EVALUATION AND ACCEPTANCE OF APPLICANT ENVIRONMENTAL INFORMATION DOCUMENT AND FINAL FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Wastewater System Improvement Project

City of Stites
Idaho County, Idaho

January 2018

I. Introduction and Background Information

The U.S. Army Corps of Engineers, Walla Walla District (Corps) proposes to assist the city of Stites, Idaho (City) with its Wastewater System Improvement Project under the authority of Section 595 of the Water Resources Development Act (WRDA) of 1999. The City currently owns and operates a municipal wastewater collection system originally built in 1968 that includes a mainline collection and conveyance system. In 2005 the City installed a three mile transmission line and began pumping waste to nearby Kooskia for treatment. The City's mainline collection and conveyance system wastewater system is relatively unchanged since 1968 and is in poor condition.

The City's wastewater system currently has two critical problems. First, excessive infiltration and inflow levels due to the deteriorating condition of the aging collection system. Wastewater flows during the wet season have been up to eight times the typical dry season flows. The second problem occurs during the dry season, when increased infiltration and inflows are absent resulting in lower flows being discharged from the City increasing wastewater detention time in the transmission line to Kooskia. The detention time increases enough that the natural sewage digestion process within the pipe becomes anaerobic resulting in excess levels of hydrogen sulfide to develop, causing elevated hydrogen sulfide levels to be present at the Kooskia discharge point.

Numerous problems stem from the increased infiltration and inflow problem including:

1. Increased damage to the aging wastewater collection system.
2. Pump stations are overwhelmed causing wastewater to backup within the system which then requires that domestic water be temporarily shut off to prevent additional wastewater generation.
3. Increased volume to the Kooskia sewer treatment plant has resulted in violation of the agreement between Stites and Kooskia and exceedance of Kooskia's National Pollution Discharge Elimination System (NPDES) permit.
4. Kooskia exceeding their maximum capacity which results in flooding conditions at the Kooskia sewer treatment plant.

5. Increased potential for sewage leakage to the environment from the deteriorating collection system potentially impacting ground water during low flow.

The City's proposed action includes the replacement of the majority of manholes, collection mainline piping, and service lateral lines to reduce infiltration and inflow of water into the system. Additionally the proposed action includes chemical injection at the City's lift station to mitigate the formation of hydrogen sulfide. This would require a new building and injection pump be installed adjacent to the City's pumping station. All actions would take place within the City.

The Corps is not assisting the City with the entire proposed action. The Corps and the City have agreed the Corps would provide funding (under Section 595) for engineering design, preparation of plans and specifications, and camera inspection of existing sewer lines. Any remaining Section 595 funds would be used for the replacement of up to 21 manholes, collectively referred to as the "Corps Project" hereafter.

Section 595 of WRDA 1999 [Public Law (PL) 106-53], authorized the Corps to participate in water-related environmental infrastructure and resource protection and development projects in rural Nevada and Montana. In 2003, PL 108-7, Section 126 amended PL 106-53 to include rural Idaho. As a result, the Corps is able to participate in the Stites Wastewater System Improvements Project.

II. Applicant Prepared Environmental Information Document

In accordance with 40 Code of Federal Regulations (CFR) 1506.5(b), the Corps is authorized to permit applicants to prepare an environmental document, as long as the agency performs its own evaluation of the environmental issues and makes its own findings on potential impacts. The City submitted the *City of Stites, Idaho - Wastewater System Improvement Project, Environmental Information Document (EID),* prepared by TD&H Engineering. The Corps had no role in the preparation of the EID, but did undertake an independent review of the document and determined the information contained therein is accurate and satisfies the requirements of the National Environmental Policy Act (NEPA) regulations, except as supplemented or explained below in Section V. The EID is, therefore, incorporated (in its entirety) herein by reference and made a part hereof.

III. Purpose and Need

The purpose of the Corps Project is to assist the City, under Section 595, with upgrading the City's aging wastewater system by providing funding primarily for the completion of engineering design, preparation of plans and specifications, and camera inspection of existing sewer lines. Any remaining Section 595 funds (likely no more than $18,000) would be used for the replacement of up to 21 manholes.

The Corps Project is needed because the City's current infrastructure is aging and deteriorating allowing infiltration and inflow of water to the wastewater system causing

numerous problems including overwhelming pumps, interruption of domestic water supply, and exceeding maximum capacity at the Kooskia sewer treatment plant.

IV. Project Alternatives

The EID evaluated two alternatives to address both the increased hydrogen sulfide levels and the increased infiltration and inflow problem into the wastewater system:

No Action: Under this alternative, the wastewater system would continue to be at risk for additional damage as a result of the increased hydrogen sulfide that can be converted into sulfuric acid by bacteria in the system which causes damage to concrete and metals used in the wastewater system. The Kooskia sewer treatment plant would still have an increased health and safety risk due to the increased hydrogen sulfide at the plant. The wastewater system would continue to have extra water entering the system through the manholes, service laterals, and mainline during the wet season. This infiltration and inflow would keep the wastewater system at risk for violating Kooskia's NPDES permit and flooding at the sewer treatment. There would continue to be disruptions to the City's drinking water during periods as infiltration and inflow overwhelm the capacity of the wastewater system. The potential for sewage leakage into the ground during low flow times would remain. Although this alternative does not meet the stated purpose and need, it was carried forward to serve as the baseline environmental condition for comparison with other alternatives as required by NEPA.

New building and Injection pump for chemical injection and the replacement of manholes, service laterals, and collection mainlines (Proposed Action): This alternative would involve the design and construction of facilities next to the Stites pumping station for chemical injection to address the increased hydrogen sulfide problems and the replacement of various parts of the wastewater collection system to address the infiltration and inflow problems during the wet season.

The Proposed Action includes the following construction activities:

1. Installation of a new building and injection pump to allow chemical injection at the pumping station. The building would also provide safe storage for the 55-gallon drums of chemicals.
2. Replacement of all manholes constructed prior to 2005 for a total of 21.
3. Trench and replace 190 linear feet of existing service laterals and associated connectors.
4. Trench and replace existing collection mainline, 5700 linear feet of 8-inch PVC pipe and 355 linear feet of 10-inch PVC pipe.

As previously mentioned, the majority of Corps funding would go towards preliminary and final design, environmental documentation, and camera inspection of existing

sewer lines. Any additional funding (likely no more than $18,000) would be used to replace up to 21 manholes.

V. Environmental Effects

The EID evaluated the effects of the Proposed Action on the following resources:

- Physical Aspects
- Climate
- Population
- Economics and Social Profile
- Land Use
- Floodplain Development
- Wetlands
- Wild and Scenic Rivers
- Cultural Resources
- Flora and Fauna
- Recreation and Open Space
- Agricultural Lands
- Air Quality
- Water Quality, quantity, and sole source aquifers
- Public Health
- Solid waste/sludge management
- Energy
- Reuse/land application or subsurface disposal system
- Regionalization

The analysis did not identify any significant impacts to the human environment should the proposed action be implemented. Short-term negative effects that may occur during project construction include temporary disruption of the wastewater systems, increased noise, increased dust pollution, increased potential for stormwater runoff, and disruption of localized traffic conditions. There would not be long-term or cumulative effects as a result of the proposed action. The contractor would be responsible for managing the temporary disruptions of the system and implementing Best Management Practices (BMPs) to reduce negative construction effects.

a. **Endangered Species Act.** The Corps obtained a species list from the U.S. Fish and Wildlife Service (USFWS) dated September 24, 2017 (Consultation Code: 01EIFW00-2017-SLI-1500). The USFWS indicated that there are four listed species or critical habitat identified for the vicinity of the Corps Project. The Corps has determined the Corps Project would have no effect on these species (ATTACHMENT A). There are also two species under jurisdiction of the National Marine Fisheries Service (NMFS). The Corps has determined the Corps Project would have no effect to these species and critical habitat (ATTACHMENT A).

b. **National Historic Preservation Act.** Multiple federal agencies are involved in the execution of Section 595 projects. For the current project, the U.S. Department of Agriculture (USDA) was the lead federal agency for Section 106 compliance requirements and consultation. The Corps reviewed the cultural resources documentation and concurs with all findings. A finding of "No Historic Properties Affected" (ATTACHMENT B) was based on the fact that all of the proposed work is taking place in previously disturbed areas, and consultation with the Nez Perce Tribe Tribal Historic Preservation Officer is sufficient to meet the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations, 36 Code of Federal Regulations Part 800.

c. **Clean Water Act** Section 404 of the Clean Water Act (33 U.S.C. 1344) requires a Department of the Army permit be obtained for the discharge of dredged or fill material into waters of the United States. In a letter dated June 3, 2014 (ATTACHMENT C), the Corps Regulatory Division Office in Boise, Idaho determined that the Proposed Action would not involve work in areas subject to the Corps jurisdiction and a Department of the Army permit is not required. There have been no changes to any portions of the Proposed Action that the Corps is assisting with since the Regulatory Division review of the complete project.

   Because the construction of the project would disturb more than one acre of ground and there is the potential for stormwater runoff to enter surface water, a Section 402 Construction General Permit from the Environmental Protection Agency (EPA) and the preparation of a Stormwater Pollution Prevention Plan (SWPPP) would be required. BMPs would be implemented to minimize turbidity and stormwater runoff.

d. **Executive Order 11988: Floodplain Management.** This EO requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.

   Due to the fact that the Corps Project is located in the mapped flood hazard area of the Salmon River, a Floodplain Development Permit would be needed from the City of Stites. This permit would have conditions that must be met during the design and construction of the Corps Project to mitigate impacts to the floodplain and to the wastewater system from a potential flood event. All pumps and electronics must be elevated above the base flood elevation and flood proofing of the collection system would occur. The typography and elevations would not change from existing conditions, and no changes to the flow capacity of the floodplain would occur as a result of this Corps Project.

VI. Coordination

Coordination with federal, state, local agencies, organizations and tribes has been conducted by the consultant, TD&H Engineering. Those contacted include Walla Walla District Corps of Engineers Regulatory Office, U.S. Fish and Wildlife Service, National Marine Fisheries Service, U.S. Forest Service Nez Perce/Clearwater National Forest, U.S. Environmental Protection Agency, Bureau of Land Management, Idaho Department of Water Resources, Idaho Department of Commerce, Idaho Department of Fish and Game, Idaho Department of Environmental Quality, North Central City Health Department, U.S. Department of Agriculture – Natural Resource Conservation Service, Idaho State Historic Preservation Officer, City of Stites, and the Nez Perce Tribe. Each agency, organization, or tribe was provided information on the proposed improvements to the water system and given an opportunity to comment. Information was also disseminated through City Council meetings and public open houses.

In compliance with NEPA, the Corps distributed the draft FONSI and the EID for a 15-day public comment period beginning on December 29, 2017 and concluding on January 12, 2018. The Corps received one comment document from NMFS indicating that they concurred with the no effect determination on ESA-listed species or designated critical habitat under NMFS' jurisdiction in the proposed action area.

VII. Finding

Having reviewed the EID, I find that the actions covered by the EID are substantially the same actions that the Corps is authorized and committed to participate in pursuant to Section 595 of the Water Resources Development Act of 1999 with the City. Further, the EID provides sufficient discussions on the need for the proposal, alternatives to the proposal, the environmental impacts of the proposed action and the alternatives, and a listing of agencies and persons consulted. Finally, after an independent review of the EID, the Corps has determined the document provides both sufficient evidence and analysis to meet its requirements pursuant to NEPA, except as supplemented or explained above.

I have taken into consideration the technical aspects of the Corps Project, best scientific information available, public comments, and the information contained in the EID. Based on this information, I have determined that the proposed Corps Project would not significantly affect the quality of the human environment, and therefore an environmental impact statement is not required. The Corps will proceed to fund a portion of the City's Proposed Action under the authority of Section 595 of the Water Resources Development Act of 1999, when funds are made available for that purpose.

6 Feb 18
Date

DAMON A. DELAROSA
Lieutenant Colonel, EN
Commanding