

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 • FAX (334) 271-7950

CATEGORICAL EXCLUSION FROM ENVIRONMENTAL REVIEW

Water and Sewer Board of the City of Gadsden
Etowah County

SRF Project No. CS011044-01

May 13, 2024

The Alabama Department of Environmental Management has made \$5,050,000 in financial assistance available to the Water and Sewer Board of the City of Gadsden using funds from the American Rescue Plan Act (ARPA) and State Revolving Fund (SRF). In accordance with State and Federal regulations that govern the program, the Alabama Department of Environmental Management has conducted a review to assess the potential impacts upon the environment that may result from implementation of this project.

The Water and Sewer Board of the City of Gadsden proposes improvements to its sanitary sewer system. The project consists of replacement and rehabilitation of numerous sewer lines using cured-in-place pipe (CIPP), pipe bursting, and manhole repairs. These areas have been determined to have substantial infiltration/inflow (I/I). Completion of this project will provide for a much improved sewer system.

The Alabama Department of Environmental Management has determined that the project qualifies for a Categorical Exclusion (CE) from further environmental study under the guidelines specified by the State Environmental Review Process (SERP) which specifically include actions which are solely directed toward minor rehabilitation of existing facilities, functional replacement of equipment, or towards the construction of new ancillary facilities adjacent or appurtenant to existing facilities. However, this decision may be reconsidered if significant adverse information concerning the potential environmental impacts of the project is discovered.

Comments relative to this project should be submitted in writing to Mr. Thomas Cade Runyan, SRF Section, Permits & Services Division, Alabama Department of Environmental Management, P.O. Box 301463, Montgomery, Alabama 36130-1463, no later than 30 days after the date of this CE. The Alabama Department of Environmental Management will not take formal action to proceed with the project without carefully evaluating any public comments opposing the project.

Lance R. LeFleur
Director

TCR
Attachment



Water and Sewer Board of the City of Gadsden
SRF# CS011044-01

The Categorical Exclusion is promulgated in the State Environmental Review Process (SERP) in Part IV, Section C: Categorical Exclusions for Drinking Water State Revolving Fund Projects: (Italicized sections apply.)

1. The following drinking water projects are eligible for categorical exclusions:
 - a. *Actions intended solely for minor rehabilitation, functional replacement, or ancillary facilities adjacent or appurtenant to existing facilities.*
 - b. Minor construction, including:
 - (1) New wells or replacement wells for water supply purposes if ancillary to the existing system;
 - (2) Facilities for the disinfection of public water supplies;
 - (3) Facilities such as looping that will result solely in the provision of adequate public water system pressure;
 - (4) Construction of water tanks;
 - (5) Construction of new water lines in previously disturbed areas within one mile of the existing distribution system.
 - (6) Improvements not intended to increase capacity of the system;
 - c. Projects where funding is being provided for planning and/or engineering costs only (in which case the requirements of IV.C.1.a-d do not apply).
2. In order to determine if a drinking water project is eligible for a CE, all of the following must not apply:
 - a. The action is known or expected to directly or indirectly adversely impact any of the following:
 - (1) Cultural or historical resources;
 - (2) Endangered or Threatened Species and/or their critical habitats;
 - (3) Environmentally important natural resource areas such as floodplains, wetlands, prime agricultural land, or aquifer recharge zones.
 - b. The action is not cost effective.
 - c. The action will cause significant public controversy.
 - d. The action will create a new or expanded surface drinking water source.

This project complies with the above requirements and has been determined to be eligible for a Categorical Exclusion.



ALABAMA HISTORICAL COMMISSION

468 South Perry Street
Montgomery, Alabama 36130-0900

Lisa D. Jones
Executive Director
State Historic Preservation Officer

Tel: 334-242-3184
Fax: 334-242-1083

September 26, 2023

Chad Hare
515 N. Albert Rains Blvd.
Gadsden, AL 35901

Re: AHC 23-1369

The Water Works and Sewer Board of the City of Gadsden - CWSRF Sanitary Sewer System Improvements
Etowah County

Dear Mr. Hare:

We concur with the above referenced project provided all construction activities will occur within **existing and previously disturbed** highway right-of-way and/or other previously disturbed areas. For the purposes of this letter, previous disturbance is defined as mechanical disturbance to either culturally sterile subsoil, or the maximum depth of the proposed undertaking. It should be noted that agricultural plowing does not typically meet this threshold of disturbance, nor do previously undisturbed portions of the ROW that require clearing of additional vegetation. Any area that is to be involved and does not fall into one of the above categories will require a cultural resource assessment by a professional archaeologist. Submit the resulting report to our office for review and determination prior to project initiation.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or Amanda.McBride@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

A handwritten signature in blue ink that reads "Lee Anne Hewett".

Lee Anne Hewett
Deputy State Historic Preservation Officer

LAH/AMH/nj



2023-0133485

SL



197 East University Drive
Suite #1
Auburn, AL 36832
Post Office Box 2155
Auburn, AL 36831
Tel (334) 466-9431
Fax (334) 466-9430

cdge.com

September 27, 2023

Mr. Bill Pearson
Field Supervisor
U.S. FISH & WILDLIFE SERVICE
1208 Main Street
Daphne, Alabama 36526

**RE: REQUEST FOR CONCURRENCE
THE WATER WORKS AND SEWER BOARD OF THE CITY OF GADSDEN
CWSRF SANITARY SEWER SYSTEM IMPROVEMENTS
ETOWAH COUNTY, ALABAMA**

Dear Mr. Pearson:

The Water Works And Sewer Board Of The City Of Gadsden (Gadsden Water) has requested funding from the Alabama Department of Environmental Management (ADEM) Clean Water State Revolving Fund (CWSRF) for sanitary sewer collection system rehabilitation and repair.

Based on the investigation efforts completed to date, the improvements listed below have been determined as the best options for Gadsden Water to continue to reduce infiltration/inflow (I/I), which contribute to sanitary sewer overflows (SSOs), wet-weather capacity deficiencies, and percent removal requirements at the WWTPs.

Several areas in the system have already been identified to be rehabilitated by pipe bursting, Cured-In-Place-Pipe Liner (CIPP) and manhole lining. These areas have been determined as areas of substantial I/I but found void of significant offsets, bellies, or collapsed sections, making them prime candidates for rehabilitation. These areas include:

1. North Gadsden in areas around the 6th and 11th Street Basin
2. Southeast Gadsden in the Gray Road area
3. Northwest Gadsden in the areas within Walnut Park

These three areas are displayed on the attached Project Location Map.



We request concurrence from your office regarding the proposed improvements projects highlighted above. If there are any questions or additional supporting documents are required, please contact our office, or send an email to cason.stevens@cdge.com.

Thank you for your time and consideration for this project.

Sincerely,
CDG, INC.


Cason A. Stevens
Project Engineer


Enclosures



U.S. Fish and Wildlife Service
1208-B Main Street – Daphne, Alabama 36526
Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See

<https://www.fws.gov/project/best-management-practices-alabama>).


William Wilson, Project
Field Supervisor
Alabama Ecological Services Field Office

OCT 24 2023

Date

#3



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT
600 VESTAVIA PARKWAY, SUITE 203
VESTAVIA HILLS, AL 35216

December 15, 2023

North Branch
Regulatory Division

SUBJECT: Department of the Army, No Permit Required, File Number SAM-2023-00884-LET, Gadsden Water Works and Sewer Board—sewer line rehabilitation, Gadsden, Etowah County, Alabama

City of Gadsden Water Works and Sewer Board
% CDG Engineers, Inc.
Attention: Mr. Cason Stevens
Post Office Box 2155
Auburn, Alabama 36831

Transmitted electronically to cason.stevens@cdge.com

Dear Mr. Stevens:

This is in response to your letter, on behalf of the City of Gadsden Water Works and Sewer Board, dated September 26, 2023, requesting Department of Army (DA), U.S. Army Corps of Engineers (USACE) review of the proposed rehabilitation of existing sanitary sewer lines using trenchless repair techniques in 3 identified work areas across Gadsden in Etowah County, Alabama. The Walnut Park work area is located near center coordinate latitude 34.015317 North, longitude -86.059999 West. The 6th Street to 11th Street work area is located near center coordinate latitude 34.015433 North, longitude -86.011548 West. The Gray Road work area is located near center coordinate latitude 33.976045 North, longitude -85.956757 West. This project has been assigned file number SAM-2023-00884-LET, which should be referenced in all future correspondence regarding this project.

Section 404 of the Clean Water Act (33 U.S.C. 1344) specifically addresses discharges of dredged and/or fill material into waters of the United States (U.S.), including wetlands, and requires that a Department of the Army (DA) permit must be obtained prior to conducting any work that would include a discharge of dredged and/or fill material into waters of the U.S. However, based on information provided in your letter, the City of Gadsden Sewer Board plans to utilize multiple trenchless line repair methods including pipe bursting, cured-in-place pipe lining, and manhole lining, which access the sewer lines from existing system openings such as manhole, in order to avoid land disturbing rehabilitation methods. These trenchless methods that avoid land disturbance are activities typically not regulated under Section 404 of the Clean Water Act (33 U.S.C. 1344) as they would not involve the discharge of dredged and/or fill material into waters of the U.S.

Based on our findings regarding the City of Gadsden Water Works and Sewer Board's sewer line rehabilitation project, as specified herein, a DA permit pursuant to Section 404 of the Clean Water Act would not be required to implement the sewer line repairs, as proposed.

The statements contained herein do not convey any property rights or any exclusive privileges, and do not authorize any injury to property or obviate the requirements to obtain other local, State, or Federal assents required by law for the activities discussed above. If the scope of work, implementation methods, or project locations change such that land disturbing impacts in wetlands and/or streams would be required, you are urged to contact this office for re-evaluation and verification of this determination.

We appreciate your cooperation with the USACE Regulatory Program. Please contact me at (205) 213-9623 or at leslie.e.turney@usace.army.mil if you have any questions concerning this matter. For additional information about our Regulatory Program, you may visit our web site at <http://www.sam.usace.army.mil/Missions/Regulatory.aspx>. Also, please take a moment to complete our customer satisfaction survey located under the Menu header on the right side of our webpage. Your responses are appreciated and will allow us to improve our services.

Sincerely,

Leslie E. Turney
Chief, North Branch

Enclosures



EAST ALABAMA

Regional Planning and Development Commission

September 27, 2023

Cason A. Stevens,
197 East University Drive
Suite #1
Auburn AL 36832

RE: **Intergovernmental Concurrence**
THE WATER WORKS AND SEWER BOARD OF THE CITY OF GADSDEN
CWSRF SANITARY SEWER SYSTEM IMPROVEMENTS
ETOWAH COUNTY, AL

Dear Mr. Stevens,

The East Alabama Regional Planning and Development Commission is aware that the Water Works and Sewer Board Of The City Of Gadsden (Gadsden Water) has requested funding from the Alabama Department of Environmental Management (ADEM) Clean Water State Revolving Fund (CWSRF) for sanitary sewer collection system rehabilitation and repair.

We understand the project will rehabilitate pipes in several areas through pipe bursting, cured-in-place-pipe liner (CIPP), and manhole lining. Further, we understand that the project targets North Gadsden in locations around the 6th and 11th Street Basin, Southeast Gadsden in the Gray Road area, and Northwest Gadsden in the areas within Walnut Park. We understand that these efforts will help Gadsden Water to continue to reduce infiltration/inflow, which contributes to sanitary sewer overflows, wet-weather capacity deficiencies, and percent removal requirements at the treatment plants.

On behalf of the Board of the East Alabama Regional Planning and Development Commission, our planning staff has evaluated the effects of this project and any other planned projects occurring in the project area. We have determined that this project is compatible with the Comprehensive Economic Development Strategy for the East Alabama Region, and we concur with the application for Sanitary Sewer System Improvements planned for the Water Works and Sewer Board Of The City Of Gadsden reflected in the documents provided to us.

Good luck with this project.

Sincerely,


Lori Sokol (Oct 3, 2023 15:10 CDT)

Lori Sokol
Executive Director

EAST ALABAMA CALHOUN CHAMBERS CHEROKEE CLAY CLEBURNE COOSA ETOWAH RANDOLPH TALLADEGA TALLAPOOSA
Regional Planning and Development Commission | 1130 Quintard Avenue Suite 300 Quintard Tower P.O. Box 2186 Anniston, AL 36202
Phone (256) 237-6741 | Fax (256) 237-6763 | Email earpdc@earpdc.org | Website www.earpdc.org

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MAYOR, CITY OF PIEDMONT

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TREASURER
TOBY BENNINGTON
DIRECTOR OF ECONOMIC DEVELOPMENT
& CITY PLANNING

OFFICE OF THE GOVERNOR

KAY IVEY
GOVERNOR



STATE OF ALABAMA

ALABAMA DEPARTMENT OF ECONOMIC
AND COMMUNITY AFFAIRS

KENNETH W. BOSWELL
DIRECTOR

September 27, 2023

Mr. Cason Stevens
CDG Engineers
197 East University Drive Suite # 1
Auburn, AL 36832

**RE: Request for Concurrence – The Water Works and Sewer Board of the City of Gadsden –
CWSRF Sanitary Sewer System Improvements - Etowah County, Alabama:**

Dear Mr. Stevens:

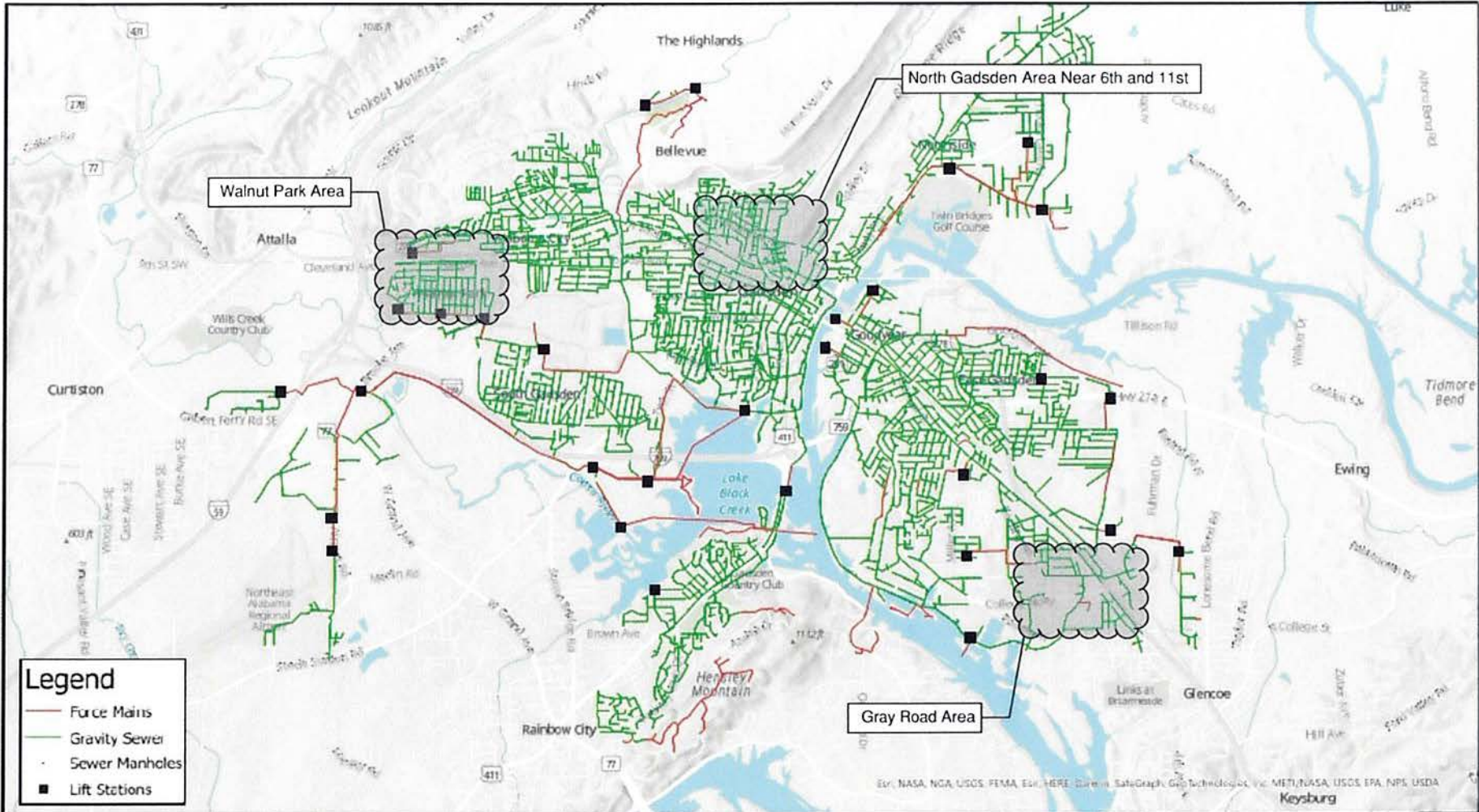
We have reviewed your letter concerning the sanitary sewer collection system rehabilitation and repair for the Water Works and Sewer Board of the City of Gadsden. Based on our review of the information provided and the statutory and regulatory requirements of the Alabama Water Resources Act, we concur with the project.

Let us know if you have any questions. The staff for water management can be reached at (334-242-5499 or via e-mail at water@adeca.alabama.gov).

Respectfully,

A handwritten signature in black ink, appearing to read "Michael J. Harper".

Michael J. Harper
Alabama Water Use Reporting Program Coordinator
Water Management Unit
Alabama Office of Water Resources



Legend

- Force Mains
- Gravity Sewer
- Sewer Manholes
- Lift Stations

Drawn By:	LKY
Checked by:	RCS
Date:	February 2023


 Sheet No.
1



224 Broad St., Ste 201
 Gadsden, AL 35901
 (256) 543-9431
 www.cdg.com

2023 CWSRF - Sanitary Sewer System Improvements
The Water Works and Sewer Board of the
City of Gadsden
 Gadsden, AL