



**State of Vermont**  
**Agency of Transportation**  
**Environmental Section**  
Barre City Place, 4th Floor,  
219 North Main Street  
Barre City, VT 05641  
<http://vtrans.vermont.gov/>

Mr. Matthew R. Hake, P.E.  
Division Administrator  
Federal Highway Administration  
87 State Street, Montpelier, Vermont 05602

04/28/21

Attn: FHWA, Environmental Program Manager, via NEPA SharePoint Site  
Re: Winooski TAP TA17 (2)/ STP BP19 (7)

Dear Mr. Hake:

Project TAP TA17 (2)/ STP BP19 (7) is located along Main Street (US Route 2/7) in Winooski. The project begins at the New England Central Railroad bridge (Bridge 151) and continues northerly for approximately 4,000 ft to the Colchester town line. Work to be performed includes sidewalk, greenbelt, and driveway construction; bump-outs; new pedestrian signs and flashing beacons; pavement markings, crosswalks, and incidental items.

VTrans also reviewed the NEPA compliance documentation prepared for the overall project, which is to be funded via a Vermont / U.S. Environmental Protection Agency (USEPA) Clean Water Revolving Loan (Number RF1-212) and by municipal funds. A Finding of No Significant Impact (FNSI) was issued by the Vermont Department of Environmental Conservation (DEC) Facilities Engineering Division on September 17, 2018. Work to be performed under the overall project includes the reconstruction of Main Street, to include new curbing, sidewalk, stormwater infrastructure, new sewer and water infrastructure, undergrounding of aerial utilities, streetscape enhancements to include new lighting, landscaping, new signs, pavement markings, and other highway related items.

The Vermont Agency of Transportation (VTrans) has considered the potential environmental consequences of the project in accordance with the National Environmental Policy Act (NEPA). VTrans has determined that this project meets all of the criteria specified in the Programmatic Agreement entitled "Processing of Projects Eligible for Categorical Exclusion," executed 03/14/19. The project qualifies for Categorical Exclusion pursuant to 23 CFR 771.117(c)(3)(8) "Environmental Impact and Related Procedures - Categorical Exclusions" as the project consists of construction of bicycle and pedestrian lanes, paths, and facilities; and installation of signs and pavement markings.

This project will not induce significant impacts to planned growth or land use for the area; will not require the relocation of significant numbers of people; will not have a significant impact on any natural, cultural, recreational, historic or other resource; will not involve significant air, noise, or water quality impacts; will not have significant impacts on travel patterns; and will not otherwise, either individually or cumulatively, have any significant environmental impacts. Please contact Jeff Ramsey, Environmental Specialist Supervisor @ 802-917-4467 if you require additional information.

Respectfully,

A handwritten signature in black ink that reads "Jeff Ramsey".

Jeff Ramsey

VTrans Environmental Specialist Supervisor

Attachments; cc: Ross Gouin, Project Manager, Project File

## PROGRAMMATIC CATEGORICAL EXCLUSION CRITERIA

VTrans has determined that this project will **NOT**:

- A. X Require a temporary detour outside existing right-of-way, or a temporary wetland or stream crossing which will require non-routine mitigation, or a ramp closure, unless the following conditions are met :
  - (1) provisions are made for access by local traffic and the facility is posted accordingly,
  - (2) businesses dependent upon through traffic will not be unduly affected,
  - (3) the temporary detour or ramp closure will not interfere with local special events,
  - (4) the temporary detour, ramp closure, wetland or stream crossing will not substantially increase the environmental consequences of the action (project).
- B. X Involve construction in wetlands totaling more than 5,000 square feet of permanent impacts, requiring the Army Corp of Engineers to coordinate with resource agencies per the General Permit.
- C. X Require a Risk Analysis for an increase in 100-year flood water surface elevations, per EO 11988.
- D. X Involve construction within, or alter drainage patterns so as to adversely affect, a Sole Source Aquifer.
- E. X Require coordination with the US Fish and Wildlife Service for the preparation of a Biological Assessment for Threatened and Endangered Species, per 16 CFR Section 7.
- F. X Require acquisition of additional right-of-way (including permanent or temporary construction easements) involving: more than three acres of land per mile of roadway, or a total of 10 acres or more for a non-linear improvement (such as a bridge or an intersection), or any relocation of residences or businesses.
- G. X Require FHWA approval for changes in access control.
- H. X Involve acquisition of, or impacts upon Prime or Unique Farmland, unless a USDA Farmland Conversion Impact Rating Part VI Site Assessment has been completed and indicates Total Site Assessment Points less than 160 (doesn't apply to designated urban areas).
- I. X Cause an Adverse Effect to an archaeological or historic resource listed in, or eligible for inclusion in, the National Register of Historic Places.
- J. X Require use (permanent or temporary) of a Section 4(f) resource, unless that use meets the criteria for a de minimis or Programmatic 4(f); or involve the use of a Section 6(f) resource when compensation is required (property acquired or improved using Land and Water Conservation Funds).
- K. X Involve hazardous or residual waste liabilities subject to CERCLA and/or RCRA requirements.
- L. X Require a bridge permit from the US Coast Guard, per 23CFR 650 Subpart H.
- M. X Qualify as a Type I project and require analysis of noise abatement measures, per 23 CFR 772 and the FHWA approved VTrans Noise Policy.
- N. X Require greater than 50% Emergency Relief (ER) funding.

(NOTE: If coordination with the FHWA was required to reach this determination attach concurrence memo)

**Categorical Exclusion  
Environmental Analysis Sheet**

Town Winooski Project No. TAP TA17 (2)/ STP BP19 (7) Route Main Street (US Route 2/7)

**Project Setting:** Urban X Village \_\_\_\_\_ Rural \_\_\_\_\_  
Traffic 13,460 – 17,126 Year 2019  
Typical 14' Travel Lanes, 8' Parking Lanes, 3' Green Belt, 5' Sidewalks  
AASHTO Functional Classification Principal Arterial

**CRITERIA OF 23 CFR771.117 (C) APPLICABLE?** X YES \_\_\_\_\_ NO \_\_\_\_\_

**NOTE: PROJECTS THAT MEET THE CRITERIA OF 23 CFR771.17 (C) NEED ONLY ADDRESS THOSE ISSUES MARKED WITH AN ASTERISK (\*). THIS DOES NOT PRECLUDE THE NEED TO OBTAIN APPLICABLE STATE & FEDERAL CONCURRENCES & PERMITS.**

**1. Air Quality**

Since the state of Vermont is in attainment for all the National Ambient Air Quality Standards (NAAQS) criteria pollutants (CO, Pb, NO2, O3, SO2, PM10, and PM2.5), the proposed project is exempt from conformity per 40 CFR 93.126 or 40 CFR 93.128 and is also exempt from regional conformity (regional emissions analysis requirements) per 40 CFR 93.127. Such projects may proceed toward implementation even in the absence of a conforming transportation plan and TIP. When completed, the project is not expected to result in any meaningful changes in traffic volumes, vehicle mix, or any other factor that would cause an increase in emissions impacts or contribute to violations of the NAAQS.

Urban intersection improvement Yes \_\_\_\_\_ No \_\_\_\_\_  
Project Level-of-Service (LOS) degrading to D, E, or F Yes \_\_\_\_\_ No \_\_\_\_\_  
[If "Yes" to both, then attach the Carbon Monoxide (CO) Hot-spot Analysis]

**2. Noise**

Type I Project (VTrans Noise Policy) Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, number of receptors impacted \_\_\_\_\_  
Mitigation Requirements \_\_\_\_\_

**3. Water Quality**

Lakes or Ponds  
VANR Lakes & Ponds permit Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_

Rivers or Streams  
VANR Title 19 Consultation Yes \_\_\_\_\_ No \_\_\_\_\_ Completed \_\_\_\_\_  
Wild/ Scenic River Consultation Yes \_\_\_\_\_ No \_\_\_\_\_ Completed \_\_\_\_\_

Wetlands  
\* Wetland Impact area Temporary 0 Permanent 0

\* Buffer Impact area Temporary 0 Permanent 0

\* VANR Wetland Permit Yes \_\_\_\_\_ No X Acquired \_\_\_\_\_

401 Water Quality Certification Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_

Stormwater Discharge Permit Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_

Floodplains Encroachment Yes \_\_\_\_\_ No \_\_\_\_\_

Flood Hazard Area/  
River Corridor Permit Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_

Describe Hydraulic Changes \_\_\_\_\_

Ground Water/Surface Water/Well Impacts Yes \_\_\_\_\_ No \_\_\_\_\_

Describe/ VANR Comments \_\_\_\_\_

4. **U.S. Army Corps of Engineers**  
Section 10 and/or Section 404 Permit Required Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_  
Permit Type \_\_\_\_\_  
COE Comments \_\_\_\_\_

5. **U.S. Coast Guard**  
Navigable Waters Yes \_\_\_\_\_ No \_\_\_\_\_ Involved Waterway \_\_\_\_\_  
Rivers & Harbors Act Section 9 and/or  
Bridge Act of 1946 Permit(s) Required Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_  
Section 144(c) "Exemption" Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_  
USCG Comments \_\_\_\_\_

\* 6. **Threatened and Endangered Species and Habitat**  
Present in Project Area Yes  No \_\_\_\_\_  
ANR Non-Game and Natural Heritage Program comments none at this time  
USF&WS comments none at this time  
See VTrans Biologist Natural Resource Clearance dated 01/04/21.

7. **Agricultural Land [Farmland Policy Protection Act]**  
Project located in Federal-aid Urban Area Yes \_\_\_\_\_ No \_\_\_\_\_  
Prime/secondary/locally important soils present Yes \_\_\_\_\_ No \_\_\_\_\_  
Describe Impacts/Comments \_\_\_\_\_  
Current land use (land in agricultural use) \_\_\_\_\_  
Form 1006 Parts 1, III, VI, VII, completed (FHWA) Yes \_\_\_\_\_ No \_\_\_\_\_  
Form 1006 Parts II, IV, V completed (NRCS) Yes \_\_\_\_\_ No \_\_\_\_\_  
Vermont Department of Agriculture comments \_\_\_\_\_

\*8. **Hazardous/ Residual Waste Liabilities**  
Present in project area Yes  No \_\_\_\_\_  
Determination from VANR Atlas Yes  No \_\_\_\_\_  
Determination from field visit Yes \_\_\_\_\_ No   
Borings completed Yes \_\_\_\_\_ No   
Petroleum related wastes Yes \_\_\_\_\_ No   
CERCLA involvement Yes \_\_\_\_\_ No   
Remediation required Yes \_\_\_\_\_ No   
Describe There are hazardous or residual waste liabilities mapped within the project area per the ANR Natural Resources Atlas online mapping 04/27/21, but due to the nature of the work, no impacts are anticipated.  
See ANR Natural Resource Atlas Map.

\* 9. **Historical or Archaeological Resources (Section 106)**  
Historic Resources: Present in APE Yes  No \_\_\_\_\_ Exempt \_\_\_\_\_  
Archeological Resources: Present in APE Yes  No \_\_\_\_\_ Exempt \_\_\_\_\_  
Section 106 Determination No Adverse Effect issued 04/27/21  
See Section 106 Memorandum for additional information.  
Programmatic/ Memorandum of Agreement needed Yes \_\_\_\_\_ No  Executed \_\_\_\_\_  
SHPO coordination completed N/A per 2019 PA  
Advisory Council coordination completed n/a

\* 10. **Section 4(f) Resources**  
Section 4(f) Resource(s) present in project area Yes \_\_\_\_\_ No

Nature of Section 4(f)

Parks/Rec. Areas \_\_\_\_\_ Wildlife and Waterfowl Refuge \_\_\_\_\_ Historic Property \_\_\_\_\_

Temporary impact to a 4(f) resource Yes \_\_\_\_\_ No X

Permanent use of 4(f) resource Yes \_\_\_\_\_ No X

Section 4(f) Approval (check one)

Negative Declaration \_\_\_\_\_ de minimis 4(f) \_\_\_\_\_ Programmatic 4(f) \_\_\_\_\_ Circulated 4(f) \_\_\_\_\_

Section 4(f) Comments Since all permanent work is within the existing ROW, there aren't any 4(f) resources within the project limits.

\*11. **6(f) Resources**

Section 6(f) involvement (LWCF Funding) Yes \_\_\_\_\_ No X

National Park Service Conversion Approval n/a

Section 6(f) Comments There aren't any 6(f) resources within the project limits.

\* 12. **Right of Way**

New ROW Acquisition fee simple Yes \_\_\_\_\_ No X

permanent easement Yes \_\_\_\_\_ No X

temporary easement Yes X No \_\_\_\_\_

Description of taking Temporary construction easements will be required.

Improved properties acquired Yes \_\_\_\_\_ No X

Displacements Rental Units 0 Private Homes 0 Businesses 0

Relocation services to be provided n/a

Properties available for relocation n/a

13. **Public Participation Opportunity**

Pre-Design Site Meeting Yes \_\_\_\_\_ No \_\_\_\_\_ Date \_\_\_\_\_

Public Information Meeting Yes \_\_\_\_\_ No \_\_\_\_\_ Date \_\_\_\_\_

Public Hearing Required (502) Yes \_\_\_\_\_ No \_\_\_\_\_ Date \_\_\_\_\_

Comments by Local Officials/RPC's \_\_\_\_\_

14. **Social and Economic Concerns**

Project consistent with Local and Regional Land Use Plans Yes \_\_\_\_\_ No \_\_\_\_\_

Describe if not, what is inconsistent? \_\_\_\_\_

Act 250 Permit or Amendment Yes \_\_\_\_\_ No \_\_\_\_\_ Acquired \_\_\_\_\_

Neighborhood and Community Concerns Yes \_\_\_\_\_ No \_\_\_\_\_

\_\_\_\_\_ Churches \_\_\_\_\_ Elderly

\_\_\_\_\_ Schools \_\_\_\_\_ Handicapped

\_\_\_\_\_ Low Income Housing \_\_\_\_\_ Environmental Justice Exec. Order 12898

\_\_\_\_\_ Emergency Services \_\_\_\_\_ Other

Describe \_\_\_\_\_

Effect on local business Yes \_\_\_\_\_ No \_\_\_\_\_ (Describe) \_\_\_\_\_

Temp. effect on business Yes \_\_\_\_\_ No \_\_\_\_\_ (Describe) \_\_\_\_\_

Loss of parking Yes \_\_\_\_\_ No \_\_\_\_\_ (Describe) \_\_\_\_\_

Pedestrian Facilities Sidewalk Widths Existing \_\_\_\_\_ Proposed \_\_\_\_\_

Bicycle Facilities Paved Shoulder Widths Existing \_\_\_\_\_ Proposed \_\_\_\_\_

If not minimum standard (sidewalk 5ft, paved shoulder 4ft), explain \_\_\_\_\_

15. **Aesthetic Considerations**

Scenic Byway/VT Scenic Highway Yes \_\_\_\_\_ No \_\_\_\_\_

Describe \_\_\_\_\_

Comments \_\_\_\_\_

16. **Effects of Temporary Detour/Bridge**

Detour required Yes \_\_\_\_\_ No \_\_\_\_\_ Additional Length \_\_\_\_\_ (Attach Plans)

Temporary bridge required Yes \_\_\_\_\_ No \_\_\_\_\_

Impacts of Detour/Bridge \_\_\_\_\_

Local Government coordination Yes \_\_\_\_\_ No \_\_\_\_\_ Comments \_\_\_\_\_

**Field Inspection Comments** \_\_\_\_\_ See supporting documentation.

**Summary of Commitments and Mitigation**

Describe

Emerald Ash Borer.

As of 2018, emerald ash borer (EAB), Agrilus planipennis, has been confirmed within Vermont’s borders. To provide an assurance of compliance with state and federal EAB laws the contractor shall adhere to the following:

Known EAB infestation areas are changing rapidly. Therefore the Contractor shall consult the online version of the EAB Infested Area Map (Located here: [www.vtinvasives.org/land/emerald-ash-borer-vermont](http://www.vtinvasives.org/land/emerald-ash-borer-vermont)) on the same day cutting is to occur. If the project is located with an EAB infested area, ALL tree material, regardless of species, within the project area shall be handled in accordance with a document developed by the Vermont Department of Forests, Parks and Recreation and the Vermont Agency of Agriculture titled “Recommendations to SLOW THE SPREAD of Emerald Ash Borer When Moving Ash from the Infested Area”, <https://vtinvasives.org/sites/default/files/images/SlowSpreadWoodVT.pdf>. Tree material shall not be moved out of state.

Alternatively, the Contractor may choose to hire a qualified professional (Arborist certified by the International Society of Arboriculture or Licensed Forester), at their own expense, to identify the presence of ash trees. Those identified ash trees would be subject to the above referenced recommendations, however other tree species would not.

The Contractor is also hereby made aware of the same potential restrictions as they relate to proposed Waste, Borrow and Staging areas under Section 105.25 Control of Waste, Borrow, and Staging Areas.

Prepared by: Jeff Ramsey 04/28/21 Reviewed by: Julie Ann Held 04/28/2021  
Signature Date Signature Date

Document Template Last Revised 03/14/19