



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

Martin Manahan, Public Works Director
Authorized Representative
City of St. Albans
100 North Main St.
St. Albans, VT 05478

3/14/2025
Expiration Date: 3/14/2030

**Re: Houghton Park CSO Off-Line Storage Project
Vermont/ USEPA Clean Water Revolving Loan Number RF1-324**

Notice of Intent to Issue a Finding of No Significant Impact

Dear Mr. Manahan:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the Houghton Park CSO Off-Line 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 stream buffer to replace the existing overflow outlet at an elevation to accommodate the storage location as well as a soil management plan for proper handling and disposal of contaminated soil. These impacts will be managed by complying with local zoning requirements for the buffer impacts and following the soils management plan to be reviewed by the Vermont Department of Environmental Conservation Sites Management Section.

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

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Houghton Park CSO Off-Line Storage Project
Finding of No Significant Impact
3/14/2025

received during that period demonstrate that this Notice of Intent is in error, then the Finding of No Significant Impact will become effective.

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, 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 9/23/2024, by Wayne Elliott, PE, Aldrich + Elliott. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=212346&DVID=0>

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5. Preliminary Engineering Report (PER) titled "*CSO Offline Storage Tank Study*", dated March 2024 and last revised October 2024, by Wayne Elliott, PE of Aldrich + Elliott, PC.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=210787&DVID=0>

COPY LIST

Jason Booth, PE, Aldrich + Elliott

John Merrifield, VT-DEC, Watershed Management Division, Wastewater Program

Scott Dillon, Division for Historic Preservation, ACCD

Chip Sawyer, St. Albans, Director of Planning & Development



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 St. Albans
Houghton Park CSO Off-Line Storage Project**

Vermont/ USEPA Clean Water Revolving Loan Number: RF1-324

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 Houghton Park CSO Off-Line Storage Project. This project involves the construction of a 500,000 gallon underground offline storage tank at Houghton Park, adjacent to Stevens Brook. 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 Stevens Brook stream buffer to install the overflow outlet in a new location from the existing outlet as well as inclusion of a soils management plan for handling of contaminated soil 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 9/23/2024, by Wayne Elliott, PE, of Aldrich + Elliott of Essex Junction, VT.

**City of St. Albans
Houghton Park CSO Off-Line Storage Project
Notice of Intent to Issue a Finding of No Significant Impact
3/14/2025**

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

Martin Manahan, Public Works Director
City of St. Albans
100 North Main St.
St. Albans, VT 05478

tel. (802) 879-7733
m.manahan@stalbansvt.com

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.)

Jason Booth, PE
Aldrich + Elliott
6 Market Place, Suite 2
Essex Junction, VT 05452

tel. (802) 879-7733
jbooth@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:

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

3/14/2025

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 St. Albans
Houghton Park CSO Off-Line Storage Project
Environmental Assessment
evaluation of eligibility for Finding of No Significant Impact

DATE: 3/14/2025

A. Project Identification

Project Name: City of St. Albans
Houghton Park CSO Off-Line Storage Project

Address: Martin Manahan, Public Works Director
City of St. Albans
100 North Main St.
St. Albans, VT 05478

Project Location: City of St. Albans, Vermont
The project will install a 500,000 gallon subsurface combined sewer storage tank in Houghton Park along Lower Welden Street. This project will take place in the St. Albans Bay watershed of Lake Champlain.

Vermont/ USEPA Clean Water Revolving Loan Number: **RF1-324**

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Evaluation of Eligibility for Finding of No Significant Impact
Houghton Park CSO Off-Line Storage Project
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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 9/23/2024, by Wayne Elliott, PE, Aldrich + Elliott.
- Preliminary Engineering Report (PER) titled “*CSO Offline Storage Tank Study*”, dated March 2024 and last revised October 2024, by Wayne Elliott, PE of Aldrich + Elliott, PC.

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 stream buffer and potential management of contaminated soil. 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 is located in Franklin County, Vermont in the St. Albans Bay watershed of Lake Champlain.

The proposed project will install a new underground 500,000-gallon combined sewer storage tank in Houghton Park in St. Albans, Vermont. The city of St Albans employs an older combined sewer system (CSS) which includes one combined sewer overflow (CSO's). For some larger wet weather events, excessive runoff entering the CSS can overwhelm the system. To relieve this, the CSOs redirect excess sewage into a nearby stream, Stevens Brook. 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 St. Albans CSS to Stevens Brook 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.

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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. The project will also abide by the soils management plan included in the project specifications.

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 stream buffer to replace the existing overflow outlet structure. These impacts will be mitigated by compliance with local zoning permit requirements. Additionally, contaminated soil found on the site will be managed in accordance with a soil management plan approved by the Sites Management Section of the Vermont Department of Environmental Conservation.

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.