



Water Investment Division

Environmental Information Document and Environmental Report

Project Name Westford Community Wastewater Disposal System
Address Westford, Vermont 05494
Project Location Westford Town Center, Vermont

Drinking Water System Name n/a WSID No. n/a
State Assigned Drinking Water Revolving Loan (DWSRF) Number RF3- n/a

Wastewater and/or Stormwater System Name Westford Community Wastewater Disposal System
List Existing Permit Numbers:

State Assigned Clean Water Revolving Loan (CWSRF) Number RF1-267-1.0

All Projects: USEPA Grant (STAG) Number N/A
Federal Fiscal Years (s) of USEPA Grant Appropriation

I.) Please provide below a brief description of the project including the purpose and need as detailed in the Preliminary Engineering Report.

Purpose and Need:

The Westford Town Center area has clay soils, significant ledge, and a high-water table, making the soils generally unsuitable for wastewater disposal systems. The area around the Town Common, and the Village generally, is the heart of the Town's civic infrastructure. Without community wastewater capacity, small lot sizes and challenging soil and groundwater conditions severely limit the Village (this PER's and EID's Project Area) in terms of supporting both present and desired future uses.

Since the 2007-8 alternatives study, this area's needs related to health, sanitation, and aging infrastructure have become clearer and more urgent. The septic system serving the Town office and library is about 50 years old. The library's septic tank was replaced in 2016, after it collapsed; leakage from the tank had contaminated the water supply shared by the Town Office and library. The shared leach field sits under the parking lot for the Town office and is at the end of its useful life. If this system fails, there is no option or location for an alternate system. It was recently discovered that the septic tank for the 1705 VT Route 128 property, located east of the Town office, also uses the same leach field as the Town office and library. The septic system for the Brick Meeting House is also compromised and nearing the end of its useful life. The Westford Common Hall has only a holding tank, no leach field or disposal area. The tank needs to be pumped regularly. The Westford Common Hall recently spent several thousand dollars repairing the line that runs from the Hall to the holding tank.

At the very least, the Town must find solutions for its public buildings and civic meeting spaces. The lack of wastewater capacity is limiting commercial development in the village. If the Town concentrates on only finding solutions to the wastewater challenges facing the Town's public structures, a dearth of capacity will still exist for other properties in and around the village. This will prevent significant redevelopment of the village, including the development of any small-scale business or affordable housing. If the Town can develop a community wastewater system, it will eliminate the biggest barrier

to the future revitalization and redevelopment of the Town Center.

See Section 3 of the attached EID for further detail.

Proposed Project:

The service area for the proposed community wastewater collection, treatment, and disposal system is limited to the Common Zoning District and a small portion of the Village Zoning District, and more specifically to the Designated Village and Neighborhood Development Area portion of the Common Zoning District and the route of the collection system along Brookside Road to the wastewater disposal system (EID Figure 2 – alternative 4 collection system plan and alternative 5 disposal system plan). The system is designed for a minimum design flow of 24,300 gallons/day. The primary treatment and collection system includes septic tanks at each service connection, with septic tank effluent pump conveyance to a pump station located near the Town Office (formerly anticipated near the west end of the Town Common). From the pump station, a force main conveys effluent to the community wastewater disposal site at the Maple Shade Town Forest where it will be dispersed into subsurface drip disposal zones. See Section 4 of the EID for further detail.

The level of detail and the amount of information provided in this environmental report should be commensurate with the magnitude of construction activities and their potential impact on environmental and historical resources. If, for example, a project is likely to have no or very minimal effects, the project representative needs to formally request a Categorical Exclusion in Section V, make simple statements in the spaces provided in Section VI, and attach any additional information like a qualified consultant assessment or determination letters, permits from regulatory authorities, and mapping when available. Projects limited to the existing footprint of a building (e.g., a UV disinfection project) will not generally need to submit an environmental report at all (not applicable to USDA funding).

A more involved and complex project will go through the same review checklist but there will need to be more analysis, explanation, and documentation provided before SRF staff can issue a Categorical Exclusion or a Finding of No Significant Impact (FNSI). Please note that if the project does not meet the Categorical Exclusion criteria mentioned in VII.d.1 of the DWSRF State Environmental Review Process and/or Section VIII of the SRF Environmental Review Procedures, the authorized project representative shall describe the consequences of a specific activity on a specific resource and establish and discuss any mitigation measure(s) necessary to avoid or minimize any adverse impacts to an environmental or historical resource (see Section VII of this report).

Even though applicants are required to integrate and consider environmental and historical values during a proposed project's planning and design, it is the responsibility of SRF review staff to independently evaluate and verify accuracy of information supplied in this environmental report. The SRF staff takes final responsibility for the scope and content of this environmental report. In order to expedite the application process and SRF review and approval of a proposed project, applicants are strongly encouraged to consult early and frequently with our staff to ensure that all environmental issues are described, evaluated, and impacts appropriately considered and mitigated. If a determination is made that an Environmental Assessment or an Environmental Impact Statement is required, the SRF staff will be responsible for initiating the preparation of this document internally or by a third party.

Through a memorandum of understanding between United States Department of Agriculture-Rural Development and the Vermont Agency of Natural Resources, this environmental report format is acceptable to both funding agencies. However, please note that Categorical Exclusion eligibility, public comment, and public notice requirements may differ among the funding agencies.

II.) Drinking Water Projects: Will the project expand capacity to serve more than 500 additional users or a 30% increase in the existing population, whichever is greater? Yes No

Wastewater projects: Will the project increase hydraulic (flow) treatment capacity by more than 20%, or increase influent 5-day biochemical oxygen demand (BOD5) organic treatment capacity by more than 30% ? YES NO Provide a capacity statement with a chart indicating the existing and proposed hydraulic and organic capacities and indicate the percent change. If there are differences in the permitted vs. physical capacities, include all capacity information.

III.) All projects: Will the project take place in an area designated by the Environmental Protection Agency as a Sole Source Aquifer? YES NO

IV.) Drinking water projects: Does the project call for a new withdrawal of groundwater or surface water? YES NO

Wastewater or stormwater projects: Does the project include a new discharge to surface water or groundwater? YES NO

V.) DRINKING WATER PROJECTS: Will the project result in a 30% increase in groundwater or surface water withdrawal at an existing site? YES NO

VI.) Do you believe your project qualifies for a Categorical Exclusion in accordance with the Environmental Review Procedures for projects funded through the Vermont/EPA Drinking Water Revolving Loan Program and/or the Vermont/EPA Clean Water Revolving Loan Program, based on the following environmental information and documentation? YES NO

If yes, please fill out only Section VII below. If no, you must fill out Sections VII and VIII for all affected environmental and historical considerations (essentially if you answer "yes" in Section VII you will need to follow-up with mitigation measures or an alternative action plan in Section VIII).

VII.) Environmental Resource and Archeological Checklist

<u>Considerations</u>	<u>Yes or No</u>	<u>*Basis for Determination and Documentation</u>
<p><u>A.) Air Quality:</u> Will there be any changes to air quality: emissions, noise, dust, odor, etc? Is an Air Pollution Control Permit required? Is your digester unequipped and operated without a flare? Other than the digester flare noted above, are there any other combustion devices at your facility, including but not limited to: stationary internal combustion engines such as diesel generators/ pumps, boilers or space heaters greater than 3 million BTU, or combustion turbines and/or boilers?</p> <p>Note: Emergency generators/pumps are only subject to limited requirements provided they are used strictly for emergency purposes (includes limited emergency demand response programs) and do not participate in peak shaving programs.</p>	No	EID Section 4.4 and Section 5: Nuisance dust, noise, and exhaust from construction vehicles will be controlled during construction. Odors, if any occur during system operation, will be controlled with appropriate BMPs.
<u>B.) Water Quality and Quantity: Will</u>	No	The proposed project will be permitted as a

there be negative direct impacts to water quality or quantity?		<p>“System with New Indirect Discharge to Class B water” under the Indirect Discharge Rules and has a preliminary capacity determination for the design flow of 24,300 gpd from the VT DEC.</p> <p>Decommissioning of existing wastewater disposal systems in the Project Area will reduce nutrient and pathogen loading to the Browns River.</p> <p>Construction-related impacts to surface waters in the Project Area will be minimized through proper implementation of erosion prevention and sediment control practices.</p> <p>Known hazardous sites, urban soil background conditions, and related recognized environmental conditions will be avoided or effects will be mitigated during construction.</p> <p>See EID Section 4.5 for more detail.</p>
C.) <u>Wetlands/Water Resources</u> : Will there be construction in Class II or III wetlands?	No	No wetlands or wetland buffers will be disturbed by the project, see EID Section 4.6.1 and Appendix B.
D.) <u>Floodplains, Floodways and Fluvial Erosion Hazard Zones</u> (Flood Hazard Areas): Will the project involve construction in a 500 or 100 year floodplain, floodway or fluvial erosion hazard zone, or impact floodplain development?	No	The project construction limits avoid the Browns River, its floodplain, and associated flood hazard areas including the 500 year floodplain with 2 ft. freeboard (elevation 444'). See EID Section 4.6.1 and Figure 3.
E.) <u>Stream Alterations</u> : Will the project involve construction in a stream?	No	The project will not involve construction in a stream. See EID Section 4.6.4 and Figure 3.
F.) <u>Stream Crossings</u> : Will the project involve directional drilling under a stream and/or an aerial crossing over a stream?	No	No stream crossing or directional boring to cross streams is expected. See EID Section 4.6.4 for more detail.
G.) <u>Dam Safety</u> : Does the project involves impoundment of more than 500,000 CF of water?	No	No impoundments are proposed.
H.) <u>Endangered Species</u> : Is the project likely to adversely affect an endangered or threatened species?	No	No threatened or endangered species identified through USFWS or VT DEC Fish and Wildlife consultation. See EID Section 4.9 and Appendix D for results of USFWS determination.
I.) Fish and Wildlife Coordination Act of 1934.	N/A	Not applicable to this project
J.) Magnuson–Stevens Fishery Conservation and Management: Will the	N/A	<i>Vermont does not have Exclusive Economic Zones.</i>

project affect coastal fishing?		
K.) <u>Migratory Bird Treaty Act</u> : Will the project affect migratory birds?	N/A	Not applicable to this project. If ground nesting birds are encountered a specialist will be retained and the construction schedule may be adjusted to avoid nesting season. See EID Section 4.6.3.
L.) <u>Historic Preservation</u> : Will the project adversely affect cultural resources such as archeological or historic sites and/or National Landmark?	No	The project will be designed to avoid areas identified as having potential archaeological significance. Phase 1B archaeological investigations will be conducted at the north end of the disposal field and if disturbance cannot be otherwise avoided along the collection system route. See EID Section 4.8 and Appendix E.
M.) <u>Wild and Scenic Recreational Rivers</u> : Is the project within a quarter-mile of a river on the National Park Service's Nationwide Rivers Inventory? Will the project impact a wild, scenic or recreational river area and create conditions inconsistent with the character of the river?	No	The Browns River is not listed on the Nationwide Rivers Inventory (NRI). See EID Section 4.10 for more detail.
N.) <u>Public Lands</u> : Will the project adversely impact formally-classified local, state, and federal lands (e.g., parks, natural areas, wildlife management areas, and wilderness areas)?	No	The project will not impact present uses of the Town Common or the open field that will host the disposal field at the Maple Shade Town Forest. See EID Section 4.7.
O.) <u>Farmland</u> : Will the project convert Agricultural Soils to non-agricultural uses?	No	The project will not convert agricultural soils to non-agricultural use. The proposed design minimizes disturbance of areas mapped as prime agricultural soil. Slight modifications to the proposed force main route or disposal field limits during final design may eliminate disturbance of these soils. Temporary disturbance of any prime agricultural soils for construction of the project would not prevent future agricultural use. See EID Section 4.6.2.
P.) <u>NEPA</u> : Is there a controversy with respect to environmental effects of the project based on reasonable and substantial issues?	No	The project has no environmental impacts and will result in net improvement to groundwater and surface water quality as failed onsite systems are replaced with the community wastewater system.
Q.) <u>NEPA</u> : Is the project significantly greater in scope than normal projects for the area?	No	The project is tailored to the Town's current and future goals for its village, and is entirely consistent with the scope and scale of normal projects for the area. See EID Sections 2 and 3.
R.) <u>NEPA</u> : Does the project have significant unusual characteristics?	No	The project is responsive to current and future wastewater treatment and disposal needs for the State-designated Neighborhood Development Area, and uses best-available and widely accepted collection, treatment, and

		disposal systems for wastewater management. See EID Sections 2, 3, and 4.
S.) <u>NEPA</u> : Does the project establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (cumulative impact based on current information)?	No	This project does not present any precedent toward future actions with potentially significant environmental impacts.
T.) <u>NEPA</u> : Does the project have significant adverse direct or indirect effects on parkland, other public lands, or areas of recognized scenic or recreational value?	No	The project will, at minimum, maintain the functions and appearance of, and public access for recreation to, the Town Common and the Maple Shade Town Forest. See EID Section 4.
U.) <u>Population</u> : Will the project provide new drinking water facilities to serve populations of over 2000 persons, and/or wastewater or stormwater facilities in communities of over 10,000 persons?	No	The entire Town of Westford's population is ~2,000 residents, and the population in the Project Area is substantially smaller. See EID Section 2.2 for more detail.
V.) <u>Socio-economics</u> : Is the project known or expected to have a significant negative effect on the quality of the human environment? Is there potential for significant changes to the socio-economic make-up of the area? Is the project cost-effective?	No Yes, cost-effective	The project will have a significant positive impact on the quality of the human environment. See <i>Preliminary Engineering Report</i> and see EID Sections 3 and 4.7.
W.) <u>Land Use</u> : Is additional Land Use and Development Act (Act 250) review and approval necessary?	No	See EID Section 4.11 and Appendix F.
X.) <u>Growth</u> : Does the project contribute to growth outside of designated growth centers?	No	The project is located within and is proposed to serve a designated Neighborhood Development Area. See EID Sections 2.2, 3, and Appendix F.
Y.) <u>Cumulative Impacts</u> : Will the project cause other significant environmental impacts, including secondary impacts?	No	The project will have no significant environmental impacts or secondary impacts. See EID Sections 4 and 5.

VIII.) Mitigation Measures and/or Alternative Plans of Action (if applicable, in order to minimize adverse effects) Explain how mitigation measures will be achieved and monitored (Special Grant Condition or review of Plans and Specifications). Remember to consider structural and non-structural methods.

<u>Affected Environmental or Archeological Resources</u>	<u>Mitigation Measures or Alternative Plan of Action</u>
A.) See EID Section 5 for affected resources and mitigation measures.	
B.)	
C.)	
D.)	

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10/05/2022

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Prepared By

Date

Title

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10/7/22

Town Planner

Reviewed By

Date

Authorized Representative

***Basis for Determination and Documentation**

The basis for determination and documentation information must be traceable and establish the factual data to support the response to each question. Any environmental concerns that are raised by federal, state, or local agencies or the public must be addressed as completely as possible and resolved before the environmental report will be considered complete. All supporting documentation (e.g., correspondence and exhibits) should be attached and easily cross-referenced back into the main body of the environmental report. Types of information to be included in this column are outlined below.

1. **FIELD OBSERVATION:** A site visit that does not usually involve any testing or measurements. FIELD OBSERVATION is an important method for initial screening of the issues, but for some of the categories it may be inadequate for final evaluation. Support documentation should include date of the site visit and by whom.
2. **PERSONAL CONTACT:** Personal contacts are useful when the individual contacted is an accepted authority on the subject(s) and the interview is documented. Supporting documentation should include the name, organization, and title of the person contacted and the date of the conversation. *Copies of written site inspection reports and determinations by regulatory authorities on applicability of regulations and permit requirements should be attached.*
3. **PRINTED MATERIALS:** These are useful sources of detailed information, materials such as comprehensive land use plans, maps, statistical surveys, and studies. Information must be current, i.e., not so old that changing conditions make them irrelevant and must represent accepted methodologies. Citations for the material should include enough information so that an outside reviewer can locate the specific reference.
4. **SPECIAL STUDY:** This is a study conducted for an individual factor or resource, and should be performed by a qualified person using accepted methodologies. Some tests are relatively simple to perform but others may require elaborate equipment or personnel with additional expertise. The preparer is responsible for obtaining assistance from others in order to have the appropriate test or studies conducted. Copy of the study must be appended or referenced as for Printed Materials.
5. **CONTRIBUTOR EXPERIENCE:** The professional judgment of the persons contributing to this environmental report can be useful provided their expertise is relevant. The contributor may have previous knowledge from familiarity with the area, or may have professional background to make judgments about a specific factor. Provide information of the person's qualification in addition to name, organization and position.