<u>Attachment 1. CATEX Eligibility and/or Extraordinary Circumstances Statement(s)</u>

Waterline Replacement Project, Town of Troy, VT

III. A & III. B. The Project will replace approximately 1,500 linear feet of 6-inch ductile iron water main with 8-inch PVC watermain primary using open-cut construction. The Project will also replace 17 service connections along the watermain up to the right-of-way and replace the existing curb stops. The watermain to be replaced begins at the junction of VT-101 and S. Pleasant Street and extends along S. Pleasant Street to the town line with Westfield at 258 S Pleasant Street. The Project involves minor expansion of an existing water main from 6-inch to 8-inch diameter pipe.

The Project will not involve new or relocated discharges to surface or groundwater, result in the substantial increase in the volume or the loading of pollutants to receiving water, provide capacity to serve a population of 30 percent greater than the existing population, or upgrade or extend infrastructure systems primarily for the purpose of future development.

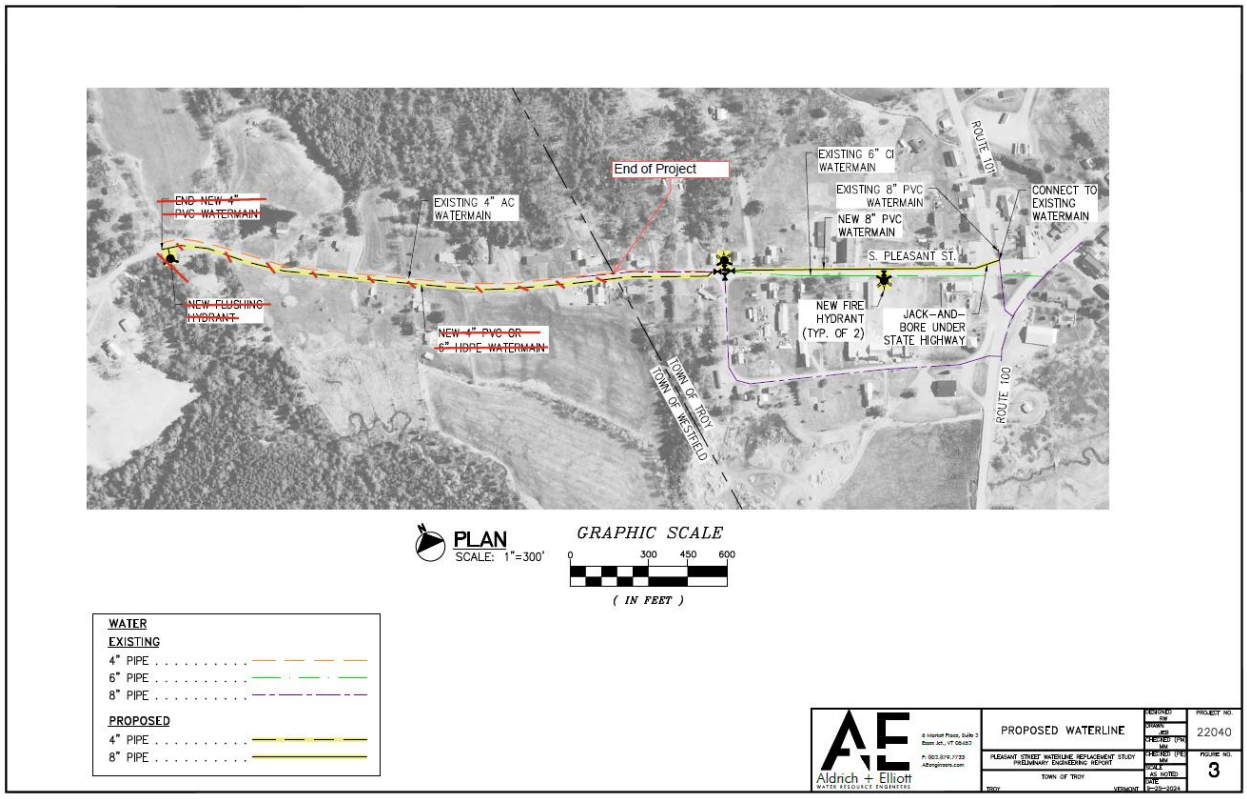

Figure 1: Waterline Replacement Project Area

Summary of previous environmental reviews. The Project has been evaluated in a Vermont State Environmental Review Procedure for the DWSRF Loan Program review in February 2026. The Project has not been evaluated in any previous National Environmental Policy Act Reviews.

IV. A. 2. Construction activities will generate minor noise, emissions, and traffic; however, construction-related effects will be minor, temporary, and localized. The Project will follow all relevant local and state regulations during construction (e.g., those relating to dust suppression and noise control). Project

implementation will result in an overall long-term benefit to communities by mitigating leaks and breaks, increasing fire flow capability, and potentially removing lead service lines.

IV. A. 3. An Unofficial IPaC Species List (dated July 6, 2026) indicates that one species proposed for listing has the potential to occur in the vicinity of the Project Area, and no critical habitat is present within the Project Area. However, the Project will occur within the existing right-of-way, mostly within paved roads, and will not involve tree removal. Therefore, the Project is not likely to jeopardize the continued existence of species proposed for listing.

IV. A. 4. The Town of Troy has led the consultation with the Vermont Division for Historic Preservation under Section 106 of NHPA. An archaeological resource assessment (dated December 5, 2025) was conducted by Crown Consulting Archaeology on behalf of the Town of Troy and included a desktop review and field inspection. The results of the assessment identified no archaeological resources within the Area of Potential Effects. A historic preservation project review form was submitted to the Vermont SHPO on January 14, 2026. The Vermont SHPO responded with a finding of no historic properties affected on January 14, 2026.

IV. A. 5. The Project Area includes qualifying farmland: prime farmland and farmland of statewide importance. However, the Project is a corridor subsurface project. A soil disturbance/removal and reconstruction plan for all work within qualifying farmland will be implemented. Therefore, the Project will not impact any significant agricultural lands.

The Project is not expected to affect aquifer recharge zones, coastal zones, barrier islands, wild and scenic rivers, significant fish or wildlife habitat, wetlands, or floodplains.

IV. A. 6. The Project is not located in a nonattainment or maintenance area for any Clean Air Act criteria pollutants. The Project will result in a temporary, minor increase in construction-related emissions. Because the Project will not install any new emissions units, no long-term changes in air pollution will occur as a result of this Project.

IV. A. 7. The Project will not result in any changes to facility footprints, land use, or population. The Project will take place in a previously developed area.