

Vermont Department of Environmental Conservation

Agency of Natural Resources

FACILITIES ENGINEERING DIVISION National Life Building, MAIN 1 1 National Life Drive Montpelier, VT 05620-3510 FAX: (802)828-1552

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E-Mail Address: robert.pelosi@vermont.gov Telephone: (802) 522-2192

March 29, 2019

Chad Whitehead, Town Manager Town of St. Johnsbury 51 Depot Square, Suite 3 St. Johnsbury, VT 05819

RE: Pleasant Street and Gilman Avenue Combined Sewer Separation Project Town of St. Johnsbury, VT Vermont/USEPA Clean Water Revolving Loan: RF1-215 Vermont/USEPA Drinking Water Revolving Loan: WPL-277 Supplemental Environmental Review 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 Town of St. Johnsbury, Pleasant Street and Gilman Avenue Combined Sewer Separation Project. This decision supplements a prior Environmental Review, conducted in October 2018, that overlooked specific improvements to stormwater infrastructure. Further, this decision speaks only to the proposed stormwater improvements along Gilman Avenue, Waterman Circle, Farmer Drive, Pleasant Street and School Street. Accordingly, parties interested in revisiting the associated water and sewer improvements are invited to review the Categorical Exclusion posted on October 5, 2018.

To address existing stormwater management deficiencies and further sewer separation efforts, the Town proposes to reduce overall impervious surface area, eliminate catch basins currently connected to the combined sewer system, utilize green infrastructure where appropriate, replace an existing culvert, install separate stormwater collection systems inclusive of two subsurface infiltration structures and restore affected road surfaces.

To accomplish the above, the project focuses on three objectives. First, by complementing the work performed on Oak Street in 2018, the project concludes sewer separation efforts for the drainage area affecting the Oak Street Pump Station and CSO 016. Second, the improvements increase hydraulic capacity of both sewer and stormwater infrastructure thus implementing other control measures mandated by the current 1272 Order and reducing the likelihood that public and private properties flood during wet weather events. Finally, certain project elements are necessary to comply with the 2017 Vermont Stormwater Management Manual Rule and Design Guidance.

The project does not qualify for a Categorical Exclusion from Environmental Review as the subsurface infiltration structures create new discharges to groundwater. The Department, however, has determined that 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 <u>pertinent reports</u> 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,

E BEH

Eric Blatt, P.E. Director Facilities Engineering Division

Enclosures

Sincerely,

RL+ RL.

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

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. **Preliminary Engineering Report,** titled "*Final Preliminary Engineering Report for Pleasant Street and Gilman Avenue Combined Sewer Separation, St. Johnsbury, Vermont,*" stamped January 2, 2018, and prepared by Andrea J. Day, P.E. of Dufresne Group Consulting Engineers from St. Johnsbury, Vermont.
- 5. Environmental Information Document, titled "Environmental Report for Pleasant Street and Gilman Avenue Drainage Area, St. Johnsbury, Vermont," dated August 31, 2018, and prepared by Dufresne Group Consulting Engineers of St. Johnsbury, Vermont.

#### COPY LIST

Kathleen Parrish, Environmental Analyst, Wastewater Program, Watershed Management Division, VT DEC

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

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

Ashley Lucht, Environmental Analyst, Drinking Water SRF Program, Facilities Engineering Division, VT DEC

VERMONT Vermont Department of Environmental Conservation

Agency of Natural Resources

TO:	Eric Blatt, P.E., Director, Facilities Engineering Division 2/29/19
FROM:	Robert Pelosi, E.I., Design Engineer, Facilities Engineering Division RL+ RL-
SUBJECT:	Town of St. Johnsbury Pleasant Street and Gilman Avenue Combined Sewer Separation Supplemental Environmental Review Evaluation of Eligibility for a <b>Finding of No Significant Impact</b>
DATE:	February 26, 2019

# A. <u>Project Identification</u>

Project Name:	Town of St. Johnsbury, Vermont Pleasant Street and Gilman Avenue Combined Sewer Separation
Address:	Chad Whitehead, Town Manager Town of St. Johnsbury 51 Depot Square, Suite 3 St. Johnsbury, VT 05819
Project Location:	The Town of St. Johnsbury, Vermont has proposed this project to complete sewer separation efforts for the drainage area contributing to the Oak Street Pump Station and CSO 016 and improve stormwater management in the proximate neighborhoods. The project area is generally bound by three alignments. First, improvements are proposed where Nelson, Dundee, and St. John Streets intersect with Pleasant Avenue. Second, the work parallels Pleasant Avenue from a point north of Emerson Street to the intersection with John Street at Ramsey Park, inclusive of spurs along Orient, School, and Oak Streets. Finally, the proposal coincides with Gilman Avenue, Waterman Circle, and Farmer Drive.
Funding:	Vermont/USEPA Clean Water Revolving Loan Number RF1-215 Vermont/USEPA Drinking Water Revolving Loan: WPL-277

# B. <u>Summary of Environmental Review</u>

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

Please note that this evaluation supplements the Environmental Review conducted in October 2018. The prior review overlooked specific improvements to stormwater infrastructure. Accordingly, this Notice of Intent speaks only to the proposed stormwater improvements along Gilman Avenue, Waterman Circle, Farmer Drive, Pleasant Avenue and School Street, Orient Street, and Oak Street. As such, parties interested in revisiting the associated water and sewer improvements are invited to review the <u>Categorical Exclusion posted on October 5, 2018</u>.

To make this decision, the Department has reviewed the following planning documents:

- **Preliminary Engineering Report,** titled "*Final Preliminary Engineering Report for Pleasant Street and Gilman Avenue Combined Sewer Separation, St. Johnsbury, Vermont,*" stamped January 2, 2018, and prepared by Andrea J. Day, P.E. of Dufresne Group Consulting Engineers from St. Johnsbury, Vermont.
- Environmental Information Document, titled "Environmental Report for Pleasant Street and Gilman Avenue Drainage Area, St. Johnsbury, Vermont," dated August 31, 2018, and prepared 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 the subsurface infiltration structures create new discharges to groundwater. 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 in Caledonia County, Vermont.

The Town intends to address three principle deficiencies characteristic of the existing infrastructure. First, by complementing the Oak Street CSO project completed in 2018, the work concludes sewer separation efforts for the drainage area contributing to the Oak Street Pump Station and CSO 016 while implementing other control measures mandated by the current 1272 Order. Second, the improvements correct age-related deficiencies while increasing the hydraulic capacity of both sewer and stormwater infrastructure; thus, the work is expected to reduce flooding (of public infrastructure and private properties) during wet weather events and convey more flow to the wastewater treatment facility. Finally, certain project elements are necessary to comply with the 2017 Vermont Stormwater Management Manual Rule and Design Guidance.

Specific project elements may be categorized by location. As described above, construction is to occur along Gilman Avenue, Waterman Circle, Farmer Drive, Pleasant Avenue and areas proximate to School Street. The improvements are summarized below.

### Gilman Avenue

Gilman Avenue is excessively wide and generates large stormwater volumes due to the considerable impervious surface area. To reduce stormwater volume and prevent commingling of stormwater and sewage, the Town proposes to:

- Decrease the width of pavement by installing stone filter strips and grass-lined swales parallel to the travelled lanes;
- Reduce the size of the intersection between Gilman Avenue and Concord Avenue using grassed areas;
- Eliminate an existing catch basin from the combined sewer system; and
- Grade restored surfaces to direct stormwater towards the filter strips and swales.

The above improvements also comply with treatment standards required by the 2017 Vermont Stormwater Management Manual Rule and Design Guidance.

## Waterman Circle

Waterman Circle is not excessively wide, but the 2017 Vermont Stormwater Management Manual Rule and Design Guidance requires a specified degree of stormwater treatment once the road surface is restored (paved after the Town installs water and sewer infrastructure). The Town proposes to treat stormwater along Waterman Circle using 1,900 linear feet of grass-lined swale.

# Farmer Drive

The existing 24-inch diameter culvert below Farmer Drive is in failure allowing road material to enter an unnamed tributary of the Passumpsic River. To correct this deficiency, the Town plans to replace the existing culvert with a 60-inch culvert.

Required stormwater treatment is difficult at this location. The Town is to replace an existing catch basin with a deep sump catch basin that discharges to a plunge pool and level spreader. Additional treatment is available using a site-balancing approach where Farmer Drive receives credit for the significant level of treatment afforded by improvements along Gilman Avenue.

### Pleasant Avenue and School Street

The proposed work aligned with Pleasant Avenue and School Street eliminates stormwater inflow to the combined sewer system. To accomplish this, the Town is to eliminate 20 catch basins currently connected to the combined sewer system. Further, the Town proposes to install separate stormwater collection systems that discharge to two subsurface infiltration structures – one located in Ramsey Park off Jones Street and the other near the intersection of St. John Street and Pleasant Avenue.

The subsurface infiltration structure at Ramsey Park is sized to treat a 1-inch rain event. Excess volume is to be conveyed via a new storm drain along Oak Street and discharged through an existing stormwater outfall (S/N 002).

The subsurface infiltration structure on St. John Street is sized to treat the 25-year storm.

# 2. Justification for Finding of No Significant Impact

As mentioned previously, the project is not eligible for Categorical Exclusion. However, the Design Section has determined that the proposed project meets the criteria for issuance of a Finding of No Significant Impact.

As discussed in a prior section, the Design Section recognizes that the project creates new discharges to groundwater via the subsurface infiltration structures. However, the scope and magnitude of these discharges are such that the direct and indirect environmental effects of the project are not significant. Furthermore, the work is compliant with the 2017 Vermont Stormwater Management Manual Rule and Design Guidance.

The Design Section finds that other project elements do not jeopardize this Finding. Reducing impervious area by installing filter strips and grass-lined swales do not constitute discharges as contemplated by the procedures. Further, other stormwater system improvements are either connected to existing outfalls or replace existing discharges.

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, after coordination with the State Historical Preservation Office, there are no anticipated effects on historic or prehistoric sites.

The Town held an Environmental Impact Hearing on February 25, 2019 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

### Pleasant Street and Gilman Avenue Combined Sewer Separation Project

Vermont/USEPA Clean Water Revolving Loan: RF1-215 Vermont/USEPA Drinking Water Revolving Loan: WPL-277

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the proposed Pleasant Street and Gilman Avenue Combined Sewer Separation Project.

Under the Department's <u>Environmental Review Procedures for Projects Funded Through the Vermont/EPA</u> <u>Revolving Loan Program</u>, the project is ineligible for Categorical Exclusion from detailed Environmental Review. The project includes two subsurface infiltration structures – one located at Ramsey Park and the other at St. John Street – to manage stormwater. Each structure creates a new discharge to groundwater.

The Department has determined that the project does not impact other natural and cultural resources. 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, after coordination with the State Historical Preservation Office, there are no anticipated effects on historic or prehistoric sites.

The scope and magnitude of these discharges are such that 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 February 25, 2019 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:

Town of St. Johnsbury, 51 Depot Square, Suite 3, St. Johnsbury, VT 05819

Dufresne Group Consulting Engineers, 481 Summer 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

March 29, 2019\_\_\_\_\_ Date