



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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April 7, 2015

Monte Vista, Colorado – Wastewater System Improvements

**Categorical Exclusion for
Special Appropriation Act Grant**

Categorical Exclusions are for projects which are so minor in scope and impacts that they may be determined by the EPA to not need a full environmental review under the National Environmental Policy Act (NEPA) and EPA's regulations at 40 CFR Part 6. The EPA makes the determination if a project will qualify for a Categorical Exclusion based on information provided by the grantee.

Project Description:

The proposed project will rehabilitate or replace approximately 28,000 linear feet of existing sanitary sewer pipe in the City of Monte Vista's primary trunk lines to eliminate inflow and infiltration (I/I). The reduction of I/I will ultimately allow the City to consolidate their two wastewater treatment plants (WWTP) at the Henderson location without major WWTP upgrades. Without first reducing the inflow and infiltration, it would not be feasible to consolidate the two treatment plants. The decision to rehabilitate (e.g., slip line) or replace pipe will be based on review of the sanitary sewer collection system. The City has been inspecting the sewers by camera to identify the portions of interceptors that can be slip lined and the sections of the sewer that will need to be replaced. The majority of the sewer interceptors can be repaired through slip lining; however, there are small sections that will need to be replaced. Sanitary sewer manholes will also be either replaced or rehabilitated during the proposed project. In general, the project area consists of the City's major trunk lines in Sickles Street, 2nd Street, 6th Avenue, Huxley Avenue and Henderson Avenue.

Background: The City of Monte Vista owns and operates two WWTPs: the Henderson and Veterans facilities. The City plans to consolidate wastewater treatment into one plant located at or near the Henderson WWTP to reduce operations and maintenance costs. Also, older portions of the Monte Vista sanitary sewer system, primarily the sewers discharging into the Henderson WWTP, have seasonally high levels of inflow and infiltration. Approximately 50% of influent flows during the summer are attributed to I/I. These I/I flows have also been identified as a source of additional organic loading to the Henderson WWTP. The organic loading spikes associated with I/I, as measured by (BOD₅), have exceeded 95% of the permitted organic loading on several occasions. Under the State of Colorado's discharge permit (CPDES) regulations, communities which exceed 80% of the treatment capacity must

begin planning to expand WWTP capacity and construction must commence when capacity exceeds 95% of the treatment capacity. During periods when there is limited I/I, organic influent loadings remain below 80% of capacity.

[Information from the 2015 Wastewater Capital Improvements Project Preliminary Engineering Report for the City of Monte Vista port, RG and Associates, LLC October 2014. Emails from: Nick Marcotte <NMarcotte@rgengineers.com>, January 27, 2015, and April 3, 2015; Robert Vance <robertv@ci.monte-vista.co.us>, March 30, 2015]

Cross-Cutters:

Cross-Cutters (Executive Orders and laws that may apply to federal infrastructure projects.) apply to all Special Appropriations Act Project (SAAP) projects even if they are granted a categorical exclusion from the NEPA. The entire list of Cross-Cutters can be found in the SAAP Guidance memorandums. For additional information on potential Cross-Cutters see EPA's "Environmental Review Guide for Special Appropriations Grant," Appendix C @ <http://www.epa.gov/compliance/resources/policies/nepa/environmental-review-guide-grants-pg.pdf>.

Typical Cross-Cutters that might apply to a Special Appropriations Act Project			
Historic, Archaeological or Cultural Resources <i>No</i>		Sole Source Aquifer—mainly Missoula in Region 8 <i>No</i>	
Air Conformity -- Is the Project in a Nonattainment Area? <i>No</i>		Near a Wild and Scenic River? <i>No</i>	
Any wetlands or waters of the U. S. crossings? <i>No</i>		Within a Floodplain? <i>See below</i>	
Environmental Justice communities? <i>See below</i>		On Prime Farmland? <i>No</i>	
Threatened and Endangered Species? <i>No</i>		Special Wildlife Habitat, Wildlife corridor? <i>No</i>	

No Cross-Cutter issues are anticipated for this project since the construction will be under existing roadways within the city of Monte Vista. The following Cross-Cutters have been considered and determined not to be of concern in this project:

- Threatened and Endangered Species: The project will have no effect on Threatened and Endangered Species.
- Historic, Archaeological or Cultural Resources: No cultural resources or potential historic properties are anticipated to be affected by the proposed project. In October 2014, Monte Vista asked the State Historic Preservation Office (SHPO) for information on historic properties or cultural resources in Monte Vista. In a letter dated October 14, 2014, the SHPO requested additional information on the project and listed cultural properties in or near Monte Vista from the Office’s files. The EPA consulted informally with the SHPO on March 30, 2015, to more fully describe the extent and locations of the proposed construction disturbance as well as EPA’s finding that no historic properties would be affected by the proposed project. With that information, the SHPO agreed with EPA’s determination that no historic properties would be affected by the project and no further consultation with the SHPO was needed.

- Environmental Justice: The proposed project area was evaluated to determine if any potential environmental justice communities were present. Several census blocks in Monte Vista are considered to be environmental justice communities, primarily due to low income. Impacts from the proposed project during construction will be minimal (dust, noise, traffic disturbance) and localized to the immediate area of construction. Post construction there would be no adverse impacts. There would be an overall positive impact of increasing efficiencies for the sanitary sewer system that would reduce the need to increase rates for the future consolidated water treatment plant. In the interim, the improvements will also reduce operating costs for the existing Henderson WWTP.

- Within a Floodplain: The FEMA map for the area shows that the Rio Grande floodplain is immediately north of the City of Monte Vista. One existing industrial subdivision is located within the current 100-year floodplain. The two Executive Orders (11988 & 13690) regarding federal projects that affect floodplain management have been developed to protect communities and infrastructure within floodplains. For projects such as the proposed sewer system rehabilitation, the main requirements of the executive orders are: the project should not induce development in the floodplain and the proposed project would be designed for resiliency during flood conditions. The City has no plans for further development in the floodplain and they have designed the proposed project to be resilient during flood conditions by designing the manholes in the current regulatory floodplain to be watertight. To address the new Executive Order 13690, additional manholes will be designed to be watertight in anticipation of future changes to the regulatory floodplain.

- Prime Farmland: The project will have no effect on prime or important farmland.

- Wetlands: No previously inventoried wetlands or plants or soils characteristic of wetlands were found within the project area, which is all within existing road and alley right of ways.

CATEGORICAL EXCLUSION CRITERIA (40 CFR 6.204(a)(1)(ii))	
1. NO known or expected potentially significant environmental impacts on public health or the environment either individually or cumulatively over time.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Is the project for minor upgrade or minor expansion of system capacity? This includes, but is not limited to: minor extensions of sanitary sewers or force mains or drinking water extensions to primarily serve existing development; stormwater detention pond and retention pond cleaning and dredging or minor storage increase or culvert upgrades to serve existing development.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3. Is the project for rehabilitation of existing facilities? This includes, but is not limited to: functional replacement of existing systems and components, infiltration and inflow corrections in the existing wastewater collection system or equipment rehabilitation at the existing wastewater plant, pumping, or storage facilities; drinking water system equipment replacement or modifications at an existing water plant, or pumping and storage facilities; stormwater culvert and outlet rehabilitation and repair.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<p>4. Is the project for new minor ancillary facilities adjacent to or on the same property as existing facilities? This includes, but is not limited to: new wastewater facilities and equipment for sludge handling, screening, flow equalization, disinfection, or laboratory facilities; new drinking water facilities such as alum sludge handling, filtration, flow equalization, chemical storage, chlorination, or laboratory facilities; facilities at existing stormwater control locations, such as sedimentation basins, infiltration trenches, detention pond to retention pond retrofits, or oil and grit separators.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>If the answer to 1 is yes and at least one of answers to 2 through 4 are yes; then proceed to the next section: Excluding Factors. Conversely, if the answer to 1 is no, or if all answers to 2 through 4 are no then the project does not qualify for a categorical exclusion.</p>	
<p>Excluding Factors (40 CFR 6.204(b))</p>	
<p>(1) Project will have disproportionate impacts on any community: EJ, minority, etc.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>(2) Project will involve new or relocated discharges to surface or ground water</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>(3) Project will result in substantial increases in the volume of discharge or the loadings of pollutant to the receiving water</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>(4) Project will provide capacity to serve a population 30 percent greater than the existing population.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>(5) Project will be in conflict with state or other regional growth plan or strategy</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>(6) Project will directly or indirectly relate to upgrading or extending infrastructure systems primarily for the purposes of future development</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Categorical Exclusion Finding:

Upon review of the application materials and NEPA regulations pertaining to the granting of a Categorical Exclusion determination, the EPA Region 8 finds that the City of Monte Vista Sanitary Sewer System Improvements Special Appropriation Act Project Grant has met the criteria to be categorically excluded from further NEPA review.



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