



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

Melissa Manka, Planning Coordinator & Authorized Representative
Town of Westford
1713 VT Rte 128
Westford, Vermont 05494

10/12/2022
Expiration Date: 10/12/2027

Re: Westford Community Wastewater System Project
Vermont/USEPA Clean Water Revolving Loan Number RF1-267

Notice of Intent to Issue a Finding of No Significant Impact

Dear Ms. Manka:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FONSI) for the Westford Community Wastewater Disposal System Project.

The project has positive environmental impacts including the decommissioning of individual on-site residential septic systems in proximity to private and public drinking water wells in the Westford Village area, some of which have historically failed, or are currently failing, or are past useful life.

This project will create a new discharge to groundwater. Appropriate design, construction, and operation of the community wastewater indirect discharge disposal system will mitigate potential impacts to groundwater. The proposed disposal system will be subject to the Indirect Discharge Rules in effect at the time an application for an indirect discharge permit is submitted.

Wetlands have been identified within the project area. Additional wetland delineation is required by Vermont DEC Wetlands Program and was completed in October 2022. During final design and construction wetland impact will be kept to a minimum. An updated site plan reflecting wetland boundaries will need to be forwarded to the Wetlands Program to assess proposed impacts. Where disturbance within the wetland or wetland buffers is unavoidable, appropriate wetland permits will be sought and mitigation measures implemented.

Though floodway, floodplain, floodplain buffer, and river corridor of the Browns River and smaller tributaries have been identified in the project area, the community wastewater system project activity will not occur within the floodway, floodplain, floodplain buffer, and river corridor.

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Encountering nesting migratory birds in the disposal field area is a possibility; therefore, a detailed desktop review and potential hiring of an ornithologist during final design will be needed. Construction impacts to the taking of a migratory bird, egg, and nest will be kept to a minimum. Where disturbance is unavoidable, appropriate best mitigation practices measures will be implemented.

Any historical/archaeological impacts within the project area will be minimal. Disturbance of lawn areas will be avoided, where possible, or Phase 1B testing will be completed during final design if disturbance is unavoidable in areas identified as sensitive during the Phase I evaluation. Phase 1B testing will be completed at the north end of the community wastewater disposal area on the Maple Shade Town Forest site. Phase II investigations will be conducted if found warranted.

Prime and statewide agricultural soils have been identified in the project area of the Maple Shade Forest parcel. Concurrence from the USDA Natural Resource Conservation Service regarding potential force main and disposal field impacts of the mapped areas will be completed. If possible, the final design and construction will minimize disturbance and/or eliminate disturbance of those areas. Where disturbance within the known area is unavoidable, guidance from NRCS must be provided within the special conditions. Temporary disturbance will require that any prime agricultural soils affected by construction of the project will not impact future agricultural use.

A brownfield site (Site No. 2019-4863) and hazardous site (Site No. 2015-4598) have been identified within the project area. 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 final design. 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 soils and a management plan for dewatering of contaminated groundwater.

Otherwise, this project may have been eligible for a 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).

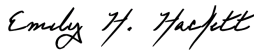
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The Department's environmental review procedures require a 30-day public comment period following the issuance of a Notice of Intent to Issue a Finding of No Significant Impact. If no public comments received during that period demonstrate that this 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

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, Westford Community Wastewater Disposal System,*” and dated 10/5/2022, prepared by Amy Macrellis of Stone Environmental, and signed 10/7/2022 by the Town of Westford.
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<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196794&DVID=0>

5. Environmental Report, titled “*Westford Community Wastewater Disposal System Environmental Information Document, CWSRF Loan Number RF1-267-1.0*,” and dated 5/20/2021, amended 9/2022, prepared by Amy Macrellis of Stone Environmental.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196795&DVID=0>
6. Preliminary Engineering Report entitled “*Westford Community Wastewater Disposal System*,” and dated 5/21/2021, signed by Brad Washburn, PE, of Green Mountain Engineering.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196797&DVID=0>
7. Draft Supplemental Preliminary Engineering Report titled “*Community Wastewater Disposal System*,” and dated 2/2022 prepared by Brad Washburn, PE, of Green Mountain Engineering.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196796&DVID=0>
8. Project Review Sheet 8/5/2021.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196793&DVID=0>

Copy List

Bryan Harrington, Indirect Discharge Program, VT-DEC-DWGWPD
Allison Lowry, Regional Engineer, VT-DEC-DWGWPD
Scott Dillon and Elizabeth Peebles, Division for Historic Preservation, ACCD
Elijah Schumacher, Wetlands Program, VT-DEC-WMD
Kimberly Caldwell, Sites Management Section, VT-DEC-WMPD
Everett Marshall, Wildlife Division, VT Department of Fish and Wildlife
Kevin Anderson, ARPA Planner, VT-ANR-OP
Neil Kamman, Director, VT-DEC-WID
Amy Macrellis, Stone Environmental
Quin Mann, The Clark Group (NRBC)
Representative Alyssa Black, Chittenden 8-3 House Representative



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

(802) 261-0288

Notice of Intent to Issue a Finding of No Significant Impact

**Town of Westford
Westford Community Wastewater System**

Vermont/USEPA Clean Water Revolving Loan Number: RF1-267

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 Westford Community Wastewater System Project. The proposed project area for the community wastewater collection, treatment, and indirect discharge disposal system includes parcels within the Designated Village center and buffer along Route 128 and Brookside Road, and the Maple Shade Town Forest. The service area will comprise 27 parcels (anticipated) with a design capacity of the 24,300 gallons per day indirectly discharged into the groundwater within the Browns River watershed. The primary treatment and collection system includes septic tanks at each service connection with septic tank effluent pump (STEP) conveyance to a pump station located near the Town Office along Route 128. From the pump station, a force main along Brookside Road conveys effluent to the community wastewater indirect disposal discharge site at the Maple Shade Town Forest where it will be dispersed into subsurface drip disposal zones.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review. The project involves a new groundwater discharge 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.

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

1. Environmental Information Document, “*Environmental Information Document and Environmental Report, Westford Community Wastewater Disposal System,*” and dated 10/5/2022, prepared by Amy Macrellis of Stone Environmental, and signed 10/7/2022 by the Town of Westford.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196794&DVID=0>
2. Environmental Report, titled “*Westford Community Wastewater Disposal System Environmental Information Document, CWSRF Loan Number RF1-267-1.0,*” and dated 5/20/2021, amended 9/2022, prepared by Amy Macrellis of Stone Environmental.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196795&DVID=0>
3. Preliminary Engineering Report entitled “*Westford Community Wastewater Disposal System,*” and dated 5/21/2021, signed by Brad Washburn, PE, of Green Mountain Engineering.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196797&DVID=0>
4. Draft Supplemental Preliminary Engineering Report titled “*Community Wastewater Disposal System,*” and dated 2/2022 prepared by Brad Washburn, PE, of Green Mountain Engineering.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196796&DVID=0>
5. Project Review Sheet 8/5/2021.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196793&DVID=0>

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

Melissa Manka, Planning Coordinator
Town of Westford
1713 VT Rte 128
Westford, VT 05494

tel. (802) 878-4587
planner@westfordvt.us

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.)

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Amy Macrellis
Stone Environmental
535 Stone Cutters Way
Montpelier, VT 05602

tel. (802) 229-1884
amym@stone-env.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

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

10/14/2022

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}
EJH

SUBJECT: Town of Westford
Westford Community Wastewater System Project
Environmental Assessment
Evaluation of eligibility for Finding of No Significant Impact

DATE: October 12, 2022

A. Project Identification:

Project Name: Westford Community Wastewater System

Address: Melissa Manka, Authorized Representative
1713 VT Route 128
Westford, Vermont 05494

Project Location: Town of Westford, Vermont

The proposed project area for the community wastewater collection, treatment, and indirect discharge disposal system includes parcels within the Designated Village center and buffer along Route 128 and Brookside Road, and the Maple Shade Town Forest parcel. The service area will comprise 27 parcels (anticipated) with a design capacity of the 24,300 gallons per day indirectly discharged into the groundwater within the Browns River watershed. The primary treatment and collection system includes septic tanks at each service connection with septic tank effluent pumps (STEP) and low pressure sewer conveyance to a pump station located near the Town Office along Route 128. From the pump station, a force main along Brookside Road conveys effluent to the community wastewater indirect disposal discharge site at the Maple Shade Town Forest where it will be dispersed into subsurface drip disposal zones.

Vermont/USEPA Clean Water Revolving Loan Number: **RF1-267**

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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:

1. Environmental Information Document, “*Environmental Information Document and Environmental Report, Westford Community Wastewater Disposal System,*” and dated 10/5/2022, prepared by Amy Macrellis of Stone Environmental, and signed 10/7/2022 by the Town of Westford.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196794&DVID=0>
2. Environmental Report, titled “*Westford Community Wastewater Disposal System Environmental Information Document, CWSRF Loan Number RF1-267-1.0,*” and dated 5/20/2021, amended 9/2022, prepared by Amy Macrellis of Stone Environmental.
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5. Project Review Sheet 8/5/2021.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=196793&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 from detailed environmental review due to potential impacts to groundwater as a new groundwater discharge. 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 Town of Westford is located in Chittenden County, Vermont in the Lake Champlain watershed. The developed portion of the Common and Village area lie within a north-south lying valley formed in part by the Browns River, which is a tributary of the Lamoille River and part of the Lake Champlain watershed.

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The proposed project will replace old, failed, and failing septic systems in the designated village center service area around the town green in Town of Westford, Vermont. Westford Village struggles with aging onsite wastewater infrastructure, pollution from wastewater disposal system failures, and poor conditions for wastewater disposal in the village area where there are nearby drinking water wells.

Based on detailed studies of the Designated Village Center area, engineering and planning conducted between 2007 and Spring 2022, and the amount of funding available, the estimated impacts evaluated anticipate the following maximum scope:

- Construction of a collection system serving 27 properties (anticipated) and 45 equivalent users at initial design year with a design capacity of 24,300 gallons per day. Full implementation of the community wastewater system will provide 14,200 gallons per day of new wastewater capacity over the estimated 10,100 gallons per day in current flows, representing an increase of approximately 40 percent over existing conditions. While the translation of new flow capacity to new development or expanded uses is neither direct nor certain, the available new capacity, as well as the availability of treatment that enables more intensive uses (i.e., food related or restaurant) and frees up on-site lands is expected to create more land use flexibility and intensity within the service area. Westford will be preparing for infill and redevelopment in the designated village center to promote the town and state planning goals.
- Collection system construction consist of 27 STEP systems, approximately 4,000-feet of low-pressure service force main, approximately 3,200-feet of low pressure 3-inch force main, 5,000-gallon precast concrete duplex pump station, approximately 4,200-feet of 3-inch force main, cleanouts, air releases manholes, and concrete valve vault.
- Disposal system construction consists of drip wastewater disposal system with nine dispersal areas totaling 54,600 square feet. Additionally, isolation gate valves, piping, electrical panels, and required appurtenances are included.

This work is expected to be constructed with Clean Water State Revolving Fund (CWSRF) loan, Village Water and Wastewater American Rescue Plan Act (ARPA) grant, and Northern Boarder Regional Commission grant.

Eligibility for Clean Water State Revolving Fund (CWSRF) construction loans and Village Water and Wastewater ARPA grant 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 a new groundwater discharge in the form of a community wastewater indirect

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discharge disposal system. The project will be regulated and operated under the parameters of the Indirect Discharge Program, which requires monitoring of the nearby water quality of the Browns River.

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).

A public hearing will be held on October 17, 2022, at 6:30 pm at the Westford Public Library and online as part of this FONSI process.
