

## Categorical Exclusion and Extraordinary Circumstances Review Form

United States Environmental Protection Agency  
Washington, DC 20460

### I. General Information

Project Name

WIFIA Id Number

1909 Raw Water Intake Replacement

20154IL

Borrower Name

City of Evanston

Project Description

The City of Evanston currently has three active intakes that supply raw water from Lake Michigan to the Evanston Water Treatment Plant (WTP), each of which draws water from between 5,000 feet and 6,000 feet offshore. Two of the intakes were constructed in the 1970s and consist of buried concrete pipes with diameters of 48 inches and 54 inches, installed in marine trenches with approximately five feet of cover on top of the pipes. The third intake, which needs to be replaced, was constructed in 1909 and consists of 36 inch and 42 inch diameter cast iron pipes that lay on the lakebed.

The 1909 raw water pipe and intake structure have exceeded their intended design lifespans. Over the years the City has performed routine inspections and maintenance of the intakes, and has recently observed a decrease in flow capacity from the 1909 intake. In order to maintain treatment capacity at the WTP for decades to come, the 1909 intake pipe and structure need to be replaced.

Replacement of the existing 1909 intake will require construction of a new intake structure and pipeline, in addition to onshore modifications to connect to the Evanston WTP. The new intake will consist of 60 inch diameter prestressed concrete cylinder pipe with a submerged, upturned cone inlet structure located approximately 5,500 feet from the WTP shoreline (60 inch Intake). The 60 inch Intake will be located near the alignment of the 1909 Intake. Construction of the proposed 60 inch Intake will be performed by a combination of offshore marine open-trench, nearshore marine open-trench, and coffer dam construction methods. The intake replacement project is at the 90 percent design phase, with the beginning of construction planned for early 2022.

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

The project is located in Cook County, Illinois, within the City of Evanston. The WTP is located near the intersection of Lincoln Street and Campus Drive.

The landside portion of the project area is an existing water treatment plant, consisting of several buildings and associated treatment infrastructure. Landcover within the project limits consists primarily of pavement, water treatment infrastructure, and turfgrass. There are a few landscaped trees present within the project limits that may need to be trimmed or removed, as approved by the City of Evanston. The landside project limits encompass 1.1 acres, which includes paved areas for vehicle parking and laydown areas on top of existing buried water detention basins with strict loading limits.

The transition from lake to land within the project limits occurs at a vertical sheetpile face, followed by a short and steep rubblemound shoreline protection slope leading up to turfgrass. Some trees and shrubs have grown through the rubblemound slope, well above the Ordinary High Water Mark of Lake Michigan. Lake Michigan water levels were high in 2019 and 2020 - there was no beach or vegetation present at the toe of the sheetpile wall during site inspections.

The project site extends 5,500 feet out into Lake Michigan, within a 100-foot-wide corridor. A hydrographic survey was performed in 2019 using a multi-beam echosounder. Aside from the existing 1909 raw water intake pipe and intake, and another smaller previously-abandoned intake, no other man-made or naturally formed structures were observed. The lake bottom is similar to nearby nearshore Lake Michigan areas, consisting primarily of flat to rippled sand or silt with a gentle slope down to the east.

The landside portion of the work will be completed within the existing WTP facility limits, which have been previously disturbed. The lakeside portion of the work will be located parallel to the 1909 intake to be replaced, but offset, to allow for construction.

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

Name	Title	Phone Number
Leslie Temple	Environmental Reviewer	(202) 564-4734

**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 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 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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**III.B. Extraordinary Circumstances** (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.

YES	NO	
<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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**III.C. Extraordinary Circumstances Statement** (*Check ONLY ONE box*) If the responses to Section III.A indicate the project is CATEX eligible, and if a **NO** 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.

<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	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).

**IV. NEPA Review Determination and Responsible Official Signature**

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 *does apply*, the Responsible Official must sign below.

**Categorical Exclusion Determination** The 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, the EPA will not prepare an environmental impact statement or an environmental assessment for the proposed project. The 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.

As the Responsible Official, I have determined that **this action is eligible for a Categorical Exclusion** 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.

_____ Signature of Responsible Official	XXXXX _____ Title	_____ Date
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**Attachment 1. CATEX Eligibility and/or Extraordinary Circumstances Statement(s)**

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.

*Environmental Justice*

Populations of environmental justice concern are not present in the project area. The project location does not appear to be in or impact Indian country.

*Endangered Species Act*

There are nine federally listed species with potential to occur in the project area; however, the project area does not contain habitat for these nine species present within the project limits and, therefore, the project is not anticipated to impact any of these federally listed species.

*National Historic Preservation Act*

The project’s area of potential effect includes four structures that are eligible to be listed as historic properties; however, modifications to the above listed structures are within the existing aesthetic character of the structures. The project will have no adverse effect to eligible structures within the area of potential effect.