



FACILITIES ENGINEERING DIVISION  
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May 20, 2019

Megan Moir, Assistant Department of Public Works Director  
City of Burlington  
234 Penny Lane  
Burlington, VT 05401

**RE: City-wide Gravity Pipe Assessment and Rehabilitation  
City of Burlington, VT  
Vermont/USEPA Clean Water Revolving Loan: RF1-187  
Notice of Intent to Issue a Finding of No Significant Impact**

Dear Ms. Moir:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the proposed City-wide Gravity Pipe Assessment and Rehabilitation Project in Burlington, Vermont. For this project, the City proposes to improve a significant portion of the sewer and stormwater infrastructure.

Of the sewer assets throughout the municipality, the City plans to improve 130 pipe segments and 73 manholes. Specifically, 82 pipe segments are to be rehabilitated *in situ* (e.g. with cure-in-place pipe lining) without excavation, 48 pipe segments are to be addressed using either point repair or open-trench replacement, and 73 manholes are to be restored using a combination of (1) cover and frame replacement, (2) cleaning, (3) patching, and (4) sealing with minimal excavation.

For the widely distributed stormwater assets, the City proposes to rehabilitate 118 pipe segments. All stormwater asset rehabilitation is to be conducted *in situ* (e.g. with cure-in-place pipe lining) without excavation.

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Given the ambitious scope of this project, the Department anticipates two potential impacts to natural and cultural resources. First, the City has identified three areas within the proposed alignment that may impact delineated wetlands. Second, even with limited excavation, the project may impact historic properties adjacent to the alignment. For these reasons, the project does not qualify for a Categorical Exclusion from Environmental Review. However, with appropriate regulatory oversight, the Department has concluded 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 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. **Preliminary Engineering Report**, titled “*City-wide Gravity Pipe Assessment and Rehabilitation, Preliminary Engineering Report for the City of Burlington, Vermont,*” dated April 2019, and prepared by Michael A. Stein, P.E. from Wright-Pierce of Manchester, New Hampshire.
5. **Environmental Information Document**, titled “*Environmental Report and Environmental Information Document,*” executed April 30, 2019, and prepared by Michael A. Stein, P.E. from Wright-Pierce of Manchester, New Hampshire.

**COPY LIST**

**Mark Ferguson**, Natural Heritage Zoologist, VT Department of Fish and Wildlife

**Bob Popp**, Department Botanist, VT Department of Fish and Wildlife

**David DiDomenico**, Environmental Analyst, Wastewater Program, Watershed Management Division, VT-DEC

**Tina Heath**, District Wetland Ecologist, Wetlands Program, Watershed Management Division, VT-DEC

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



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

FROM: Robert Pelosi, E.I., Design Engineer, Facilities Engineering Division 

SUBJECT: City of Burlington  
City-wide Gravity Pipe Assessment and Rehabilitation

Evaluation of Eligibility for a **Finding of No Significant Impact**

DATE: May 17, 2019

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A. Project Identification

Project Name: City of Burlington, Vermont  
City-wide Gravity Pipe Assessment and Rehabilitation

Address: Megan Moir, Assistant Department of Public Works Director  
City of Burlington  
234 Penny Lane  
Burlington, VT 05401

Project Location: Distributed throughout the Municipality (see the maps [here](#))  
City of Burlington, Vermont

Funding: Vermont/USEPA Clean Water Revolving Loan Number RF1-187

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 City-wide Gravity Pipe Assessment and Rehabilitation Project.

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The Department has reviewed the following planning documents:

- **Preliminary Engineering Report**, titled “*City-wide Gravity Pipe Assessment and Rehabilitation, Preliminary Engineering Report for the City of Burlington, Vermont,*” dated April 2019, and prepared by Michael A. Stein, P.E. from Wright-Pierce of Manchester, New Hampshire.
- **Environmental Information Document**, titled “*Environmental Report and Environmental Information Document,*” executed April 30, 2019, and prepared by Michael A. Stein, P.E. from Wright-Pierce of Manchester, New Hampshire.

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 due to anticipated effects on wetlands and historic properties. However, with requisite regulatory oversight by the District Wetland Ecologist and Survey Archeologist, 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

Regarding sewer infrastructure, the City proposes to rehabilitate 130 pipe segments and 73 manholes distributed throughout the City’s sewer collection system. Specifically, 82 pipe segments are to be rehabilitated *in situ* (e.g. with cure-in-place pipe lining) without excavation, 48 pipe segments are to be addressed using either point repair or open-trench replacement, and 73 manholes are to be restored using a combination of (1) cover and frame replacement, (2) cleaning, (3) patching, and (4) sealing with minimal excavation.

For the widely distributed stormwater assets, the City proposes to rehabilitate 118 pipe segments. All stormwater asset rehabilitation is to be conducted *in situ* (e.g. with cure-in-place pipe lining) without excavation.

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.

As discussed in a prior section, the Department recognizes that the project may include construction in delineated wetlands. Within the extensive project area, there are five manhole locations and four pipe segments adjacent to delineated wetlands. These locations are generally described as:

- The intersection of Staniford Road, Appletree Point Road, and Appletree Point Lane;
- The west side of Pine Street proximate to the intersection with Howard Street; and
- The west side of Pine Street north of the intersection with Flynn Avenue.

Even where the above work coincides with wetlands, the Vermont Wetlands Rules conditionally exempt the maintenance, repair, and reconstruction of existing infrastructure. Further, as the project progresses through design, the project engineer is to consult with the District Wetland Ecologist to confirm that any disturbance complies with the Rules. Thus, with requisite regulatory oversight, the project is not expected to significantly impact wetlands.

Further, as mitigation, the Department shall require future Engineering Services Agreement(s) to list coordination with the Wetlands Program as a contracted task.

The Department also recognizes that the proposed alignment may conflict with cultural resources such as historic properties. As articulated by the Vermont Division of Historic Preservation, “an Archeological Resource Assessment will be necessary for each design phase... to determine potential adverse effects.”

As above, with this regulatory oversight, the project is not expected to adversely affect cultural resources.

Additionally, as mitigation, the Department shall require future Engineering Services Agreement(s) to list coordination with the Vermont Division of Historic Preservation as a contracted task.

To conclude, the project does not require an Environmental Impact Statement (EIS). With regulatory oversight and appropriate mitigation, it is not expected to negatively impact wetland and cultural resources. Further, as evidenced by the Environmental Information Document, the project is not expected to directly or indirectly affect other aspects of the environment.

The Town held an Environmental Impact Hearing on May 15, 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

**City of Burlington, Vermont**  
**City-wide Gravity Pipe Assessment**  
**and Rehabilitation Project**

Vermont/USEPA Clean Water Revolving Loan: RF1-187

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the proposed City-wide Gravity Pipe Assessment and Rehabilitation Project

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. The proposed work is proximate to or coincides with wetlands in three locations. Further, given the scope, the Department anticipates conflict with cultural resources, such as historic properties.

The Department has determined that the project does not impact other natural or cultural resources. The project does not create new or additional discharges to surface water or groundwater. Further, as evidenced by the Environmental Information Document and the VT ANR Resource Atlas, all construction is distant to rare, threatened, or endangered species. Finally, none of the project locations are proximate to floodplains.

The scope and magnitude of these impacts 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 May 15, 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:

**City of Burlington, 234 Penny Lane, Burlington, VT 05401**

**Wright-Pierce, 250 Commercial Street, Suite 4014, Manchester, NH 03101**

**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.



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

May 21, 2019

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Date