



TO: Eric Blatt, P.E., Director, Facilities Engineering Division 

FROM: Robert Pelosi, E.I., Pollution Control Design Engineer, FED 

SUBJECT: Town of St. Johnsbury
Oak Street Sewer Separation Project
Evaluation of Eligibility for a **Finding of No Significant Impact**

DATE: May 12, 2017

A. Project Identification

Project Name: Town of St. Johnsbury, Vermont
Oak Street Sewer Separation Project

Address: Chad Whitehead, P.E., Town Manager
Town of St. Johnsbury
Pomerleau Building
51 Depot Square, Suite 3
St. Johnsbury, Vermont 05819

Project Location: Oak Street Neighborhood
St. Johnsbury, Vermont

Funding: Vermont/USEPA Clean Water Revolving Loan Number RF1-153

B. Summary of Environmental Review

The Department of Environmental Conservation, Facilities Engineering Division, has reviewed this proposed project in accordance with Department's Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program. Consistent with those procedures, the Department intends to issue a Finding of No Significant Impact (FONSI) for the proposed Oak Street Sewer Separation Project.

The Department has reviewed the following planning documents:

- Planning document titled, **Preliminary Engineering Report** for *Oak Street Drainage Area Combined Sewer Separation, St. Johnsbury, Vermont*, dated April 7, 2016, revised October 17, 2016, and prepared by Dufresne Group Consulting Engineers of St. Johnsbury, Vermont.
- **Environmental Information Document** titled *Environmental Report, Oak Street Drainage Area, St. Johnsbury, Vermont*, and dated December 18, 2015 (signed March 24, 2017), by Dufresne Group Consulting Engineers of St. Johnsbury, Vermont.

A **Finding of No Significant Impact** (FONSI) is the appropriate environmental review response for this project. The project is ineligible for Categorical Exclusion from detailed Environmental Review as it includes the construction of a new storm water outfall -- necessarily defined as a new discharge to surface water. Overall, however, the direct and indirect environmental effects of the project are not significant enough to require an Environmental Impact Statement (EIS), as described in Section XI of the Department's environmental review procedures.

1. Project Description

The Town of St. Johnsbury is located in Caledonia County, Vermont. The project is necessary to address deficiencies of the neighborhood collection system. The installation of 3,700 LF of new PVC sanitary sewer main replaces the existing, deteriorating main, thus reducing infiltration. The installation of 2,200 LF of new HDPE storm sewer main allows the Town to separate storm water from wastewater, thus reducing inflow. With these deficiencies corrected, the Oak Street Pump Station is expected to receive significantly reduced volumes during wet weather events.

The separation of storm water from the collection system requires a discharge point. Accordingly, the project includes the construction of an outfall.

Incidental to the above construction, the Town has also proposed to replace 2,300 LF of new water main exposed by excavation.

In addition to the above, the Town intends to use Ecosystem Restoration Grant #2017-ERP-M-10 to concurrently implement various Green Stormwater Infrastructure (GSI) practices including, but not limited to, bio-retained infiltration and pervious pavement.

With the GSI practices, the associated infiltration creates a new discharge to groundwater.

As mentioned previously, the project is not eligible for Categorical Exclusion.

2. Justification for Finding of No Significant Impact

The Design Section has determined that the proposed project meets the criteria for issuance of a Finding of No Significant Impact.

The project is ineligible for Categorical Exclusion from detailed Environmental Review only because it includes the construction of a new storm water outfall -- necessarily defined as a new discharge to surface water. The Design Section emphasizes that reducing inflow to the collection system reduces the likelihood of sewer overflows and energy impacts related to pumping. Further, VT DEC has awarded a grant to the Town for implementing green infrastructure as part of a Stormwater Master Plan to achieve Water Quality Standards. Consequently, the project achieves significant environmental benefits overall.

Per procedure, the Design Section has also determined that no other direct or indirect environmental effects warrant an Environmental Impact Statement (EIS). As evidenced by the Environmental Information Document and the VT ANR Resource Atlas, all construction is proposed outside of delineated wetland buffers, and there are no proximate rare, threatened, or endangered species present. Finally, an Archeological Resources Assessment does not identify any areas of archeological sensitivity.

The Town held an Environmental Impact Hearing on April 10, 2017 to discuss project details with the public. Attendees did not raise objections or voice concerns about the project.

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Notice of Intent to Issue a Finding of No Significant Impact

**Town of St. Johnsbury, Vermont
Oak Street Sewer Separation Project**

Vermont/USEPA Clean Water Revolving Loan: RF1-153

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the proposed Oak Street Sewer Separation Project, which consists of installing 3,700 LF of new PVC sanitary sewer main, 2,200 LF of new HDPE storm sewer main, a storm water outfall, and 2,300 LF of new water main incidentally affected by the work. Using an Ecosystem Restoration Grant (2017-ERP-M-10), the Town also intends to concurrently implement various Green Stormwater Infrastructure (GSI) practices including, but not limited to, bio-retained infiltration and pervious pavement.

Under the Department's Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program, the project is ineligible for Categorical Exclusion from detailed Environmental Review. As described above, the separation of sanitary and storm sewers necessitates the construction of a new storm water outfall which creates a new discharge to surface water. Further, the GSI practices create a new discharge to groundwater.

The Department has also evaluated the project's impact on other natural and cultural resources. The facility's alignment is not proximate to a wetland and the construction does not affect streams or floodplains. Further, an Archeological Resources Assessment does not identify any areas of archeological sensitivity.

In conclusion, the direct and indirect environmental effects of the project are not significant enough to require an Environmental Impact Statement (EIS), under the Department's environmental review procedures.

The Town held an Environmental Impact Hearing on April 10, 2017 to discuss project details with the public. Attendees did not raise objections or voice concerns about the project.

Further information on the project and this Determination is available for inspection at the following locations:

St. Johnsbury Town Offices, Pomerleau Building, 51 Depot Square, Suite 3, St. Johnsbury, Vermont 05819

Dufresne Group Consulting Engineers, 459 Portland Street, St. Johnsbury, Vermont 05819

**Vermont Department of Environmental Conservation, Facilities Engineering Division,
National Life Building, MAIN 1, 1 National Life Drive, Montpelier, Vermont 05620-3510
Telephone: (802) 828-1550 (land line)**

No significant administrative action will be taken on this project for thirty (30) days from issuance of this Notice of Intent, to allow for public response.



Eric Blatt, P.E., Director
Facilities Engineering Division

May 12, 2017

Date



Vermont Department of Environmental Conservation

Agency of Natural Resources

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May 12, 2017

Mr. Chad Whitehead, P.E.
Town Manager
Town of St. Johnsbury
Pomerleau Building
51 Depot Square, Suite 3
St. Johnsbury, Vermont 05819

**RE: Oak Street Sewer Separation Project
Town of St. Johnsbury, VT
Vermont/USEPA Clean Water Revolving Loan: RF1-153
Notice of Intent to Issue a Finding of No Significant Impact**

Dear Mr. Whitehead:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the proposed Oak Street Sewer Separation Project, which consists of installing 3,700 LF of new PVC sanitary sewer main, 2,200 LF of new HDPE storm sewer main, a storm water outfall, and 2,300 LF of new water main incidentally affected by the work. Using an Ecosystem Restoration Grant (2017-ERP-M-10), the Town also intends to concurrently implement various Green Stormwater Infrastructure (GSI) practices including, but not limited to, bio-retained infiltration and pervious pavement. The project is ineligible for Categorical Exclusion from detailed Environmental Review as the proposed storm water outfall creates a new discharge to surface water. Further, the GSI practices create a new discharge to groundwater. Overall, however, the direct and indirect environmental effects of the project are not significant enough to require an Environmental Impact Statement (EIS), under the Department's environmental review procedures.

The Department's environmental review procedures require a 30-day public comment period following the issuance of a Notice of Intent to Issue a FONSI. If no public comments are received during this period, the Finding of No Significant Impact becomes effective immediately. If comments are received, the Department must evaluate and address any comments before affirming the decision.

Copies of documents supporting a FONSI are enclosed. Please keep copies of the enclosed documents, along with any pertinent reports by your consulting engineer, available for public inspection during the 30-day public comment period. The documents which must be available for public inspection are listed below.

Please contact Robert Pelosi at (802) 522-2192 if you have any questions or concerns.

Sincerely,



Eric Blatt, P.E.
Director
Facilities Engineering Division

Sincerely,



Robert Pelosi, E.I.
Pollution Control Design Engineer
Facilities Engineering Division

Enclosures

Documents Enclosed for Finding of No Significant Impact Public Comment Period (30 Days)

1. **Notice of Intent** to Issue a **Finding of No Significant Impact**
(Signed by Eric Blatt, P.E., Director, Facilities Engineering Division)
2. **Evaluation** of Eligibility for Finding of No Significant Impact
(Approved by Eric Blatt, P.E., Director, Facilities Engineering Division)
3. **Environmental Review Procedures** for Projects Funded Through the Vermont/EPA Revolving Loan Program

Additional Documents Needed for Finding of No Significant Impact Public Comment Period (30 Days)

4. Planning document titled, **Preliminary Engineering Report for Oak Street Drainage Area Combined Sewer Separation, St. Johnsbury, Vermont**, dated April 7, 2016, revised October 17, 2016, and prepared by Dufresne Group Consulting Engineers of St. Johnsbury, Vermont.
5. **Environmental Information Document** titled *Environmental Report, Oak Street Drainage Area, St. Johnsbury, Vermont*, and dated December 18, 2015 (signed March 24, 2017), by Dufresne Group Consulting Engineers of St. Johnsbury, Vermont.

COPY LIST

Richard A. Wilson, Regional Engineer, St. Johnsbury Regional Office, Drinking Water and Groundwater Protection Division, VT-DEC

Cynthia Parks, P.E., Engineering Team Lead, Drinking Water and Groundwater Protection Division, VT-DEC

Patrick Ross, P.E., River Management Engineer, Watershed Management Division, VT-DEC

Everett Marshall, Information Manager, Nongame and Natural Heritage Program, VT Department of Fish and Wildlife

Shannon Morrison, District Wetlands Ecologist, Wetlands Section, Watershed Management Division, VT-DEC

Scott Dillon, Archeologist, Division for Historic Preservation, VT Department of Housing and Community Affairs