



Vermont Department of Environmental Conservation

Agency of Natural Resources

WATER INVESTMENT DIVISION
National Life Building, DAVIS 3
1 National Life Drive
Montpelier, VT 05620-3510

Daniel Tyler, Director of Public Works
Town of Brattleboro
211 Fairground Road
Brattleboro, Vermont 05301

2/16/2024
Expiration Date: 2/16/2029

Re: Phase 1 Water System Improvements – Signal Hill Pump Station, Black Mountain Pump Station Generator, and Bridge Street Water Main
Vermont/USEPA Drinking Water Revolving Loan Number RF3-480

Notice of Intent to Issue a Finding of No Significant Impact

Dear Mr. Tyler:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the Brattleboro Phase 1 Water System Improvements project.

The project has positive environmental impacts by correcting deficiencies identified in the 2021 Sanitary Survey and replacing aging infrastructure. The proposed project is the first phase of improvements at three sites within the existing public drinking water system that are owned and operated by the Town of Brattleboro. The environmental review will focus on phase 1 of the drinking water system improvements, specifically Site 1 – Signal Hill Pump Station, Site 2 – Bridge Street Water Main Replacement, and Site 3 – Black Mountain Pump Station Generator.

Wetland

Class III wetland and buffer have been identified within the project area of Site 1 – Signal Hill Pump Station. The Wetlands Program visited the undeveloped lot south of 401 Guilford Street on June 23, 2020, and #2020-394 Wetland Classification Report was completed. No State Wetland permit will be required for this project. Reevaluation of the wetland status on the property would be required on or after June 23, 2025.

Brownfield and Hazardous Sites

Brownfield sites (Site No. 20083846 – 4 Depot Street; Site No. 2008838345 and Site No. 20083836 – 26 Depot Street) and Hazardous Site (Site No. 770036 – Route 119/Bridge Street) have been identified within the Bridge Street Water Main Replacement project area. The property at Site No. 20083846 has soil and/or groundwater contamination. The property at Site No. 20083845 and Site No. 20083836 were enrolled in the Vermont BRELLA program. The soil is impacted by petroleum VOCs, PCE, PAHs, lead, and arsenic. The corrective action plan includes an engineered barrier at

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Phase 1 Water System Improvements
Finding of No Significant Impact – Signal Hill, Bridge Street, and Black Mountain
2/16/2024

26 Depot Street. The property at Site No. 770036 has deed restrictions along with coal tar contaminated soil and benzene and naphthalene contaminated groundwater. There is also the potential for urban background soils.

“*Linear Construction Projects Guidance Document*,” dated 3 January 2022 by the Waste Management and Prevention Division provides guidance for identification and management of constrained soils and groundwater potentially encountered during a linear construction project. Minimization of impacts to contaminated soil and groundwater will be considered during construction. Where disturbance within the known contamination zones is unavoidable, collaboration with Sites Management Section (SMS) will be sought and mitigation measures implemented within the design and provided in the special conditions. SMS must be notified immediately if additional contamination of soil and/or groundwater is found during construction. Mitigation measures need to be specific to the contamination determined and may include changes in pipe materials to prevent the migration of contaminants into the pipes and bentonite dams to prevent contamination plumes from moving freely along pipe bedding material. Additionally, a soils management plan will be required for wasted soil and a management plan for dewatering of contaminated groundwater.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review because the project is known or expected to affect directly or indirectly an environmentally important natural resources area, specifically, wetlands. The direct and indirect environmental effects of the project are not significant enough to necessitate 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 Finding of No Significant Impact. If no public comments received during that period demonstrate that this Notice of Intent is in error, then the FONSI will become effective.

Copies of documents supporting our FONSI are enclosed. Please keep copies of the enclosed documents, along with any pertinent reports by your consulting engineers, 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 contact me (802) 261-0288 (emily.hackett@vermont.gov) if you have questions or concerns.

Sincerely,

DocuSigned by:

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Emily Hackett, EI
Environmental Engineer
Water Investment Division

Daniel Tyler, Director of Public Works, Town of Brattleboro
Phase 1 Water System Improvements
Finding of No Significant Impact – Signal Hill, Bridge Street, and Black Mountain
2/16/2024

Enclosures

Documents Posted 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 of Engineering, Water Investment Division, enclosed)
2. Evaluation of Eligibility for Finding of No Significant Impact (Approved by Eric Blatt, P.E., Director of Engineering, Water Investment Division, enclosed.)
3. State Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program, <https://dec.vermont.gov/water-investment/water-financing/srf/environmental-review>

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

4. Environmental Information Document, “*Environmental Information Document and Environmental Report, Town of Brattleboro – Phase 1 Water System Improvements*,” and dated 11/8/2022, prepared by Chrsitina Haskins, PE, of Dufresne Group, and signed 11/9/2022 by Daniel Taylor, Town of Brattleboro Director of Public Works.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206424&DVID=0>
 5. Environmental Review Support Documents, Phase 1 Water System Improvements – Site 1, 2, and 3, note dated.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206425&DVID=0>
 6. Site 1 Design Plans, titled “*Signal Hill Pump Station Improvements, Brattleboro, Vermont – Permit Submittal*,” and dated 6/18/2021, stamped and signed by Christina Haskins, PE, of Dufresne Group.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206427&DVID=0>
 7. Site 2 Design Plans, titled “*Bridge Street Water Main Replacement, Brattleboro, Vermont – 90% Design Submittal*,” and dated 1/5/2022, stamped and signed by Christina Haskins, PE, of Dufresne Group.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206423&DVID=0>
 8. Site 3 Design Plans, titled “*Black Mountain Pump Station Improvements, Brattleboro, Vermont – Bid Documents*,” and dated 2/22/2022, stamped and signed by Sadegh M. Radvar, PE, of SMR Engineering, PC.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206426&DVID=0>
-

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Copy List

Rebecca Chalmers, Wetlands Program, VT-DEC-WMD
Lynda Provencher, Brownfields Program, VT-DEC-WMP
William Nickerson, Supervisor Engineering Section, VT-DEC-DWGPD
Stephanie Gile, District 2 Coordinator, Act 250 Program
Christina Haskins, P.E., President, Dufresne Group
Eric Blatt, P.E., Director for Engineering, VT-DEC-WID
Jeff Fehrs, P.E., Supervisor DCE Section, VT-DEC-WID
Amy Galford, DWSRF Project Developer, VT-DEC-WID



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National Life Building, DAVIS 3
1 National Life Drive
Montpelier, VT 05620-3510

Notice of Intent to Issue a Finding of No Significant Impact

Town of Brattleboro
Phase 1 Water System Improvements – Signal Hill Pump Station, Black Mountain Pump Station Generator, and Bridge Street Water Main

Vermont/USEPA Drinking Water Revolving Loan Number: RF3-480

In accordance with section VII of the Vermont Department of Environmental Conservation's *Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program*, the Department intends to issue a Finding of No Significant Impact (FONSI) for the proposed Brattleboro Phase 1 Water System Improvements Project. The proposed project is the first phase of improvements at three sites within the existing public drinking water system that are owned and operated by the Town of Brattleboro. The purpose of the project is to address deficiencies identified in the 2021 Sanitary Survey and replace aging infrastructure. The environmental review will focus on phase 1 of the drinking water system improvements, specifically Site 1 – Signal Hill Pump Station, Site 2 – Bridge Street Water main, and Site 3 – Black Mountain Pump Station Generator.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review. The project is known or expected to affect directly or indirectly an environmentally important natural resources area, specifically, wetlands. The direct and indirect environmental effects of the project are not significant enough to necessitate an Environmental Impact Statement (EIS), under the Department's environmental review procedures.

Consideration of the FONSI included a review of the following documents:

1. Environmental Information Document, "*Environmental Information Document and Environmental Report, Town of Brattleboro – Phase 1 Water System Improvements*," and dated 11/8/2022, prepared by Chrsitina Haskins, PE, of Dufresne Group, and signed 11/9/2022 by Daniel Taylor, Town of Brattleboro Director of Public Works.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206424&DVID=0>
2. Environmental Review Support Documents, Phase 1 Water System Improvements – Site 1, 2, and 3, note dated.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206425&DVID=0>

Daniel Tyler, Director of Public Works
Brattleboro Phase 1 Water System Improvements
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2/16/2024

3. Site 1 Design Plans, titled “*Signal Hill Pump Station Improvements, Brattleboro, Vermont – Permit Submittal*,” and dated 6/18/2021, stamped and signed by Christina Haskins, PE, of Dufresne Group.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206427&DVID=0>
4. Site 2 Design Plans, titled “*Bridge Street Water Main Replacement, Brattleboro, Vermont – 90% Design Submittal*,” and dated 1/5/2022, stamped and signed by Christina Haskins, PE, of Dufresne Group.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206423&DVID=0>
5. Site 3 Design Plans, titled “*Black Mountain Pump Station Improvements, Brattleboro, Vermont – Bid Documents*,” and dated 2/22/2022, stamped and signed by Sadegh M. Radvar, PE, of SMR Engineering, PC.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206426&DVID=0>

Further information on the project and this Notice of Intent is available for inspection at the following locations:

Daniel Tyler, Director of Public Works
Town of Brattleboro
211 Fairground Road
Brattleboro, Vermont 05301

tel. (802) 254-4255
dtyler@brattleboro.gov

Emily H. Hackett, EI
Vermont Department of Environmental Conservation
Water Investment Division
1 National Life Drive, Davis 3
Montpelier, VT 05620 3510

tel. (802) 261-0288
Emily.Hackett@Vermont.gov

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

Christina Haskins, PE
Dufresne Group
56 Main Street, Suite 200
Springfield, Vermont 05156

tel. (802) 768-8291
chaskins@dufresnegroup.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 a public response.

DocuSigned by:

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

2/16/2024

Date


Vermont Department of Environmental Conservation
Agency of Natural Resources

TO: Eric Blatt, P.E., Director of Engineering, Water Investment Division ^{DS} *EB*

FROM: Emily Hackett, EI, Environmental Engineer, Water Investment Division ^{DS} *EH*

SUBJECT: **Town of Brattleboro**
Phase 1 Water System Improvements
Environmental Assessment
Evaluation of eligibility for Finding of No Significant Impact

DATE: February 16, 2024

A. Project Identification:

Project Name: Phase 1 Water System Improvements – Signal Hill Pump Station, Black Mountain Pump Station Generator, and Bridge Street Water Main

Address: Daniel Tyler, Director of Public Works
 Town of Brattleboro
 211 Fairground Road
 Brattleboro, Vermont 05301

Project Location: Town of Brattleboro, Vermont

The proposed project is the first phase of improvements at three sites within the existing public drinking water system that are owned and operated by the Town of Brattleboro. The purpose of the project is to address deficiencies identified in the 2021 Sanitary Survey and replace aging infrastructure to help the Town of Brattleboro continue to provide safe drinking water for the community and non-residents.

Vermont/USEPA Clean Water Revolving Loan Number: **RF3-480**

B. Summary of Environmental Review

The Department of Environmental Conservation, Water Investment Division, has reviewed this proposed project in accordance with the Department's State Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program.

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Evaluation of Eligibility for Finding of No Significant Impact – Signal Hill, Bridge Street, and Black Mountain
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The Department has reviewed the following planning documents:

1. Environmental Information Document, “*Environmental Information Document and Environmental Report, Town of Brattleboro – Phase 1 Water System Improvements*,” and dated 11/8/2022, prepared by Chrstitina Haskins, PE, of Dufresne Group, and signed 11/9/2022 by Daniel Taylor, Town of Brattleboro Director of Public Works.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206424&DVID=0>
2. Environmental Review Support Documents, Phase 1 Water System Improvements – Site 1, 2, and 3, note dated. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206425&DVID=0>
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<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=206426&DVID=0>

A Finding of No Significant Impact (FONSI) is the appropriate environmental review response for this project if the issues presented can be resolved with mitigation or permits. This project is not eligible for Categorical Exclusion due to the project is known or expected to affect directly or indirectly an environmentally important natural resources area, specifically, wetlands. Also, the project’s direct and indirect environmental effects do not necessitate issuance of an Environmental Impact Statement (EIS), under the Department’s environmental review procedures.

1. Project Description

The Town of Brattleboro is in Windham County, Vermont in the Whetstone Brook and Connecticut River watershed. The Phase 1 Water System improvements project will include providing improvement to address deficiencies and replace aging infrastructure. The environmental review will focus on phase 1 of the drinking water system improvements, specifically Site 1 – Signal Hill Pump Station, Site 2 – Bridge Street Water main, and Site 3 – Black Mountain Pump Station Generator.

A brief description of each construction contract included in this environmental review follows:

- Site 1 – Signal Hill Pump Station Replacement

The location of the existing water booster pump station is 401 Guilford Street. The existing pump station was identified on the 2021 Sanitary Survey as a significant deficiency with 16 regulatory deficiencies. A new prefabricated booster pump station will be installed to serve existing and projected future demand, as well as fire protection. Approximately 950 linear-feet of water main replacement along Guilford Street and Hillcrest Terrace will be installed.

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- Site 2 – Bridge Street Water Main Replacement

The location of the water main replacement is Bridge Street between Main Street and Depot Street, Depot Street, and Vernon Street between Bridge Street and 28 Vernon Street. The existing water mains on Bridge Street, Depot Street, and Vernon Street are aging infrastructure and require replacement with new 8-inch water main as designated in the Preliminary Engineering Report dated 8/19/2022. Approximately 700-linear feet of water main on Bridge Street and Vernon Street will be installed, including one new fire hydrant. Approximately 350-linear feet of water main on Vernon Street will be installed, including resetting of one existing hydrant.

- Site 3 – Black Mountain Pump Station Generator

The location of the existing water booster pump station is east of 89 Wallace Way. The existing pump station was identified on the 2021 Sanitary Survey as a significant deficiency due to the lack of standby power. A new standby emergency generator with new conduit, wiring, transformer, and automatic transfer switch at the existing water booster pump station will be installed. The work will be completed within previously disturbed areas. Excavation for the conduit between the building and generator will be limited to a 3-foot maximum depth.

A summary of the environmental impacts identified during the environmental review follows:

Wetland

The Wetlands Program visited the undeveloped lot south of 401 Guilford Street on June 23, 2020, and #2020-394 Wetland Classification Report was completed. Class III wetland and buffer have been identified within the project area of Site 1. No State Wetland permit will be required for this project. Reevaluation of the wetland status on the property would be required on or after June 23, 2025.

Brownfield and Hazardous Sites

Brownfield sites (Site No. 20083846 – 4 Depot Street; Site No. 2008838345 and Site No. 20083836 – 26 Depot Street) and Hazardous Site (Site No. 770036 – Route 119/Bridge Street) have been identified within the Bridge Street Water Main Replacement project area. The property at Site No. 20083846 has soil and/or groundwater contamination. The property at Site No. 20083845 and Site No. 20083836 were enrolled in the Vermont BRELLA program. The soil is impacted by petroleum VOCs, PCE, PAHs, lead, and arsenic. The corrective action plan includes an engineered barrier at 26 Depot Street. The property at Site No. 770036 has deed restrictions along with coal tar contaminated soil and benzene and naphthalene contaminated groundwater. There is also the potential for urban background soils.

“*Linear Construction Projects Guidance Document*,” dated 3 January 2022 by the Waste Management and Prevention Division provides guidance for identification and management of constrained soils and groundwater potentially encountered during a linear construction project. Minimization of impacts to contaminated soil and groundwater will be considered during construction. Where disturbance within the known contamination zones is unavoidable, collaboration with Sites Management Section (SMS) will be sought and mitigation measures implemented within the design and provided in the special conditions. SMS must be notified immediately if additional contamination of soil and/or groundwater is found during construction. Mitigation measures need to be specific to the contamination determined and may include changes in pipe materials to prevent the migration of contaminants into the pipes and

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bentonite dams to prevent contamination plumes from moving freely along pipe bedding material. Additionally, a soils management plan will be required for wasted soil and a management plan for dewatering of contaminated groundwater.

This work is expected to be constructed with Drinking Water State Revolving Fund (DWSRF) loan. Eligibility for Drinking Water State Revolving Fund (DWSRF) construction loans will be limited to the eligible 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 Finding of No Significant Impact

We have determined that the proposed project meets the criteria for issuance of a Finding of No Significant Impact. This project is known or is expected to affect directly or indirectly an environmentally important natural resources area, specifically, wetlands. The direct and indirect environmental effects of the project are not significant enough to necessitate an Environmental Impact Statement (EIS), under the Department's environmental review procedures.

A public hearing was held on December 5, 2023, at 6:00 p.m. at the Selectboard Meeting Room at the Municipal Center and online as part of this FONSI process. The meeting minutes are available on the Town of Brattleboro's website.
