

**Categorical Exclusion and Extraordinary Circumstances Review Form**

United States Environmental Protection Agency  
Washington, DC 20460

**I. General Information**

Project Name	WIFIA Id Number
DeKalb County's Priority Areas Sewer Assessment and Rehabilitation Program (PASARP) and Other Sewer Assessment & Rehabilitation Program (OSARP)	18146GA
Borrower Name	
DeKalb County, Georgia	

**Project Description**

The WIFIA project consists of repair, replacement, or upsizing of the pipes in DeKalb County's (the County) waste collection treatment system and water main distribution system and is further defined below:

- Briarcliff Corridor Water Infrastructure Replacement. The County plans to replace existing lines with 8-inch, 12-inch, or 16-inch water main lines along Briarcliff Road between Virginia Avenue Northeast and Clifton Road and within an adjacent residential area east of Briarcliff Road. The purpose of the replacement is to address an area of low pressure and low flow within the County that is a result of aging infrastructure. This area is generally bounded on the west by Briarcliff Road, the east by Lullwater Drive, the north by Emory Road and the south by The by Way. Total footage of water mains that require replacement is approximately 45,000 feet.
- Upsizing, Trunk Sewers, S. Fork Peachtree Interceptor. The County has identified multiple high-priority locations for sewer line upsizing, trunk sewer upsizing, and manhole rehabilitation or replacement through the County's Priority Area and Sewer Assessment Rehabilitation Program (PASARP). This scope of work will comprise a collection of six hard-bid construction packages and up to 400,000 linear feet of sewer in varying sizes primarily from 8-inch to 24-inch in diameter for non-trunk sewer lines and between 30-inch and 54-inch in diameter for trunk sewer lines.
- Sewer Rehabilitation Annual Contract Work. The County has identified work across the County summing up to approximately 400,000 linear feet of sewer that will primarily consist of in-line pipe rehabilitation, point repairs, and manhole rehabilitation and lining. Closed Circuit Television (CCTV) inspections will identify areas that cannot be rehabilitated in-line and will require open-cut point repairs. This work comprises multiple high-priority locations identified through the County's PASARP covered by six construction packages. Additional construction packages are anticipated for non-priority areas that will be identified under the County's Other Sewer Assessment and Rehabilitation Program (OSARP).

The County's PASARP, which is a collection of repair and rehabilitation sub-projects or work packages, evolved out of the need to rehabilitate and repair an aging wastewater collection and treatment system which allowed for hazardous sanitary sewer overflows (SSOs). The County entered into a Consent Decree with EPA in December 2011. Since then, the County identified areas within the system that required immediate attention which is classified as the PASARP and "non-essential areas" which is classified as the OSARP. The need for repair and rehabilitation and/or replacement of the aging wastewater collection and treatment system (WCTS) is the foundational basis of the PASARP. Further, assessment, capacity improvement, and rehabilitation measures planned under the OSARP are critical components of the County's efforts to minimize the risk of sanitary sewer overflows, to maintain or improve hydraulic performance, and to extend the service life of the WCTS assets.

**Project Location Description (street address/city/state/ZIP code; site characteristics)**

The Project will occur in various locations throughout DeKalb County that are the result of condition assessment analysis, prioritization, and hydraulic modeling capacity enhancement recommendations.

The Project is occurring within existing utility rights-of-way (ROW). The areas of the proposed work are generally characterized by residential/commercial land uses. Some utility ROWs parallel streams for portions of their alignments.

**II. EPA Contact for Environmental Review on this Project (If different from Responsible Official)**

Name	Title	Phone Number
Dan-Tam Nguyen	Environmental Engineer	(202) 654-2784

**III.A. Categorical Exclusion Eligibility** (Check YES or NO) Complete the following questions in their entirety to determine if the project is eligible for a Categorical Exclusion (CATEX) pursuant to 40 CFR § 6.204(a)(1)(ii). Additionally, supporting statements and documentation can be included in Attachment 1.

If yes to any, CATEX applies	Does the project involve actions relating to existing infrastructure systems (e.g., sewer systems; drinking water supply systems; and stormwater systems, including combined sewer overflow systems) and involve:		
	<b>YES</b>	<b>NO</b>	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor upgrading
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor expansion of system capacity or rehabilitation (including functional replacement) of the existing system and its components (such as the sewer collection network and treatment system; the system to collect, treat, store and distribute drinking water; and stormwater systems, including combined sewer overflow systems)
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Construction of new minor ancillary facilities next to or on the same property as existing facilities
If yes to any, CATEX does not apply	Will the project include actions that:		
	<b>YES</b>	<b>NO</b>	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Involve new or relocated discharges to surface or ground water
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Will likely result in the substantial increase in the volume or the loading of pollutant to the receiving water
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Will provide capacity to serve a population 30% greater than the existing population
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Are not supported by the state, or other regional growth plan or strategy
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Directly or indirectly involve or relate to upgrading or extending infrastructure systems primarily for the purpose of future development

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<b>III.B. Extraordinary Circumstances</b> (Check YES or NO) Complete the following questions in their entirety to determine if the project involves any of the following extraordinary circumstances which would make it ineligible for a CATEX pursuant to 40 CFR § 6.204(b)(1) through (b)(10). Additionally, supporting statements and documentation can be included in Attachment 1.		
<b>YES</b>	<b>NO</b>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	1) Is the action known or expected to have potentially significant environmental impacts on the quality of the human environment either individually or cumulatively over time?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	2) Is the action known or expected to have disproportionately high and adverse human health or environmental effects on any community, including minority communities, low-income communities, or federally-recognized Indian tribal communities?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	3) Is the action known or expected to significantly affect federally listed threatened or endangered species or their critical habitat?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	4) Is the action known or expected to significantly affect national natural landmarks or any property with naturally significant historic, architectural, prehistoric, archaeological, or cultural value, including but not limited to, property listed on or eligible for the National Register of Historic Places?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	5) Is the action known or expected to significantly affect environmentally important natural resource areas such as wetlands, floodplains, significant agricultural lands, aquifer recharge zones, coastal zones, barrier islands, wild and scenic rivers, and significant fish or wildlife habitat?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	6) Is the action known or expected to cause significant adverse air quality effects?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	7) Is the action known or expected to have a significant effect on the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population, including altering the character of existing residential areas or may not be consistent with state or local government, or federally-recognized Indian tribe approved land use plans or federal land management plans?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	8) Is the action known or expected to significantly cause significant public controversy about potential environmental impacts of the proposed action?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	9) Is the action known or expected to be associated with providing financial assistance to a federal agency through an interagency agreement for a project that is known or expected to have potentially significant environmental impacts?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	10) Is the action known or expected to conflict with federal, state, or local government, or federally-recognized Indian tribe environmental resource-protection, or land-use laws or regulations?

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<p><b>III.C. Extraordinary Circumstances Statement</b> (<i>Check ONLY ONE box</i>) If the responses to Section III.A indicate the project is CATEX eligible, and if a <b>NO</b> response was recorded for each of the questions in Section III.B, then no Extraordinary Circumstances are present pursuant to 40 CFR § 6.204(b) and one of the following statements should be selected.</p>		
<input type="checkbox"/>	<p>1) <b>No extraordinary circumstances apply</b> to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b). This statement is based on either past experience with similar actions <b>at the proposed action site</b> resulting in a CATEX and/or information gathered as part of previous NEPA or environmental due diligence review conducted <b>at the proposed action site</b>. Provide any supporting documentation or references in Attachment I.</p>	
<input checked="" type="checkbox"/>	<p>2) A statement and supporting documentation is attached explaining why no extraordinary circumstances exist or apply to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b).</p>	
<p><b>IV. NEPA Review Determination and Responsible Official Signature</b></p>		
<p>Sections I through III must be completed to satisfy EPA's documentation requirements for CATEX eligibility. If completion of this form indicates that a CATEX <i>does apply</i>, the Responsible Official must sign below.</p>		
<p><b>Categorical Exclusion Determination</b> EPA finds that the proposed action is eligible for exclusion from detailed environmental review under 40 CFR § 6.204(a)(1)(ii), and will not involve any of the extraordinary circumstances delineated under 40 CFR § 6.204(b)(1) through (b)(10). Consequently, EPA will not prepare an environmental impact statement or an environmental assessment for the proposed project. EPA may revoke this categorical exclusion if changes in the proposed action render it ineligible for exclusion or if new evidence emerges which indicates that serious local or environmental issues exist or federal, state, or local laws would be violated.</p> <p>As the Responsible Official, I have determined that <b>this action is eligible for a Categorical Exclusion</b> per the substantive environmental review requirements under EPA regulations at 40 CFR § 6.204. Section III.C of this form has been completed providing the required Extraordinary Circumstances Statement.</p>		
<p>_____ Signature of Responsible Official</p>		<p>_____ Title</p>
		<p>_____ Date</p>

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<b>Attachment 1. CATEX Eligibility and/or Extraordinary Circumstances Statement(s)</b>	
The space below may be used for a statement and supporting documentation explaining CATEX eligibility why no extraordinary circumstances exist or apply to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b). Attach additional pages as needed.	

This project is being developed to reduce environmental impacts by reducing the frequency of hazardous SSOs and, consequently, the volume of waste materials discharged to surface waters.

The county has a minority population of 71 percent, which compares to 46 percent minority population in Georgia. As minority populations equal or exceed 50 percent of the population in the county, environmental justice communities are present. In addition, low-income populations in some block groups within the county may be meaningfully greater than state and/or county low-income populations, further supporting EPA's finding that environmental justice communities are present in the study area. Construction-related impacts are expected, such as air emissions, noise, traffic and transportation detours. These impacts are expected to be short-term in nature and will be minimized using best management practices. Therefore, the project would not result in disproportionately high and adverse impacts on minority or low-income populations.

EPA received concurrence from the U.S. Fish and Wildlife Service (FWS) West Georgia Ecological Services Sub Office on EPA's determination that the project may affect but is not likely to adversely affect three identified plant species (Black-Spored Quillwort, Little Amphianthus, and Michaux's Surmac) or their critical habitats within the proposed project area.

The project received a finding from Georgia's Historic Preservation Division of "no adverse impact" to identified properties or districts listed or eligible for listing in the National Register of Historic Places (NRHP). Additional conditions were set for the sewer line work under the project to: (1) avoid historic resources and features; (2) provide adequate protective measures to prevent damage to historic resources and features during construction; and (3) minimize impacts to granite curbing within the area of potential effect or replace in-kind any disturbed areas. These conditions will be included on all construction contracts issued for the sewer line work.

The project area does not contain any jurisdictional wetlands, agricultural lands, coastal zones, barrier islands, federally recognized wild and scenic rivers or significant fish and wildlife habitat, including essential fish habitat.

The project area is in attainment for all criteria pollutants, except ozone and particulate matter (PM<sub>2.5</sub>). The emissions associated with this project are limited to construction. No operational emissions are expected to occur. Construction-related emissions will be generated from the exhaust of mobile equipment and fugitive dust from earthmoving and are not expected to affect the area's attainment of air quality standards.

The proposed project is within existing highway and road right of ways, no change in land use is expected to change as a result of this project. No change in growth or distribution of population is expected.