



**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

Ted Gillen, Assistant City Engineer  
Authorized Representative  
City of Rutland  
PO Box 969  
Rutland City, VT 05702

3/12/2025  
Expiration Date: 3/12/2030

**Re: City of Rutland, Connor Park Offline Storage Project  
Vermont/ USEPA Clean Water Revolving Loan Number RF1-334**

**Notice of Intent to Issue a Finding of No Significant Impact**

Dear Mr. Gillen:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the Connor Park Offline Storage Project.

The project has positive environmental impacts consisting of abatement of the incidence of combined sewer overflow events by providing off-line storage in the combined sewer system. The additional storage capacity will prevent the collection system from becoming overwhelmed during wet weather events and as a result there will be fewer overflows into the receiving water.

This project additionally involves impacts to the 100-year floodplain during construction of the subsurface storage tanks. These impacts will be mitigated by erosion control measures during construction and returning the impacted area to the vegetated condition at its present pre-construction elevation.

Otherwise, this project may have been eligible for Categorical Exclusion from detailed environmental review; additionally, the direct and indirect environmental effects of the project are still not significant enough to necessitate an Environmental Impact Statement (EIS).

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 Finding of No Significant Impact will become effective.

**Ted Gillen, Authorized Representative, City of Rutland**  
**Connor Park Storage**  
**Finding of No Significant Impact**  
**3/12/2025**

Copies of documents supporting a Finding of No Significant Impact 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 call, (802) 490-8019 or e-mail [william.wilson@vermont.gov](mailto:william.wilson@vermont.gov), if you have any questions or concerns.

Sincerely,



Winn Wilson  
Environmental Engineer  
Water Investment Division

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

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

4. Environmental Information Document titled "*Environmental Report and Environmental Information Document*", and dated 8/30/2024 by Michael Mainer, PE, of Aldrich + Elliott. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=212359&DVID=0>
5. Preliminary Engineering Report entitled "*CSO Long Term Control Plan Connor Park CSO Storage Addendum Report*", and dated April 2024, by Michael Mainer, PE, Aldrich + Elliott of Essex Junction, VT. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=212360&DVID=0>

**Ted Gillen, Authorized Representative, City of Rutland**  
**Connor Park Storage**  
**Finding of No Significant Impact**  
**3/12/2025**

**COPY LIST**

**Aaron Krymkowski**, Wastewater Program, VT-DEC  
**Scott Dillon**, Division for Historic Preservation, ACCD  
**Michael Mainer, PE**, Aldrich + Elliott  
**Jeff Fehrs**, Supervisor, Design & Construction Engineering Section, WID



Vermont Department of Environmental Conservation

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Department of Environmental Conservation  
Water Investment Division  
1 National Life Drive, Davis 3  
Montpelier, VT 05620

Notice of Intent to Issue a Finding of No Significant Impact

**City of Rutland  
Connor Park Offline Storage Project**

Vermont/ USEPA Clean Water Revolving Loan Number: RF1-334

In accordance with section VII of the Department's *"Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program"*, the Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the proposed Connor Park Offline Storage Project. This project involves the construction of a 750,000 gallon underground offline storage tank at Connor Park, adjacent to East Creek. This storage tank will be used to collect excess flow from the combined sewer system during storm events to prevent overflows from discharging to surface water. The stored combined wastewater will then be pumped back into the sewer collection system once flows within the system have post-storm flow capacity.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review. The project involves impacts to the 100-year floodplain and therefore exceeds the threshold for CATEX.

Also, 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 project will not increase the current permitted flow capacity of the treatment plant, and the project will not include sewer extensions.

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

- **Environmental Information Document (EID)** signed 8/30/2024 by Michael Mainer, PE, of Aldrich + Elliott of Essex Junction, VT.

**City of Rutland  
Connor Park Storage Project  
Notice of Intent to Issue a Finding of No Significant Impact  
3/12/2025**

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

Ted Gillen, Assistant City Engineer  
City of Rutland  
PO Box 969  
Rutland City, VT 05702

tel. (802) 773-1813  
tedg@rutlandcity.org

Winn Wilson  
Vermont Department of Environmental Conservation  
Water Investment Division  
1 National Life Drive, Davis 3  
Montpelier, VT 05620-3510

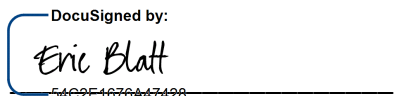
tel. (802) 490-8019  
william.wilson@vermont.gov

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

Michael Mainer, PE  
Aldrich + Elliott  
6 Market Place, Suite 2  
Essex Junction, VT 05452

tel. (802) 879-7733  
mmainer@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.

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

3/12/2025

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Date

Department of Environmental Conservation  
Vermont Agency of Natural Resources



Vermont Department of Environmental Conservation

*Agency of Natural Resources*

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

FROM: Winn Wilson,  
Environmental Engineer, Water Investment Division

SUBJECT: City of Rutland  
Connor Park Offline Storage Project  
**Environmental Assessment**  
**evaluation of eligibility for Finding of No Significant Impact**

DATE: 3/12/2025

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A. Project Identification

Project Name: City of Rutland  
Connor Park Offline Storage Project

Address: Ted Gillen, Authorized Representative  
City of Rutland  
PO Box 969  
Rutland City, VT 05702

Project Location: Rutland, Vermont  
The project will construct a subsurface storage tank below Connor Park along Meadow Street in Rutland, Vermont. The project will take place in the Otter Creek Watershed.

Vermont/ USEPA Clean Water Revolving Loan Number: **RF1-334**

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**Ted Gillen, Authorized Representative, City of Rutland**  
**Evaluation of Eligibility for Finding of No Significant Impact**  
**Connor Park Storage**  
**Vermont/ USEPA Clean Water Loan Number RF1-334**  
**3/12/2025**

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.

The Department has reviewed the following planning documents:

- Environmental Information Document titled “*Environmental Report and Environmental Information Document*”, and dated 8/30/2024 by Michael Mainer, PE, of Aldrich + Elliott.
- Preliminary Engineering Report entitled “*CSO Long Term Control Plan Connor Park CSO Storage Addendum Report*”, and dated April 2024, by Michael Mainer, PE, Aldrich + Elliott of Essex Junction, VT.

A Finding of No Significant Impact (FNSI) 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 from detailed environmental review due to potential impacts to the 100-year floodplain. Also, the project’s direct and indirect environmental effects do not necessitate issuance of an Environmental Impact Statement (EIS), consistent with the criteria as described in section XI of the Department’s environmental review procedures.

1. Project Description

The City of Rutland is located in Rutland County, Vermont in the Otter Creek Watershed.

The proposed project will install a new underground 750,000-gallon combined sewer storage tank in Connor Park in Rutland, Vermont. The city of Rutland employs a combined sewer system (CSS) which includes several remaining overflow locations. For some larger wet weather events, excessive runoff entering the CSS can overwhelm the system. To relieve this and prevent backflow into structures the system includes overflow locations which discharge to surface water. This results in combined sewer/stormwater entering a local waterway which can pose a direct negative impact to public health and environmental concerns for the region. The project will improve sanitary health, and environmental conditions of the receiving water by reducing the frequency and volume of combined sewer overflows by storing the excess flow until the combined system has capacity to convey the stored volume back to the wastewater treatment facility.

This work is expected to be constructed with Clean Water State Revolving Fund (CWSRF) loan.

**Ted Gillen, Authorized Representative, City of Rutland**  
**Evaluation of Eligibility for Finding of No Significant Impact**  
**Connor Park Storage**  
**Vermont/ USEPA Clean Water Loan Number RF1-334**  
**3/12/2025**

Eligibility for clean water revolving loan (CWSRF) construction funding will be limited to the eligible clean 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 involves impacts to the 100-year floodplain during construction of the subsurface storage tanks. These impacts will be mitigated by erosion control measures during construction and returning the impacted area to the vegetated condition at its present pre-construction elevation.

Otherwise, this project may have been eligible for Categorical Exclusion from detailed environmental review; additionally, the direct and indirect environmental effects of the project are still not significant enough to necessitate an Environmental Impact Statement (EIS).

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 does not include sewer extensions.

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.

A public hearing will be held during the public comment period at a duly warned public meeting as part of this FNSI process and any substantive public comments received will be addressed prior to issuing a final decision.