5. Have you contacted the appropriate agency to determine if your project is near a known hibernaculum or maternity roost tree?

Location information for northern long-eared bat hibernacula is generally kept in state Natural Heritage Inventory databases – the availability of this data varies state-by-state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited. A web page with links to state Natural Heritage Inventory databases and other sources of information on the locations of northern long-eared bat roost trees and hibernacula is available at www.fws.gov/midwest/angered/mammals/nleb/nhisites.html.

Yes

6. Will the action affect a cave or mine where northern long-eared bats are known to hibernate (i.e., hibernaculum) or could it alter the entrance or the environment (physical or other alteration) of a hibernaculum?

No

7. Will the action involve Tree Removal?

No

Project Questionnaire

If the project includes forest conversion, report the appropriate acreages below. Otherwise, type '0' in questions 1-3.

1. Estimated total acres of forest conversion:

0

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

If the project includes timber harvest, report the appropriate acreages below. Otherwise, type '0' in questions 4-6.

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type '0' in questions 7-9.

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type '0' in question 10.

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?
0