



Vermont Department of Environmental Conservation

EC7 Water Investment Division

1 National Life Drive, Davis 3
Montpelier, VT 05620-3510

Agency of Natural Resources

Mr. Scott Murphy, Municipal Manager
Village of Ludlow
37 Depot Street,
Ludlow, VT 05149

December 24, 2020

Re: Ludlow, High Street Infrastructure Project
Vermont/ USEPA Clean Water State Revolving Loan Number RF1-272
Vermont/ USEPA Drinking Water State Revolving Loan Number RF3-417

Categorical Exclusion from Detailed Environmental Review

Dear Mr. Murphy:

The Department of Environmental Conservation has determined that the Village of Ludlow's proposed "High Street Infrastructure Project" may be excluded from the detailed environmental review procedures that are required for projects that have environmental effects. The Department's Clean Water State Revolving Fund related environmental review procedures require a 30 day public comment period following the issuance of a Notice of Determination of Eligibility for Categorical Exclusion. If no public comments received during that period demonstrate that this Determination is in error, then the Categorical Exclusion exempting the project from detailed review will become effective.

Copies of documents supporting a Categorical Exclusion are enclosed. Please keep copies of the enclosed documents available for public inspection during a public comment period of 30 days. A full listing of the documents that must be available for public inspection is attached. Please call 802 522-5564 or 802 477-2669 if you have any questions or concerns.

If you have any questions, please do not hesitate to send an email to celia.riechel@vermont.gov or hugo.martinez.cazon@vermont.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Celia Riechel".

Celia Riechel

DWSRF Program Lead
Water Investment Division

A handwritten signature in black ink, appearing to read "Hugo Martinez Cazon".

Hugo Martínez Cazon, P.E.

CWSRF Design Engineer
Water Investment Division

Documents Enclosed for Categorical Exclusion Public Comment Period (30 days)

1. *"Notice of Determination of Eligibility for Categorical Exclusion"*
(Signed by Eric Blatt, PE, Director of Engineering, Water Investment Division.)
2. *"Evaluation of Eligibility for Categorical Exclusion"*
(Approved by Eric Blatt, PE, Director of Engineering, Water Investment Division.)

Additional Documents Needed for Categorical Exclusion Public Comment Period (30 days)

1. ***"Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program"***, <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=129684&DVID=0>
2. **Categorical Exclusion** (CatEx) request letter, Village of Ludlow, dated December 3, 2020.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=187128&DVID=0>
3. **Preliminary Engineering Report** (PER) entitled "High Street Infrastructure Project" and revision dated December 2020, by Aldrich and Elliott of 6 Market Place, Suite 2, Essex Junction, Vermont 05452.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=186944&DVID=0>
4. **Environmental Information Document** (EID) signed September 22, 2020, by Aldrich and Elliott PC, of 6 Market Place, Suite 2, Essex Junction, Vermont 05452.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=186697&DVID=0>
5. **Section 106-Project Review Sheet** from the Vermont Division for Historic Preservation, dated November 4, 2020. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=186611&DVID=0>

COPY LIST

Wayne Elliott P.E., Aldrich and Elliott PC
Amy Polaczyk, Wastewater Management Program, Watershed Management Division
Tom Brown, CWSRF Program Lead, Financial Management Section, VT-DEC-WID
Allison Murphy P.E., Drinking Water and Groundwater Protection Division
Celia Riechel, DWSRF Program Lead, Drinking Water State Revolving Fund (DWSRF)

Notice of Determination of Eligibility for Categorical Exclusion

Village of Ludlow

Ludlow, High Street Infrastructure Project

Vermont/ USEPA Clean Water State Revolving Fund Loan Number (RF1-272)
Vermont/ USEPA Drinking Water State Resolving Fund Loan Number (RF3-417)

In accordance with section VII of the Department's *"Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program"*, the Village of Ludlow has requested that its proposed High Street Infrastructure Project be evaluated for eligibility for a Categorical Exclusion from the detailed environmental review that is described in the Procedures and required for projects with significant environmental effects.

Consideration of the requests for Categorical Exclusion included a review of the following documents:

- **Environmental Information Document (EID)** signed September 22, 2020, by Aldrich and Elliott PC, of 6 Market Place, Suite 2, Essex Junction, Vermont 05452.

Upon completion of its independent evaluation, the Department has determined that the proposed project meets the criteria for issuance of a Categorical Exclusion.

Specifically, the project will not increase the permitted annual average flow (hydraulic) capacity of the existing Village of Ludlow, Wastewater Treatment Facility, and it will not increase permitted pounds of pollutants that may be discharged by that plant. Also, the project will not increase the design organic (equivalent population) treatment capacity of the wastewater treatment plant. The project will not add a new permanent discharge of stormwater or treated wastewater to surface waters or groundwater. Further, the project does not involve (create) serious local or environmental issues or meet any of the criteria that would result in denial of an Exclusion, nor does the project meet the definition of sewer extension.

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

Mr. Scott Murphy, Municipal Manager
Village of Ludlow
37 Depot Street,
Ludlow, VT 05149

telephone 802 228 2841
tmanager@tds.net

Celia Riechel
Vermont Department of Environmental Conservation
Water Investment Division
1 National Life Drive, Main 2
Montpelier, VT 05620-3510

telephone 802 477-2669
celia.riechel@vermont.gov

Hugo Martínez Cazón, P.E.
Vermont Department of Environmental Conservation
Water Investment Division
1 National Life Drive, Main 2
Montpelier, VT 05620-3510

tel. 802 522-5564
hugo.martinez.cazon@vermont.gov

(Note: National Life requires photo identification to obtain an access badge for entry.)

Wayne Elliott, P.E.
Aldrich and Elliott PC
6 Market Place, Suite 2
Essex Junction, Vermont 05452

tel. 802.879.7733 x103
welliott@aeengineers.com

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



Eric Blatt, P.E., Director of Engineering
Water Investment Division

12/24/2020

Date

Department of Environmental Conservation
Vermont Agency of Natural Resources



Vermont Department of Environmental Conservation

EC7 Water Investment Division

1 National Life Drive
Main Building, 2ND Floor
Montpelier, VT 05620-3510

Agency of Natural Resources

TO: Eric Blatt, P.E., Director of Engineering, Water Investment Division

A handwritten signature in blue ink, appearing to read "E. Blatt".

FROM:

Hugo Martínez Cazón, P.E.
Pollution Control Design Engineer
Clean Water State Revolving Fund
Water Investment Division

Celia Riechel
DWSRF Program Lead
Drinking Water State Revolving Fund
Water Investment Division

SUBJECT: Village of Ludlow
High Street Infrastructure Project

Evaluation of Eligibility for Categorical Exclusion
from Detailed Environmental Review

DATE: December 3, 2020

A. Project Identification

Project Name: High Street Infrastructure Project

Address:

Mr. Scott Murphy, Municipal Manager
Village of Ludlow
37 Depot Street,
Ludlow, VT 05149

telephone 802 228 2841
tmanager@tds.net

Project Location: High Street, approximately between Thompson Ave and Depot Street. Additionally, the Village is seeking to replace short segments and extend the existing stormwater collection system from Orchard Street to Depot Street. The project is located in the Black River watershed in the Village of Ludlow, Windsor County, Vermont

Vermont/ USEPA Clean Water State Revolving Loan Number (RF1-272 2.0)

Vermont/ USEPA Drinking Water State Revolving Loan Number (RF3-417)

Village of Ludlow
High Street Infrastructure Project
Evaluation of Eligibility for Categorical Exclusion from Detailed Environmental Review
December 3, 2020

B. Summary of Environmental Review

In accordance with section VII of the Department's "*Environmental Review Procedures for Projects Funded Through the Vermont/EPA State Revolving Loan Program*", the Village of Ludlow has requested that the proposed High Street Infrastructure Project be evaluated for eligibility for a Categorical Exclusion from the detailed environmental review that is described in the Procedures and required for projects with significant environmental effects.

The applicant's request and the following planning document have been reviewed, and our findings are summarized below:

Environmental Information Document (EID) signed September 22, 2020, by Aldrich and Elliott PC, of 6 Market Place, Suite 2, Essex Junction, Vermont 05452.

1. Project Description

The Village of Ludlow is located in Windsor County, Vermont.

The Village of Ludlow is seeking to replace the existing watermain and sewer collection system on High Street, approximately between Thompson Ave and Depot Street. Additionally, a need for additional infrastructure between Orion Ave and Orchard Street was identified, and the Village is seeking to replace short segments and extend the existing stormwater collection system from Orchard Street to Depot Street to tie into an existing drainage structure adjacent to the road.

Eligibility for clean water revolving loan (**CWSRF**) construction funding and drinking water revolving loan (**DWSRF**) funding will be limited to the eligible clean water work and drinking water work, as detailed in the Preliminary Engineering Report and to physical areas cleared through this environmental review process.

The contract documents will contain standard requirements to limit hours of construction and to control noise, dust and discharges of stormwater runoff or pollutants during construction.

2. Justification for Categorical Exclusion

We have determined that the proposed project meets the criteria for issuance of a Categorical Exclusion. Specifically:

- the project will not increase the design hydraulic capacity of the wastewater treatment plant by more than 20 percent, and it will not increase the design organic treatment capacity (equivalent population served) by more than 30 percent.
- the project will not create a new permanent discharge of stormwater or treated wastewater to surface waters or groundwater, and there will be no increase of effluent pollutant loadings (pounds per day) permitted to be discharged from associated wastewater treatment plant.

**Village of Ludlow
High Street Infrastructure Project
Evaluation of Eligibility for Categorical Exclusion from Detailed Environmental Review
December 3, 2020**

- the project will not expand drinking water capacity to serve more than 500 new users, or to an 30% increase in existing population
- the project will not require a new withdrawal of groundwater, or result in a 30% increase in groundwater or surface water withdrawal at existing site
- the project is not expected to adversely affect wetlands, wetlands buffer zones, floodplains, historic sites, archeological sites, habitats of threatened or endangered species, or other environmentally or culturally sensitive areas.
- the project does not involve serious local or environmental issues or meet any of the criteria that would result in denial of a Categorical Exclusion.